



REGIONAL ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING

VOLUME ONE

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**PREPARED FOR:
THE COLLABORATIVE FORMED BY
CITY OF MILWAUKEE
CITY OF WAUWATOSA
CITY OF WEST ALLIS
JEFFERSON COUNTY
MILWAUKEE COUNTY
OZAUKEE COUNTY
WASHINGTON COUNTY
WAUKESHA COUNTY**

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EXECUTIVE SUMMARY

BACKGROUND AND PURPOSE OF THE STUDY

The counties of Milwaukee, Jefferson, Ozaukee, Washington, and Waukesha, and the cities of Milwaukee, Wauwatosa, and West Allis – referred to in this report as “the Collaborative” – joined together in 2019 to undertake a regional analysis of impediments to fair housing choice and access. This regional analysis, required by federal law and Department of Housing and Urban Development (HUD) regulations, is a vital step to developing a meaningful strategic approach to affirmatively further fair housing.

On its face, the joint agreement had the benefit of efficiency, since each of the jurisdictions had previously conducted, prepared, and filed its own fair housing assessment and analysis of impediments.

More important, the creation of the Collaborative was groundbreaking for the geographic area these jurisdictions encompass. It recognized the reality that the many factors inhibiting or denying individuals fair housing choice and access are rarely confined or isolated to a single community, particularly in and adjacent to urban areas. In addition, these impediments are by their nature contentious, systemic, and longstanding. To address these issues comprehensively, multiple jurisdictions must be: able, first, to identify them; willing to acknowledge them; open to understanding how they affect access to fair housing in the region as a whole; and prepared to actively and jointly pursue strategies to remove them.

With this as a guide, this regional analysis:

- examines policies, practices, local socioeconomic data, and local housing market characteristics and trends that are believed to contribute to, or that have the effect of, inhibiting or preventing individuals from accessing fair housing;
- identifies significant impediments to fair housing choice and access that affect the included communities;
- recommends specific actions to address, mitigate, and remove those impediments; and
- suggests strategies communities may wish to consider to help document progress and milestones in removing them.

The issues examined in this report are both complex and important to the economic and social well-being of every community in the Collaborative. We encourage individuals to read the full report for an in-depth discussion of each of the identified impediments and the recommendations we make to address them, and to facilitate conversations on the findings and recommendations with stakeholders throughout the region.

KEY IDENTIFIED IMPEDIMENTS AND PLANNED ACTIONS

Over the approximately one-year period of investigation of fair housing in the Collaborative region, 15 key impediments were identified along with proposed actions to address them. For many impediments, members of the Collaborative already have activities and programs underway on which they can build to address the barriers that were identified and increase access to opportunity areas. Opportunity areas are generally viewed as areas with low poverty, low crime, sound quality schools and health care facilities, access to employment, and other features that contribute to residents' well-being.

The following is a brief summary of the impediments and recommended actions to address them:

Impediment 1: Lack of a Regional Housing Strategy or Plan

Housing opportunity and choice is a regional issue that requires a coordinated regional solution. To address this need, all members of the Collaborative should work together at the regional level to:

- ensure that all communities expand housing options, especially housing for low- and moderate-income households;
- endorse and pursue a state legislative change that would include a fair housing plan as part of the housing element currently required by Wisconsin's Smart Growth and Comprehensive Planning Law (Section 66.1001(2) (b));
- establish a mobility program to help households that would like to move to opportunity areas; and
- work with local public housing authorities to develop a region-wide affordable rental housing mobility program to expand use of Housing Choice Vouchers to opportunity areas in the region.

Impediment 2: Lack of Regionally Dispersed Affordable Housing

The key component required for a regional housing strategy is a more equitable distribution of affordable housing opportunities throughout counties and individual communities within the Collaborative region.

We recommend that members of the Collaborative:

- Use Community Development Block Grant (CDBG) and HOME funds as well as other financial incentives to develop affordable housing in low-poverty/high opportunity areas.
- Support proper maintenance of naturally occurring, privately owned affordable rental housing in the region that is not publicly subsidized.

Impediment 3: Restrictive Local Land Use Regulations and Other Ordinances

A key factor affecting patterns of racial and ethnic segregation in the region has long been local land use regulations that limit multifamily housing, housing for families with children, and publicly subsidized affordable housing.

To address this impediment:

- Members of the Collaborative, especially but not exclusively jurisdictions located outside of the City and County of Milwaukee, should continue to address exclusionary zoning requirements, such as:
 - Residential zoning district maximum density and/or minimum floor area ratio requirements that might restrict affordable multifamily housing development.
 - Regulations that restrict higher densities and mix of housing types.
 - Restrictions on alternative types of affordable housing, such as accessory dwellings and manufactured homes.
 - Design regulations that do not promote flexibility in development and construction costs.
- All communities in the Collaborative should jointly promote integrated neighborhoods through inclusionary zoning. This tool is designed to increase the economic integration of communities by mandating that a percentage of housing units in projects above a given size be affordable by low- and moderate-income households. A change in the State of Wisconsin's prohibition on inclusionary zoning would be required to undertake this effort.

Impediment 4: Restrictive Zoning Regulations for Group Homes and Community Living Facilities

Some communities in the Collaborative region continue to have zoning requirements that restrict the development or adaptive reuse of dwellings for persons with disabilities.

- Members of the Collaborative should review community living arrangements/group homes sections of their zoning ordinances to determine the extent to which regulations limit development of these facilities, thereby limiting access to housing for persons with disabilities.

Impediment 5: Prevalent “Fear of Others” Exists among Residents, including NIMBYism

Race and disability are the most frequently cited bases of housing discrimination complaints that are filed with the State of Wisconsin, HUD, and the Milwaukee Metropolitan Fair Housing from the Collaborative area.

Actions that each Collaborative member should undertake to address this impediment include the following:

- Develop a diversity awareness curriculum and make it available to a variety of local public employees who are involved in housing and community development policy and planning, as well as local frontline staff who may receive discrimination complaints.
- Work with local nonprofit organizations and subrecipients of CDBG and HOME funds to integrate diversity awareness into their organizational training.
- Provide training programs for local leaders, elected officials, and the general public about the benefits of population and housing diversity.

Impediment 6: Strong Jobs-Housing-Transit Mismatch

During interviews and meetings, stakeholders repeatedly identified a mismatch between the locations of affordable housing and job centers across the region.

Recommended actions to address this impediment include:

- Encourage development of new affordable and/or mixed-income housing near job centers in communities throughout the Collaborative region.
- Facilitate affordable and workforce housing development near existing and planned transportation facilities.
- Provide incentives for affordable housing development, such as density bonuses and fee waivers, to spur development.

Impediment 7: Lack of Fair Housing Guidance and Enforcement

Waukesha, Jefferson, Ozaukee, and Washington counties currently do not have county-level fair housing ordinances, which provide a starting point for clarification of protected classes; prohibited areas of discrimination in the housing market, such as insurance and lending; enforcement powers; and penalties for violations.

- To address this impediment, as members of the Collaborative, Jefferson, Ozaukee, Washington, and Waukesha counties should develop county-level fair housing ordinances and/or policies to provide guidance for municipalities and other jurisdictions within their boundaries.

Impediment 8: Lack of Accessible Housing for Persons with Disabilities

Based on interviews and discussions with local housing advocacy groups and other stakeholders, accessible housing for persons with disabilities is limited in the Collaborative area, due in significant part to regulatory barriers and the age of the housing stock.

Recommended actions to address this impediment include:

- Members of the Collaborative should use available federal resources to encourage new development and/or rehabilitation of existing housing to accommodate the needs of persons with disabilities.
- County members of the Collaborative should also encourage jurisdictions within each county to facilitate new housing development and/or rehabilitation to accommodate the needs of persons with disabilities.
- Members of the Collaborative should continue to use the Tax Increment Financing (TIF) tool to encourage affordable and accessible housing development.
- Members of the Collaborative and other jurisdictions in the area should consider other mechanisms to encourage accessible housing development and availability, such as density bonuses for residential developments that include accessible units.
- Members of the Collaborative should consider establishing a Housing Trust Fund for special needs housing similar to that implemented by the City of Milwaukee and Milwaukee County.

Impediment 9: Gap in Homeownership by Racial and Ethnic Minorities Compared to White Households

In 2017 only 28 percent of African-American households were homeowners compared to 68 percent of White households. Similarly, only 38 percent of Hispanic households and 49 percent of Asian households were homeowners.

To address this impediment:

- Members of the Collaborative should consider establishing a Housing Trust Fund similar to that implemented by the City of Milwaukee and Milwaukee County, as a new source of revenue to support affordable housing.
- Training/counseling programs should be made available to encourage current renters to become homeowners.

Impediment 10: Overcrowded Housing

Stakeholders expressed concern that low-income households (especially but not exclusively new immigrant households) are often overcrowded¹ in the city and county of Milwaukee as households double up or have larger or extended families who share housing in part to reduce overall housing costs.

To address this issue:

¹ Overcrowding occurs when a housing unit has more than one person per room.

- The City and County of Milwaukee should direct public resources to increase the availability of large affordable housing units (i.e., 3- and 4-bedrooms) capable of accommodating larger households.

Impediment 11: Extensive Use of Evictions

While eviction rates have decreased over the last several years, they still remain high in the City and County of Milwaukee (4.25 percent and 3.26 percent, respectively in 2016).

According to the City of Milwaukee, a number of initiatives are already underway to address the problem of evictions. These should continue to be supported. They include:

- A partnership led by the City of Milwaukee and CommonBond Communities of Wisconsin has engaged the Wisconsin Policy Forum to carry out research and encourage local stakeholders to address issues related to evictions.
- Community Advocates Public Policy Institute worked to create a Tenant Leadership Team to advocate for public education and policies to reduce eviction.
- To augment these efforts, the City and County, as well as other members of the Collaborative, should consider directing a portion of their CDBG allocations to provide legal assistance for tenants, and counties in the Collaborative could also encourage communities within each county to use CDBG funds for this purpose.

CITY OF MILWAUKEE

As the largest city in the Collaborative region, Milwaukee has some distinguishing characteristics that—although shared by other older suburban cities in the area—deserve special attention when identifying fair housing issues.

Impediment 12: Lack of Private Investment in Specific Neighborhoods

Limited resources to maintain and rehabilitate the older housing stock in many Milwaukee neighborhoods, along with a lack of willingness of some real estate agents to market for-sale or rental housing in many lower-income neighborhoods, have the effect of discouraging investment in new or rehabilitated housing in these areas. As a result, low- and moderate-income racial and ethnic minority households have few choices for quality housing.

To address this issue, the City of Milwaukee is encouraged to:

- Continue providing financial assistance to private property owners and developers to encourage housing development and rehabilitation through existing programs such as the Targeted Investment Neighborhood Rental Rehabilitation Loan Program; the ME2 Energy Improvement Program; the Milwaukee Shines program; the Childhood Lead Poisoning Prevention Program; the Strong Neighborhoods Rental Rehabilitation Loans; the Milwaukee Employment/Renovation Initiative; the

Challenge Fund; Tax Increment Financing; the Housing Trust Fund; and other programs for owner occupants.

Impediment 13: Gentrification of Some Neighborhoods Surrounding Downtown

In contrast to Milwaukee neighborhoods that lack private investment, some areas are experiencing substantial private investment that threatens to displace existing low- and moderate-income households, especially racial and ethnic minorities.

To address this finding, the City of Milwaukee is encouraged to continue a variety of actions that it is currently planning, specifically:

- Activities, including affordable housing strategies, related to a transit-oriented development plan for these areas in partnership with the Historic King Drive Improvement District; Harbor District, Inc; and Walker’s Point Association.
- MKE United Greater Downtown Action Agenda, a comprehensive planning process to assist all area residents by increasing home ownership, addressing segregation, and minimizing displacement.
- Data You Can Use, an effort to undertake improved data collection for use in measuring displacement.
- A proposed Common Council Affordable Housing Ordinance that would require developments receiving direct financial assistance from the City of Milwaukee to provide a specific percentage of affordable units or pay an “in-lieu” fee to the City’s Housing Trust Fund.

PRIVATE SECTOR REAL ESTATE INDUSTRY

Impediment 14: Racial and Ethnic Disparities in Mortgage Lending, Insurance, and Appraisal Practices

Evidence of racial disparities in lending has been documented in numerous reports, including a 2016 report by the National Community Reinvestment Coalition with assistance by the Metropolitan Milwaukee Fair Housing Council, which concluded that local lenders favored White mortgage applicants, and that loans in the Milwaukee metropolitan area are heavily concentrated in majority White and middle- and upper-income neighborhoods.²

Actions needed to address this problem in the private real estate industry include:

- Members of the Collaborative should support efforts by the Metropolitan Milwaukee Fair Housing Council (MMFHC) to investigate predatory lending and provide information to potential borrowers on how to avoid predatory loans.

² National Community Reinvestment Coalition, “Home Mortgage Lending in St. Louis, Milwaukee, Minneapolis and Surrounding Areas,” July 2016, pages 22.

- Members of the Collaborative should consider working with MMFHC and local lenders to establish a Consumer Rescue Fund to remediate and refinance predatory loans for borrowers.
- Continued local work is needed to ensure that lenders who do business with members of the Collaborative and/or jurisdictions within them fully conform to the Community Reinvestment Act and provide an annual public statement of goals for community investments.
- Support for financial literacy education and training by local nonprofit organizations would enable potential home buyers to make more informed decisions when reviewing housing financing options.
- Seek state legislative and/or state administrative approval to require agents who sell insurance to undergo training that includes fair-housing compliant rating and marketing practices.
- Home buyers who receive funds through HOME, CDBG, or local programs should be offered home buyer education.
- Members of the Collaborative should encourage professional organizations that offer educational training sessions to appraisers to emphasize not only fair housing issues affecting appraisals, but also offer specialized training in the valuation process in low-income residential areas. MMFHC could also assist with the fair housing training.

Impediment 15: Lack of Awareness of Fair Housing Laws

The primary impediment to fair housing throughout the Collaborative region is a lack of awareness and understanding of local, county, state, and federal housing laws by residents, government officials, real estate industry members, and the general public.

Recommended actions to address this impediment include:

- Members of the Collaborative should provide fair housing training on an annual or semiannual basis to real estate professionals. These training sessions should be in addition to those already offered by the Greater Milwaukee Association of Realtors®.
- Distribute materials on fair housing to new and established landlords by enlisting the assistance of organizations representing landlords.
- Encourage municipalities within the Collaborative to contact MMFHC to provide technical assistance in fair housing administration, compliance, training, and best practices.

SECTION I. INTRODUCTION

PURPOSE OF THE STUDY

The U.S. Department of Housing and Urban Development (HUD) requires recipients of federal funding to affirmatively further fair housing (AFFH) to advance the purpose of the Fair Housing Act. HUD promulgated the AFFH rule to aid program participants to identify and implement meaningful, proactive efforts to overcome patterns of segregation, advocate fair housing choice, and cultivate diverse communities. HUD also encouraged recipients of federal funding to work together to develop a regional approach to fair housing. To achieve this objective, the counties of Milwaukee, Jefferson, Ozaukee, Washington, and Waukesha, and the cities of Milwaukee, Wauwatosa, and West Allis joined together to undertake a regional analysis of impediments.

The AFFH rule provides an approach to aid program participants in taking meaningful actions to overcome patterns of segregation, advocate fair housing choice, and cultivate diverse communities. HUD has implemented a new reporting format called Assessments of Fair Housing (AFH) that provides a plan to achieve specific goals. HUD's AFH rule defined four fair housing issues that federal funding recipients must assess:

1. Patterns of integration and segregation
2. Racially or ethnically concentrated areas of poverty
3. Disparities in access to opportunity
4. Disproportionate housing needs¹

Additionally, “the AFH process begins with the provision of data, guidance, and an assessment tool that will help program participants identify fair housing issues and related contributing factors in their jurisdictions and region. Program participants are required to set goals to overcome fair housing issues and related contributing factors. Those goals must inform subsequent housing and community development planning processes.”²

¹ “The Assessment of Fair Housing,” U.S. Department of Housing and Urban Development. Accessed February 20, 2020. Available at: <https://www.hudexchange.info/programs/affh/overview/>

² “Affirmatively Furthering Fair Housing,” U.S. Department of Housing and Urban development, Office of the Secretary. Accessed February 20, 2020. Available at: <https://www.hudexchange.info/programs/affh/overview/>

WHO CONDUCTED THE STUDY

Applied Real Estate Analysis (AREA), Inc., was selected by the regional Collaborative of the cities of Milwaukee, West Allis, and Wauwatosa, as well as Milwaukee and Waukesha counties to conduct an Analysis of Impediments (AI) to fair housing choice. Washington, Ozaukee, and Jefferson counties are members of the HOME Consortium and were included in this study. Together the five counties and three cities are referred to as “the Collaborative.”

AREA is a real estate research and public policy consulting firm located in Chicago, Illinois. The firm regularly conducts studies for local agencies as an independent third party. The project director was Maxine V. Mitchell, CRE[®], President of AREA; the project manager was Ann Moroney, Principal of AREA; and the project associate was Serrater Chapman, an analyst at AREA.

METHODOLOGY

The process of developing a Regional Housing Plan for the cities of Milwaukee, West Allis and Wauwatosa and the counties of Milwaukee, Waukesha, Jefferson, Ozaukee, and Washington included a demographic analysis sourced from the 2000 and 2010 U.S. Decennial Census as well as the American Community Survey (ACS) 2013–2017 five-year estimates and the ACS 2017 one-year estimate. These data sources provided detailed information at the census-tract, municipal, and county levels. Although the information provided by the ACS is estimated, it is still comparable to the U.S. Decennial Census, but the data from the two sources may not match in all cases.

Additionally, several fair housing reports and studies as well as information gathered by outreach initiatives were used to inform this report. These initiatives included online surveys as well as conversations and roundtable discussions with residents, municipal stakeholders, local fair housing advocates, and real estate professionals, which provided insights into identifying fair housing impediments and potential resolutions. AREA also contacted agencies whose work influences municipalities’ efforts to affirmatively further fair housing.

ACKNOWLEDGMENTS

The authors would like to thank the City of Milwaukee Community Development Grants Administration, the cities of Milwaukee, West Allis, and Wauwatosa, and the counties of Waukesha, Jefferson, Ozaukee, and Washington for the data and assistance they provided to develop the Analysis of Impediments. We would also like to thank all partners, participants of the roundtable discussions, and survey respondents who helped us gain meaningful insights of the issues affecting fair housing choice.

ORGANIZATION OF STUDY

The study is organized in 11 sections:

- I. **Introduction.**
- II. **Overview of the Collaborative** provides contextual information on the counties and municipalities in the Collaborative Group and their levels of federal funding.
- III. **Fair Housing History and Policies** provides information on the federal Fair Housing Act, state and local fair housing regulations, and key legal activity in the Collaborative area.
- IV. **Demographics and Socioeconomic Analysis** provides a detailed discussion of the patterns of racial, ethnic, and economic segregation and integration in the Collaborative area as well as the population of each protected class.
- V. **Housing Supply and Factors Affecting Fair Housing Access** discusses the location of rental and owner-occupied housing across the Collaborative area and affordability and availability of each housing type.
- VI. **Employment and Transportation** provides information about the intersection of housing, employment, and transportation and factors constraining housing choice.
- VII. **Opportunity Analysis** analyzes education, employment, transportation, poverty, and environmental health disparities within the region.
- VIII. **Fair Housing Activities and Outreach** describes steps currently undertaken by members in the Collaborative and other organizations to further the goals of fair housing.
- IX. **Fair Housing Surveys, Public Meetings, Roundtables, and Interviews** analyzes the results of the web-based fair housing surveys, community meetings as part of the Consolidated Plan process, interviews, and roundtable discussions with residents, housing organizations, and real estate professionals.
- X. **Fair Housing Complaints** analyzes data on housing discrimination complaints submitted to the State of Wisconsin, HUD, and housing advocacy organizations.
- XI. **Impediments and Actions** lists and describes the identified impediments to fair housing choice as well as the recommended actions the Collaborative can take to overcome the impediments.
- XII. **Implementation** provides a narrative on the timeframe for implementing the various actions recommended for overcoming identified impediments.

Appendices to this report contain additional information and maps, detailed summaries of the fair housing survey responses, and responses from the public comment period.

SECTION II.

OVERVIEW OF THE COLLABORATIVE

The cities of Milwaukee, West Allis, and Wauwatosa and the counties of Milwaukee, Waukesha, Jefferson, Ozaukee, and Washington entered a collaborative agreement to develop a regional approach to affirmatively furthering fair housing. Members of the Collaborative have been cooperating extensively with government bodies, numerous for-profit and nonprofit agencies, and local citizens as part of this agreement.

The study area is located in the southeastern part of Wisconsin and adjacent to Lake Michigan. Racine, Walworth, and Rock counties are south of the study area, Dane and Dodge counties are west of the study area, and Fond du Lac and Sheboygan counties are north of the study area. For purposes of this analysis, the study area is referred to as the “Collaborative area” or the “Collaborative region.” According to the American Community Survey’s five-year 2013–2017 estimates, the Collaborative region was home to approximately 845,097 people, an increase of 7.4 percent from the approximately 786,791 people counted in the 2010 Decennial Census. The entire Collaborative region covers approximately 3,908 square miles. (See the following exhibit.)

GOVERNMENT

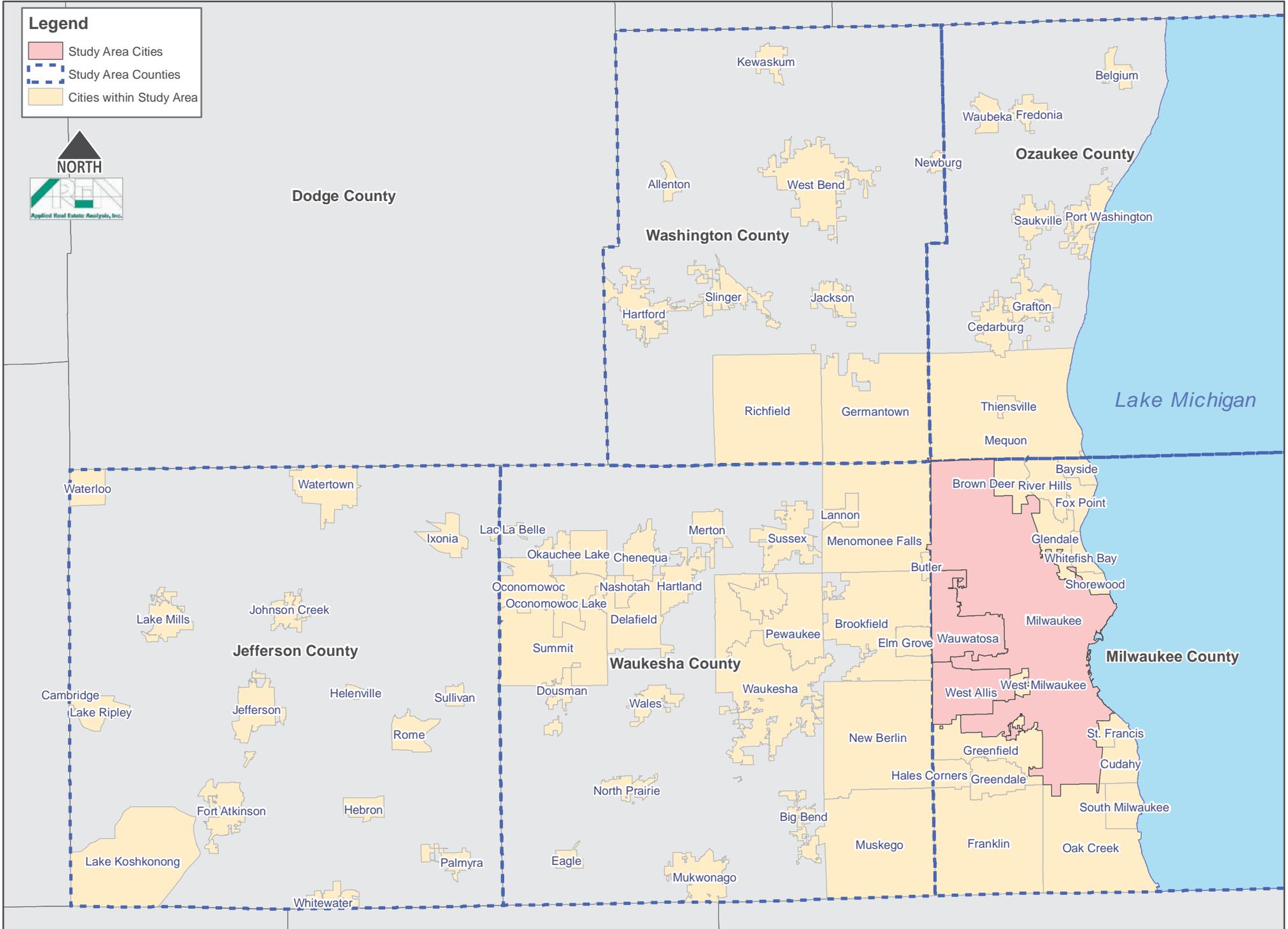
Wisconsin is a home-rule state where cities and villages within the state are authorized to regulate local affairs.

HUD FORMULA GRANT PROGRAM

Members of the Collaborative have been awarded funds from the Bureau of Economic Development through the HUD Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) programs. CDBG funds help municipalities provide housing and economic opportunities for low- and moderate-income households, construct public facilities and improvements, support economic development, increase public services, and acquire and demolish properties and relocate residents. CDBG funds can thus be directed to housing as well as general infrastructure improvements. HOME funds can be used to create affordable housing for low-income and very low-income households.

CDBG and HOME consortiums allow jurisdictions to pool resources and funding to further regional housing goals. The City of Milwaukee is an entitlement community for CDBG and HOME funding and serves as the lead agent in a four-county partnership with Milwaukee, Waukesha, Ozaukee, and Washington counties. Milwaukee County is a designated Urban County in a HOME consortium with the cities of West Allis and Wauwatosa. The

Exhibit II-1.
Study Area Cities, Villages, and Community Designated Places



cities of West Allis and Wauwatosa are also entitlement communities for CDBG. Waukesha County is an Urban County entitlement community for CDBG and the lead agent of a four-county consortium for HOME funds with Jefferson, Ozaukee, Washington, and Waukesha counties.

For the 2018 program year, the funding allocation for HOME and CDBG funds is as follows:

- The City of Milwaukee received \$15,835,000 in CDBG funds and \$5,967,429 in HOME funds.
- Milwaukee County received \$1,606,587 in CDBG funds and \$1,321,445 in HOME funds.
- The City of West Allis received \$1,255,225 in CDBG funds.
- The City of Wauwatosa received \$976,933 in CDBG funds.
- Waukesha County received \$1,426,915 in CDBG funds and \$1,410,311 in HOME funds.

Recipients of federal funding are required to prepare fair housing assessments. The City of Milwaukee last conducted an Analysis of Impediments (AI) to Fair Housing Choice in August 2005. Milwaukee County, the City of Wauwatosa, and the city of West Allis most recently completed an AI in 2008. Waukesha County and the HOME Consortium including Jefferson, Ozaukee, and Washington counties conducted an AI in 2014.

SECTION III.

FAIR HOUSING HISTORY AND POLICIES

Federal, state, and local laws govern fair housing funding and policies in the counties and municipalities encompassed by the Collaborative. In Wisconsin, federal and state fair housing laws protect fair housing rights for all citizens, and a number of municipalities and counties have passed their own ordinances over time, as well. These laws prohibit discrimination for certain groups of people (known as “protected classes”). The bases of discrimination of varying laws often overlap but not wholly; some laws and ordinances are more expansive than others.

All municipalities in the United States must abide by the Fair Housing Act (Title VIII of the Civil Rights Act of 1968), which is enforced by the U.S. Department of Housing and Urban Development (HUD). In Wisconsin, the Wisconsin Open Housing Law prohibits housing discrimination in all state jurisdictions. Within the area encompassed by the Collaborative, Milwaukee County and the City of Milwaukee also have fair housing ordinances within their jurisdictions.

HISTORY

The struggle for fair housing grew out of the civil rights struggle to end segregation. Over time, the concept of fair housing has expanded, and those who are protected by fair housing legislation has evolved as well, at the federal, state, and local levels.

The federal **Fair Housing Act** grew out of contentious efforts during the civil rights era to redress housing discrimination that were often stymied at the local level. Although the U.S. Supreme Court had outlawed racially restrictive housing covenants in the 1948 case *Shelley v. Kramer*, racially motivated housing segregation and discrimination continued. In the 1960s, numerous organizations lobbied for more extensive fair housing legislation to be included with the landmark Civil Rights Act of 1964, efforts that were unsuccessful. Title VIII of the Civil Rights Act of 1968, known as the Fair Housing Act 1968, was first met with contention and opposition when proposed. However, days after the assassination of civil rights leader Martin Luther King, Jr., in 1968, Congress passed the housing bill into law.¹ In the same year, the Supreme Court ruling in *Jones v. Mayer Co.* barred all racial discrimination in both private and public housing. The Fair Housing Act has been amended several times since it was passed in 1968.

In **Wisconsin**, the legislature passed its own fair housing law in 1965, three years before the federal law. However, it did not include most housing types. After protests erupted in

¹ https://www.hud.gov/program_offices/fair_housing_equal_opp/aboutfheo/history

the City of Milwaukee sparked by charges of housing discrimination in 1967, the legislature expanded the **Wisconsin Open Housing Law** to include more housing types.

The struggle for fair housing in **Milwaukee** traces to the waves of African Americans who migrated north after the United States entered World War I to escape Jim Crow laws in southern states. After African Americans started to settle in western Milwaukee in 1924, the Milwaukee Real Estate Board steered African Americans to one area within the city thus limiting housing and loan options or “redlining.”

This process is highlighted by a 1938 residential security map, also known as a redlining map, which depicts how neighborhoods in Milwaukee were graded by the Home Owner’s Loan Corporation (HOLC). The HOLC map was used by the Federal Housing Administration for housing investment decisions, lending, and neighborhood risk assessment. In the map, neighborhoods were characterized based on the race of its residents, the age of the housing, neighborhood aesthetic, proximity to facilities, and environmental hazards.² A review of protests against housing discrimination in Milwaukee notes that the population in the predominately African-American area increased from 9,000 to 92,000 from 1941 to 1967 as a direct result of segregation.³

In 1960, a voluntary Covenant of Open Occupancy for Milwaukee housing was first recommended by the existing Mayor’s Committee on Social Problems in the Inner Core Area of the City to the new incoming Mayor and was rejected. In 1962, another open housing ordinance was introduced to prohibit discrimination within all housing, but it was defeated by the Milwaukee Common Council 18 to 1. After a landlord refused to rent a flat to a war veteran and his family, an open housing ordinance was re-introduced in the Milwaukee Common Council three times between 1966 and 1967 and defeated each time.

Shortly after the open housing ordinance failed to pass again, in 1967, nonviolent protests started but eventually led to rioting in Milwaukee’s predominately low-income African-American neighborhood. Milwaukee’s open housing marches and protests garnered national attention and lasted approximately 200 days. During the protest, a limited open housing ordinance was passed, but many continued to protest to include more housing types throughout the city. In April 1968, another open housing ordinance was introduced but defeated 12 to 7. Finally, in May 1968, Milwaukee’s Common Council passed an amended open housing ordinance that exempted rental property with two or fewer units, instead of four or fewer units, which increased the percentage of housing included in the ordinance from 80 percent to 90 percent of housing within the city. Since the open housing ordinance was passed to address racial discrimination in 1968, it has been amended to include more protected classes and other forms of discrimination.⁴

² <https://www.wiscontext.org/how-redlining-continues-shape-racial-segregation-milwaukee>

³ <https://www.mpl.org/blog/now/200-nights-that-shook-milwaukee-the-1967-1968-open-housing-marches>

⁴ Op.Cit.

FAIR HOUSING ACT

The federal Fair Housing Act prohibits discrimination against persons while renting or purchasing home, obtaining a mortgage, seeking housing assistance, or engaging in other housing-related activities. When originally passed into law in 1968, the Fair Housing Act was mainly meant to address housing discrimination based on race. Over time, the bases of discrimination addressed by the law protected classes have expanded. The Fair Housing Act now prohibits housing discrimination on the basis of the following:

- Race
- Color
- National origin
- Religion
- Sex
- Familial status
- Disability

The Fair Housing Act covers most types of housing, but it can exempt “owner-occupied buildings with no more than four units, single-family houses sold or rented by the owner without the use of an agent, and housing operated by religious organizations and private clubs that limit occupancy to members.”⁵

Additionally, the Fair Housing Act prohibits any housing marketing that indicates a preference, limitation, or discrimination because of race, color, religion, sex, disability, familial status, or national origin. This restriction applies to publishers, people, and entities that market real estate in newspapers, directories, and websites.

WISCONSIN OPEN HOUSING LAW

In Wisconsin, the Wisconsin Open Housing Law declares that all persons within the protected classes have equal access to housing. In addition to the protected classes identified in the federal Fair Housing Act, the Wisconsin Open Housing Law also includes the following as bases for protection via the law, which expands upon the federal law:

- Marital status
- Ancestry
- Lawful source of income
- Age
- Status as a victim of domestic abuse, sexual assault, or stalking

⁵ https://www.hud.gov/program_offices/fair_housing_equal_opp/fair_housing_act_overview

In November 2019, sponsors proposed a bill in the state Senate to ban housing discrimination based on immigration status.⁶

Legal Activity

In Wisconsin, a number of court cases have cited housing discrimination by municipalities. Examples outside the study area include the following:

- In 2016, the U.S. government filed a complaint against the owners and property managers of Applewood of Cross Plains, a 15-unit apartment complex in Cross Plains. The complainants were awarded \$40,000 in damages, and the defendant was required to adopt and maintain a non-discrimination housing policy, attend fair housing training, and advertise that they were an equal opportunity housing provider.
- In 2014, a court awarded \$8,500 to a married couple who were victims of discrimination by the owner of a 96-unit apartment complex, Allegro Apartments, in Racine. The complaint had alleged that the owners refused to rent to the woman on the basis of her disability and assistance dog. The court also required the defendants to adopt a new assistance animal policy and attend fair housing training.
- In 2012, manager and owner of an apartment complex in La Crosse settled a lawsuit for \$57,500 for violating the Fair Housing Act. It was determined that the manager at Geneva Terrace told African Americans seeking housing that there were no available units, but told white renters that there were apartments available to rent.⁷
- In 2012, \$50,000 was awarded to a homeless woman seeking temporary housing at Lowrey Hotel & Café in Richmond. The co-manager and owner of the hotel warned the woman that sexual favors might be requested of her. The manager who committed the violation was barred from the hotel and from any involvement in the management, rental, or maintenance of any rental property. Additionally, management at the hotel was required to develop and maintain non-discrimination housing policies and attend fair housing training.
- In 2011, a court awarded \$35,000 to an African-American family due to discrimination by the owner of a single-family rental property in Green Bay. The basis for discrimination was race and familial status.
- In 2011, a complaint was filed on the basis of sex and familial status against an owner and manager of a two-bedroom single-family home in Bangor. The

⁶ <https://wxow.com/news/top-stories/2019/11/05/proposed-wisconsin-law-aims-to-ban-housing-discrimination-based-on-citizenship-status/>

⁷ <https://www.justice.gov/opa/pr/justice-department-settles-lawsuit-against-wisconsin-landlord-and-former-manager>

complaint alleged that that the owner refused to rent to a single mother and her young son. HUD conducted an investigation and issued a charge of discrimination.

- In 2008, a court awarded \$30,750 in damages to a complainant and her children by the owners and property managers of a Section 8 apartment complex in Hudson. The court concluded that the owners and property managers of the complex refused to provide reasonable accommodation for the family and later evicted them. The defendants also were required to attend fair housing training, adopt a reasonable accommodation policy, and adhere to reporting requirements.
- In 2005, HUD conducted an investigation for discrimination on the basis of disability toward a condominium association in western Wisconsin. The complainant said she was not reasonably accommodated because the access ramp in her building was not properly maintained. Condominium associations are required to maintain the ramp in good condition while she resided at the building.
- In 2005, \$13,000 in damages was awarded to a complainant where familial status provisions were violated. The defendant was also required to attend fair housing trainings and adhere to reporting and monitoring requirements.⁸

MILWAUKEE COUNTY FAIR HOUSING ORDINANCE

History

The history of the Milwaukee County Fair Housing Ordinance of 1968 coincides with the City of Milwaukee Equal Rights Law. After protests erupted in the City of Milwaukee, the Milwaukee County Fair Housing Ordinance was adopted.

Components of the Ordinance

In Milwaukee County, the municipal Fair Housing Ordinance of 1968 prohibits housing discrimination within Milwaukee County. As with other local housing laws, the groups protected by the law have expanded over time. In addition to the protected classes identified in the Fair Housing Act and the Wisconsin Open Housing Law, the Milwaukee County Fair Housing Ordinance now prohibits discrimination on the basis of:

- Gender identity or expression
- Domestic partnership

The Milwaukee County Fair Housing Ordinance also prohibits:

- Refusing to sell, lease, finance, or construct housing or refusing to discuss terms

⁸ <https://www.justice.gov/crt/housing-cases-summary-page>

- Refusing permit inspections or requesting different or higher pricing in the terms or conditions of the sale, lease, financing, or rental of housing
- Publishing, circulating, issuing, or displaying any materials in connection with the sale, financing, lease, or rental of housing that is discriminatory
- Insurers refusing to enter into, or by exacting different terms, a contract to insure a dwelling
- Refusing to renew a lease, causing an eviction, or engaging in the harassment of a tenant⁹

Legal Activity

A number of recent legal actions regarding fair housing have been taken against jurisdictions within the County.

- In 2014, a complaint was filed against the owner and manager of an apartment complex in Oak Creek on the basis of racial and familial status discrimination. The defendants were charged with discrimination and prohibited from violating the Fair Housing Act and required to attend fair housing training.¹⁰
- In 2007, the City of West Allis settled a lawsuit against the owners and managers of an apartment building owned by James Krahn, one of West Allis's largest residential property owners. The Metropolitan Milwaukee Fair Housing Council (MMFHC) sent African-American and White testers posing as home seekers to one of Krahn's apartment complexes. The African-American testers were told several times that there was no housing available, while the White testers were shown available units. The settlement terms required James Krahn to pay \$110,000 to MMFHC, the African-American testers, and their attorneys.¹¹
- In 1980, several African-American families seeking housing in Wauwatosa were continually steered to housing in the City of Milwaukee by Wauwatosa Realty. No damages were awarded by the court, but the complaint was brought to the attention of the court by over 15 people who felt that they were discriminated against and steered to a city with a higher African American population.¹²

CITY OF MILWAUKEE EQUAL RIGHTS ORDINANCE

The City of Milwaukee Equal Rights Ordinance, enforced by the Equal Rights Commission (ERC), prohibits housing and employment discrimination within the City of Milwaukee. The City of Milwaukee established the ERC, first known as the Mayor's

⁹https://library.municode.com/wi/milwaukee_county/codes/code_of_ordinances?nodeId=MICOC_OGEORVOII_CH107COFAHOOR

¹⁰<https://www.justice.gov/crt/housing-cases-summary-page>

¹¹<http://www.fairhousingwisconsin.com/PDF/Krahn%20press%20release%20final%20version.pdf>

¹²<https://law.justia.com/cases/federal/district-courts/FSupp/486/838/1753906/>

Committee on Inter-Racial Relations, in 1948. The committee develops policy recommendations on equal opportunities in housing and employment for protected classes. In 2009, the City of Milwaukee adopted a new ERC model that shifted the organization's focus from investigation to oversight and accountability. The organization now investigates only discriminatory housing practices that are not addressed by federal and state agencies.¹³ In addition to the protected classes identified in the federal Fair Housing Act, the Wisconsin Open Housing Law, and the Milwaukee County Fair Housing Ordinance, the City of Milwaukee Equal Rights Act includes military service as an additional protected class.

Legal Activity

The City of Milwaukee has initiated a number of fair housing lawsuits due to housing discrimination.

- In 2004, a charge of discrimination was issued to the owner of two eight-unit rental properties on the basis of familial status. The owner did not want to rent an upper-level unit to a pregnant woman because the lower-unit tenant did not want children living above her.
- In 2001, a complaint was filed against the developers and owners who failed to design apartments with reasonable accommodations for those with disabilities. The defendants had to pay \$8,000 to further fair housing for those with disabilities, attend fair housing training sessions, design and build future housing with reasonable accommodations, and report to HUD on retrofitting and future housing construction in the Milwaukee area.
- In 1997, a complaint was filed against the City of Milwaukee alleging discrimination toward Native Americans by denying a zoning variance that would allow the development of a low-income senior citizen housing development. The City agreed to pay \$650,000 toward the construction of the development, with \$340,000 in damages for the plaintiffs.
- In 1995, over 1,600 households in the Milwaukee metropolitan area were awarded \$5 million in damages to compensate victims for discriminatory practices by American Family Mutual Insurance. The complaint alleged that the company used race as a factor to determine whether to issue homeowner's insurance policies. Additionally, \$9 million was awarded in the case for community-based relief. The company also had to issue a non-discrimination statement, conduct random testing, and provide a new custom value policy to make insurance more accessible.¹⁴

¹³ Mission of the Milwaukee Equal Rights Commission, <https://city.milwaukee.gov/erc/About-Us.htm#.XvFcNOdG2Uk>

¹⁴ <https://www.justice.gov/crt/housing-cases-summary-page>

CITY OF WAUWATOSA

Wauwatosa passed a fair housing ordinance in 1968. The ordinance addresses the sale, rental, or lease of housing. Protected classes are those that are included in the Wisconsin Open Housing Law.

CITY OF WEST ALLIS

The City of West Allis passed a fair housing ordinance, which is administered by the City's Fair Housing Board. The ordinance addresses equal housing opportunity for persons regardless of sex, race, color, sexual orientation, disability, religion, national origin, marital status, family status, lawful source of income, age, or ancestry. The regulation states that, because the sale and rental of single-family residences constitute a significant portion of the housing business for the City, single-family, owner-occupied units are included in the ordinance along with other types of rental and for-sale housing.

WAUKESHA, JEFFERSON, OZAUKEE, AND WASHINGTON COUNTIES

Waukesha, Jefferson, Ozaukee, and Washington counties currently do not have county-level fair housing laws. These jurisdictions follow the requirements of the federal Fair Housing Act and the Wisconsin Open Housing Law.

Legal Activity

Waukesha County and municipalities within the county have faced issues with fair housing. Examples include the following:

- In 2016, a court awarded a family \$4,500 in damages on the basis of discrimination due to familial status in Pewaukee. The complaint alleged that the family was told that there were no children allowed in upper-level apartments at an apartment building on Morris Street. The owners were also required to receive fair housing training and use a fair housing logo in all advertising.¹⁵
- In 2012, the U.S. Department of Justice reached a settlement in a lawsuit against the City of New Berlin. The lawsuit alleged that the city of New Berlin blocked a developer from constructing a 180-unit affordable housing apartment complex. Initially, the City's planning department approved the project but reversed and denied the project weeks later due to public opposition. According to local media, some residents in the area strongly opposed the development due to the fear that new residents would be low-income African Americans. The settlement required the City to establish a Housing Trust Fund with a minimum of \$75,000 to promote affordable housing, integration, and equal housing opportunities. The City was also

¹⁵ <http://www.fairhousingwisconsin.com/PDF/osburn.preston%208.2016.pdf>

required to appoint a fair housing compliance officer, provide fair housing training for City officials, and pay a \$5,000 civil penalty to the United States.¹⁶

- In 2011, the MMFHC alleged that Waukesha County distributed over \$12 million in federal CDBG and HOME funds without confirming that affordable housing was being provided, as required by recipients of HUD funding. In the complaint, MMFHC alleged the County was creating and maintaining barriers via zoning to prevent the development of affordable housing. An agreement was settled where local governments in the region would collaborate to produce an assessment to fair housing that would list impediments that limit housing choices and provide recommendations to correct them.¹⁷

Washington County has also had filed legal action for fair housing discrimination.

- In 2012, a court awarded \$50,000 in damages to a married couple on the basis of discrimination due to race and familial status in Kewaskum. The complaint alleged that the owner and property managers of a 10-unit apartment complex refused to rent to a married couple with three young children. The defendants were also required to attend fair housing training.¹⁸

Jefferson County has also filed legal action for fair housing discrimination.

- In 2014, a single mother filed a complaint with HUD against a 230-unit mobile park home community in Whitewater on the basis of familial status. The complaint alleged that policies made sections of the community unavailable to families with children and prevented the sale of a mobile home to a single mother and her child. The U.S. Department of Justice issued a charge of discrimination.¹⁹

¹⁶ <https://www.justice.gov/opa/pr/justice-department-settles-lawsuit-against-city-new-berlin-wisconsin-blocking-affordable>

¹⁷ <https://www.wuwm.com/post/waukesha-county-reaches-settlement-over-housing-discrimination#stream/0>

¹⁸ <https://www.justice.gov/crt/housing-cases-summary-page>

¹⁹ <https://www.justice.gov/crt/housing-cases-summary-page>

SECTION IV.

DEMOGRAPHIC AND SOCIOECONOMIC ANALYSIS

Understanding where various racial and ethnic groups reside in a metropolitan area facilitates the analysis of fair housing opportunities and constraints. This section of the report provides an overview of the demographic characteristics of all jurisdictions in the Collaborative and changes over time. The section examines patterns of integration and segregation of various racial and ethnic groups and special populations, such as persons with disabilities, as well as socioeconomic conditions and trends in the Collaborative area. The primary purpose of this section is to provide an understanding of the size and location of the protected classes within each jurisdiction as well as demographic and socioeconomic trends from 2000 to 2017 in the Milwaukee Collaborative region. The data analysis includes the years 2000, 2010, and 2017 (the last year for which American Community Survey data was available at the time of this research).

RESIDENT POPULATION

The Milwaukee County region as a whole experienced growth in population between the years 2000 and 2017, with similar percentages to the statewide rate of population growth but notably less growth compared to the national increase in population. The rate of population growth for the Milwaukee County region was 3.05 percent between 2000 and 2010, and 2.28 percent from 2010 to 2017. The rate of population growth for the state of Wisconsin as a whole between 2000 and 2010 was 5.11 percent, and from 2010 to 2017 it was 2.22 percent. The rate of population growth for the United States was 8.01 percent from 2000 to 2010, and 5.61 percent from 2010 to 2017, considerably higher than the rate of increase in Wisconsin and the Milwaukee Collaborative region.

The three areas that saw the most rapid population growth over this time period within the Collaborative area were Jefferson, Washington, and Waukesha counties, while the remaining two counties experienced lower levels of population growth. Jefferson, Washington, and Waukesha counties each rose in population by over 7 percent from 2000 to 2010, and the next highest percentage of growth of counties within the collaborative was a 4.4 percent increase in Ozaukee County.

In terms of absolute growth in population, Waukesha County grew most substantially adding over 25,000 people during the decade. Despite the slight population losses from 2000 to 2010 in each of the cities of West Allis, Wauwatosa, and Milwaukee, Milwaukee County as a whole managed to grow by 3 percent adding approximately 7,000 people.

Although no part of the Milwaukee Collaborative region experienced losses between 2010 and 2017, the highest rate of growth was 3.27 percent, for the city of Wauwatosa. Waukesha County continued to experience the most substantial absolute population

change adding over 10,600 people and followed by the City of Milwaukee, which reversed its population decline of the previous decade and added 9,389 people by 2017.

EXHIBIT IV-1.

POPULATION IN THE MILWAUKEE COLLABORATIVE REGION, 2000 TO 2017

	2000	2010		2017	
	Population	Pop.	Percent Change	Pop.	Percent Change
City of Milwaukee	596,974	589,697	-1.22%	599,086	1.59%
City of West Allis	61,254	60,009	-2.03%	60,546	0.89%
City of Wauwatosa	47,271	46,179	-2.31%	47,687	3.27%
Milwaukee County*	234,665	241,731	3.01%	249,267	3.12%
Waukesha County	360,767	386,130	7.03%	396,731	2.75%
Washington County	117,493	130,206	10.82%	133,967	2.89%
Ozaukee County	82,317	85,945	4.41%	87,817	2.18%
Jefferson County	74,021	82,778	11.83%	84,586	2.18%
Milwaukee Collaborative Region	1,574,762	1,622,675	3.05%	1,659,687	2.28%

*Excluding the cities of Milwaukee, West Allis, and Wauwatosa.

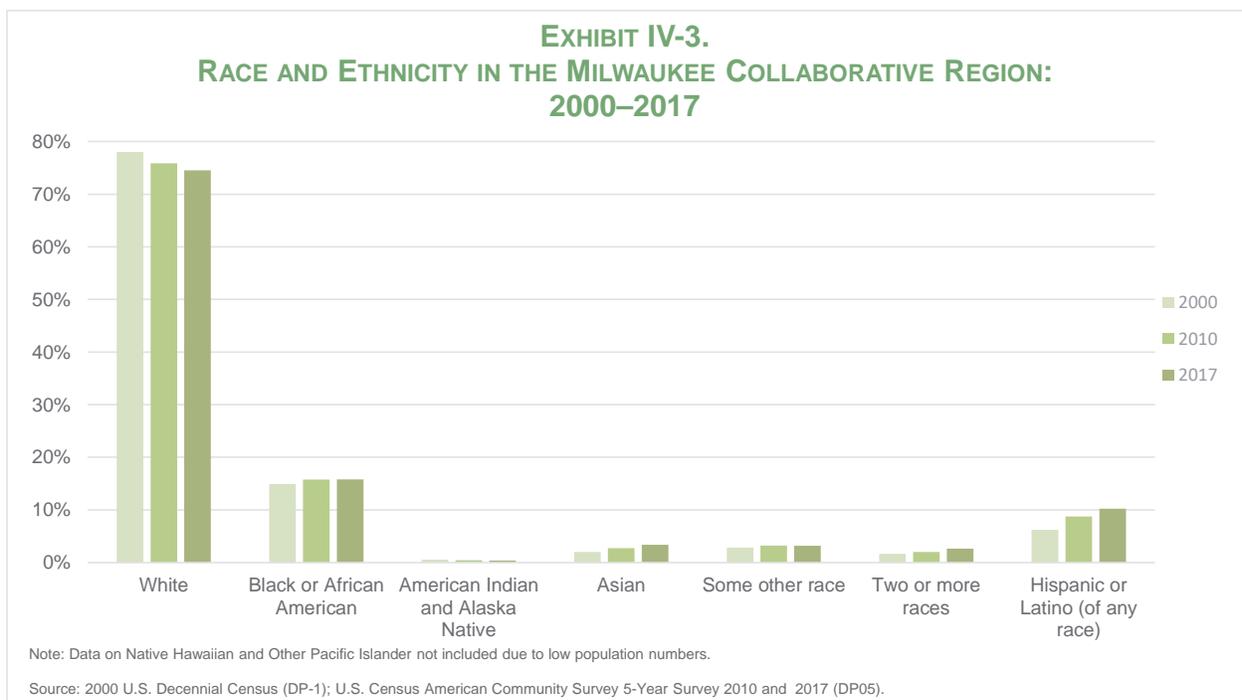
Sources: 2000 U.S. Decennial Census (DP-1); U.S. Census American Community Survey 5-Year Survey 2010 and 2017 (DP05).

Population of Townships and Municipalities

The majority of townships and municipalities in the Milwaukee County region experienced slight to moderate increases in growth from 2010 to 2017. Many of the largest municipalities increased in population slightly over the observed time period, whereas the smaller townships were more prone to having large increases or decreases in percentage of population change. The areas with the highest percentages of townships/municipalities that decreased in population over this time were Washington County (35 percent of all townships and municipalities), Jefferson County (34.6 percent), and Ozaukee County (31.3 percent). Almost all municipalities/townships with over 10,000 residents increased in population from 2010 to 2017, except for the city of Brookfield in Waukesha County which decreased in population by 0.7 percent. Information on the population statistics for all townships and municipalities in the Milwaukee collaborative area are available in Appendix A.

The population of all races that are not White and not “White alone” has generally trended upward from 2000 to 2017. During this period, the population of African Americans has increased by 11.4 percent, the population of Asians has increased by 78 percent, and the population of Hispanic/Latino residents has increased by 74.4 percent. The population of African Americans was substantially larger than that of all other minorities, despite the smaller rate of increase in population. An exception to the growth of non-White racial groups is the population of those who identify as American Indians or Alaskan Natives. Although small in absolute numbers, this group decreased over this time period by around 18 percent, which was a decline in about 1,500 persons.

In 2017, Whites accounted for about 75 percent of all residents in the Milwaukee Collaborative region, with African Americans at 16 percent, Asians at 3.5 percent, and all other races under 4 percent. Residents of Hispanic/Latino ethnicity accounted for 10.2 percent of the population in 2017.



Waukesha, Ozaukee, Jefferson, and Washington counties all are predominantly White, with White residents comprising over 90 percent of each of those counties’ total population in 2017. The population of White residents was over 85 percent in Milwaukee County.

The city of Milwaukee had a very low percentage of White residents compared to the other two cities in 2017, at 45.8 percent of the total population. The cities of West Allis and Wauwatosa were both above 80 percent White only as of 2017. The city of Milwaukee also had the highest population of Black residents in the region, at 39 percent of the population in 2017.

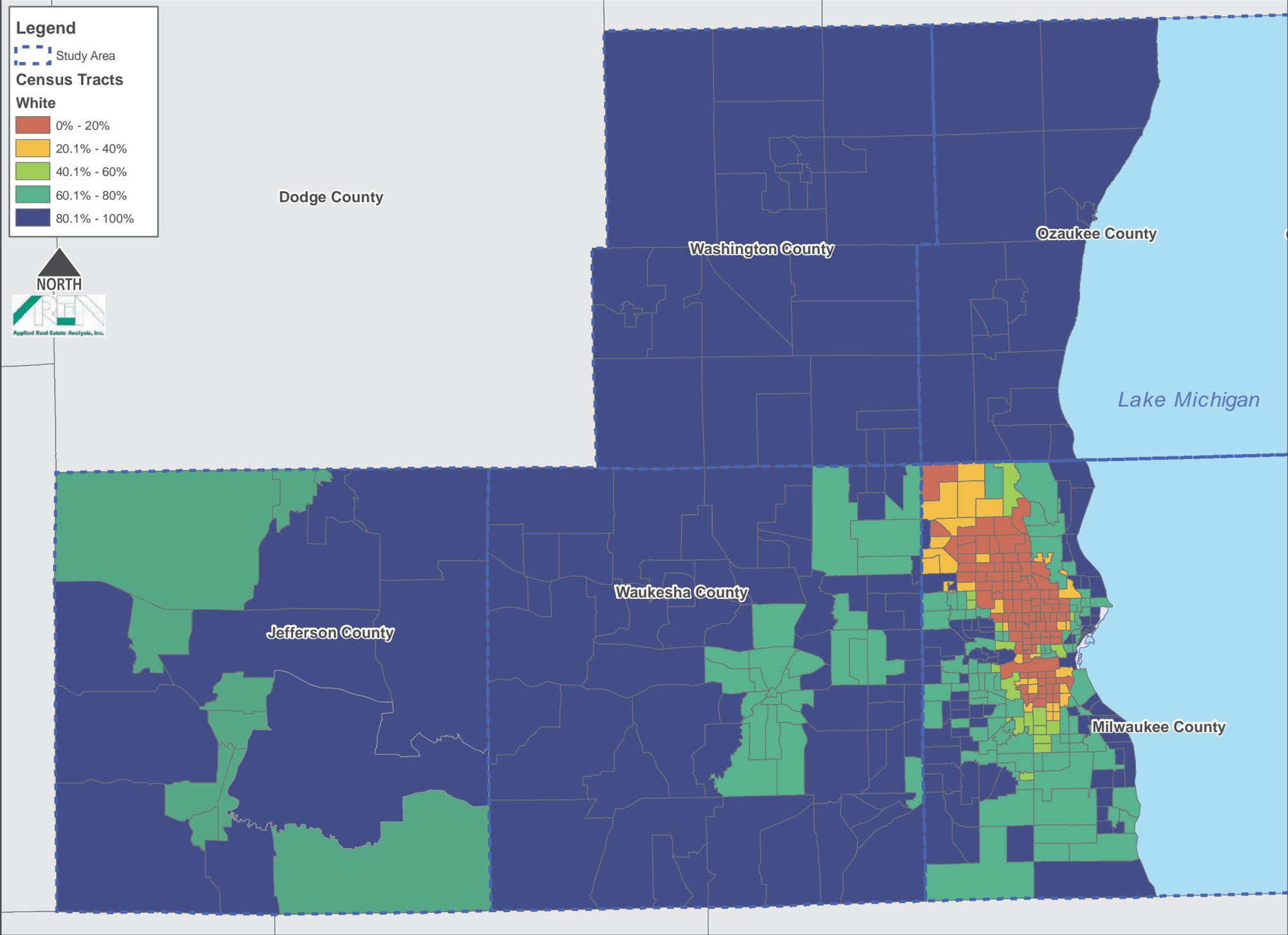
Asian residents were most prominent in the cities of Milwaukee and Wauwatosa, as Asians accounted for over 4 percent of the population in each area in 2017. The county with the largest Asian population in 2017 was Milwaukee, with Asians representing about 4.6 percent of the population.

The population of Hispanic/Latino residents represented less than 5 percent of total population in all counties, except Milwaukee County and Jefferson County. The cities of Milwaukee and West Allis had substantial increases in the population of Hispanic residents from 2000 to 2017. Additionally, the population of individuals categorized under “some other race” and “two or more races,” while small, has steadily increased since 2000. (See Appendix A.)

When viewed as a whole, the Milwaukee Collaborative region appears to be polarized in terms of the locations in which people of different races and ethnicities reside. In general, the population in areas outside of Milwaukee County is predominantly White. The Black population is densely concentrated in northern Milwaukee County (especially on the north side of the city of Milwaukee) and sparsely dispersed in all other areas. Hispanic residents are concentrated in clusters in the Collaborative area, with the majority of Hispanic residents living in a compact area in southern Milwaukee. The Asian population is highly represented in Milwaukee and Waukesha counties. Native Hawaiian and other Pacific Islander residents are generally scattered throughout Milwaukee County, with notable populations in Ozaukee and Waukesha counties.

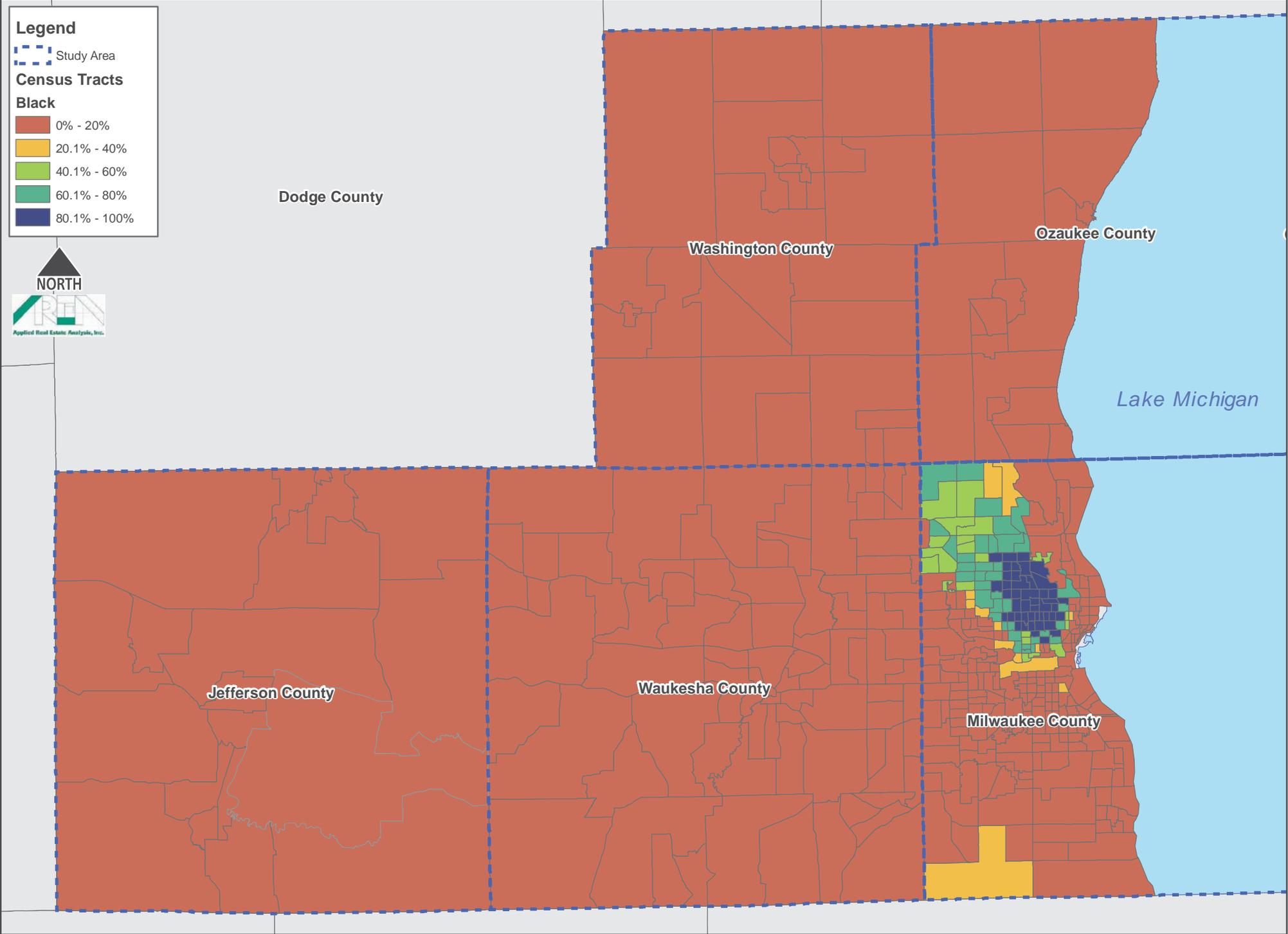
A visual representation of racial and ethnic distribution in the Collaborative region can be found in the maps that follow. (The data on race and ethnicity of populations for each individual area of the Milwaukee Collaborative region can be found in the Appendix.)

Exhibit IV-4.
Study Area White Population



Source: U.S. Census Bureau American Community Survey; Applied Real Estate Analysis, Inc.

Exhibit IV-5.
Study Area Black Population



Source: U.S. Census Bureau American Community Survey; Applied Real Estate Analysis, Inc.

Exhibit IV-6.
Study Area Asian Population

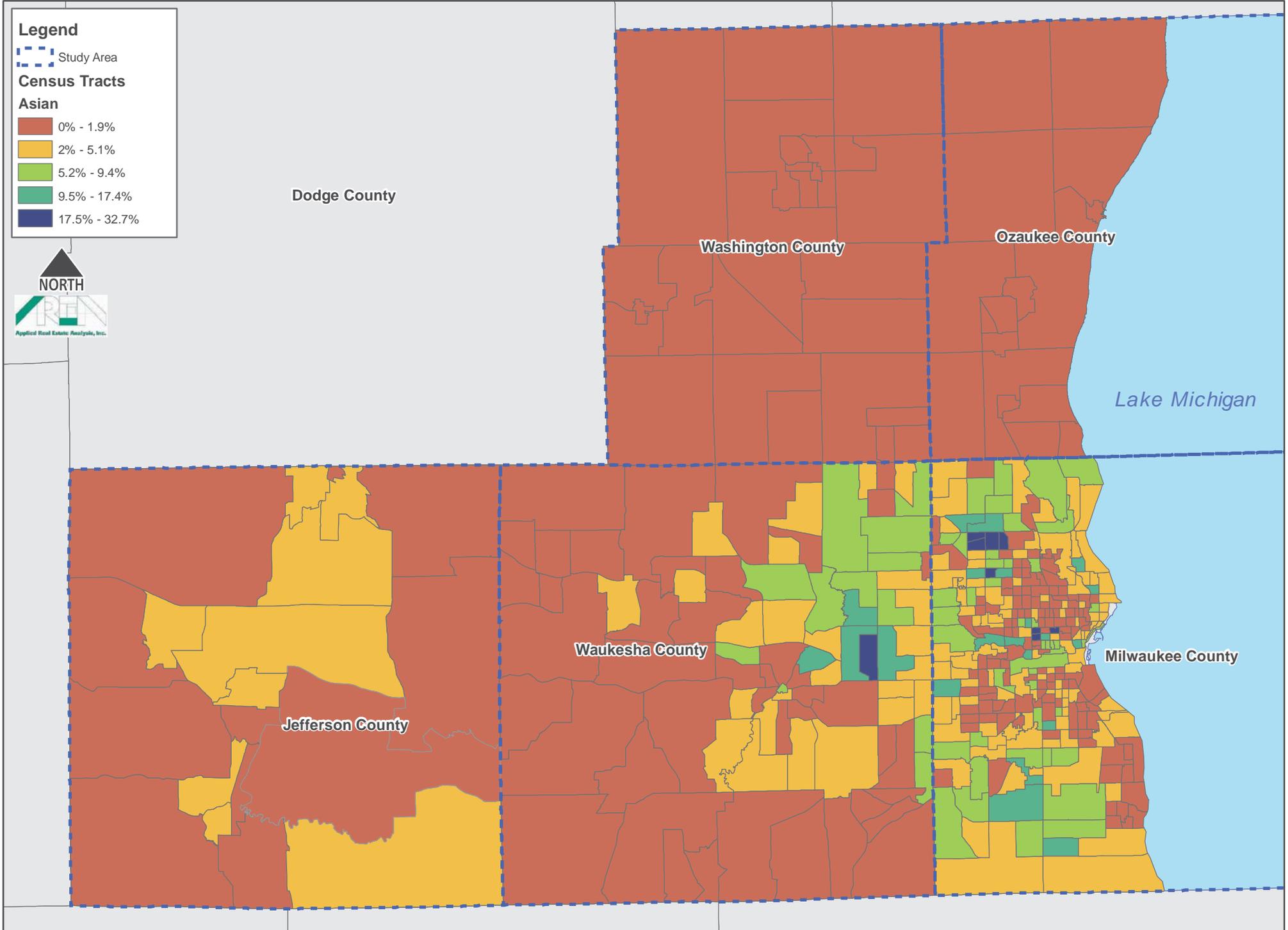


Exhibit IV-7.
Study Area Hispanic Population

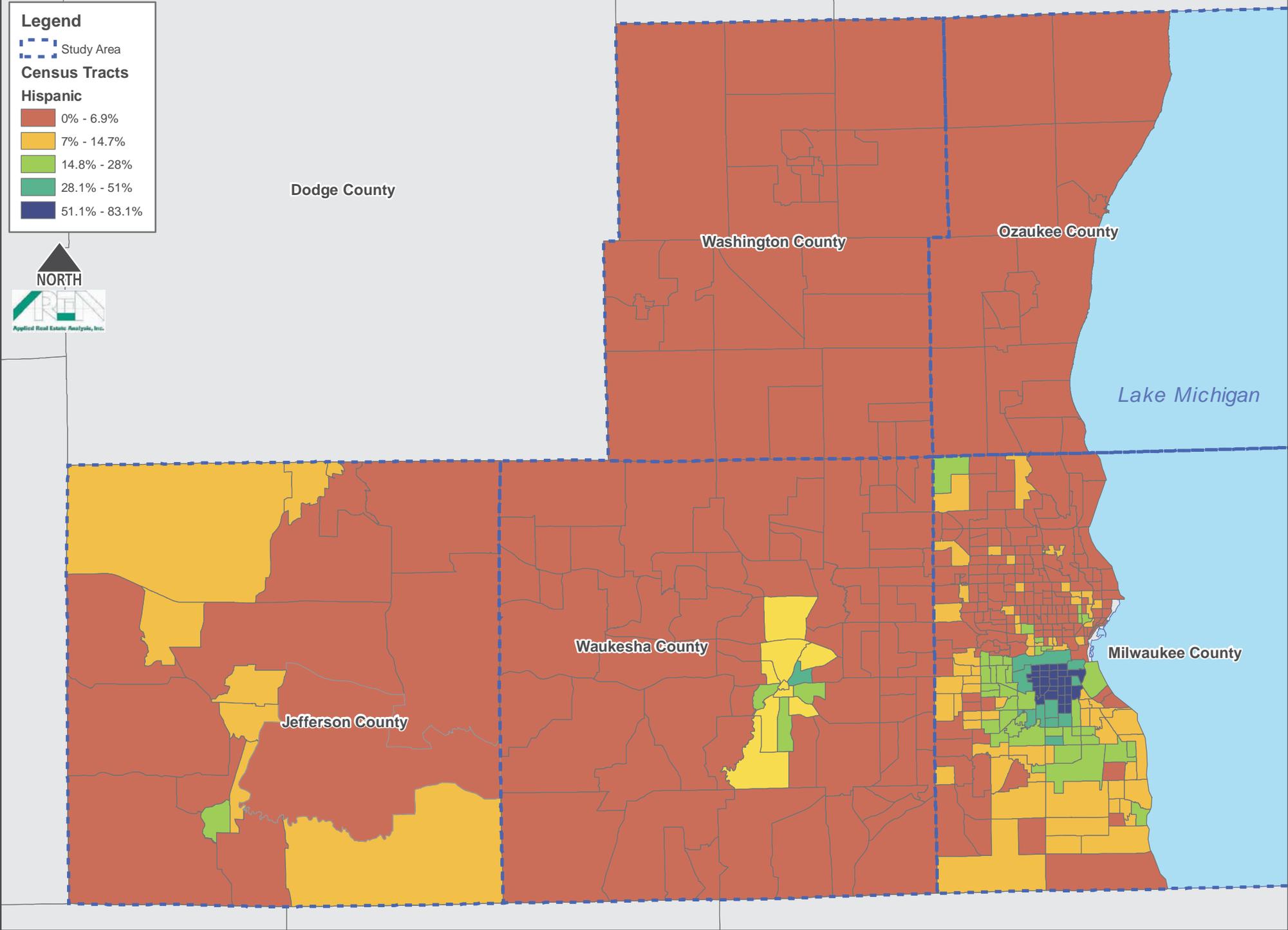
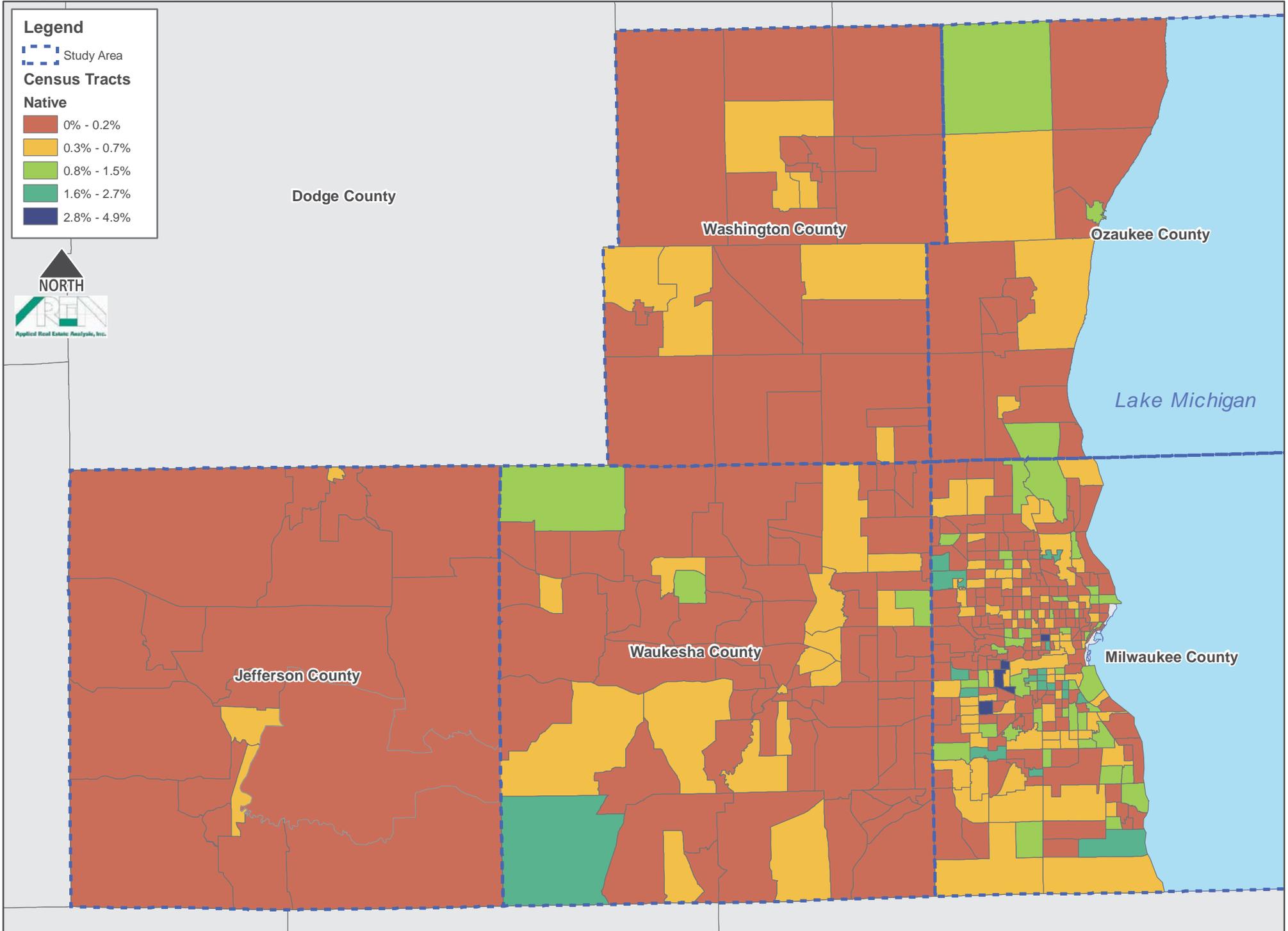


Exhibit IV-8.
Study Area Native Population



Gender

The ratio of males to females in the Milwaukee Collaborative region reflects statewide and national trends. As of 2017, 51.2 percent of the population in the Milwaukee Collaborative region was female, and 48.8 percent of the population was male. In the same year, the national percentage of females was 50.8, and the percentage of males was 49.2; in Wisconsin, the percentage of females was 50.3 and males 49.7 as of 2017.

Age

The clear trend within the entire region is an increase in older age groups since 2000, with older residents representing an increasing percentage of the population and younger residents representing a decreasing percentage in recent years. In the Collaborative area, the largest percentage increases in the population from 2000 to 2017 were those aged 55 to 61 and 62 to 74. Between 2000 and 2010, the numbers of people aged 55 to 61 increased by 44.5 percent, and between 2010 and 2017 the same age group increased by 17 percent. The population of residents aged 62 to 74 increased by 5.2 percent from 2000 to 2010 and nearly 35 percent from 2010 to 2017. The population of those aged 35 to 54 in the Milwaukee Collaborative region decreased by 1.5 percent from 2000 to 2010 and 7.6 percent between 2010 and 2017. The population of those aged 0 to 17 year decreased about 3 percent during both 2000 to 2010 and 2010 to 2017.

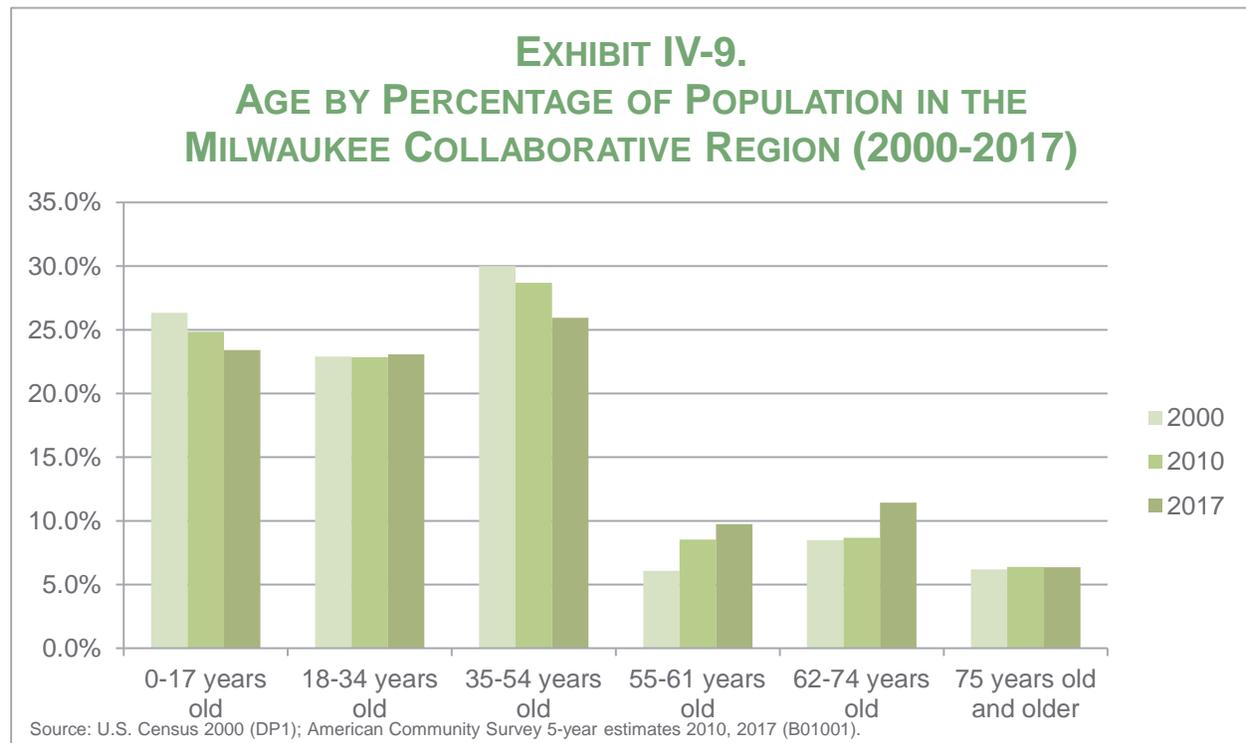
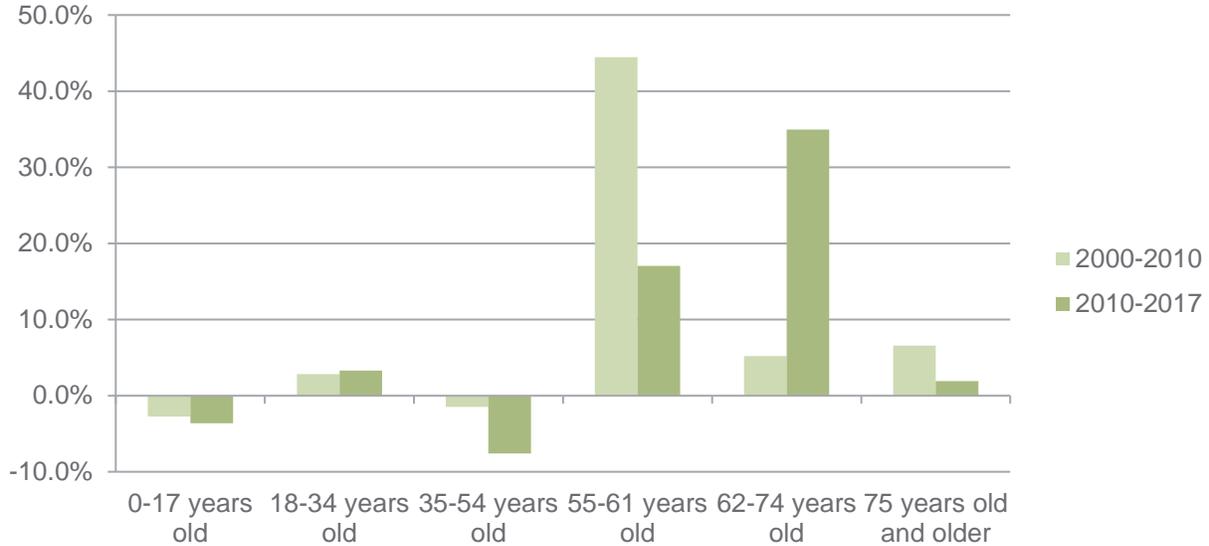


EXHIBIT IV-10. PERCENTAGE OF CHANGE IN POPULATION IN THE MILWAUKEE COLLABORATIVE REGION (2000-2017)



Source: U.S. Census 2000 (DP1); American Community Survey 5-year estimates 2010, 2017 (B01001).

Ozaukee, Waukesha, Washington, and Jefferson counties each saw higher percentage increases of older residents in comparison to Milwaukee County. The age group which consistently was higher in population in Milwaukee County compared to most counties was 18-34, which makes Milwaukee County one of the youngest areas in the Collaborative region. The age groups that saw the biggest percentage decreases since 2000 in all counties were 0 to 17 and 35 to 54. The population of those aged 18 to 34 increased at about the same rate as the total population for the Milwaukee Collaborative region during both time periods. The increasing percentages of elderly residents in the region will surely impact housing requirements, given the specific forms of housing many seniors choose to reside in. (Data on the age composition of each county can be found in Appendix A.)

EXHIBIT IV-11.
AGE OF INDIVIDUALS IN THE MILWAUKEE COLLABORATIVE REGION: 2000 TO 2017

Year	Total	Change	0-17 years old				18-34 years old				35-54 years old			
			Number	Percent	Change	Number	Percent	Change	Number	Percent	Change			
2000	1,574,762	N/A	414,646	26.3%	N/A	360,552	22.9%	N/A	472,689	30.0%	N/A			
2010	1,622,675	47,913	403,259	24.9%	-11,387	370,793	22.9%	10,241	465,798	28.7%	-6,891			
2017	1,659,687	37,012	388,561	23.4%	-14,698	383,043	23.1%	12,250	430,527	25.9%	-35,271			

Year	Total	Change	55-61 years old				62-74 years old				75 years old and older			
			Number	Percent	Change	Number	Percent	Change	Number	Percent	Change			
2000	1,574,762	N/A	95,770	6.1%	N/A	133,728	8.5%	N/A	97,377	6.2%	N/A			
2010	1,622,675	47,913	138,363	8.5%	42,593	140,685	8.7%	6,957	103,777	6.4%	6,400			
2017	1,659,687	37,012	161,950	9.8%	23,587	189,853	11.4%	49,168	105,753	6.4%	1,976			

N/A indicates the data are not available.

Source: U.S. Census 2000 (DP1); American Community Survey 5-year estimates 2010 and 2017 (B01001).

Household Income

Household incomes within the Milwaukee Collaborative region are not evenly distributed. The lowest household income levels of all counties included in the study were seen in Milwaukee and Jefferson counties, and the remaining three counties had household income levels notably higher than the other two. The lowest household income levels for the cities were found in Milwaukee and West Allis, whereas Wauwatosa had significantly higher percentages of households in higher income brackets.

The specific ranges of income for this data analysis were selected to reflect the HUD income limits for three- to four-person households within the Milwaukee County area in 2019. HUD classified a four-person household that earns \$25,750 or less as “extremely low income,” between \$25,750 and \$41,150 as “very low income,” and between \$41,150 and \$65,850 as “low-income.”

In the Milwaukee Collaborative region, about 21.3 percent of households earned under \$25,000, 35.2 percent earned under \$40,000, and 51.6 percent earned under \$60,000 in 2017. These values are almost exactly the same as the national rates for each income group.

The lowest household income levels in the Milwaukee Collaborative area as of 2017 were found in the city of Milwaukee, where 33.7 percent of households earned less than \$25,000, about 51.5 percent earned less than \$40,000, and 68.7 percent earned less than \$60,000. Household income levels in the city of West Allis were lower compared to the rest of the region, with approximately 61.2 percent of households earning less than \$60,000 in 2017. The household income levels in the city of Wauwatosa were high in comparison to the other two cities, with under 40 percent of all households earning less than \$60,000.

In both Milwaukee County (excluding the three cities included in the study) and Jefferson County, there were similar percentages of households in low-income groups to the collaborative region as a whole: about 47.3 percent of Milwaukee County households and 50.3 percent of Jefferson County households earned below \$60,000 in 2017.

The counties with the highest percentages of households in high income brackets in 2017 were Waukesha, Ozaukee, and Washington counties. Waukesha and Ozaukee counties in particular had the highest percentages of households earning over \$100,000 in 2017, with around 39 percent each. Only 37 percent of households in either Waukesha or Ozaukee counties earned less than \$60,000.

EXHIBIT IV-12.**HOUSEHOLD INCOME IN THE MILWAUKEE COLLABORATIVE REGION: 2017**

	City of Milwaukee		City of Wauwatosa		City of West Allis	
	Number	Percent	Number	Percent	Number	Percent
Total	230,463		20,395		27,565	
Less than \$25,000	77,711	33.7%	3,164	15.5%	6,927	25.1%
\$25,000 to \$39,999	40,985	17.8%	2,225	10.9%	4,503	16.3%
\$40,000 to \$59,999	39,693	17.2%	2,713	13.3%	5,447	19.8%
\$60,000 to \$99,999	44,135	19.2%	4,995	24.5%	6,810	24.7%
\$100,000 or more	27,939	12.1%	7,298	35.8%	3,878	14.1%

	Milwaukee County*		Waukesha County		Ozaukee County	
	Number	Percent	Number	Percent	Number	Percent
Total	103,604		156,996		35,044	
Less than \$25,000	17,949	17.3%	18,368	11.7%	4,540	13.0%
\$25,000 to \$39,999	12,849	12.4%	16,782	10.7%	3,725	10.6%
\$40,000 to \$59,999	18,229	17.6%	22,495	14.3%	4,578	13.1%
\$60,000 to \$99,999	24,631	23.8%	37,815	24.1%	8,674	24.8%
\$100,000 or more	29,946	28.9%	61,536	39.2%	13,527	38.6%

	Jefferson County		Washington County		Collaborative Region	
	Number	Percent	Number	Percent	Number	Percent
Total	32,739		53,756		660,562	
Less than \$25,000	5,404	16.5%	6,510	12.1%	140,573	21.3%
\$25,000 to \$39,999	5,088	15.5%	6,101	11.3%	92,258	14.0%
\$40,000 to \$59,999	5,998	18.3%	9,076	16.9%	108,229	16.4%
\$60,000 to \$99,999	8,830	27.0%	14,907	27.7%	150,797	22.8%
\$100,000 or more	7,419	22.7%	17,162	31.9%	168,705	25.5%

*Not including the cities of Milwaukee, West Allis, and Wauwatosa.

Source: 2013-2017 American Community Survey 5-Year Estimates (B19001).

Income by Race/Ethnicity

Large disparities exist among the incomes of different racial groups in the Milwaukee Collaborative region. Black and Hispanic households are consistently overrepresented in low-income groups, whereas White households are consistently overrepresented in higher income groups.

White households accounted for 78.7 percent of all households in the collaborative area as of 2017, yet White households represented 90 percent of all households who earned above \$100,000. They also accounted for 60.9 percent of households who earned less than \$25,000 and 72.3 percent of all households earning between \$25,000 and \$39,999. In contrast, Black households represented 14.7 percent of households in the area in 2017, and accounted for 4.1 percent of households earning over \$100,000, 30.8 percent of households who earned less than \$25,000, and 20.1 percent of those earning between \$25,000 and \$39,999.

Hispanic households accounted for 7.2 percent of all households in the Collaborative area, and they were slightly overrepresented in income groups earning below \$40,000 per year, but not as much as African-American households. Hispanic residents were significantly underrepresented in the income group in which households earn \$100,000 or more. The percentages of Asian households in each income group were relatively consistent with the total percentage of Asian households in the region (2.5 percent), except for a slight overrepresentation in households earning over \$100,000. (See Appendix A for additional data.)

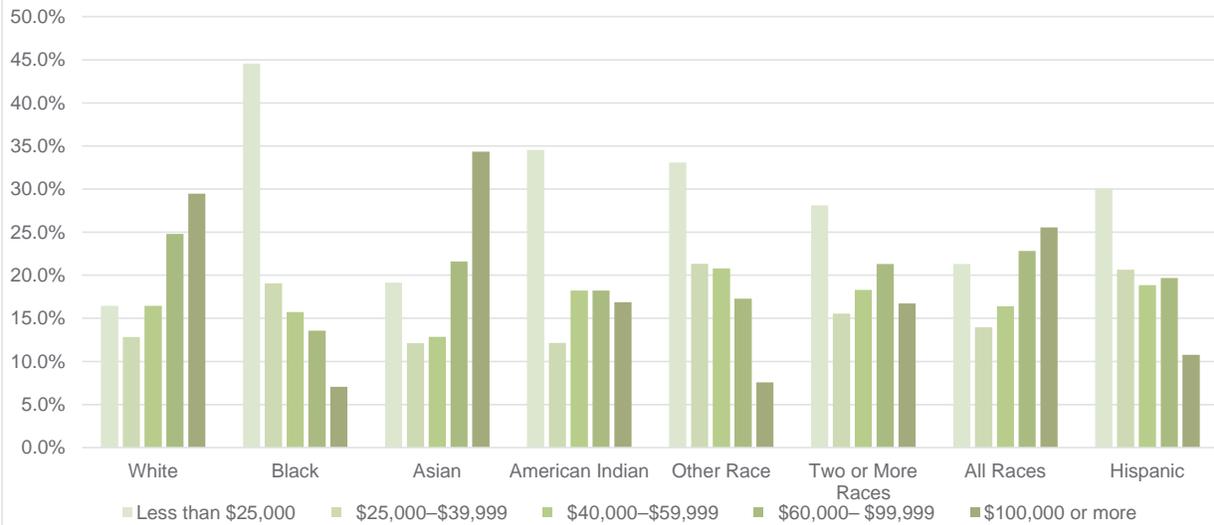
EXHIBIT IV-13.

INCOME GROUPS BY RACE/ETHNICITY, MILWAUKEE COLLABORATIVE REGION: 2017

Race/Ethnicity	Total	Less than \$25,000	\$25,000–\$39,999	\$40,000–\$59,999	\$60,000–\$99,999	\$100,000 or more
White	78.7%	60.9%	72.3%	79.0%	85.5%	90.7%
Black	14.7%	30.8%	20.1%	14.1%	8.8%	4.1%
Asian	2.5%	2.3%	2.2%	2.0%	2.4%	3.4%
Native Hawaiian or Other Pacific Islander	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%
American Indian/Alaskan Native	0.4%	0.6%	0.3%	0.4%	0.3%	0.2%
Other Race	2.3%	3.6%	3.5%	2.9%	1.7%	0.7%
Two or More Races	1.4%	1.9%	1.6%	1.6%	1.3%	0.9%
All Races	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
Hispanic/Latino	7.2%	10.1%	10.6%	8.2%	6.2%	3.0%

Source: 2013-2017 American Community Survey 5-Year Estimates (B19001A,B,C,D,E,F,G,I).

**EXHIBIT IV-14
PERCENTAGE OF HOUSEHOLDS IN INCOME RANGES BY RACE AND ETHNICITY
IN THE MILWAUKEE COLLABORATIVE REGION: 2017**



Note: Native Hawaiian and Other Pacific Islander not included due to low population numbers.

Source: 2013-2017 American Community Survey 5-Year Estimates (B19001A,B,C,D,E,F,G).

Poverty Concentration

Low-income households are particularly more vulnerable to housing discrimination than households living above the poverty line. In the Milwaukee Collaborative region, households of all races and ethnicities besides White only had relatively high rates of poverty compared to the statewide average of 11.3 percent in 2017.

In the Collaborative area, 34.5 percent of African-American households lived below the poverty line in 2017, as did 22.6 percent of American Indian/Alaska Native households, 24.1 percent of Hispanic households, and 18.1 percent of Asian households. Only 8.8 percent of White households were living in poverty in the Milwaukee Collaborative area as of 2017. In addition, 30.5 percent of households identifying as “some other race” were in poverty, and 23.3 percent of households that consisted of two or more races were living below the poverty line in 2017.

The city of Milwaukee experienced the highest levels for households below the poverty line in the Collaborative region for all races and ethnicities in 2017 (except Pacific Islanders). Every racial group besides White households and Pacific Islander households experienced a poverty rate over 30 percent within the city of Milwaukee. Ozaukee and Washington counties saw the lowest poverty rates for most racial and ethnic groups of the five counties in 2017. In Waukesha and Jefferson counties, the poverty rates of White households were low and those of African-American households were high in comparison to the other counties.

EXHIBIT IV-15.
HOUSEHOLD POVERTY BY RACE AND ETHNICITY (2017)

	City of Milwaukee		City of Wauwatosa		City of West Allis	
	Number	Percent	Number	Percent	Number	Percent
White alone	46,349	17.6%	2,597	6.3%	5,808	11.5%
Black or African American alone	83,329	36.3%	262	12.0%	1,044	31.5%
American Indian and Alaska Native alone	939	31.1%	33	20.0%	104	18.2%
Asian alone	7,397	31.7%	261	12.4%	291	17.4%
Native Hawaiian and Other Pacific Islander alone	42	27.3%	0	N/A	0	N/A
Some other race alone	14,495	35.8%	41	12.9%	278	15.5%
Two or more races	7,109	31.3%	164	12.4%	468	26.8%
Hispanic/Latino	34,145	31.4%	222	13.4%	1,691	22.2%

	Milwaukee County*		Waukesha County		Ozaukee County	
	Number	Percent	Number	Percent	Number	Percent
White alone	16,319	7.8%	16,311	4.5%	4,946	6.1%
Black or African American alone	1,882	15.6%	1,439	25.5%	25	2.2%
American Indian and Alaska Native alone	119	9.2%	256	30.1%	7	2.5%
Asian alone	1,152	10.1%	535	4.2%	61	3.5%
Native Hawaiian and Other Pacific Islander alone	0	N/A	69	41.8%	0	0%
Some other race alone	509	15.1%	500	13.5%	2	0.5%
Two or more races	981	15.7%	524	9.3%	46	3.3%
Hispanic/Latino	2,368	12.0%	500	13.5%	260	10.8%

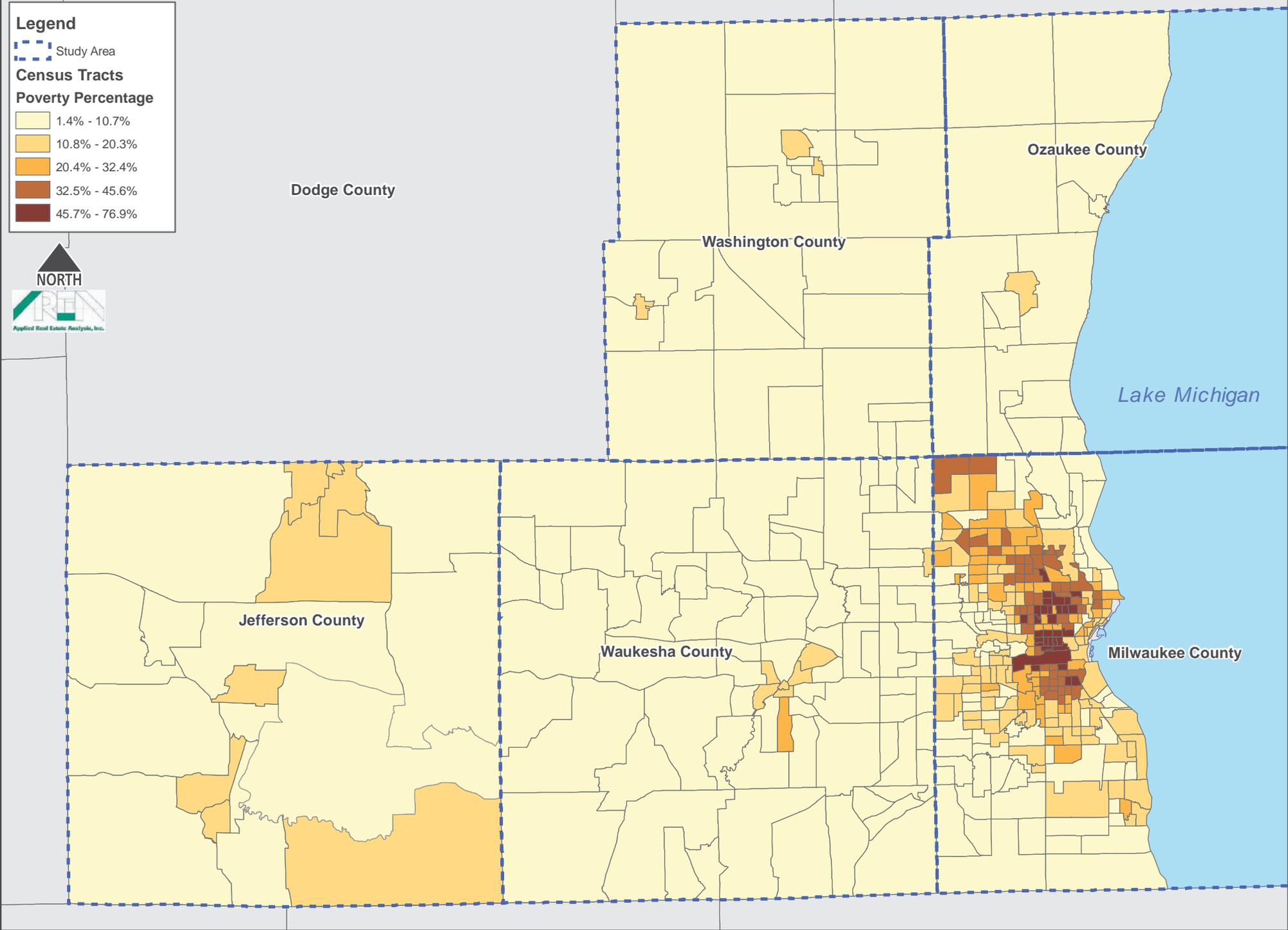
	Jefferson County		Washington County		Milwaukee County Region	
	Number	Percent	Number	Percent	Number	Percent
White alone	7,155	9.3%	6,815	5.4%	106,300	8.8%
Black or African American alone	143	24.4%	90	6.6%	88,214	34.5%
American Indian and Alaska Native alone	9	10.6%	0	0%	1,467	22.6%
Asian alone	176	34.0%	86	5.5%	9,959	18.1%
Native Hawaiian and Other Pacific Islander alone	3	8.6%	8	50.0%	122	25.9%
Some other race alone	174	10.6%	5	0.7%	16,004	30.5%
Two or more races	317	20.5%	316	16.3%	9,925	23.3%
Hispanic/Latino	1,338	24.1%	463	11.3%	40,987	24.1%

*Excluding the cities of Milwaukee, Wauwatosa, and West Allis.

Source: ACS 5-Year Survey 2017 (S1701).

The majority of households living in poverty within the Milwaukee Collaborative region are confined to specific areas in or near the city of Milwaukee, as seen in Exhibit IV-16. Many of the census tracts that are high in poverty are also majority Black or Hispanic neighborhoods.

Exhibit IV-16.
Study Area Poverty Concentration



DISABILITY

Disability is one of the eight protected classes listed in the Fair Housing Act. In 2017, an estimated 11.8 percent of non-institutionalized residents in the Milwaukee Collaborative region were classified as having a disability. Milwaukee County had the highest rate of persons with disabilities of counties within the Collaborative, at 13 percent of the population, while Ozaukee County had the lowest rate of persons with a disability, at 8.4 percent. The disabled population in Jefferson, Washington, and Waukesha counties hovered around 10 and 11 percent. In the entire Collaborative area, about 32.7 percent of residents aged 65 or older had at least one disability. The percentage of residents with a disability in the area is consistent with the statewide rate (11.9 percent) and slightly lower than the national rate (12.6 percent).

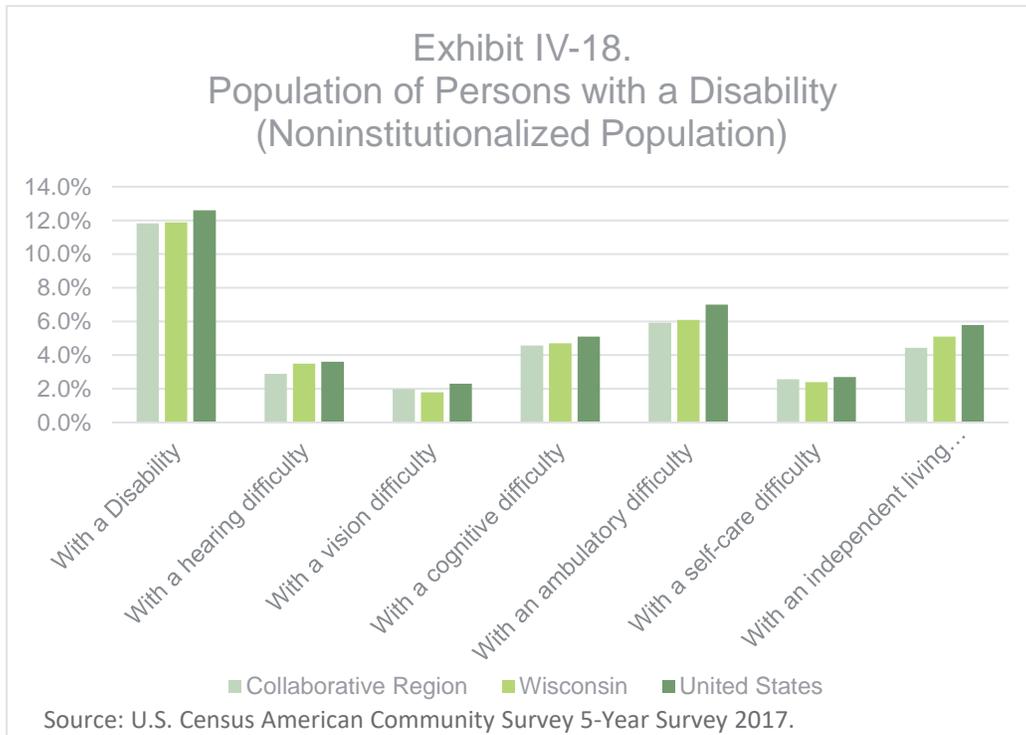
The most common form of disability experienced by those in the study area was ambulatory difficulties, or difficulties in walking, at 5.9 percent of the total population. Ambulatory difficulties were also very common among residents aged 65 or over, with 20.6 percent of the age group living with the disability. The second most common disability experienced by residents in the area was cognitive difficulties, by 4.6 percent of the population as of 2017. The third most common disability are those in which persons are unable to complete an activity of daily living (ADL) or an instrumental activity of daily living (IADL), which is experienced by 4.4 percent of area residents. ADLs involve activities such as bathing, eating meals, using the restroom, and getting dressed, whereas IADLs include grocery shopping, housekeeping, managing transportation, and managing finances. Information on the specific statistics on persons with a disability for each member of the Collaborative region can be found in Appendix A.

EXHIBIT IV-17.

POPULATION OF PERSONS WITH A DISABILITY (NONINSTITUTIONALIZED POPULATION) 2017

	Milwaukee Collaborative Region		Wisconsin		United States	
	Number	Percent	Number	Percent	Number	Percent
Without a Disability	1,630,250		5,691,138		316,027,641	
With a Disability	192,943	11.8%	675,224	11.9%	39,792,082	12.6%
With a hearing difficulty	47,164	2.9%	201,176	3.5%	11,270,650	3.6%
With a vision difficulty	32,307	2.0%	102,717	1.8%	7,390,198	2.3%
With a cognitive difficulty	74,352	4.6%	251,120	4.7%	14,957,724	5.1%
With an ambulatory difficulty	96,561	5.9%	324,358	6.1%	20,776,059	7.0%
With a self-care difficulty	41,963	2.6%	128,141	2.4%	7,889,808	2.7%
With an independent living difficulty	72,225	4.4%	224,246	5.1%	14,023,060	5.8%

Source: U.S. Census American Community Survey 5-Year Survey 2017 (S1810)



Within the Milwaukee Collaborative region, the income of persons with disabilities varies across each of the areas studied, but income levels were consistently lower than the overall median income level in each area in 2017. This is apparent by reviewing the estimated median income (EMI) of all residents.

Disabled persons in Ozaukee County had the lowest EMI for persons with a disability of the eight members of the Collaborative, at \$13,182, which is notable as Ozaukee County had the second-highest total EMI of the members of the Collaborative. Milwaukee County, Jefferson County, and the city of Milwaukee also had very low EMIs for persons with a disability, with each area’s EMI for persons with a disability under \$20,000. The remaining four members of the Collaborative — Waukesha County, Washington County, and the cities of Wauwatosa and West Allis — each had EMIs for persons with a disability between \$25,000 and \$30,000 in 2017. The estimated median income of females with a disability was typically lower than that of males, except for those in the city of West Allis and Jefferson County. The difference between EMI in disabled males and females was significantly less than that of non-disabled males and females in the Milwaukee Collaborative region.

EXHIBIT IV-19.**POPULATION OF PERSONS WITH A DISABILITY MILWAUKEE COLLABORATIVE REGION: 2017
(NONINSTITUTIONALIZED POPULATION ONLY)**

Age	Under 5		5 to 17 years old		Under 18 years old			
	Number	Percent	Number	Percent	Number	Percent		
Without a Disability	102,843		267,544		370,387			
With a Disability	961	0.9%	16,691	5.9%	17,652	4.5%		
With a hearing difficulty	543	0.5%	1,289	0.5%	1,832	0.5%		
With a vision difficulty	579	0.6%	2,715	1.0%	3,294	0.8%		
With a cognitive difficulty					12,885	3.3%		
With an ambulatory difficulty					1,087	0.3%		
With a self-care difficulty					2,196	0.6%		
With an independent living difficulty								
			18 to 64 years old	65 years and older	Total			
			Number	Percent	Number	Percent		
Without a Disability			926,690		156,101	1,437,307		
With a Disability			99,311	9.7%	75,980	32.7%	192,943	11.8%
With a hearing difficulty			17,984	1.8%	27,348	11.8%	47,164	2.9%
With a vision difficulty			16,708	1.6%	12,305	5.3%	32,307	2.0%
With a cognitive difficulty			43,696	4.3%	17,771	7.7%	74,352	4.6%
With an ambulatory difficulty			47,605	4.6%	47,869	20.6%	96,561	5.9%
With a self-care difficulty			20,889	2.0%	18,878	8.1%	41,963	2.6%
With an independent living difficulty			38,828	3.8%	33,397	14.4%	72,225	4.4%

Source: U.S. Census American Community Survey 5-Year Survey 2017 (S1810).

EXHIBIT IV-20.**INCOME OF PERSONS WITH AND WITHOUT A DISABILITY (NONINSTITUTIONALIZED POPULATION): 2017**

	Estimated Median Income			
	City of Milwaukee	City of West Allis	City of Wauwatosa	Milwaukee County
Total:	\$26,233	\$33,936	\$47,244	\$31,030
With a disability	\$16,995	\$25,099	\$29,806	\$19,365
Male	\$18,127	\$23,487	\$32,642	\$20,622
Female	\$16,204	\$25,851	\$29,667	\$18,430
No disability	\$26,783	\$34,949	\$47,905	\$31,552
Male	\$30,250	\$40,129	\$54,931	\$36,178
Female	\$24,286	\$29,933	\$41,923	\$27,654

	Estimated Median Income			
	Waukesha County	Ozaukee County	Jefferson County	Washington County
Total:	\$42,474	\$40,267	\$31,713	\$40,017
With a disability	\$25,974	\$13,182	\$16,088	\$26,598
Male	\$34,706	\$19,500	\$15,591	\$31,848
Female	\$18,137	\$11,508	\$17,169	\$21,491
No disability	\$43,410	\$40,906	\$32,191	\$40,471
Male	\$54,128	\$53,567	\$38,860	\$50,952
Female	\$34,130	\$30,855	\$26,935	\$30,920

Source: U.S. Census American Community Survey 5-Year Survey 2017 (B18140).

ADDITIONAL CHARACTERISTICS OF PROTECTED CLASSES

Ancestry

National origin is one of the bases for protection under the Fair Housing Act, which is stated as “ancestry/ethnicity.” The most common ancestries reported by residents in the Collaborative area include various European countries. In 2017, the most prominent ancestry reported was German, at 35 percent. Other notable ancestries include Polish (11 percent), Irish (10 percent), Italian (4 percent), Norwegian (4 percent), and “other groups” (30 percent). In Waukesha, Ozaukee, Jefferson, and Washington counties, around 50 percent of residents identified as of German ancestry, compared to 25 percent in Milwaukee County. In Milwaukee County, 44 percent of residents classified themselves under “other groups,” whereas 13 percent persons in the other counties self-identified using that choice.

EXHIBIT IV-21.**ANCESTRY IN THE MILWAUKEE COLLABORATIVE REGION: 2017**

	Number	Percent
Total	1,659,687	
German	580,122	35.0%
Other groups	501,932	30.2%
Unclassified or not reported	198,596	12.0%
Polish	181,183	10.9%
Irish	166,150	10.0%
English	73,589	4.4%
Italian	71,193	4.3%
Norwegian	61,908	3.7%
French (except Basque)	42,448	2.6%
American	39,635	2.4%
Swedish	27,765	1.7%
Dutch	21,691	1.3%
European	17,019	1.0%
Czech	16,693	1.0%

Source: 2013–2017 American Community Survey 5-Year Estimates (B04006).

Foreign-Born Residents

Foreign-born residents fall under those protected by “national origin” in the Fair Housing Act. Foreign-born residents accounted for about 7 percent of the total population in the Collaborative area in 2017. The most common countries from which foreign-born residents originated were Mexico (33 percent), India (9.2 percent), and China (5 percent). The most common continents from which foreign-born residents originated were Asia (34.8 percent), Europe (17.7 percent), and Africa (5 percent).

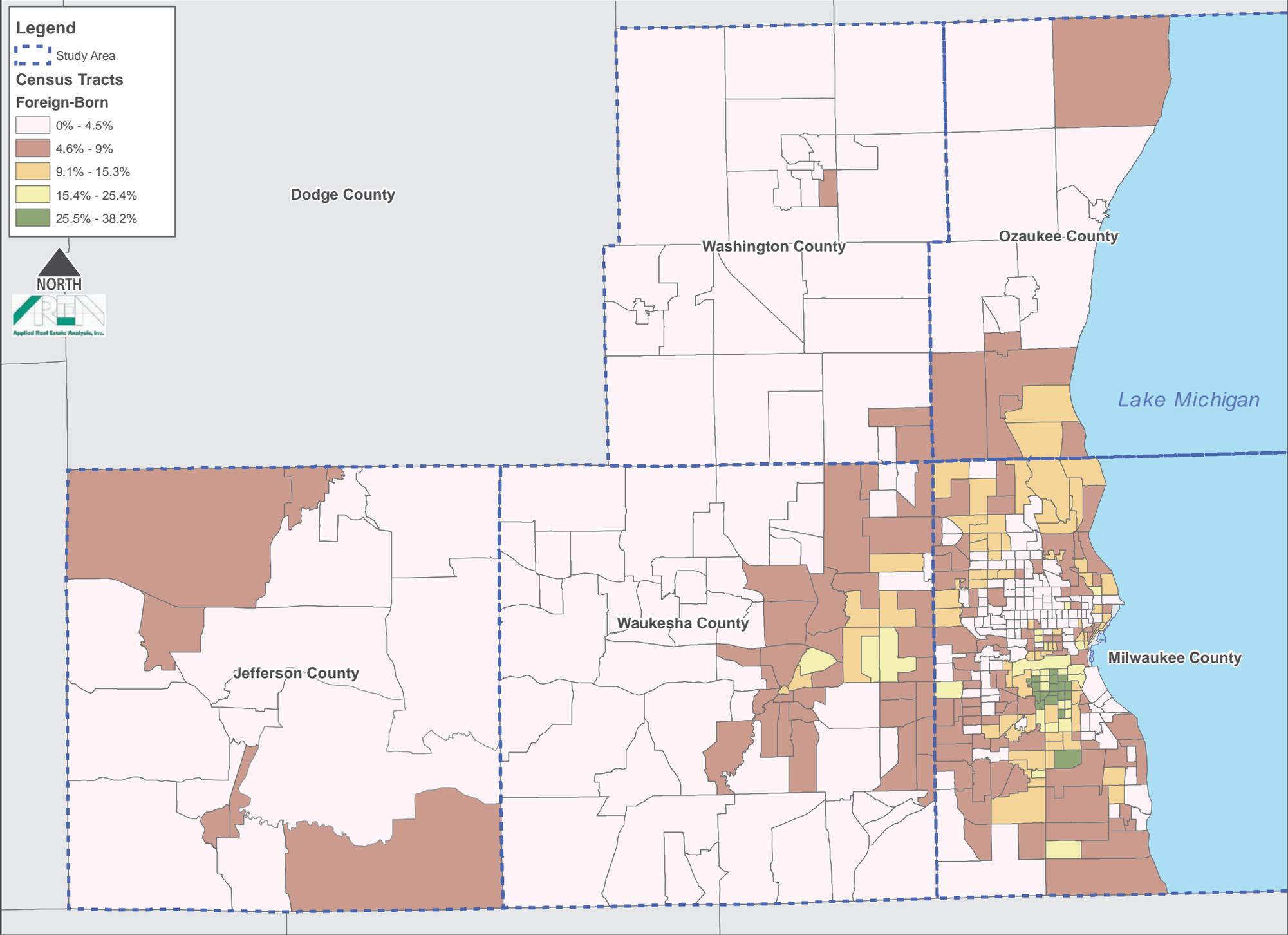
Most foreign-born residents in the study area live within Milwaukee County and are most highly concentrated in the southern portion of the city of Milwaukee. Milwaukee County contained 73 percent of all foreign-born residents in the Collaborative region in 2017. As shown in Exhibit IV-23, most sections of Washington, Ozaukee, and Jefferson counties have low percentages of foreign-born residents, while the eastern section of Waukesha County is home to slightly higher percentages of foreign-born residents.

EXHIBIT IV-22.
FOREIGN-BORN RESIDENTS IN THE MILWAUKEE COLLABORATIVE
REGION: 2017

	Number	Percent of Foreign Born
Total Foreign Born:	115,010	
Original Location		
Asia	40,065	34.8%
Europe	20,384	17.7%
Africa	5,753	5.0%
South America	3,199	2.8%
Mexico	37,982	33.0%
India	10,615	9.2%
China	5,696	5.0%
Canada	2,015	1.8%

Source: 2013-2017 American Community Survey 5-Year Estimates (B05006).

Exhibit IV-23.
Study Area Foreign-Born Population



Language

The vast majority of persons in the Milwaukee County region speak English as their first language. Less than 5 percent of the population over age five speaks English “less than very well.”

The majority of non-English speakers live in Milwaukee County, and over half of those persons speak Spanish as a primary language. About 88 percent of the Milwaukee County region only speaks English. In every county besides Milwaukee County, over 90 percent of the population only speaks English.

Approximately seven percent of the population of the region speaks Spanish, and about two percent speak other Indo-European languages as well as Asian and Pacific Island languages. Additional data on the language statistics of each county can be found in Appendix A.

**EXHIBIT IV-24.
LANGUAGE IN THE MILWAUKEE COLLABORATIVE REGION: 2017**

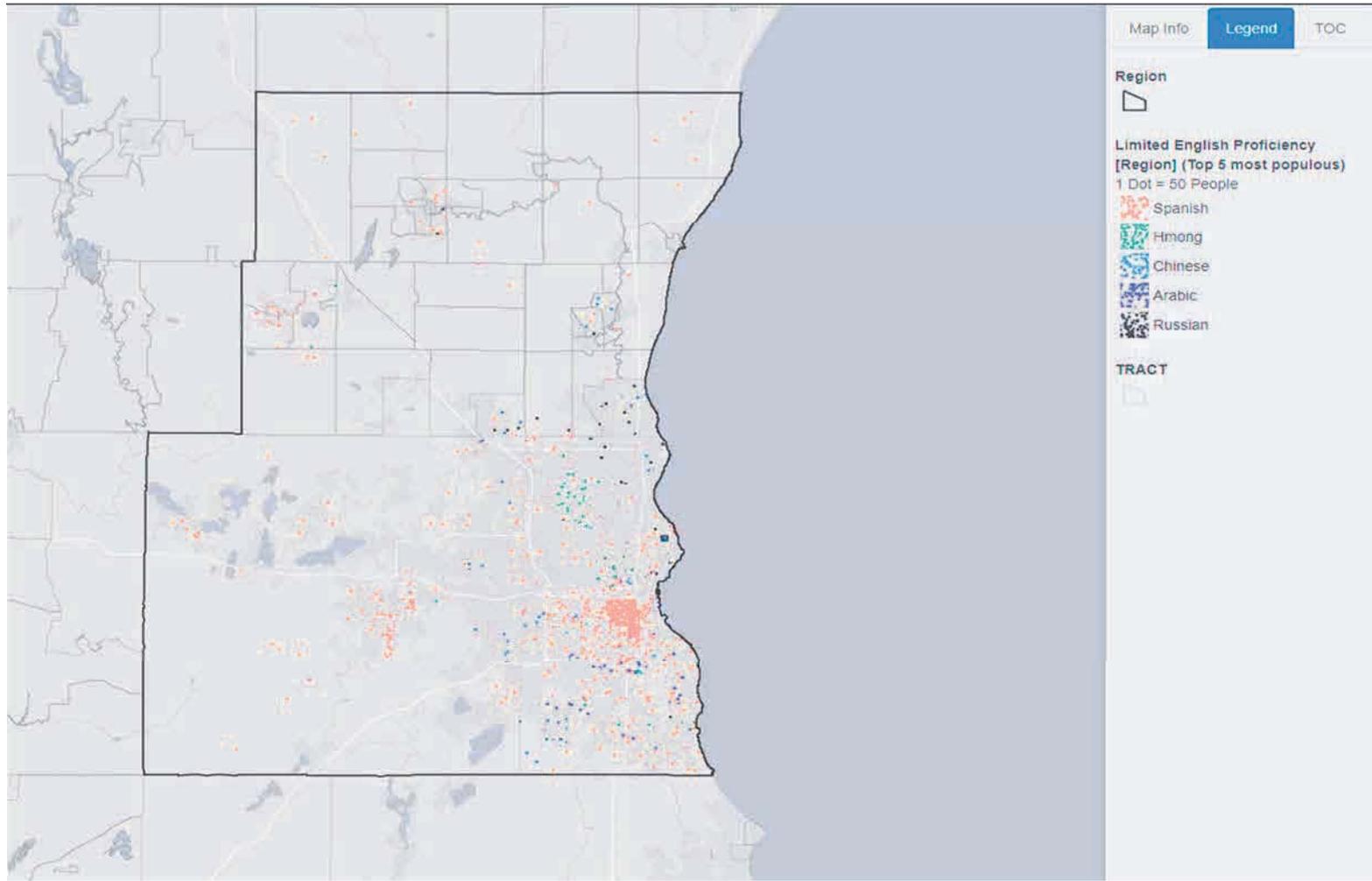
	Total		Speak English “Very Well”		Speak English Less than “Very Well”	
	Number	Percent	Number	Percent	Number	Percent
Total Population 5 years and over	1,555,883	100%	1,485,003	95.4%	70,880	4.6%
Speak only English	1,367,975	87.9%	N/A	N/A	N/A	N/A
Speak a language other than English:	187,908	12.1%	117,028	62.3%	70,880	37.7%
Spanish	109,693	7.1%	66,225	60.4%	43,468	39.6%
Other Indo-European languages	36,804	2.4%	26,541	72.1%	10,263	27.9%
Asian and Pacific Island languages	31,120	2.0%	17,658	56.7%	13,462	43.3%
Other languages	10,291	0.7%	6,604	64.2%	3,687	35.8%

N/A: The value is not applicable.

Source: 2013-2017 American Community Survey 5-Year Estimates (S1601).

Exhibit IV-25 displays the populations of residents that have a limited English proficiency according to data obtained by HUD. A significant portion of Spanish speakers who also had a limited English proficiency live in south Milwaukee, with many other Spanish speakers found outside of the city and in Washington and Waukesha counties. Other areas of Milwaukee County were home to speakers of Chinese, Hmong, and Arabic languages that had a limited English proficiency.

EXHIBIT IV-25. LIMITED ENGLISH PROFICIENCY IN THE MILWAUKEE COLLABORATIVE REGION



Note: Data for Jefferson County not available.
Source: HUD Affirmatively Furthering Fair Housing mapping tool.

Sexual Orientation

Reliable data are unavailable on the sexual orientation of individuals within the Milwaukee County region. Although the American Community Survey does not record data on married same-sex couples, they do ask whether persons who live in unmarried households live with a same-sex partner. An estimated 2,312 same-sex couples lived in the Collaborative area in 2017, representing 5.2 percent of all unmarried households. Same-sex couples were most commonly located in Milwaukee County, where they accounted for 6 percent of all unmarried households.

EXHIBIT IV-26.

SAME-SEX HOUSEHOLDS IN THE MILWAUKEE COLLABORATIVE REGION: 2017

	Milwaukee County	Waukesha County	Washington County	Ozaukee County	Jefferson County	Milwaukee County Region
Total unmarried households	29,921	7,207	2,989	1,699	2,493	44,309
Male householder and male partner	878	109	72	24	3	1,086
Female householder and female partner	915	137	47	38	89	1,226
Total same-sex households	1,793	246	119	62	92	2,312
Percentage of all unmarried households that are same-sex households	6.0%	3.4%	4.0%	3.6%	3.7%	5.2%

Source: 2013-2017 American Community Survey 5-Year Estimates (B11009).

Marital and Familial Status

Familial status is one of the categories protected under the Fair Housing Act. Households that experience housing discrimination are often those with children and single-parent households.

In the Collaborative area, approximately 62.8 percent of households were identified as family households in 2017. Family households are defined as households with two or more people who are related by birth, marriage, or adoption. The lowest percentage of family households of the five counties was in Milwaukee County, with 57.5 percent of all households considered a family household, and it also saw the lowest percentage of married-couple family households, at 35.3 percent. In Waukesha, Ozaukee, and Washington counties, about 70 percent of the households are family households and 60 percent are married-couple family households. In the Milwaukee Collaborative region, 37.2 percent of all households were classified as “nonfamily” or households with two or

more unrelated individuals, and 81.3 percent of all nonfamily households featured one householder living alone.

Single African-American and Hispanic female householders are found most commonly in Milwaukee and Waukesha counties. Unfortunately, many single-parent, female-headed households are also members of racial and ethnic population groups and, consequently, represent more than one protected class. Single mothers accounted for 34.5 percent of all Black family households and 21.4 percent of all Hispanic/Latino family households in the Collaborative region.

EXHIBIT IV-27.

**MARRIAGE AND FAMILIAL STATUS OF HOUSEHOLDS IN THE MILWAUKEE COLLABORATIVE REGION:
2017**

	Total	White	Black	Asian	Hispanic/ Latino
Total households	680,713	519,719	97,141	16,525	47,328
Family households	62.8%	62.2%	59.5%	73.8%	71.7%
Married-couple family	45.2%	50.1%	18.6%	58.4%	40.8%
Other family:	17.6%	12.1%	40.9%	15.4%	30.8%
Male householder, no wife present	4.7%	3.9%	6.4%	5.9%	9.4%
Female householder, no husband present	12.9%	8.2%	34.5%	9.5%	21.4%
Nonfamily households	37.2%	37.8%	40.5%	26.2%	28.3%
Householder living alone	30.3%	30.6%	35.2%	19.3%	20.8%
Householder not living alone	7.0%	7.2%	5.2%	6.8%	7.5%

Source: 2013-2017 American Community Survey 5-Year Estimates (B11001A, B, D, I).

Religion

The overwhelming majority of residents in the Milwaukee Collaborative region are Christian. According to data obtained by the Association of Statisticians of American Religious Bodies, approximately 96.5 percent of all religious adherents within the region were Christians in 2010. Roughly 46.7 percent of all Christians in the collaborative region were Catholic and 22.4 percent of Christians were Lutheran. This left the remaining 27.4 percent of Christians following other various faiths such as Baptist, nondenominational Christianity, Pentecostalism, and Methodism. The remaining 3.5 percent of religious followers were either of Judaic, Muslim, Hindu, or other religious faiths. The data reveal that non-Christians occupy a small minority of the population in the Milwaukee County region.

EXHIBIT IV-28.**RELIGIOUS ADHERENTS IN THE MILWAUKEE COLLABORATIVE REGION:
2010**

	Number	Percent
Total	859,271	
Roman Catholic	401,385	46.7%
Lutheran	192,742	22.4%
Other Christian Religions	235,222	27.4%
Muslim	9,156	1.1%
Judaism	8,656	1.0%
Hindu	6,169	0.7%
Other Religions	5,928	0.7%

Source: The Association of Statisticians of American Religious Bodies (ASARB), 2010.

Military Discharge Status

Veterans were much more likely to be suffering from a disability compared to other residents in the Milwaukee Collaborative region. As of 2017, veterans were most common in Washington and Jefferson counties, where they represented an estimated 8.3 percent of the population in each area. Veterans were least common in Milwaukee County, where they represented 6.1 percent of the population, while also having the highest rate of disability in Milwaukee County at about 29 percent.

EXHIBIT IV-29.**MILITARY DISCHARGE STATUS IN THE MILWAUKEE COLLABORATIVE REGION (2017)**

	Milwaukee County		Wauwatosa County		Washington County	
	Number	Percent	Number	Percent	Number	Percent
Total Veterans	43,934	6.1%	22,204	7.2%	8,535	8.3%
Veterans with any Disability	12,451	28.9%	5,782	26.3%	2,112	25.0%

	Jefferson County		Ozaukee County		Milwaukee Collaborative Region	
	Number	Percent	Number	Percent	Number	Percent
Total Veterans	5,453	8.3%	4,687	6.8%	84,813	6.7%
Veterans with any Disability	1,221	22.8%	1,110	23.7%	22,676	26.7%

Source: 2013-2017 American Community Survey 5-Year Estimates (S2101)

Additional Protected Classes

Reliable data on the number of individuals who are victims of sexual harassment, with orders of protection, who live within the study area are not available.

SECTION V.

HOUSING SUPPLY AND FACTORS AFFECTING FAIR HOUSING ACCESS

The Milwaukee Collaborative Region housing market varies greatly depending upon the municipality and county. Although rental and owner-occupied housing are located across the region, the affordability and availability of each type varies substantially. Also, rates of home ownership differ substantially by race and ethnicity with small percentages of racial and ethnic minorities who are homeowners compared to Whites. As of 2017, there were 660,562 occupied housing units in the entire Milwaukee Collaborative region.

HOUSING STOCK CHARACTERISTICS

Race of Household by Units Occupied in Structure

Over half the total households in the Milwaukee Collaborative region — 56.6 percent — lived in single-family homes in 2017. An estimated 62.6 percent of White households lived in single-unit detached structures, compared to 34.7 percent of Black households, 45.4 percent of Asian households, and 40.1 percent of Hispanic/Latino households. The disparity between White and non-White households living in single-family homes was greatest in Washington, Jefferson, Waukesha, and Milwaukee counties.

Approximately 15.8 percent of households in the Milwaukee Collaborative region lived in two- to four-unit structures in 2017. Black and Hispanic/Latino households lived in two- to four-unit structures far more frequently than other racial and ethnic groups, with 28.9 percent of Black households and 33.2 percent of Hispanic/Latino householders living in these buildings throughout the Collaborative area. Black and Asian households were most notably overrepresented within all structures that had more than five units.

EXHIBIT V-1.

RACE AND ETHNICITY OF HOUSEHOLDER BY UNITS IN STRUCTURE, MILWAUKEE COLLABORATIVE REGION (2017)

Units in Structure	Total	White	Black	Asian	Hispanic/Latino
1, detached	56.6%	62.6%	34.7%	45.4%	40.1%
1, attached	5.9%	5.5%	8.8%	6.1%	5.1%
2 to 4	15.8%	11.9%	28.9%	14.7%	33.2%
5 to 9	6.1%	5.4%	9.1%	7.6%	7.3%
10 to 19	3.8%	3.4%	4.9%	6.4%	4.5%
20 to 49	5.3%	5.0%	6.4%	10.4%	4.8%
50 or more	5.6%	5.4%	7.0%	9.2%	4.1%
Mobile home	0.7%	0.8%	0.2%	0.1%	1.1%

Source: 2013-2017 American Community Survey 5-Year Estimates (B25032A, B, D, I).

Renters and Homeowners by Race

In 2017, the ratio of renters to homeowners within the Milwaukee Collaborative region was in high contrast across households of different races and ethnicities. Approximately 72.2 percent of all African-American households lived in units they rented, compared to 39.4 percent of total households in the region. Hispanic and Asian households also rented at higher rates than average, with 61.8 percent of Hispanic households and 50.9 percent of Asian households renting. White households in the region rented at a rate of 31.6 percent, which was the lowest percentage of all races by far. The percentages of renter-occupied households for all races were relatively consistent throughout each of the five counties. (The data are available in the Appendix B.)

EXHIBIT V-2.

TENURE BY RACE AND ETHNICITY, MILWAUKEE COLLABORATIVE REGION: 2017

	All Households		White		Black		Asian		Hispanic/Latino	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Total	660,562		519,719		97,141		16,525		47,328	
Owner										
Occupied	400,263	60.6%	355,414	68.4%	26,996	27.8%	8,117	49.1%	18,074	38.2%
Renter										
Occupied	260,299	39.4%	164,305	31.6%	70,145	72.2%	8,408	50.9%	29,254	61.8%

Source: 2013-2017 American Community Survey 5-Year Estimates (B25003A,B,D,I).

Overcrowded Housing

Overcrowded housing in the Collaborative region occurs mainly in the city and county of Milwaukee and is more common for rental housing than for owner-occupied housing. The U.S. Census defines overcrowded housing as units that have more than one person per available room, excluding kitchens and bathrooms. In 2010, 4.6 percent of the city of Milwaukee's renter-occupied housing units and 3.8 percent of Milwaukee County's rental housing units were overcrowded. Overcrowding of rental units in both the city of Milwaukee and Milwaukee County decreased slightly by 2017 to 4.1 percent and 3.6 percent, respectively. Overcrowding in owner-occupied units was much lower for both the city and county of Milwaukee in 2017 at 2.2 percent for the city and 1.4 percent for the county.

Of the Collaborative members, West Allis has the next highest levels of overcrowded renter-occupied housing at 3.2 percent in 2010 and 2.2 percent in 2017. Ozaukee County has the lowest levels of overcrowded rental housing with only 0.4 percent of its units overcrowded in 2010 and 1.7 percent in 2017. For the total Collaborative region, 1.9 percent of the renter-occupied housing was overcrowded in 2010 and 3.3 percent was overcrowded in 2017. Less than one percent of the region's owner-occupied housing was overcrowded in both 2010 and 2017.

Exhibit V-3.
Overcrowded Housing Units: 2010 and 2017

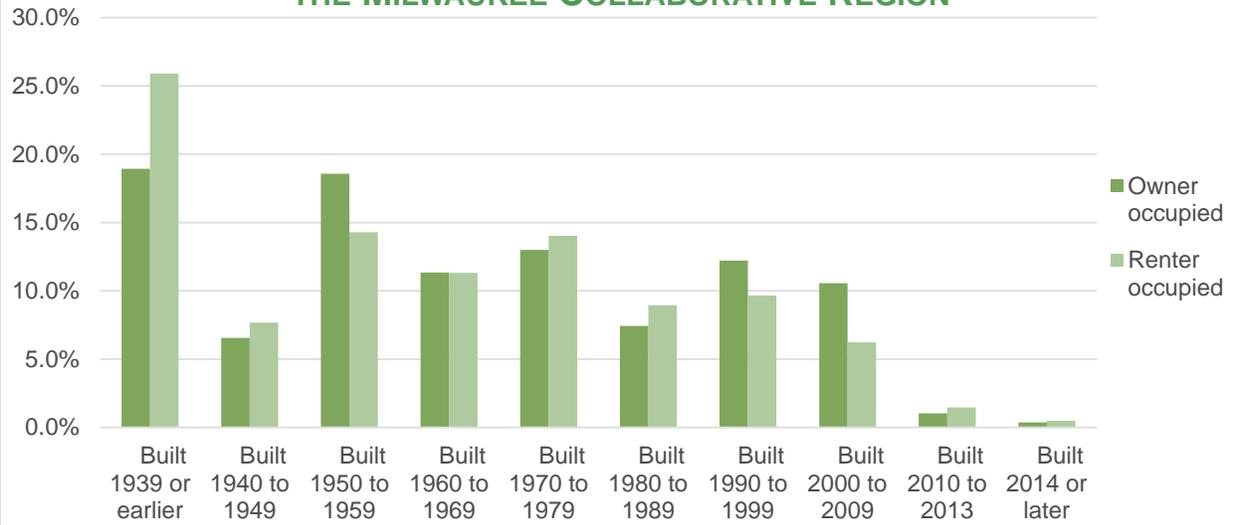
	Overcrowded Units as a Percent of Total Units			
	Owner-Occupied Units		Renter-Occupied Units	
	2010	2017	2010	2017
Jefferson County	0.8%	1.1%	2.7%	2.9%
Milwaukee County	1.4%	1.4%	3.8%	3.6%
Ozaukee County	0.5%	0.6%	0.4%	1.7%
Washington County	0.4%	0.5%	2.2%	2.0%
Waukesha County	0.3%	0.4%	2.1%	2.7%
Total Collaborative Region	0.9%	0.9%	1.9%	3.3%
City of Milwaukee	2.1%	2.2%	4.6%	4.1%
City of Wauwatosa	0.2%	0.3%	1.0%	1.9%
City of West Allis	0.9%	0.8%	3.2%	2.2%

Source: 2010 - 2017 American Community Survey 5-Year Estimates (B25014), Applied Real Estate Analysis.

Housing Stock Age

Milwaukee and Jefferson counties had the highest percentages of renter and owner occupied structures that were built before 1940 (about 30 percent of all buildings in Milwaukee and 24 percent of all buildings in Jefferson). Owner-occupied structures tended to be newer in Waukesha, Ozaukee, and Washington counties in comparison to renter occupied structures, which were on average slightly older. The oldest time period for building age recorded by the American Community Survey is “1939 or earlier”, and 25.9 percent of all renter occupied buildings in the Collaborative region were built in this time, compared to 18.9 percent of all owner-occupied structures. The disparity between owner-occupied and renter-occupied buildings was largest in the “1939 or earlier” period compared to the rest of the recorded time periods, which can be viewed in Exhibit V-3.

**EXHIBIT V-4.
TENURE BY YEAR STRUCTURE BUILT IN
THE MILWAUKEE COLLABORATIVE REGION**



Source: 2013-2017 American Community Survey 5-Year Estimates (B25036).

HOUSING AFFORDABILITY

Lack of affordable housing, especially near employment concentrations throughout the Collaborative area, can greatly limit housing choice. To understand available housing options, we examined housing affordability throughout the Milwaukee Collaborative region by household race and ethnicity. In particular, we examined the availability of housing that is not publicly subsidized, which is often called naturally occurring affordable housing.

Housing affordability is calculated using generally accepted cost burden principles by assuming that a household should not pay more than 30 percent of its income toward housing costs. We determined housing affordability by finding the maximum monthly housing payment (MMHP) for different races and ethnicities in the Milwaukee Collaborative region. The MMHP was calculated by determining 30 percent of the monthly median household income within each county.

In 2017, the MMHP for households earning the median income was lowest in Milwaukee and Jefferson counties within the Collaborative area. Black households were particularly vulnerable in both of these counties, as well as Hispanic households. Waukesha County experienced very low MMHP values for Black and Hispanic/Latino households compared to all households. Ozaukee County saw consistently high MMHP values for households of all races and ethnicities.

**EXHIBIT V-5.
HOUSING AFFORDABILITY (2017)**

	Milwaukee County*		Maximum Monthly Housing Payment (MMHP)		Waukesha County	
	Median Household Income (MHI)				MHI	MMHP
All Households	\$47,591			\$1,190	\$82,248	\$2,056
Race/Ethnicity of Household						
White	\$56,610			\$1,415	\$80,895	\$2,022
Black	\$28,526			\$713	\$46,113	\$1,153
Asian	\$54,506			\$1,363	\$129,050	\$3,226
Hispanic or Latino	\$36,399			\$910	\$58,143	\$1,454
			Jefferson County			
	Ozaukee County		Washington County			
	MHI	MMHP	MHI	MMHP	MHI	MMHP
All Households	\$82,869	\$2,072	\$56,675	\$1,417	\$75,453	\$1,886
Race/Ethnicity of Household						
White	\$80,008	\$2,000	\$59,844	\$1,496	\$73,343	\$1,834
Black	\$104,673	\$2,617	\$43,482	\$1,087	\$65,000	\$1,625
Asian	\$125,781	\$3,145	\$50,769	\$1,269	\$83,125	\$2,078
Hispanic or Latino	\$71,895	\$1,797	\$44,000	\$1,100	\$54,554	\$1,364

*Includes cities of Milwaukee, West Allis, and Wauwatosa.

Note: Maximum monthly housing payment based on 30 percent of monthly median household income.

Source: 2012-2017 U.S. Census American Community Survey 5-year estimates (B19013A, B,D,I).

Rental Affordability

The affordability of rental housing is important for all areas within the Milwaukee Collaborative region. The rent levels for different areas of the Milwaukee Collaborative region were examined in order to determine which counties had the highest percentages of residents paying high rents. The most readily available and consistent data on rental rates are provided by the U.S. Census. However, the Census does not provide the most accurate estimate of current market rents. This is because the survey asks current renters their rent, which is not reflective of the market. Rents for households who have lived in one place for extended periods of time — often with below-market rent increases — are not distinguished from households that recently moved. However, conducting a full market assessment is outside the scope of this study; therefore, U.S. Census data were used as a proxy for market rent.

Based on available data for 2017, of the five counties, rental units are most expensive in Waukesha, Ozaukee, and Milwaukee counties, and Waukesha County has notably higher rent levels than the rest of the counties. The most common rent price ranges for all rental units in the Collaborative region were between \$500 and \$749 per month (39 percent of all rental units) and \$749 and \$999 per month (27.5 percent).

Median income White and Asian households were able to afford the largest percentage of rental units in all counties except Ozaukee where median income African-American and Asian households were able to afford the largest percentage of available rental units. Median income Hispanic households are also generally able to afford a higher percentage of rental units than Black households in three of the five counties: Milwaukee, Waukesha, and Jefferson.

EXHIBIT V-6.

RENTAL HOUSING UNITS BY PRICE, MILWAUKEE COLLABORATIVE REGION: 2017

	Milwaukee County*		Waukesha County		Ozaukee County	
	Number	Percent	Number	Percent	Number	Percent
Total:	192,341		37,275		8,676	
With cash rent:	187,468	97.5%	36,318	97.4%	8,248	95.1%
Less than \$500	27,664	14.4%	2,756	7.4%	729	8.4%
\$500 to \$749	79,669	41.4%	8,928	24.0%	3,306	38.1%
\$749 to \$999	50,421	26.2%	13,187	35.4%	2,635	30.4%
\$1000 to \$1,249	15,785	8.2%	6,072	16.3%	855	9.9%
\$1,250 to \$1,499	7,074	3.7%	2,495	6.7%	292	3.4%
\$1,500 to \$1,999	4,454	2.3%	1,969	5.3%	244	2.8%
\$2,000 or more	2,401	1.2%	911	2.4%	187	2.2%
No cash rent	4,873	2.5%	957	2.6%	428	4.9%
			Washington County		Milwaukee Collaborative Region	
	Jefferson County	Percent	Number	Percent	Number	Percent
Total:	9,933		12,074		260,299	
With cash rent:	9,475	95.4%	11,467	95.0%	252,976	97.2%
Less than \$500	1,601	16.1%	1,151	9.5%	33,901	13.0%
\$500 to \$749	4,351	43.8%	5,140	42.6%	101,394	39.0%
\$749 to \$999	2,517	25.3%	2,759	22.9%	71,519	27.5%
\$1000 to \$1,249	762	7.7%	1,514	12.5%	24,988	9.6%
\$1,250 to \$1,499	179	1.8%	408	3.4%	10,448	4.0%
\$1,500 to \$1,999	16	0.2%	259	2.1%	6,942	2.7%
\$2,000 or more	49	0.5%	236	2.0%	3,784	1.5%
No cash rent	458	4.6%	607	5.0%	7,323	2.8%

*Includes Milwaukee, Wauwatosa, and West Allis cities.

Source: 2013-2017 American Community Survey 5-Year Estimates (B25056).

Comparing median rents and median renter incomes, the least affordable location in the Collaborative area is in the City of Milwaukee. The greatest difference between the median rent and what renters with the median household income can afford is \$136 in the City of Milwaukee. The maximum affordable rent assumes that renters will spend no more than 30 percent of their income for housing. The gap (\$97) between the median affordable rent and the median gross is slightly smaller for the Milwaukee County overall. A small gap (\$8) also exists for renters in Jefferson County. In the other cities and counties in the Collaborative, median renter household incomes are sufficient to afford the median rents in each of these locations.

Given that median rent in the city of Milwaukee is lower than those in other locations in the Collaborative region, the city's problem is not high rents but the low incomes of numerous renter households. Although the City of Wauwatosa has the highest median rent, it also has the highest median household income for renters, and consequently the median income renter household is able to afford \$124 more than that city's median gross rent.

Exhibit V-7.
Gross Rent Affordability 2017

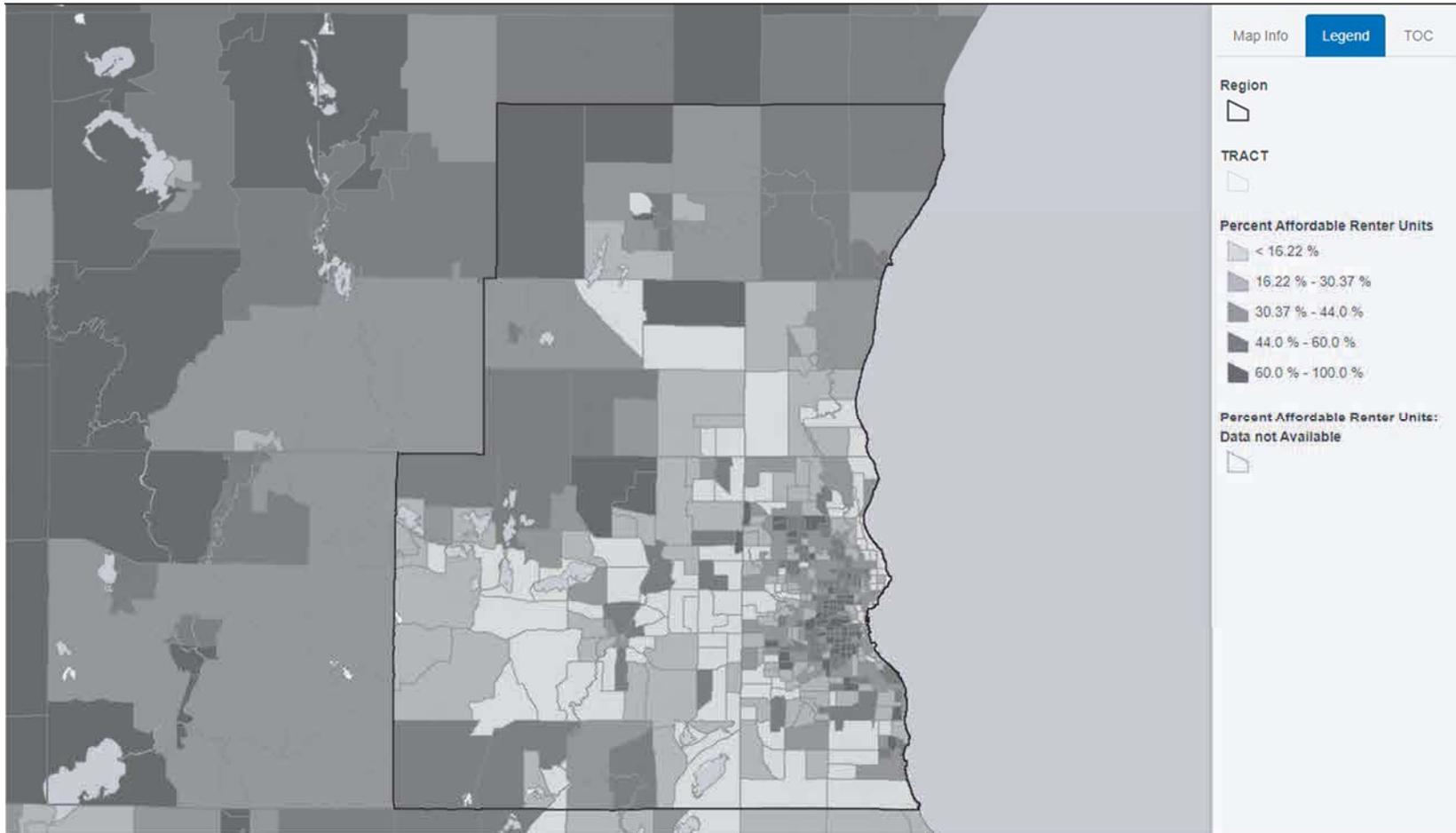
	Renter Median Household Income	Median Gross Rent	Maximum Affordable Rent**	Median Rent to Income Gap
City of Milwaukee	\$27,423	\$822	\$686	-\$136
City of Wauwatosa	\$45,047	\$1,002	\$1,126	\$124
City of West Allis	\$31,748	\$794	\$794	\$0
Jefferson County	\$34,931	\$881	\$873	-\$8
Milwaukee County*	\$30,576	\$861	\$764	-\$97
Ozaukee County	\$41,138	\$939	\$1,028	\$89
Washington County	\$42,347	\$890	\$1,059	\$169
Waukesha County	\$43,403	\$1,029	\$1,085	\$56

*Including Milwaukee, Wauwatosa, and West Allis cities.

**Maximum affordable rent is the median affordable rent based on 30 percent of the median household income for renters.

Source: 2013-2017 American Community Survey 5-Year Estimates (S2503 and DP04), and Applied Real Estate Analysis, Inc.

EXHIBIT V-8. LOCATION OF AFFORDABLE RENTAL HOUSING: PERCENTAGE OF RENTAL UNITS AFFORDABLE TO 50 PERCENT AMI IN THE MILWAUKEE COLLABORATIVE REGION



Note: The "Region" boundary set by HUD only covers Milwaukee, Waukesha, Washington, and Ozaukee counties, and is not the same as the "Collaborative Region" defined by this study.

Source: HUD Affirmatively Furthering Fair Housing mapping tool.

Exhibit V-8 displays data from HUD's Affirmatively Furthering Fair Housing (AFFH) Data and Mapping Tool, which shows the percentage of rental units in each census tract within the Milwaukee Collaborative region that are affordable to residents earning 50 percent of the AMI. HUD defines affordable as units renting at or less than 30 percent of household income. The map shows that many areas in both Waukesha and Milwaukee counties contain less than 30.37 percent of rental units that are considered affordable. Southern and northeastern Milwaukee County, central Waukesha County, and the southern portions of Washington and Ozaukee counties have no more than 44 percent of affordable rental units according to the data provided by HUD. In contrast, all census tracts in Jefferson County have over 30.37 percent of rental units that are affordable to a household earning 50 percent of the AMI.

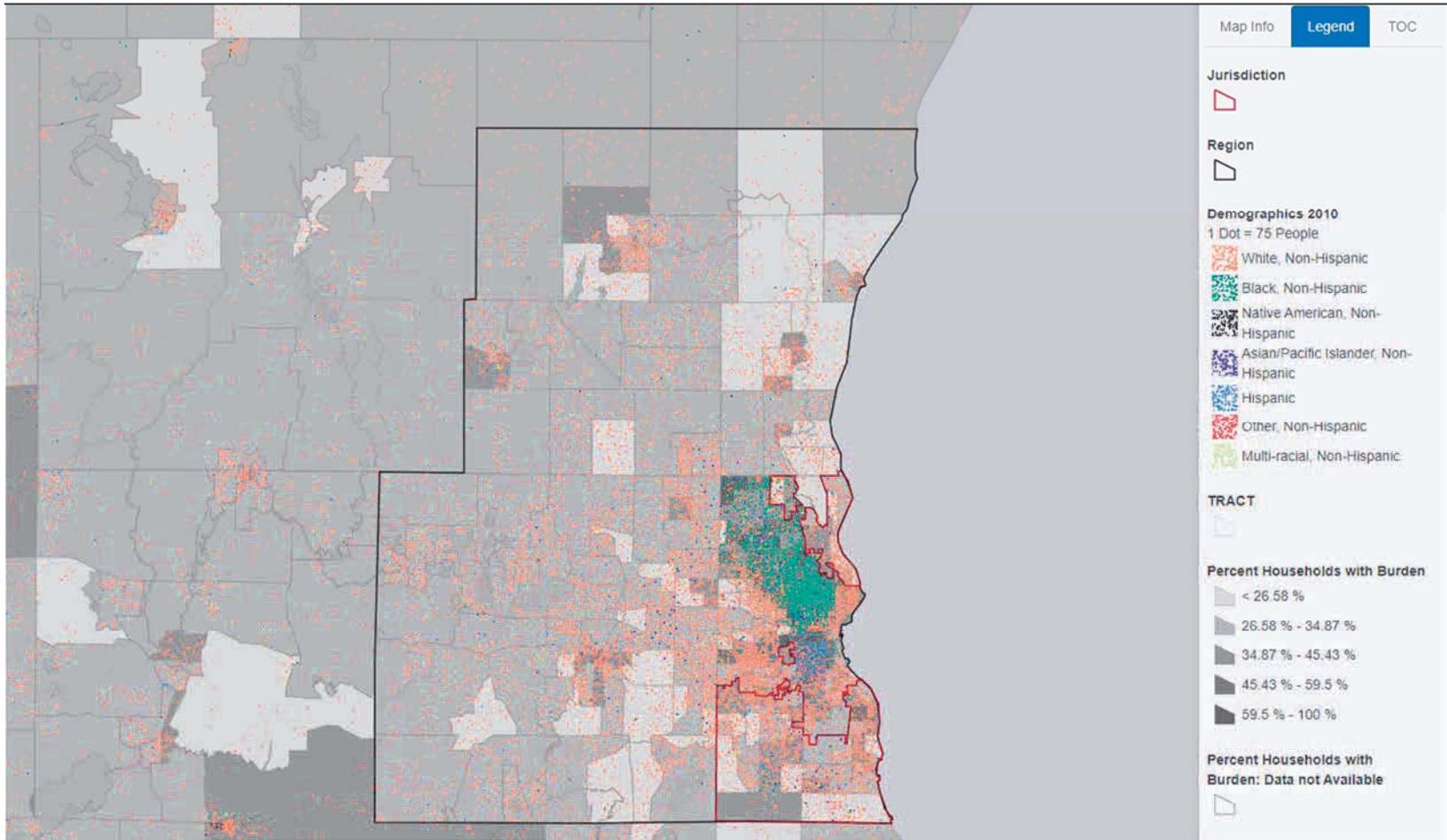
Housing Cost Burden

Housing burden refers to the impact of housing-related expenses on household income. HUD AFFH Data Mapping Tool measures the percent of households with housing burden by census tract, and a household is determined to be burdened if it meets any of the following four criteria:

- Housing cost burden is greater than 30 percent of household income.
- Severe housing costs equals burdens greater than 50 percent of household income.
- Overcrowding where households have more than 1.01 to 1.5 person per room, and over 1.51 for severe overcrowding, not including living rooms, bathrooms, or dining areas.
- Substandard housing, which includes housing occupied by households without piped hot and cold water, a flush toilet, and a bathtub or shower, and households without adequate kitchen facilities and that lack a piped sink, range or stove, or a refrigerator.

Exhibit V-9 displays the percentages of households with housing burdens in each Census tract, alongside the racial and ethnic demographics of the Milwaukee Collaborative region. The data provided by HUD shows that areas in Milwaukee County have a high percentage of cost burdened households, especially census tracts in the city of Milwaukee with high populations of African-American and Hispanic residents. Ozaukee County appears to have the lowest percentages of burdened households based on the census tract data, in comparison to Waukesha, Washington, and Jefferson counties. Milwaukee County is the only county in the region to contain multiple census tracts where over 59.5 percent of households are burdened. The most densely occupied areas in the region appear to be higher in percentage of households burdened in most cases.

EXHIBIT V-9. HOUSING BURDEN BY RACIAL AND ETHNIC DEMOGRAPHICS IN THE MILWAUKEE COLLABORATIVE REGION



Note: The "Region" boundary set by HUD only covers Milwaukee, Waukesha, Washington, and Ozaukee counties, and is not the same as the "Collaborative Region" defined by this study.

Source: HUD Affirmatively Furthering Fair Housing mapping tool.

PROPERTY TAXES

The highest average property tax rate in the Milwaukee Collaborative region was seen in Milwaukee County, at 2.58 percent in 2018. The lowest median home value in the region was also found in Milwaukee County, which means that the median property tax payment was not as high as other counties with higher home values. The median property tax payment in 2018 was highest in Waukesha County in comparison to the rest of the Collaborative region, with Ozaukee County close behind. Homeowners in Waukesha and Ozaukee counties were taxed at about 1.54 and 1.56 percent on average for their properties, which were the lowest two average property rates in the region. Washington County homeowners also paid a comparatively lower property tax rate on average at 1.61 percent. The state of Wisconsin had an average property tax rate of 1.94 percent in 2018, which was the fifth highest percentage for a state in the country.

Exhibit V-10.

Property Taxes in the Milwaukee Collaborative Region: 2018

	Average Effective Property Tax Rate	Median Annual Property Tax Payment	Median Home Value	Number of Single Family Homes
Jefferson County	1.94%	\$3,439	\$177,500	32,739
Milwaukee County*	2.58%	\$3,879	\$150,300	382,027
Ozaukee County	1.54%	\$4,044	\$262,100	35,044
Washington County	1.61%	\$3,532	\$219,600	53,756
Waukesha County	1.56%	\$4,102	\$262,700	156,996

*Includes Milwaukee, Wauwatosa, and West Allis cities
Source: 2018 American Community Survey 5-Year Estimates.

PUBLICLY SUBSIDIZED HOUSING

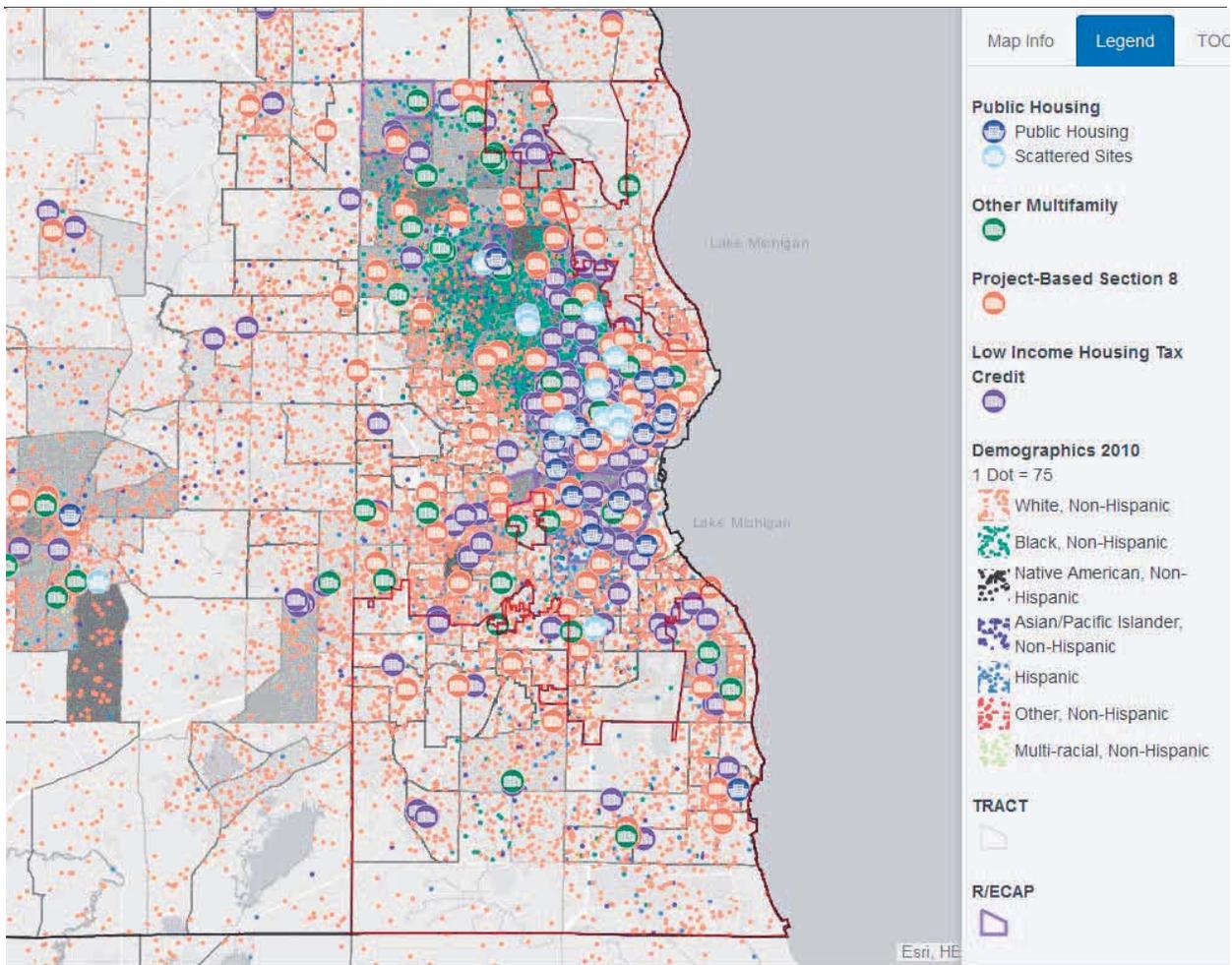
Public Housing

The supply of public housing is essential for low-income households throughout the county, especially in areas with high housing costs. The state of public housing of the Milwaukee Collaborative region was analyzed through data acquired from HUD.

The largest housing authority in Milwaukee County is the Housing Authority of the city of Milwaukee (HACM), and other housing agencies in the county include the South Milwaukee Housing Authority, the Milwaukee County Housing Authority, and the West Allis Housing Authority. The HAMC runs a public housing program in addition to a Section

8 voucher program, and the South Milwaukee Housing Authority only administers a program for public housing, whereas the remaining two housing authorities in the county only operate voucher programs. According to data compiled by HUD in 2019, 2,682 public housing units were available in Milwaukee County, 91 percent of which were occupied. 9,322 units were available for households with housing choice vouchers (HCVs). On average, households that occupied public housing units in Milwaukee County earned \$15,413 per year in 2019. In the same year, 77 percent of households in the county living in public housing units were classified as extremely low-income households, and 89 percent of were minority households.

EXHIBIT V-11. PUBLICLY SUPPORTED HOUSING BY RACE AND ETHNICITY IN THE MILWAUKEE COUNTY



Source: HUD AFFH Mapping Tool.

The Waukesha County Housing Authority runs a public housing program and a voucher program for both the city and county of Waukesha and the city of New Berlin. In 2019, 263 public housing units were available throughout the county, 90 percent of which were occupied, and 1,326 units available through the use of HCVs. Households living in public housing units in Waukesha County earned an average of \$19,690 per year in 2019, and 69 percent of all households in public housing units were considered extremely low-income households. Additionally, 48 percent of all households using public housing in the county were minority households.

Washington County has no direct housing authority that covers the entire county, but three towns within the county have their own housing authorities. The three towns include West Bend and Slinger, and the housing authorities for each town only offers HCV programs. In 2019, 470 units were available through HCV programs in Washington County. Households that used HCVs in the county earned an average of \$14,632 in 2019. An estimated 75 percent of these households were extremely low-income households, and 16 percent were minority households.

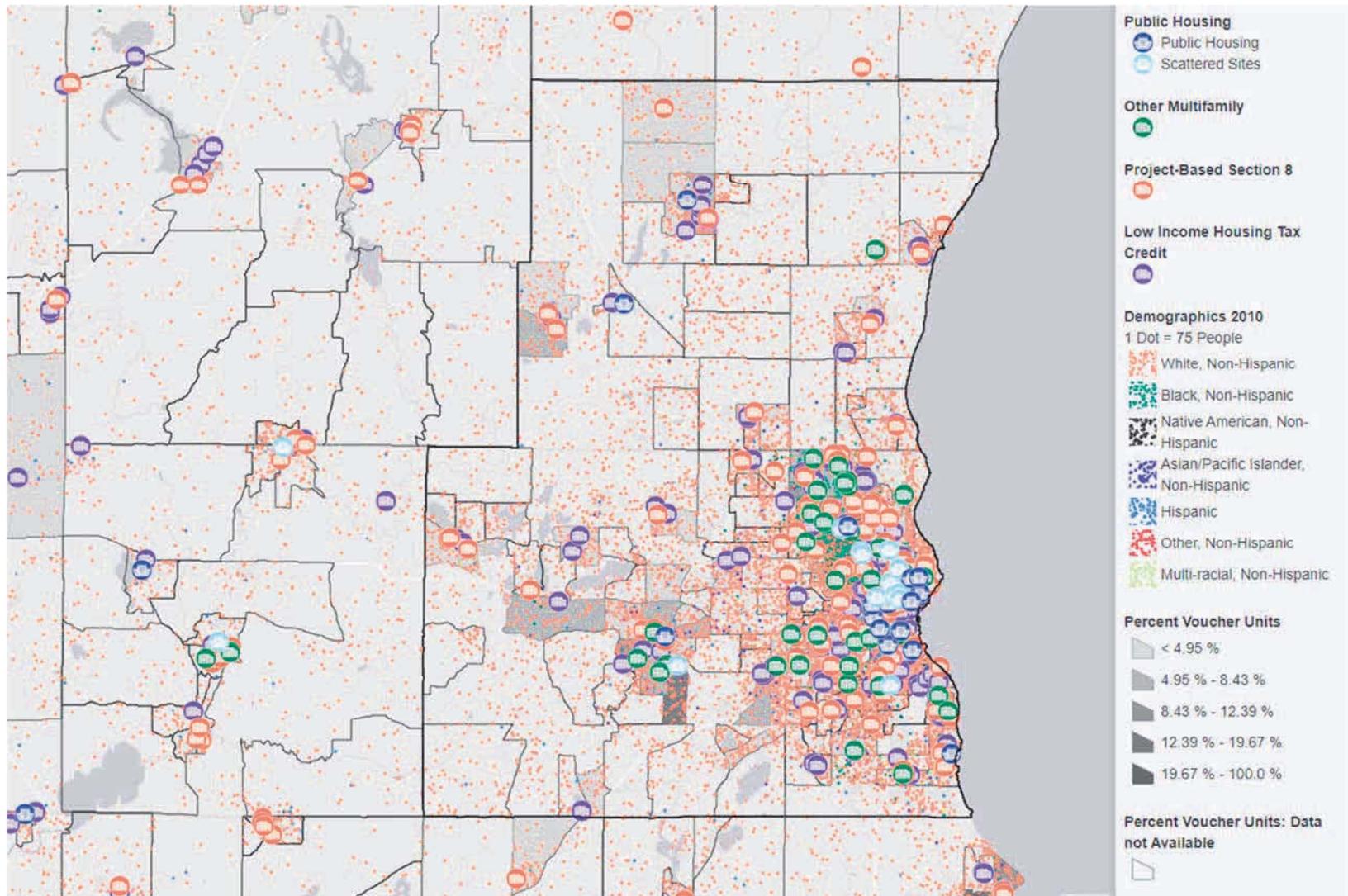
Ozaukee County has no public housing units available or any dedicated housing authorities specific to its geography. In 2019, 108 HCV units were available through voucher programs in the county. On average, households receiving assistance through HCVs in Ozaukee County received \$14,226 in 2019. In the same year, roughly 76 percent of all households using housing vouchers were extremely low-income households, and 9 percent of households were minority households.

Residents of Jefferson County are served by the Jefferson County Housing Authority. Jefferson County had 62 public housing units available in 2019. Approximately 50 percent of all households in public housing units were extremely low-income households, and 4 percent of all households in public housing were minority households.

Other Publicly Subsidized Housing

In addition to public housing and HCVs used to lease market-rate housing, numerous project-based housing programs offer affordable housing in the Collaborative area. The Low-Income Housing Tax Credits (LIHTC) program offers a federal government tax credit that subsidizes the acquisition, construction, and rehabilitation of affordable rental housing for low- and moderate-income tenants. Project based Section 8 properties are government funded and provide rental housing to low income households; these properties are typically privately owned. Public housing and scattered-site properties are publicly owned government-sponsored dwellings for low income households.

EXHIBIT V-12. PUBLICLY SUPPORTED HOUSING BY RACE AND ETHNICITY IN THE MILWAUKEE COLLABORATIVE REGION



Source: HUD AFFH Mapping Tool.

Publicly supported housing in the Milwaukee Collaborative Region is disproportionately clustered in Milwaukee County. According to the City of Milwaukee's 2019 Housing Affordability Report, the city had 239 properties containing 18,357 units that were subsidized through Project Based Section 8, LIHTC, and public housing programs.¹ Very few publicly supported housing developments are found in Ozaukee County and Washington County compared to the rest of the region. In Waukesha and Jefferson counties, the publicly subsidized housing is mostly confined to areas that are highest in population density.

Subsidized Housing for Persons with a Disability

Persons with a disability on average earn much less than persons without a disability, which makes ensuring that they have access to subsidized housing an important issue. The national statistics on public housing from HUD indicate that 32 percent of non-seniors who occupy public housing units were persons with a disability, and 36 percent of non-senior HCV users were persons with a disability in 2019. Areas in the Milwaukee Collaborative region were above the national rate of having persons with disabilities occupying public housing and HCV units. "Non-senior residents" includes anyone aged 61 or less.

Milwaukee County had the lowest percentages of non-senior persons with disabilities occupying public housing units in the region at 45 percent. The two other counties that offer public housing units were Jefferson and Waukesha, and non-seniors occupied the units at rates of 51 and 64 percent respectively. The lowest rate of non-seniors occupying HCV units was also seen in Milwaukee County, at 37 percent of all non-seniors in HCV units. The remaining counties were each over 50 percent, with Waukesha and Ozaukee counties both over 60 percent.

Workforce Housing

Workforce housing is defined as the supply of housing in a community that meets the needs of the workforce in that community.² SEWRPC's Regional Housing Plan from 2013 states that certain areas in the Milwaukee Collaborative regions, including parts of Ozaukee and Waukesha counties in particular, had a high need for subsidized workforce housing.³ Since then, a study by the Wisconsin Realtor's Association (WRA) in 2019 shows that many areas in the Milwaukee Collaborative region still have issues promoting an affordable housing supply for their local workforce. The report identifies three main causes of issues with workforce housing: not enough houses being built in the region to keep up with population growth, rising construction prices, and restrictive land use regulations that increase the price of housing.

The WRA study uses American Community Survey statistics from 2006 and 2017 on the growth of total households versus the growth in total housing units by county to determine which counties have the biggest shortages in housing production. The results show that Waukesha had the largest housing underproduction level in the Milwaukee Collaborative region, because difference in total households and total housing units added between 2006 and 2017 was 2,213. Jefferson

¹2019 City of Milwaukee Housing Affordability Report, <https://storymaps.arcgis.com/stories/afab7f8efdfa402690360bb8cf510c05>

² "Falling Behind," Wisconsin Realtor's Association, September 2019.

³ "A Regional Housing Plan for Southeastern Wisconsin: 2035," Southeastern Wisconsin Regional Planning Commission, March 2013.

and Ozaukee counties also produced more households than housing units between 2006 and 2017, with Jefferson County's household growth exceeding its housing unit growth by 1,228, and Ozaukee County's difference in growth at 827. Milwaukee and Washington counties produced more housing units than households over the examined time period.

LAND USE, ZONING, AND OTHER REGULATIONS

Zoning and land use regulations affect fair housing issues through the ranges of permitted housing types and densities specified by local governments. The percentage of owner- versus renter-occupied housing units in communities is affected by the type of structures allowed by each community's zoning ordinance, including single-family, two-units, and multiunit structures. Because rental units are usually more affordable by low- and moderate-income households, and because these units tend to be located in multiunit structures, areas that are zoned primarily for single-family structures often have less affordable housing options. Given the number of municipalities within the Milwaukee Collaborative region, a general overview of residential zoning ordinances is shown in the following exhibit.

The negative impacts of restrictive land use regulations on affordable housing development have been extensively documented. For example, in the report on "America's Rental Housing 2020," the Joint Center for Housing Studies at Harvard University states, "The rising costs of construction, land, and labor, along with restrictive land use regulations, impede production of both subsidized and market-rate rental housing."⁴ Similarly, a 2018 joint study by the National Association of Home Builders and the National Multifamily Housing Council concluded that regulation imposed by all levels of government, including local, state, and federal agencies, accounts for 32.1 percent of the cost of an average multifamily development.⁵ Even more directly relevant for fair housing, Jessica Trounstein, in her analysis, "The Geography of Inequity: How Land Use Regulation Produces Segregation," concludes that stringent land use regulations are supported by whiter communities and that they preserve racial homogeneity.⁶

In the past, extensive analysis has been conducted of the impacts of land use regulations in most counties in the Collaborative area. The Southeastern Wisconsin Regional Planning Commission (SEWRPC) is the planning agency for four of the five counties in the Milwaukee Collaborative region (all but Jefferson County). SEWRPC released a report in 2013 titled *A Regional Housing Plan for Southeastern Wisconsin 2035*,⁷ which provides details about the specific zoning regulations and their impacts for all areas within Milwaukee, Ozaukee, Washington, and Waukesha counties. The Regional Plan determines that fair housing choice can be impeded by

⁴ Joint Center for Housing and Urban Studies of Harvard University, "America's Rental Housing 2020," https://www.jchs.harvard.edu/sites/default/files/Harvard_JCHS_Americas_Rental_Housing_2020.pdf

⁵ Dr. Paul Emrath, and Caitlin Walter, National Association of Home Builders and National Multifamily Housing Council, "Multifamily Cost of Regulation: 2018 Special Study," <https://www.nmhc.org/contentassets/60365effa073432a8a168619e0f30895/nmhc-nahb-cost-of-regulations.pdf>

⁶ Jessica Trounstein, University of California, Merced, "The Geography of Inequality: How Land Use Regulation Produces Segregation," *American Political Science Review*, February 3, 2020.

⁷ "A Regional Housing Plan for Southeastern Wisconsin: 2035," Southeastern Wisconsin Regional Planning Commission, March 2013.

restrictive forms of land use lower the viability of multifamily housing, or regulations that require large lot sizes and low-density neighborhoods. The 2013 SEWRPC report concluded that households with incomes between 50 and 80 percent of the region's median income would be able to afford multifamily housing built at a density of at least 10 units per acre, with two-bedroom unit sizes of 800 square feet or smaller. The Regional Plan classified existing high density districts in 2013 as those that allowed a minimum area per dwelling unit less than 6,000 square feet, medium density districts as areas that had a minimum area between 6,000 and 19,999 square feet, and low density districts as areas between 20,000 square feet and 1.49 acres.

In the 2013 Regional Housing Plan for 2035, SEWRPC states that in order to incentivize the development of affordable single-family housing, local governments should require smaller lot and home sizes. Specifically, SEWRPC recommends minimum lot sizes of 10,000 square feet or smaller, and home sizes less than 1,200 square feet.

SEWRPC also provides recommendations for affordable multifamily housing. It states that every community should designate an area that allows for higher density multifamily residential development by requiring 7.3 or more housing units per acre for multifamily districts (or 6,000 square feet per housing unit). SEWRPC notes that 7.3 housing units per acre may not be enough to ensure affordability to all residents, and it also recommends that at least one district should have a density requirement of at least 10 units per acre, with a two-bedroom unit size requirement of 800 square feet or less.

SEWRPC also recommends that local zoning controls include planned unit developments (PUDs), traditional neighborhood developments (TNDs), and density bonuses for affordable housing as additional strategies for local governments to promote the development of affordable single-family and multifamily housing. Zoning regulations can also be restrictive to certain types of households by limiting single-family structures to a "family," which is defined in different ways throughout the region. A "family" often is limited to a certain number of unrelated individuals, which puts a restriction on group homes in specific residential districts.

In reviewing available information on current zoning regulations for members of the Collaborative, we found that while Waukesha County and the city of Wauwatosa made updates to their zoning codes that were in line with SEWRPC's recommendations, many other areas had not significantly changed their codes since the 2013 SEWRPC report. Areas that with zoning regulations that have not changed substantially since 2013 and also do not follow SEWRPC's recommendations include many of the cities and towns in Washington and Ozaukee counties. The zoning regulations of the cities of Milwaukee and West Allis, and Jefferson County had not changed since the SEWRPC report was published, but they already had zoning codes that promoted many of SEWRPC's recommended values for minimum lot sizes and minimum floor areas.

EXHIBIT V-13.
ZONING SUMMARY

	Single-Family Zoning District		Multi-Family Zoning District		Has Zoning District for Multifamily	Conditional Use Permit for Multi-Family Development
	Smallest Minimum Lot Size (square feet)	Minimum Home Size (square feet)	Maximum Density (units per acre)	Minimum Unit Size (square feet)		
City of Milwaukee	3,600	900	N/A	150	Y	Y
City of West Allis	4,800	N/A	N/A	400	Y	Y
City of Wauwatosa	6,000	N/A	N/A	N/A	Y	Y
Waukesha County	20,000	1,100	N/A	N/A	N	Y
Jefferson County	8,000	850	10	650	N	Y
Ozaukee County*	7,200	1,000	7.26	900	N	Y
Washington County**	12,000	800	10.9	650	Y	Y

*Ozaukee County does not have its own zoning regulations, so for the purpose of this study zoning codes for the city of Mequon and town of Fredonia were analyzed.

**Washington County does not have its own zoning regulations, so for the purpose of this study zoning codes for the towns of Addison, Barton, Erin, Farmington, Hartford, Kewaskum, Polk, Trenton, Wayne, and the village of Kewaskum were analyzed.

Values marked as N/A were not provided by the zoning codes for the given jurisdiction.
Source: Official zoning codes for each jurisdiction.

Milwaukee County

Milwaukee County does not have its own zoning regulations, however the zoning codes of the three largest cities in the county are presented below.

City of Milwaukee

Residential zoning in the city of Milwaukee includes six single-family districts, four two-family districts, and seven multifamily districts. Permitted housing types, minimum lot area and land area per dwelling and floor area ratio are summarized below.

- Single-family residential district RS1 has a minimum lot area of 20,000 square feet; RS2 has a minimum lot area of 12,000 square feet; RS3 has a minimum lot area of 9,000 square feet; RS4 has a minimum lot area of 7,200 square feet; RS5 has a minimum lot area of 6,000 square feet; and RS6 has a minimum lot area of 3,600 square feet. The ranges of minimum floor areas for RS1-5 are between 900 and 1,500 square feet in one-story structures, and 1,200 and 1,900 for multi-story structures. RS6 has no minimum floor area.
- Two-family districts are RT1, RT2, RT3, and RT4. District RT1 has a minimum lot area of 7,200 square feet; RT2 has a minimum lot area of 4,800 square feet; RT3 has a minimum lot area of 3,000 square feet; and RT4 has a minimum lot area of 2,400 square feet.
- The seven multifamily districts have minimum lot sizes between 2,400 and 3,600 square feet, with minimum lot area per dwelling units between 150 and 2,400 square feet. Only three of the seven districts have minimum unit sizes lower than 800 square feet.

The city of Milwaukee does not specify how many unrelated individuals can be considered as a “family members” in its zoning code.

Milwaukee’s current zoning regulations have not changed significantly since SEWRPC analyzed them in 2013, as all of the minimum floor area and minimum lot sizes for the districts remain the same. Milwaukee has some of the lowest values for minimum lot sizes and minimum floor area in the region. Many of the city of Milwaukee’s single-family residential districts have minimum lot sizes of less than 10,000 square feet, and also have minimum floor areas less than 1,200 square feet, which are the values that SEWRPC recommends for affordable single-family housing. Three of the seven multifamily districts in the city allow for two-bedroom dwelling units with minimum floor areas of under 800 square feet, as well as requiring low minimum lot areas. This fulfills SEWRPC’s recommendation of having at least one multifamily district that promotes high density residential development.

City of West Allis

Residential zoning in West Allis includes five single-family districts (one of which is an estate district), two two-family districts, and two multifamily districts. The following summarizes the city’s

zoning regulations for permitted housing types, minimum lot area and land area per dwelling, and floor area ratio.

- The Residence Estate (RE) District permits single-family homes on larger lots, with a minimum lot area per dwelling set as 15,000 square feet.
- The four other single-family districts (RA) have minimum lot sizes of 10,000, 7,200, 5,000, and 4,800 square feet.
- The minimum lot sizes of the two-family home districts (RB) are 2,500 and 3,600 square feet.
- The two multifamily districts (RC) have minimum units sizes of 800 and 2,000 square feet for two-bedroom units, 600 and 1,500 square feet for one-bedroom units, and 400 square feet for studio units. The higher density district (RC-2) contains all the lower minimum unit size values and studio units.
- A “family” includes groups of no more than five persons unrelated by blood or marriage in West Allis.

The zoning regulations of West Allis have not changed significantly since they were analyzed by SEWRPC. The minimum lot sizes remain the same, and there are no required minimum floor areas in any districts. However, the zoning regulations in place in West Allis are very much in line with SEWRPC’s recommendations. Most single-family residential districts in the city have lot size requirements below 10,000 square feet, and one of the two multifamily districts promotes high density by requiring low minimum unit sizes.

City of Wauwatosa

Residential zoning in Wauwatosa includes three single-unit districts (one of which is an estate district), one two-unit district, and two multi-unit districts (one four family and another eight family). Permitted housing types, minimum lot area and land area per dwelling are summarized below.

- The estate district has a minimum lot area of 15,000 square feet, while the other two single-unit districts have minimum lot sizes of 9,000 and 6,000 square feet.
- Two-unit residential district R2 has a minimum lot area of 7,200 square feet for two-unit dwellings and 6,000 square feet for single-unit dwellings.
- Multi-unit residential districts R4 and R8 have a minimum lot area of 7,200 square feet for two-unit dwellings, 6,000 square feet for single-unit dwellings, and 1,600 for multi-unit buildings.
- The city of Wauwatosa’s zoning code does not include a definition for a “family.”

Since the 2013 SEWRPC report recommendations were issued, Wauwatosa has renamed their districts, but the minimum lot sizes remain the same. Wauwatosa's zoning regulations for single-family districts (aside from the estate district) require lower minimum lot sizes than the 10,000 square feet recommendation set by SEWRPC, similar to the requirements of Milwaukee and West Allis. There are no specified minimum floor areas for dwelling units in the multifamily districts, but the minimum lot area values are lower than 10,000 square feet for all types of developments in these districts.

Waukesha County

Waukesha County contains three residential districts, which are not specified as single-family or multifamily.

- District R-1 has a minimum lot size of 1 acre and a minimum floor area of 1,100 square feet.
- District R-2 has a minimum lot size of 30,000 square feet and a minimum floor area of 1,100 square feet.
- District R-3 has a minimum lot size of 20,000 square feet and a minimum floor area of 1,100 square feet.
- Waukesha County defines a family as a body of persons that live in a single dwelling unit, with no designated limit on the number of unrelated individuals.

The minimum lot sizes in place today remain the same as those reported in the 2013 SEWRPC report, but the minimum floor areas have been lowered from 1,300 to 1,100 in District R-1 and from 1,200 to 1,100 in District R-2. These changes are in line with SEWRPC's recommendation for having minimum floor areas below 1,200 square feet for single-family units. However, the minimum lot sizes in each district ranging from 20,000 square feet to one acre are much higher than the recommended value of 10,000 square feet.

Washington County

Washington County has no official zoning districts listed, but the zoning codes are available for several towns within the county. The towns with listed zoning regulations for residential districts within Washington County include Addison, Barton, Erin, Farmington, Hartford, Kewaskum, Polk, Trenton, and Wayne, and additionally the village of Kewaskum has a zoning ordinance as well. An overview of the zoning regulations for each area are included in the Appendix.

- All of the towns with listed residential zoning districts fail to require minimum lot sizes of less than 10,000 square feet, as recommended by SEWRPC to ensure affordable housing in the region. The village of Kewaskum does have residential districts with minimum lot sizes less than 10,000 square feet. Many of the towns have at least one residential district with a minimum floor area requirement of less than or equal to 1,200 square feet.
- About half of the towns have at least one multifamily district, and those that do consistently meet the density and floor area recommendations that are specified by SEWRPC.

- Information on the number of unrelated individuals that can be considered as a family is not provided in the compilation of Washington County town zoning codes.

Ozaukee County

Ozaukee County does not have its own zoning regulations, but information from the city of Mequon (the largest city in the county) and the town of Fredonia (a randomly selected township) are included in order to provide some context for zoning regulations in the Ozaukee County area.

The residential zoning districts of the city of Mequon include:

- Three single-family residential districts that are labelled as “rural” (R-1, R-1B, and R-2), and the ranges minimum lot sizes of all three are between two acres and 5 acres. The ranges of minimum floor area for the rural districts are between 1,600 and 1,800 square feet.
- Four single-family residential districts are characterized as “suburban” (R-2B, R-3, R-4, and R-5), and their ranges in minimum lot sizes are between 0.5 and 1.5 acres. The ranges of minimum floor area for the suburban single-family districts are between 1,400 and 1,800 square feet.
- R-6; a two-family suburban residential attached district, with a one-acre minimum lot size, a minimum unit size of 1,000 square feet, and a maximum allowed density of 4 units per acre.
- RM; a multiple-family residential detached district that is also referred to as “low density” in the zoning code. The minimum lot size is 6,000 square feet, the minimum floor area is 900 square feet, and the maximum allowed density is 7.26 units per acre.

Compared to SEWRPC’s recommended minimum lot size and floor area values, Mequon has much higher minimum lot sizes and higher minimum floor areas than 10,000 square feet and 1,200 square feet in all single-family districts. The two multifamily districts also have higher minimum floor areas for dwelling units, but the RM zoning category is very close to the recommended maximum density of 7.3 units per acre. The values for minimum lot size and floor area have not changed since SEWRPC’s 2013 report.

The residential zoning districts of the town of Fredonia include:

- District R-1 is a single-family district that restricts structures to 0.33 dwelling units per net acre, and sets a minimum lot size of 3 acres.
- District R-2 is a single-family district that restricts structures to one dwelling unit per acre, and has a minimum lot size restriction of one acre.
- District R-3 restricts development to 2.18 dwelling units per net acre, and has a minimum lot area of 20,000 square feet.
- District R-4 restricts development to 6.05 dwelling units per net acre, with a minimum lot size of 7,200 square feet.

The town of Fredonia requires much higher minimum lot sizes than SEWRPC recommends in all districts except for R-4. Even in R-4, the density is restricted to about 6 dwelling units per acre,

which is lower than SEWRPC's recommendation of 7.3 units per acre. The density and lot size requirements have not changed since 2013.

Jefferson County

Jefferson County has two designated zoning districts: R-1 for sewered areas, and R-2 for unsewered areas. Both are intended for single-family homes but allow conditional uses for things such as mobile homes, duplexes, rest homes, day-care centers, and group homes.

- R-1 and R-2 feature minimum lot areas of 8,000 square feet.
- Multiple dwelling unit structures are conditionally permitted in both districts, with overall density not exceeding 10 units per acre in R-1 and 5 units per acre in R-2.
- Jefferson County allows no more than three unrelated individuals to be considered as a family.

Compared to SEWRPC's recommendations, Jefferson County has low minimum lot area values at 8,000 square feet compared to the recommended 10,000 square feet. Jefferson County sets a limit on density at 10 units per acre in R-1 and 5 units per acre in R-2, while SEWRPC recommends a minimum density of 7.3 in at least one district.

WISCONSIN HOUSING AFFORDABILITY REPORT

In 2018 the Wisconsin Legislature enacted legislation that required cities and villages with populations of 10,000 people or more to prepare two housing reports by January 1, 2020. The required reports are a housing affordability report and a new housing fee report. The law requires a preparation and adoption of a housing element that includes goals, objectives, policies, programs, and maps indicating local efforts to address existing and forecasted housing demand for all income levels, age groups, and needs. The law also requires that jurisdictions report on development activity and analyze the impact of their residential development requirements on the cost of developing new housing, including land use controls, site improvements, fees and land dedication requirements, and permit procedures.

The three cities that are members of the Collaborative each prepared a housing affordability report as required by the State. Key findings from these reports related to land use and other regulations are shown below.

City of Milwaukee

In its December 2019 Housing Affordability Report, the City of Milwaukee concluded that the City does not have lengthy approval processes for projects that require a zoning change or variance and does not charge development impact fees. Key issues on which the City plans to focus on to ensure affordable housing development include:

- Ongoing redrafting of the City’s subdivision ordinance to allow additional housing projects to create lots using the less costly and faster Certified Survey Map instead of creating subdivision plats.
- Research on regulations for accessory dwelling units and other small multifamily housing options that might generate affordable housing.⁸

City of Wauwatosa

The City of Wauwatosa completed a Housing Affordability Report in September 2019, which was prepared by Vandewalle & Associates, Inc. Key actions that the City planned to undertake to ensure affordable housing development in the city included the following:

- Reduce development time and costs:
 - Reduce parking requirements and/or allow shared parking for multifamily housing developments.
 - Reduce development time by allowing online applications for submission of development plans, documents, and fees for many housing development projects.
 - Modify internal procedures for project reviews and approvals to reduce time.
- Facilitate housing development:
 - Define the word “family” or modify the term “household” in the zoning ordinance to allow more unrelated individuals to live together thus reducing per capita housing costs.
 - Establish density bonuses to encourage higher density development in selected locations.
 - Regularly review and update the City’s analysis of affordable housing needs.⁹

City of West Allis

The City of West Allis prepared a brief Housing Affordability Report in 2018. The report concluded that the City’s residential development regulations, such as land use controls, site improvement requirements, fees and land dedication requirements, and permit procedures have a minor financial impact on the cost of each new housing subdivision. The study concluded that there was no need to modify regulations to meet existing and projected housing demand and that changes could not reduce the time and cost needed to approve and develop new housing by 20 percent.¹⁰

⁸ 2019 City of Milwaukee Housing Affordability Report, <https://storymaps.arcgis.com/stories/afab7f8efdfa402690360bb8cf510c05>

⁹ City of Wauwatosa Housing Affordability Report, 2019, <https://www.wauwatosa.net/home/showdocument?id=2576>

¹⁰ West Allis Housing Affordability Analysis Report, 2018, <https://www.westalliswi.gov/DocumentCenter/View/14687/2018-Housing-Affordability-Analysis-Report>

OTHER ORDINANCES AND BARRIERS TO FAIR HOUSING

Nuisance Ordinances

Numerous communities in the Milwaukee Collaborative area have enacted ordinances that disproportionately impact the protected classes. Many have adopted “crime free” and nuisance ordinances that can have a detrimental impact on renters and landlords. Crime-free and nuisance ordinances place conditions on leases in which renters agree to not commit any crimes or disturbances or affiliate with those who commit violations on or near their rental property. Landlords who have repeated violations of these ordinances at their properties are then penalized and pass those violations on to the tenants. Some ordinances require landlords to obtain a business license to rent, perform extended background checks on tenants, evict the entire household if criminal activity occurs, and evict tenants after a certain number of police calls have been made. Major offenses such as felonies as well as minor offenses such as those involving garbage and noise complaints can put tenants at risk of eviction and homelessness. Ordinances such as these can also create barriers for renters with previous violations. Violations can include police calls for persons with disabilities with increased medical needs, and disturbances caused by those persons suffering from mental illness.

Recent research into nuisance ordinances has shown the extremely negative impacts of these ordinances on low-income residents and neighborhoods. In particular, research by Matthew Desmond and Nicol Valdez indicates the impact of coercive “third-party policing” that results from nuisance ordinances. Although nuisance ordinances vary across jurisdictions, their research indicates that most share three common features: 1) they designate properties as “nuisances” based on excessive service calls made within a specific timeframe, 2) they include a broad list of “nuisance activities” that provoke the calls, and 3) they require property owners to “abate the nuisance” or face fines, property forfeiture, or even incarceration.

One negative impact of nuisance laws in many parts of the country is to discourage reports of domestic abuse. According to research by Desmond and Valdez based on data collected in the city of Milwaukee between 2008 and 2009, properties in Black neighborhoods disproportionately received these citations and had the highest likelihood of being deemed nuisances. Most citations resulted from domestic violence complaints and too often led to evictions of battered women. Their research also showed that landlords often discouraged tenants from calling 911.¹¹ Fortunately, in 2013 the State of Wisconsin legislature passed Act 76, which increased protections against eviction for victims of domestic violence.

Evictions

Evictions are linked to housing stability issues for many households, especially those that are low-income, and continue to be a problem, particularly in the city of Milwaukee. According to data compiled by the Princeton University’s Eviction Lab for over 30,000 jurisdictions across the

¹¹ “Unpolicing the Urban Poor: Consequences of Third-Party Policing for Inner City Women,” Matthew Desmond and Nicol Valdez, *American Sociological Review*, 78 (1), 2012, pages 117–141.

country,¹² two of the three cities in the Milwaukee Collaborative region had low eviction rates in 2016, while the city of Milwaukee had a very high eviction rate. The eviction rate in the city of Milwaukee was 4.25 percent, whereas the eviction rates of Wauwatosa and West Allis were 0.48 and 1.57 respectively.¹³ The city of Milwaukee was responsible for over 90 percent of the total evictions within the county in 2016. The data show that the city of Milwaukee has a problem with its system of evictions given Milwaukee's much higher eviction rate than rates for the nation (2.4 percent) and the state (1.89 percent).

Most of counties in the Milwaukee Collaborative region had eviction rates that were lower than the national and state averages in 2016, with Milwaukee County as a large exception. The eviction rates of Waukesha and Ozaukee counties were both about 0.5 percent in 2016, and the eviction rates of Jefferson and Washington counties were both slightly above 1.0 percent. Milwaukee County had the largest eviction rate in the region at 3.26 percent.

BUILDING PERMITS

From 2014 to 2018, jurisdictions in the Collaborative area issued building permits for 9,014 units. The vast majority of building permits issued over this time period were for single-unit buildings, which were issued at an average of 1,701 permits per year. Over that five-year period, a steady increase occurred in the number of single-unit building permits issued per year. Just 507 non-single unit buildings were issued in the entire Collaborative area between 2014 and 2018, most of which were either two-unit structures or five-or-more unit structures. The jurisdictions where the most multiunit structures were licensed per year were Milwaukee, Washington, and Waukesha counties. Over the five-year period, the number of two-or-more unit structure permits did not deviate much from year to year.

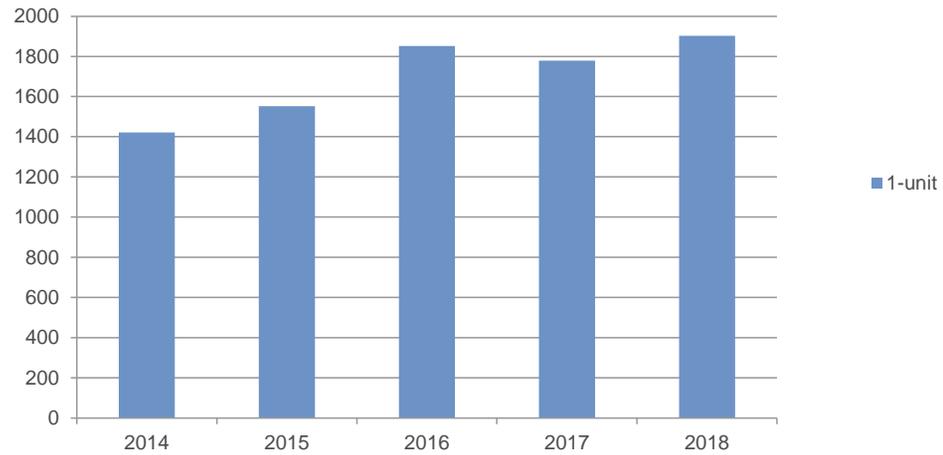
The majority of building permits were issued in Waukesha and Washington counties. The patterns of licensing were similar in these two counties as well as in Ozaukee and Jefferson counties, with many single-unit structures and very few multiunit structures granted permits over the five-year period. Generally, an increasing number of single-unit structures were issued over the five-year period in the counties, and there was relatively little change in the number of multiunit structures licensed per year. Each year from 2014 to 2018, Waukesha County alone was the site of over half the total permits granted for single-unit buildings in the Milwaukee Collaborative region.

The pattern of building permit issuance was notably different in the three cities in comparison to the counties. Very few building permits were issued over the five-year period in the cities of Wauwatosa and West Allis, where very little undeveloped land remains. Additional data on the building permits for each area can be found in Appendix B.

¹² Princeton University Eviction Lab, and <https://evictionlab.org/https://evictionlab.org/map/#/2016?geography=counties&bounds=-101.249,40.378,-82.996,46.493&type=er&locations=55,-89.931,44.728%2B55089,-87.953,43.384>

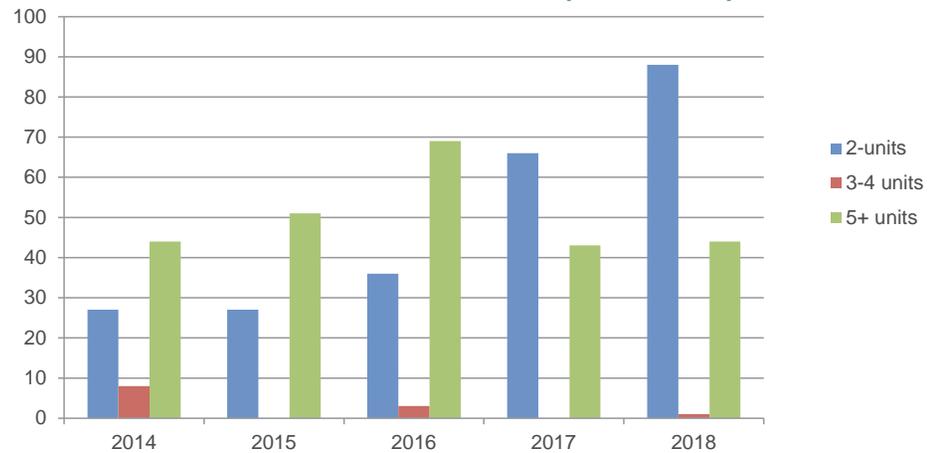
¹³ The Eviction Lab's eviction rate is the number of evictions per 100 renter homes in an area. An eviction rate of five percent indicates that five of every 100 renter homes experienced eviction during a specific year.

EXHIBIT V-14.
MILWAUKEE COLLABORATIVE REGION
SINGLE-FAMILY BUILDING PERMITS (2014-2018)



Source: U.S. Census Bureau Building Permits Survey, 2014-2018

EXHIBIT V-15.
MILWAUKEE COLLABORATIVE REGION
MULTIFAMILY BUILDING PERMITS (2014-2018)



Source: U.S. Census Bureau Building Permits Survey, 2014-2018

MORTGAGE LENDING BY RACE/ETHNICITY

Access to financial resources is considered key to fair housing choice and equal access to housing. The federal Fair Housing Act prohibits lenders from discriminating against members of the protected classes in connection with borrowing or lending money for purchase, construction, rehabilitation, or maintenance of any residential unit. The Home Mortgage Disclosure Act (HMDA) requires financial institutions to maintain records on the characteristics of mortgage borrowers, including gender, race, and ethnicity. The following exhibit shows recently available HMDA data for the Milwaukee Collaborative region from 2013 to 2018.

Over the examined six-year period, an average of approximately 49,234 mortgages were granted per year across all five counties. The majority of all mortgages were loaned to White residents in the Milwaukee Collaborative region as of 2018. Although White residents represented 75 percent of the total population in the Milwaukee Collaborative region, they received 83 percent of all loans in 2017. African-American residents accounted for about 16 percent of the population but received 4.6 percent of all mortgage loans in 2017. Asian residents received 2.8 percent of all loans granted in 2017 while representing 3.4 percent of the total population, and Hispanic residents received 5.1 percent of all loans in 2017 while accounting for 10.2 percent of the population.

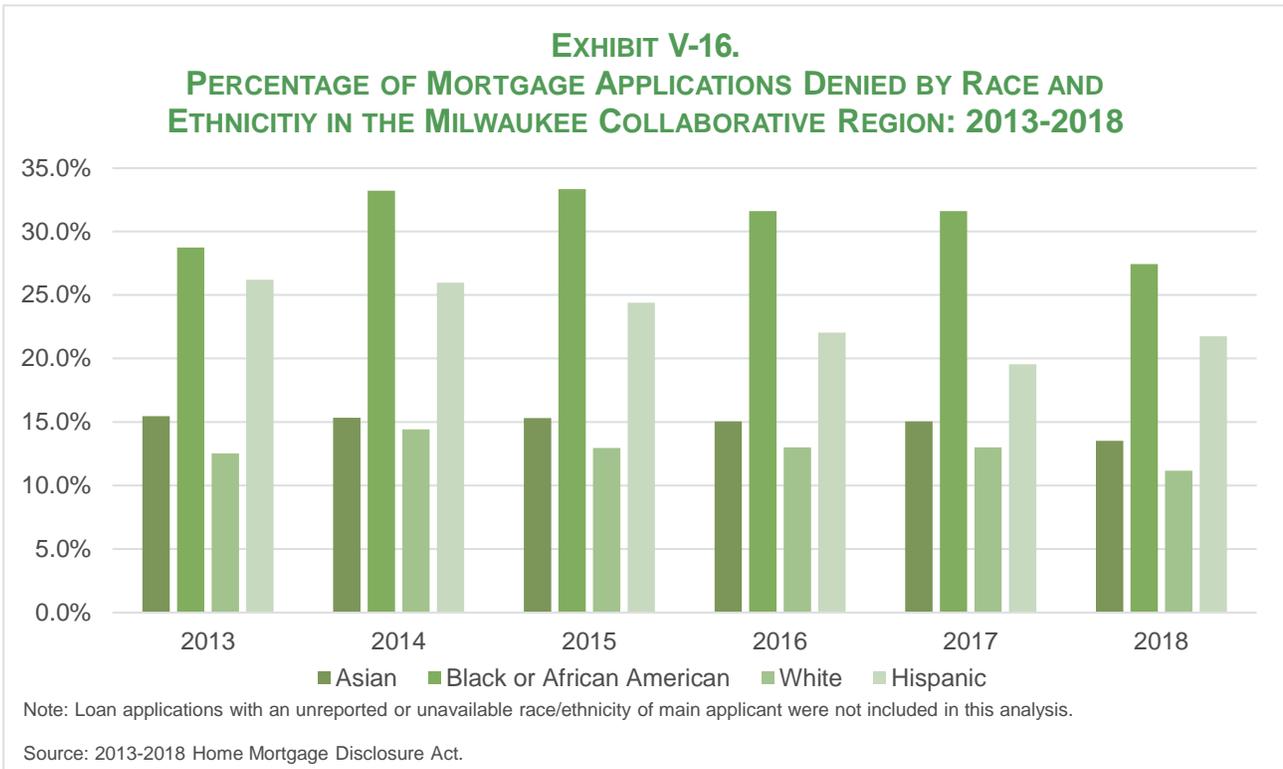
Approximately 13.6 percent of all loan applications in the entire Collaborative region were denied in 2018. The rate of denial was higher for Hispanic and African-American applicants compared to the denial rate for Asian and White applicants. Mortgage applications were denied at a rate of 12.8 percent for White applicants, 15.6 percent for Asian mortgage applicants, 29.8 percent for African-American applicants, and 21.7 percent for applicants of Hispanic ethnicity.

In-depth analyses of mortgage lending in the Milwaukee area have also found disparities in home mortgage lending by race and ethnicity. For example, a study by the National Community Reinvestment Coalition (NCRC), with which the Metropolitan Milwaukee Fair Housing Council is affiliated, examined mortgage loans in the Milwaukee metropolitan area in 2014 and concluded that local lenders favored White mortgage applicants, and that loans in the Milwaukee metropolitan area are heavily concentrated in majority White and middle- and upper-income neighborhoods. Furthermore, the study concluded that majority-minority areas of the metropolitan area have reduced neighborhood access to bank branches, unless they are on major lines of transportation.¹⁴

One key factor related to mortgage lending is the residential appraisal process. Because U.S. mortgage lenders rely on the appraisal industry to assess home value, appraisals affect both home value and mortgage terms. Legislation passed in 2010 in response to the housing crisis and the recession attempted to decrease the link between the appraisal and the mortgage lending industries by increasing the independence of appraisals used in the housing market. Research has shown that the accuracy of property valuations continues to be a problem that affects both mortgage terms for home buyers and wealth accumulation for home sellers. One analysis, “Appraisals: A Missing Link in Fair Housing/Fair Lending Debates” discusses the negative impact

¹⁴ National Community Reinvestment Coalition, “Home Mortgage Lending in St. Louis, Milwaukee, Minneapolis and Surrounding Areas,” July 2016, pages 22 to 23.

of inaccurate, low property valuations in minority neighborhoods.¹⁵ More recent research in Houston, Texas concludes that variation in appraisal methods combined with appraisers' perceptions of neighborhoods perpetuates neighborhood racial disparities in home values.¹⁶



¹⁵Squires, Gregory D., "Appraisals: A Missing Link in Fair Housing/Fair Lending Debates," updated September 21, 2014, https://www.huffpost.com/entry/appraisals-a-missing-link_b_5596879

¹⁶ Junia Howell and Elizabeth Korver-Glenn, "Neighborhoods, Race, and the Twenty-first-century Housing Appraisal Industry," *Sociology of Race and Ethnicity*, 2018, Volume 4, pages 473 to 490, <http://journals.sagepub.com/doi/full/10.1177/2332649218755178>.

SECTION VI. EMPLOYMENT AND TRANSPORTATION

EMPLOYMENT

The general employment trend from 2010 to 2017 is a substantial increase in jobs across most counties and cities in the Milwaukee Collaborative region. Private sector employment increased by 7.4 percent (58,306 jobs) in the entire region over this time period. It is worth noting that all of the counties saw lower percentages of increases in employment compared to those of Wisconsin as a whole and the United States. The total jobs in Wisconsin increased by 9.6 percent from 2010 to 2017, and the total jobs in the country increased by 14.1 percent over the same time period.

The highest growth in employment of the five counties within the Milwaukee Collaborative region occurred in Waukesha, Ozaukee, and Washington counties, which each experienced about a 9 percent increase in employment from 2010 to 2017. Waukesha County increased in total jobs by 18,118 jobs, which was the largest total increase in jobs for one county in the entire region. The lowest increase in employment during this time period was in Jefferson County, which increased in employment by 1,864 jobs (4.4 percent). The change in employment in Milwaukee County was about average compared to the rest of the counties, at an estimated 6.9 percent increase. The highest rate of increase in employment of the three cities was in Wauwatosa, at 10.3 percent (2,529 added jobs).

EXHIBIT VI-1. PRIVATE SECTOR EMPLOYMENT BY REGION

	Year		Change	
	2010	2017	Number	Percent
City of Milwaukee	251,681	267,261	15,580	6.2%
City of Wauwatosa	24,527	27,056	2,529	10.3%
City of West Allis	30,720	32,340	1,620	5.3%
Milwaukee County*	121,906	130,361	8,455	6.9%
Waukesha County	201,996	220,114	18,118	9.0%
Ozaukee County	44,056	47,927	3,871	8.8%
Jefferson County	42,414	44,278	1,864	4.4%
Washington County	69,491	75,760	6,269	9.0%
Milwaukee Collaborative Region	786,791	845,097	58,306	7.4%

*Excluding the cities of Milwaukee, Wauwatosa, and West Allis.

Source: State of Wisconsin Department of Workforce Development, Job Center of Wisconsin.

Employment by Race and Ethnicity

The employment levels of all races improved from 2010 to 2017 in the aftermath of the Great Recession, with some races showing slight growth in employment and others increasing dramatically. Asians Americans, African Americans, Hispanics/Latinos, and individuals who identified as of two or more race groups experienced notably significant increases in employment from 2010 to 2017.

The Milwaukee Collaborative region experienced substantial increases in jobs for minority workers from 2010 to 2017. The number of African-American workers increased by 28,610 (33 percent), and the number of Asian workers increased by 9,791 (49.1 percent) in the entire study area. In Milwaukee County alone, Black workers increased by 18,860 from 2010 to 2017, and Asian workers grew by 6,092. Jobs for Hispanic/Latino workers in the Collaborative region increased by 44.9 percent from 2010 to 2017. Jobs for Native American workers in the Collaborative increased at a rate of 19.7 percent (788 added jobs total). The four smaller counties saw large percentage increases in black workers, Hispanic workers, Asian workers, and workers of two or more race groups, but much smaller absolute increases in comparison to Milwaukee County. (See Appendix C.)

By contrast, White employment grew by about 3 percent in the entire region, but decreased by 1.5 percent in Milwaukee County. Despite the lower rate of increase in comparison to other races, 20,405 jobs were added for White workers from 2010 to 2017 in the Milwaukee Collaborative region.

EXHIBIT VI-2. WORKFORCE DEMOGRAPHICS BY RACE

	Milwaukee Collaborative Region					
	2010		2017		Change	
	Number	Percent	Number	Percent	Number	Percent
White Alone	706,543	85.6%	726,948	81.7%	20,405	2.9%
Black or African American Alone	86,736	10.5%	115,346	13.0%	28,610	33.0%
American Indian or Alaska Native Alone	4,001	0.5%	4,789	0.5%	788	19.7%
Asian Alone	19,958	2.4%	29,749	3.3%	9,791	49.1%
Native Hawaiian or Other Pacific Islander Alone	484	0.1%	553	0.1%	69	14.3%
Two or More Race Groups	7,388	0.9%	12,294	1.4%	4,906	66.4%
Hispanic/Latino	48,031	5.8%	69,617	7.8%	21,586	44.9%

Source: U.S. Census On the Map, 2010–2017.

Employment Density

The majority of jobs in the Collaborative region are concentrated in Milwaukee County, especially in the three biggest cities within the county (Milwaukee, Wauwatosa, and West Allis). There is also a substantial level of employment density within Waukesha County, and jobs are most densely concentrated in the center of the county around the city of Waukesha, as well as on the east side of the county, which borders Milwaukee County. Jefferson County visibly has the lowest levels of employment density of the five counties, with a large portion of the county displaying low numbers of jobs compared to the rest of the region. The jobs in Ozaukee County are mostly concentrated on the southern half of the county, and also along the coast of Lake Michigan. Washington County has the highest employment density in the center of the county by West Bend, and to the south towards Milwaukee and Waukesha counties.

THE INTERSECTION OF TRANSPORTATION, EMPLOYMENT, AND HOUSING

Public transportation is vital to connect people to employment. Given the geographic concentrations of racial and ethnic minority groups in the Collaborative area compared to the locations of employment centers, many workers rely on public transportation to access employment. The public transportation system's limitations have been well documented in providing access to employment centers in the Collaborative area, especially for low- and moderate-income persons who lack private cars. Transit access to services by seniors and persons with disabilities are also limited in the Milwaukee area. According to a 2018 study, "Arrive Together: Transportation Access and Equity in Wisconsin," 8.7 percent of workers age 16 and over rely on public transportation to get to work in the Milwaukee area, and of the total workers who use transit to reach employment, 55.9 percent were African American, 32.2 percent were White, 8.2 percent were Hispanic, and 2.4 percent were Asian. The study concluded that although the Milwaukee County Transit System provides access to most major employers located within Milwaukee County, many suburban and exurban areas have little or no transit service from the city of Milwaukee. In addition, suburban areas served by the system have limited service, including Brown Deer, Brookfield, and other communities in southern sections of the county.¹

Transit service reductions during the last decade have disproportionately affected suburban routes, resulting in few options for transit-dependent employees in the City of Milwaukee to reach suburban jobs. Public transportation gaps are not limited to suburban Milwaukee County. The 2018 study found that the Waukesha County transit system also has service gaps, and throughout the region, it is challenging and time consuming for

¹ 1000 Friends of Wisconsin, Chippewa Valley Transit Alliance, CUSH, NAOMI, MICHA, ESTHER, Sierra Club-John Muir Chapter, SOPHIA, Wisconsin Council of the Blind and Visually Impaired, WISDOM, "Arrive Together: Transportation Access and Equity in Wisconsin," October 2018, <https://www.sierraclub.org/sites/www.sierraclub.org/files/sce-authors/u2196/Arrive%20Together%20Transportation%20Access%20and%20Equity%20in%20Wisconsin.pdf>

workers from the City of Milwaukee to reach jobs in Waukesha County.² An analysis by the Public Policy Forum [now the Wisconsin Policy Forum] also concluded that although most job concentrations in the Milwaukee metropolitan area are served by public transit to some degree, some are completely disconnected from the transit system, and many suburban transit lines are only accessible at limited times of the day and week. In addition, the Wisconsin Policy Forum concluded that based on state and regional projections nearly half of the net new jobs that will become available by 2024 in the four-county area of Milwaukee, Waukesha, Ozaukee, and Washington counties will be located outside of Milwaukee County in the other three counties.³ Consequently, the disconnect between affordable housing, employment, and transit is likely to increase.

Home-to-Work Travel

The most common length of time that workers within the Milwaukee Collaborative region spent commuting to work in 2017 was between 15 to 29 minutes, which includes 42.1 percent of all workers. Milwaukee County had by far the lowest percentage of workers who commuted over 45 minutes to work, at 8.6 percent of all workers in the county, followed by Waukesha County at 10.7 percent. In contrast, 16.1 percent of workers in Jefferson County traveled 45 minutes or longer to work in 2017. Workers in Washington and Ozaukee counties travelled 45 minutes or longer in between 11 and 13 percent of all cases. Workers in counties with the highest density levels generally spent less time travelling to work.

Public Transit

Residents in the Milwaukee Collaborative region are served by public transit systems at different levels based on location. The five counties each have at least one form of public transportation system, but some are much more expansive and inclusive than others.

The Milwaukee County Transit System is a public bus system that offers 60 bus routes and 5,500 bus stops in Milwaukee County. There are many routes and stops located in the densest parts of the county, which includes the cities of Milwaukee, West Allis, and Wauwatosa. A few bus lines extend into east Waukesha County as well as Ozaukee County. A 31-day bus pass can be purchased for \$72 for people aged 12-64, and \$32 for those aged 6 to 11 and 65 or over, as well as individuals with a qualifying disability. Buses feature low floors and ramps for people that use mobility devices as well as special seating areas. Milwaukee County is also currently in the process of developing a Bus Rapid Transit (BRT) system, which is titled the East-West BRT. The goal of this system is to connect major employment, education, and recreation hubs by linking downtown Milwaukee, Marquette University, Wauwatosa, and the Milwaukee Regional Medical Center. The bus line is planned to cover 9 miles, and it is expected to start service in

² Ibid.

³ Public Policy Forum, "The Last Mile: Connecting Workers to Places of Employment," April 17, 2017, <https://www.infrastructureusa.org/the-last-mile-connecting-workers-to-places-of-employment/>

2021. BRT systems in other cities are shown to be effective in supporting economic development while being a cost-effective form of public transit.⁴

Waukesha County has two public transit bus services that are administered by the same public transit agency, Waukesha Metro Transit. The name of the main bus service is Waukesha Metro Transit, which operates 10 bus routes, and the other is Waukesha County Transit, which operates five bus routes. The service area includes central Waukesha County and Milwaukee County, and mainly connects the towns and cities of Brookfield, Milwaukee, Okauchee Lake, Delafield, and Waukesha. The two transit services have slightly different pricing; Waukesha Metro Transit lines cost \$2 per ride for adults, whereas Waukesha County Transit lines cost either \$3.75 or \$4.50 per ride depending on the zone. Reduced rates apply for seniors and disabled residents.

Ozaukee County is serviced by the Ozaukee County Express Service, which is a two-way bus service from Ozaukee to Milwaukee. This is administrated by Ozaukee County Transit Services, and operates through a contract with the Milwaukee County Transit System. There is only one bus line that connects Ozaukee County and the city of Milwaukee, with one ride for adults priced at \$3.50, and a ride for senior citizens and persons with disabilities priced at \$1.60. Ozaukee County Transit Services also offers a shared ride taxi service, which operates throughout the county and costs a maximum of \$7 per ride for adults and \$5.75 for seniors and persons with disabilities.

The only available public transit in Washington County is run by the Washington County Commuter Express (WCCE), which provides two types of transit options. The first is a coach bus route that connects to areas in Milwaukee County. Easily accessible “Park and Ride” bus stops are located in three towns in Washington County (West Bend, Richfield, and Germantown), and some of the main areas serviced in Milwaukee County include downtown Milwaukee, Marquette University, the Milwaukee Regional Medical Center, and the Milwaukee County Research Park. One ticket costs \$3.25 for adults and \$1.75 for persons with disabilities and senior citizens. The WCCE also oversees a shared ride taxi program with distanced-based pricing.

The only form of public transportation accessible in Jefferson County is run through the Aging and Disability Resource Center (ARDC), which provides transportation to medical appointments for the elderly and persons with disabilities. Trips within the county require a \$1.50 co-pay, and out of county trips require a \$7.50 co-pay.

Housing and Transportation Costs

Traditional measures of housing affordability often do not take transportation costs into account, especially in lower density and rural areas. The Center for Neighborhood Technology (CNT) measures the impacts of housing and transportation costs on a typical household through its Housing and Transportation (H+T[®]) Affordability Index. The CNT calculates what percentage of a typical household’s income will be spent on housing and transportation costs using 2015 American Community Survey data. In the Collaborative

⁴ Transit Cooperative Research Program, “Report 90, Bus Rapid Transit, Volume 1: Case Studies in Bus Rapid Transit,” https://nacto.org/docs/usdg/tcrp_rpt_90_case_studies_volume_1_levinson.pdf

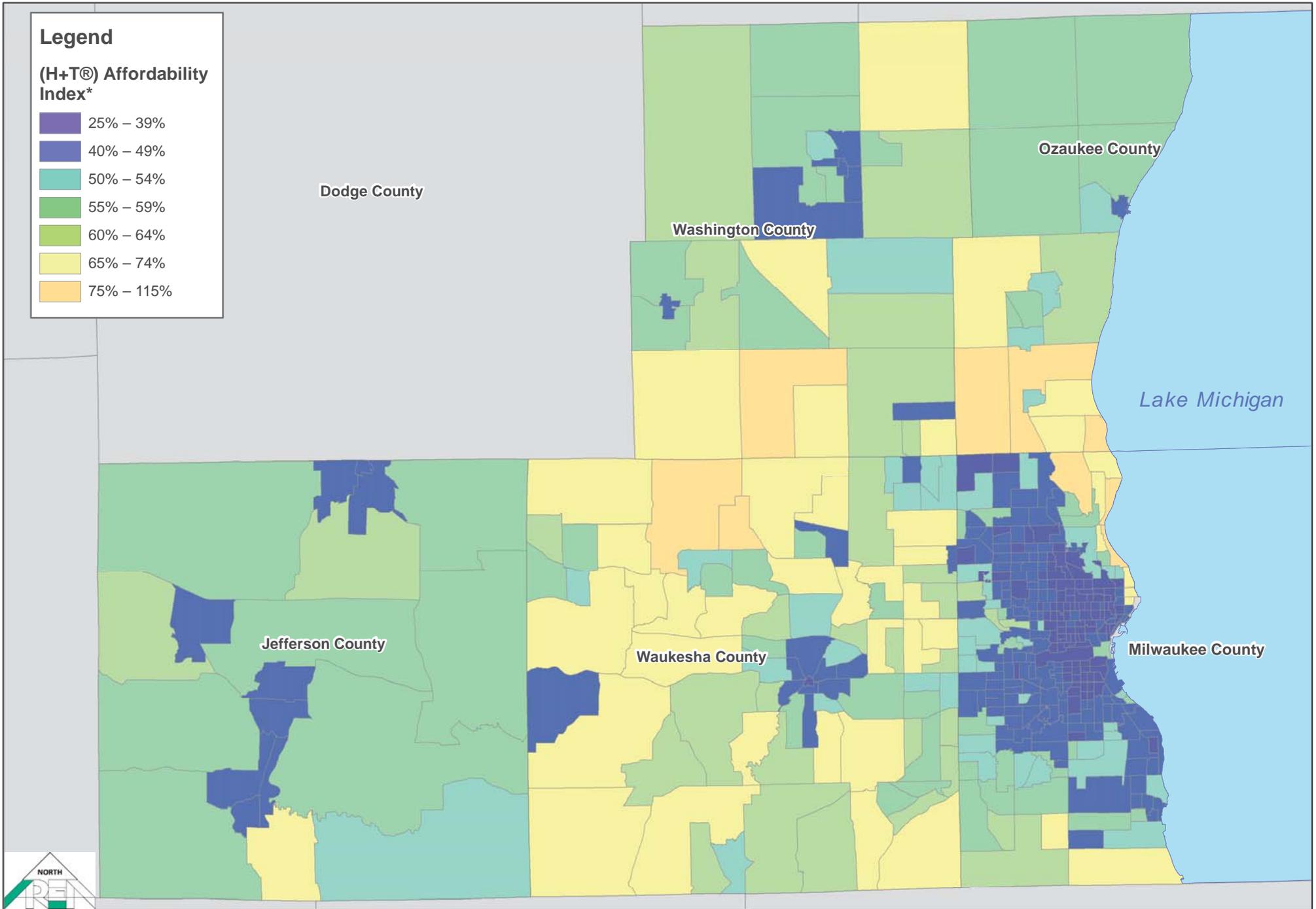
area, the combination of housing and transportation costs are high in many areas outside of the city of Milwaukee, thus limiting access to these areas for low- and moderate-income racial and ethnic minorities.

Based on the H+T[®] Affordability Index, a typical household in Milwaukee County spent 45 percent of its income on housing and transportation costs in 2015. This was the lowest average percentage of all five counties. Ozaukee and Waukesha counties each had high average percentages of household income devoted to housing and transportation, at 61 percent and 60 percent respectively. A high percentage of household income was devoted to housing and transportation in Washington County as well, at 57 percent. According to the CNT's index, a typical household in Jefferson County spent 52 percent of its income on housing and transportation in 2015.

The three cities also have H+T[®] Affordability Index values that are calculated by CNT. In the city of Milwaukee, a typical household spent 41 percent of its income on housing and transportation. West Allis households devoted a similar percentage of income to housing and transportation costs in 2015, at 44 percent. The percentage of Wauwatosa households' housing and transportation costs were the highest at 53 percent of their total income. Exhibit VI-3 shows that in many cases, the percentage of income devoted to housing and transportation costs is lower in cities and denser areas than in more rural and sparsely populated areas. Exhibit VI-4 provides a more detailed view of costs in Milwaukee County.

Exhibit VI-3.

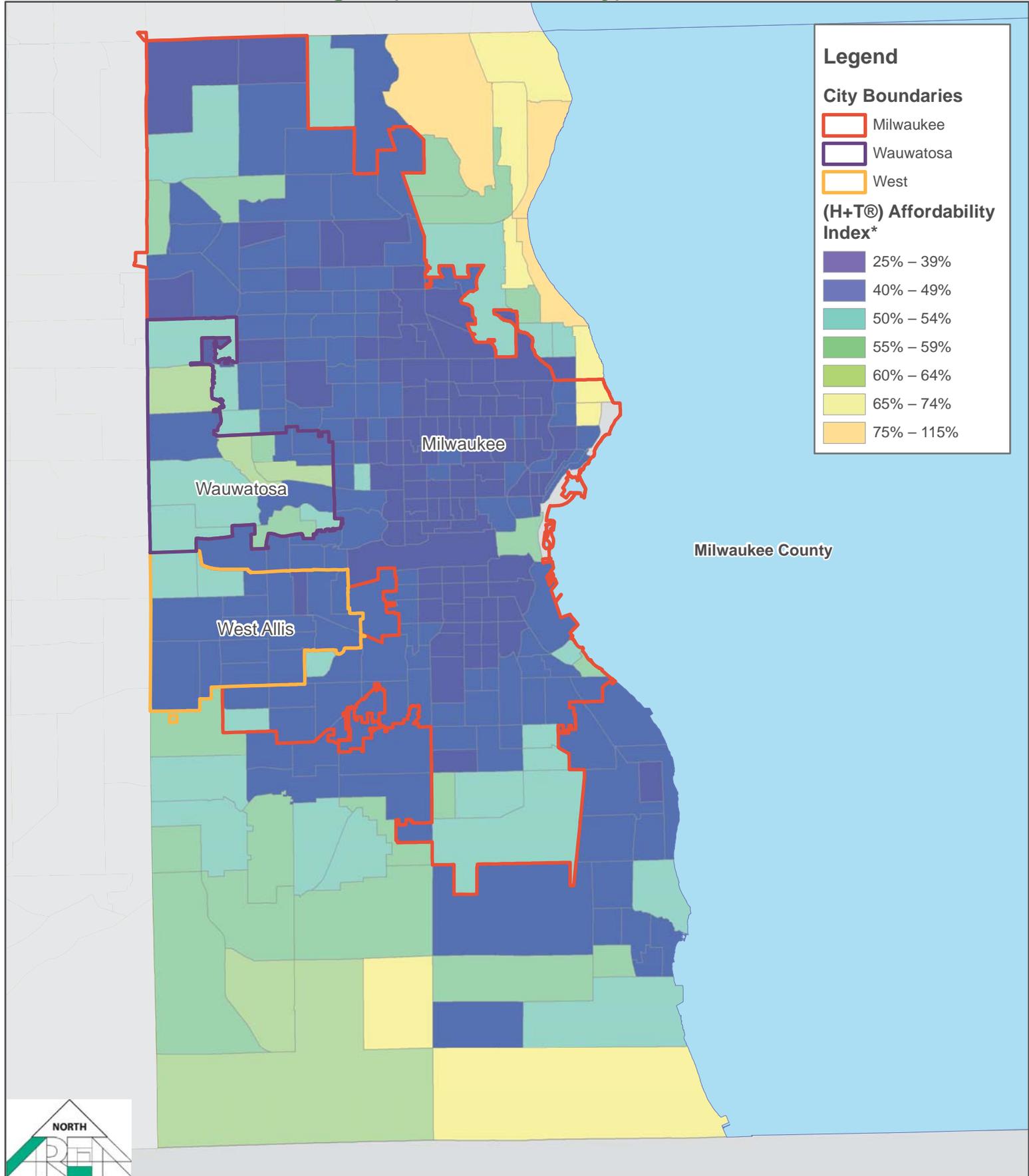
Percentage of Income Spent on Housing and Transportation in the Milwaukee Collaborative Region: 2017



*The Housing and Transportation (H+T®) Affordability Index displays the percentage of income for a typical household that is spent on housing and transportation by census tract.

Source: Center for Neighborhood Technology.

**Exhibit VI-4.
Percentage of Income Spent on Housing and Transportation in the
Milwaukee Collaborative Region (Milwaukee County): 2017**



*The Housing and Transportation (H+T®) Affordability Index displays the percentage of income for a typical household that is spent on housing and transportation by census tract.

SECTION VII.

DISPARITIES OF ACCESS TO OPPORTUNITY AREAS IN THE COLLABORATIVE REGION

In addition to the analysis of demographic and socioeconomic trends and conditions in the Collaborative area and resulting patterns of segregation, the recent guidelines for Affirmatively Furthering Fair Housing (AFFH) recommend an analysis of opportunity areas based on indices developed by HUD to assess local conditions. This section of the report examines indices developed by HUD to assess the comparative advantages and disadvantages of geographic areas within the Collaborative region and to assess disparities in access to opportunity areas in the region.

In recent years, researchers have placed increased focus on the importance of understanding the features of various geographic areas that affect residents' quality of life. Researchers have identified an array of neighborhood characteristics that are important to individual well-being. The indicators considered when analyzing neighborhood quality have varied. For example, research by Jens Ludwig and colleagues concluded that low-poverty areas have a positive impact on the physical and mental health of residents, perhaps in part because of less exposure to violent crime, according to Galster.^{1,2} In contrast, research by Briggs and Turner suggested that instead of using simple proxies, such as neighborhood racial composition or poverty rate, to define "opportunity rich" neighborhoods, these neighborhoods should be defined by factors such as community safety, quality schools, or access to skill-appropriate jobs.³ Most recently, research by Chetty and Hendren concluded that low-income children are most likely to succeed in counties that have less concentrated poverty, less income inequality, better schools, a larger share of two-parent households, and lower crime rates.⁴

HUD OPPORTUNITY INDICES

For some time, HUD has attempted to assist local communities in analyzing neighborhood conditions in terms of opportunity as part of the AFFH process. The U.S.

¹ Ludwig, Jens, Greg J. Duncan, Lisa A. Gennetian, Lawrence F. Katz, Ronald C. Kessler, Jeffrey R. Kling, and Lisa Sanbonmatsu. 2012. "Neighborhood Effects on the Long-Term Well-Being of Low-Income Adults." *Science* 337 (6101): 1505–1510.

² Galster, George. 2010. "The Mechanism(s) of Neighborhood Effects Theory, Evidence, and Policy Implications." Economic and Social Research Council Seminar, 1–32.

³ Briggs, Xavier De Souza, and Margery Austin Turner. 2006. "Assisted Housing Mobility and the Success of Low-Income Minority Families: Lessons for Policy, Practice, and Future Research." *Northwestern Journal of Law & Social Policy*, Volume 1, Issue 1 25.

⁴ Chetty, Raj, and Nathaniel Hendren. 2015. "The Impacts of Neighborhoods on Intergenerational Mobility: Childhood Exposure Effects and County-Level Estimates," Harvard University, May.

Department of Housing and Urban Development (HUD) provides indices for use in analyzing disparities in access to opportunity. The indices cover five community measures that limit or contribute to opportunity for individuals, including poverty, employment, transportation, education and environmental health.⁵ HUD's opportunity indices analyze the quality of life for those living within specific jurisdictions or geographic areas, including counties, and provide an understanding of areas where disparities exist in access to opportunity.

HUD creates indices that measure opportunity by race for total populations as well as for those who live below the federal poverty level. Racial and ethnic groups include non-Hispanic White, non-Hispanic Black, non-Hispanic Asian or Pacific Islander, non-Hispanic Native American, and Hispanic families.⁶

At the time when research for this fair housing assessment was undertaken, HUD guidelines recommended that communities review electronic data for each index provided online by the AFFH Data and Mapping Tool to analyze disparities in access to opportunity. The specific indices developed by HUD for use in analyzing fair housing are the following:

1. Low Poverty Index
2. Labor Market Engagement Index
3. Jobs Proximity Index
4. Low Transportation Cost Index
5. Transit Trips Index
6. School Proficiency Index
7. Environmental Health Index
8. Dissimilarity Index

Each opportunity index is depicted in charts in this section of the report.

Low Poverty Index

HUD's "low poverty index" uses household income data to measure the exposure to poverty by neighborhood. A higher index value suggests less exposure to poverty, while a lower rating suggests more exposure to poverty.

Non-White families in Milwaukee County are more concentrated in high-poverty neighborhoods than families in any other county within the Collaborative area. In contrast to White households, which had a county-averaged score above 60 in the low poverty index, Black households in Milwaukee County received the lowest average score (18.52),

⁵ The most recently available indices from the Affirmatively Furthering Fair Housing Data and Mapping Tool are dated February 2018; however, the data sources used to calculate some indices are older than 2018.

⁶ For some HUD indices information is not available for the Native American population.

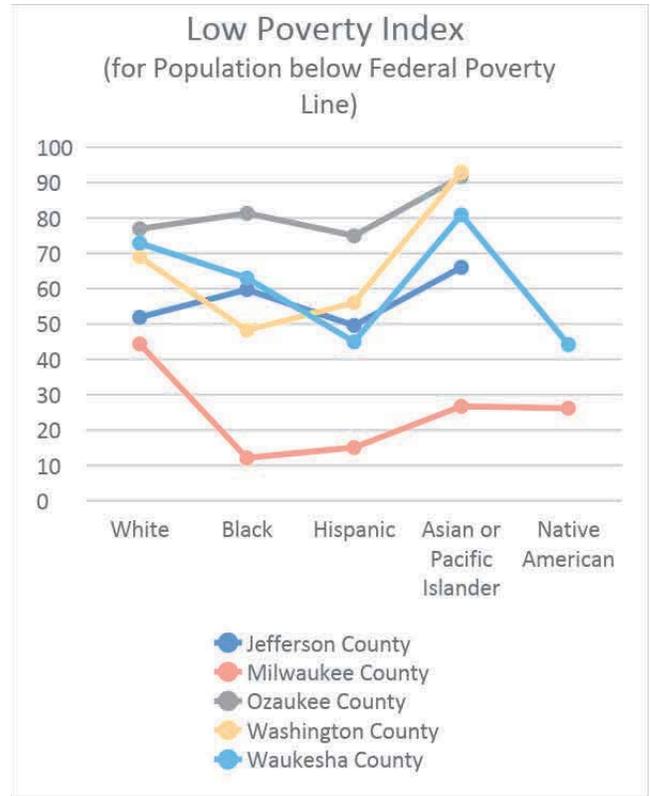
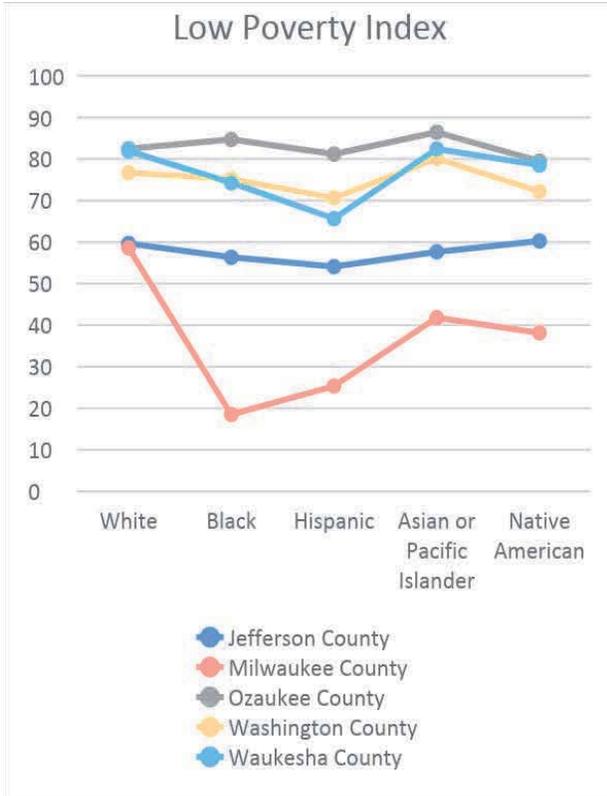
and Hispanic households had the second-lowest score (25.37). All racial groups living below the federal poverty line in Milwaukee County had even lower scores, although the difference for Whites above and below the poverty line is much less dramatic. Because Milwaukee County has the highest concentration of African Americans and Hispanics within the Collaborative, these measures indicate that most African-American and Hispanic families in the Collaborative region are living in high poverty neighborhoods.

At the other end of the spectrum, Ozaukee County has the least number of families living in high-poverty areas, with all scores over 79. The vast majority of Ozaukee County's population in 2017 (94.2 percent) was White, and White households had an average low poverty index score of 82.47. Native American and Hispanic families had the lowest scores, at 79.47 and 81.16, respectively, and Black and Asian families have the highest scores of all races and ethnicities, at 84.69 and 86.42, respectively, higher than their majority White neighbors. However, the scores for all of racial and ethnic groups in Ozaukee County are roughly the same. African Americans represented only 1.4 percent of the county's population in 2017, and the Asian-American population was 2 percent. These low percentages of Black and Asian households can indicate that Black and Asian households living in Ozaukee County require higher incomes to reside there. For those living below the poverty line, the trend is similar, with low-income Black and Asian households having limited exposure to poverty compared to low-income White households.

Hispanic families in Jefferson, Washington, and Waukesha counties had the highest exposure to poverty across races and ethnicities in the five-county Collaborative area. Jefferson County has the second-lowest low poverty index scores within the Collaborative study area, with Hispanic families having the lowest score (54.1), and Native American and White families with the highest scores at (60.27 and 59.66, respectively). In Waukesha County, the Hispanic poverty exposure score was 65.65, and White and Asian households had the highest scores (81.93 and 82.38, respectively).

For those living below the poverty level, by far the greatest exposure to poverty is in Milwaukee County, for all races and ethnicities (except there is less of a dramatic difference for White residents below versus above the poverty line). Asian Americans living in poverty experienced the least exposure to poverty outside of Milwaukee County among the racial and ethnic groups.

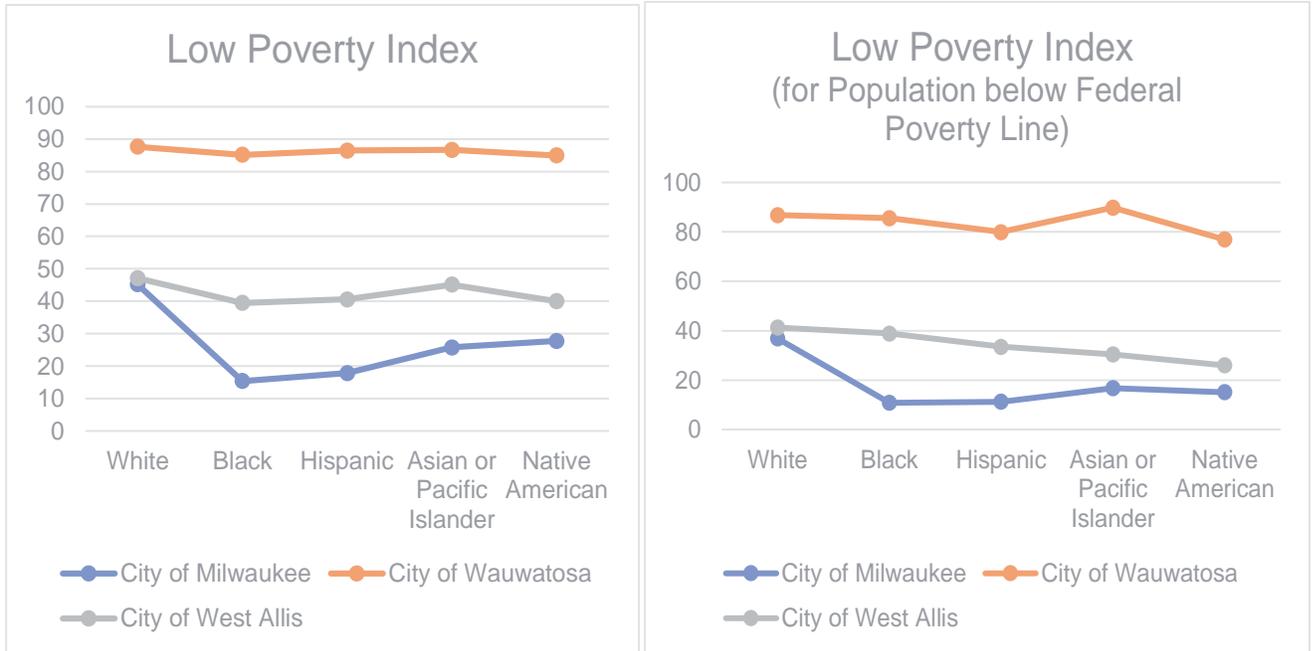
EXHIBIT VII-1.
LOW POVERTY INDICES BY COUNTY



Source: Affirmatively Furthering Fair Housing Data and Mapping Tool, Raw Data, and Applied Real Estate Analysis, Inc.

Among the three cities in the Collaborative, the city of Wauwatosa has the lowest levels of exposure to poverty, which are about the same for all racial and ethnic groups with indices from 85 to 87. In contrast, the city of Milwaukee has the greatest level of exposure to poverty for all racial and ethnic groups except whites. While African Americans in Milwaukee have a poverty exposure rate of 15, the rate for Whites is over 45. All racial and ethnic groups in West Allis have a similar rate of exposure to poverty, ranging from 39 for Blacks and Native American to 47 for Whites. The pattern for exposure to poverty for families living below the poverty line is similar to that of higher income families.

EXHIBIT VII-2.
LOW POVERTY INDICES BY CITY



Source: Affirmatively Furthering Fair Housing Data and Mapping Tool, Raw Data, and Applied Real Estate Analysis, Inc.

Conclusions

- Black and Hispanic households, which make up less than 5 percent of the population in the Collaborative area, are more likely to be exposed to poverty than other population groups.
- Households with incomes below the poverty line of all racial and ethnic groups are more likely to live in high poverty neighborhoods in Milwaukee County than in Ozaukee County.
- Of the three Collaborative member cities, Milwaukee has the highest rate of exposure to poverty for all racial and ethnic groups except Whites.

Employment Indices

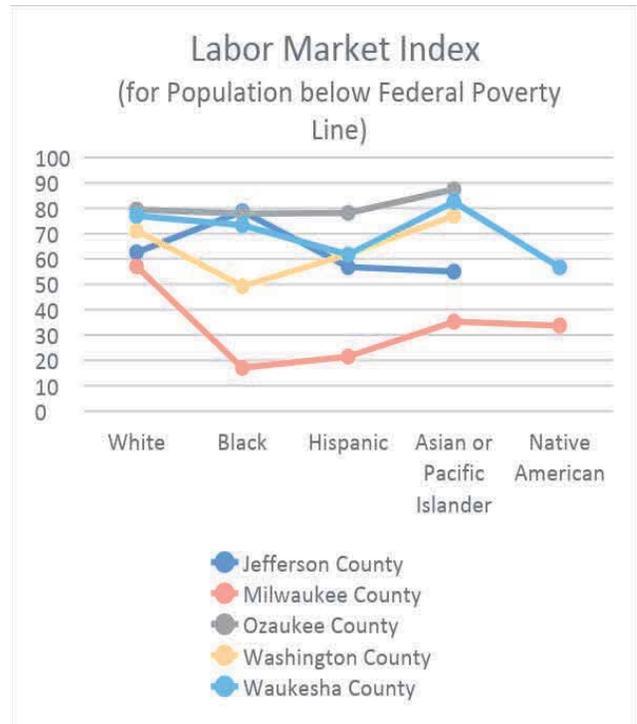
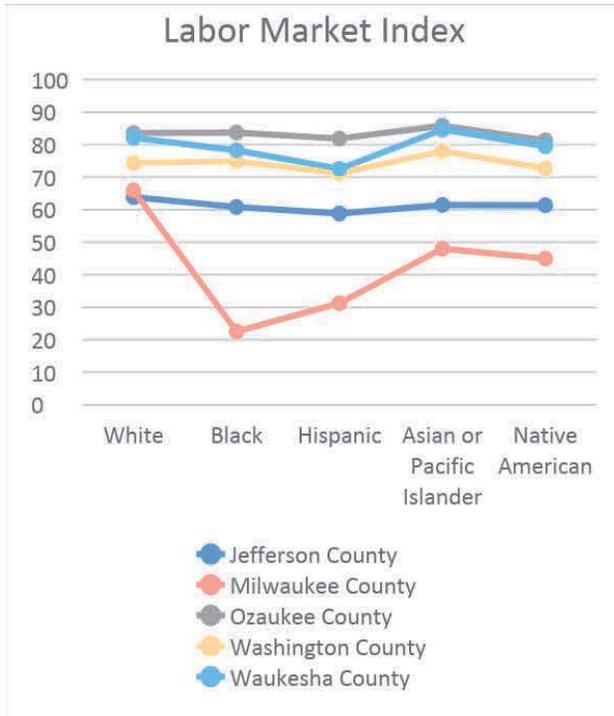
Labor Market Engagement. HUD’s “labor market engagement index” summarizes the relative intensity of labor market engagement and human capital in an area. The index is based upon measures of employment levels, labor force participation, and education attainment within a census tract. The index attempts to measure the extent to which area residents are or can be active in the local labor market and assumes that areas with high resident engagement in labor markets offer greater opportunities than areas that do not. The higher the score, the higher the labor force engagement and human capital in a specific geographic area.

On average, Milwaukee County had the lowest labor market index in the Collaborative area, with non-Hispanic Blacks and Hispanics having the lowest scores, at 22.55 and 31.21, respectively. In Milwaukee County, Whites had the highest labor market index at 65.96, which indicates a disparity in opportunity for those other racial and ethnic groups when seeking employment.

The labor market index is highest in majority-White Ozaukee County for all races. Overall, Jefferson, Ozaukee, Washington, and Waukesha counties had similarly high labor market indices across all races for the total population, with only slight disparities for minority groups.

Slightly more variation exists in the labor market index for those living below the federal poverty line. Jefferson County’s Hispanic and Asian poverty-level populations have the lowest scores, at 56.79 and 55, respectively, while non-Hispanic Blacks have the highest index, at 78.76. In Waukesha County, Hispanics and Native Americans had the lowest labor force engagement rates among those living below the poverty line, while Asian Americans and Whites had the highest. In Ozaukee County, which also had the average highest labor market index for those living in poverty in the study area, Asians reached the highest labor market index, while Whites, Blacks, and Hispanics had similarly high levels. Milwaukee County has the lowest labor market index in the region for populations living below the federal poverty line, with Blacks and Hispanics having the lowest scores.

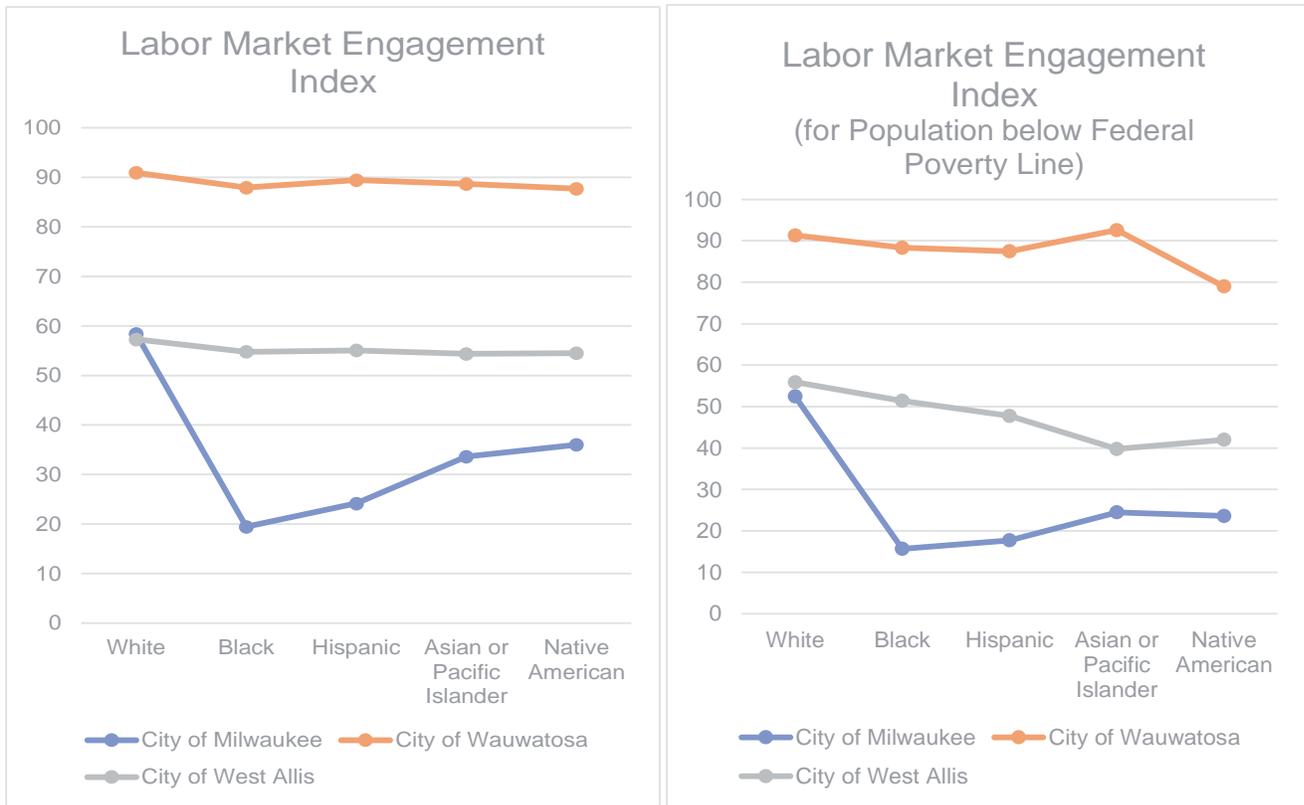
EXHIBIT VII-3.
LABOR MARKET INDICES BY COUNTY



Source: Affirmatively Furthering Fair Housing Data and Mapping Tool, Raw Data, and Applied Real Estate Analysis, Inc.

Following a pattern of comparative economic conditions for the three Collaborative member cities, Wauwatosa has the highest labor market engagement rate of the three for all racial and ethnic groups (averaging 88) followed by West Allis with the next highest indices (54 to 57). Only Whites in the city of Milwaukee have high labor market engagement rates (58), whereas all other racial and ethnic groups have rates below 36.

EXHIBIT VII-4.
LABOR MARKET INDICES BY CITY



Source: Affirmatively Furthering Fair Housing Data and Mapping Tool, Raw Data, and Applied Real Estate Analysis, Inc.

Job Proximity. HUD’s “job proximity index” quantifies job accessibility from residential neighborhoods to job sites within the overall Core-Based Statistical Area detailed by race and below poverty level.⁷ This index suggests that the location of an individual’s residence can affect their ability to obtain a job. The higher the index value, the better the area’s access to employment opportunities for residents.

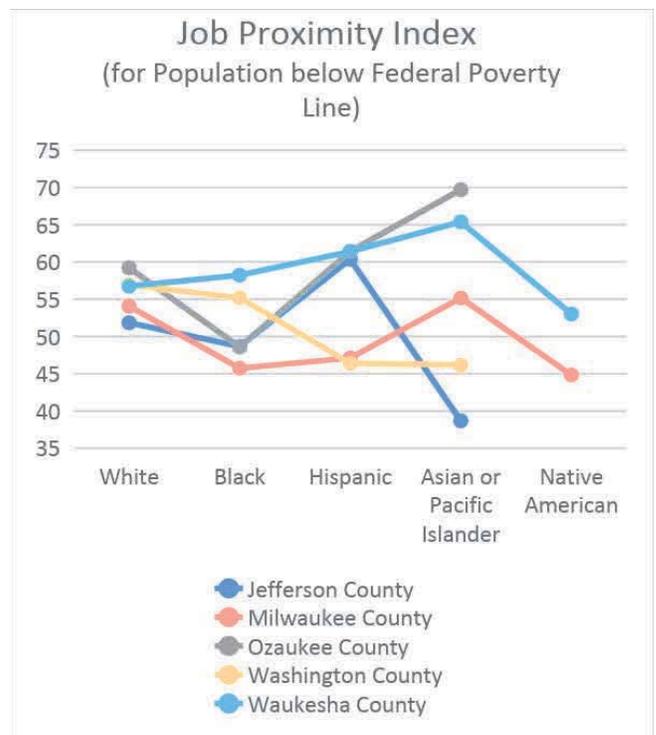
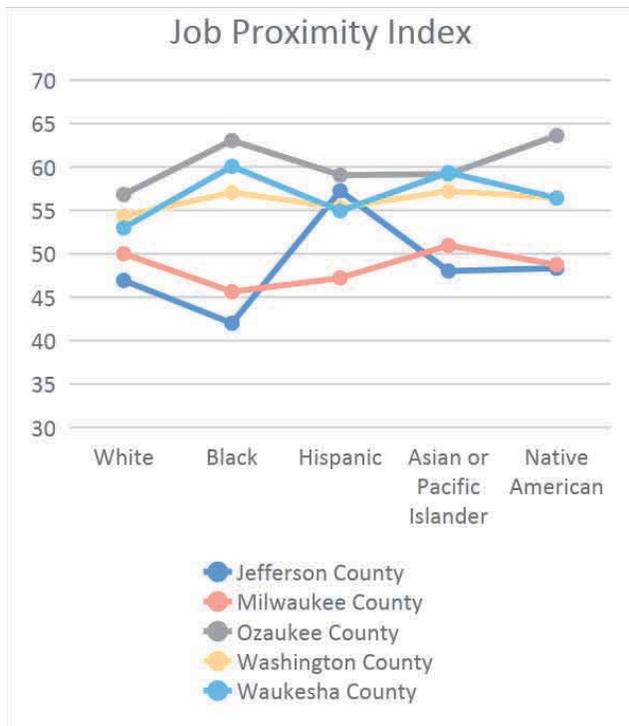
In the counties within the Collaborative, in general residents with the least access to all jobs was in Milwaukee and Jefferson counties. In those counties, Blacks had the lowest scores across races and ethnicities. Within Jefferson County, in which residents had the

⁷ The Core-Based Statistical Areas (CBSAs) are defined by the U. S. Office of Management and Budget. The CBSA Milwaukee-Waukesha-West Allis area includes Milwaukee, Ozaukee, Washington, and Waukesha counties. Jefferson County falls within the Watertown-Fort Atkinson CBSA, of which Jefferson County is the only constituent county.

lowest access to jobs of the five counties, Hispanics are a striking outlier, with the highest job proximity. Blacks in Ozaukee, Washington, and Waukesha counties, where their numbers are relatively small, had higher index numbers than almost all other races and ethnicities. The proximity to jobs index in Washington County was about the same for all races and ethnicities.

For those living below the federal poverty line, the job proximity index shows greater variation among all races in all counties. Whites living below the poverty line had the least variation across all counties in terms of access to jobs. Asian-Americans living below the poverty line had the highest job proximity index in Ozaukee, Waukesha, and Milwaukee counties. Hispanics living below the poverty line in Jefferson County had an index number that almost reached that of those not in poverty, much higher than those of other races and ethnicities in the county.

EXHIBIT VII-5.
JOB PROXIMITY INDICES BY COUNTY

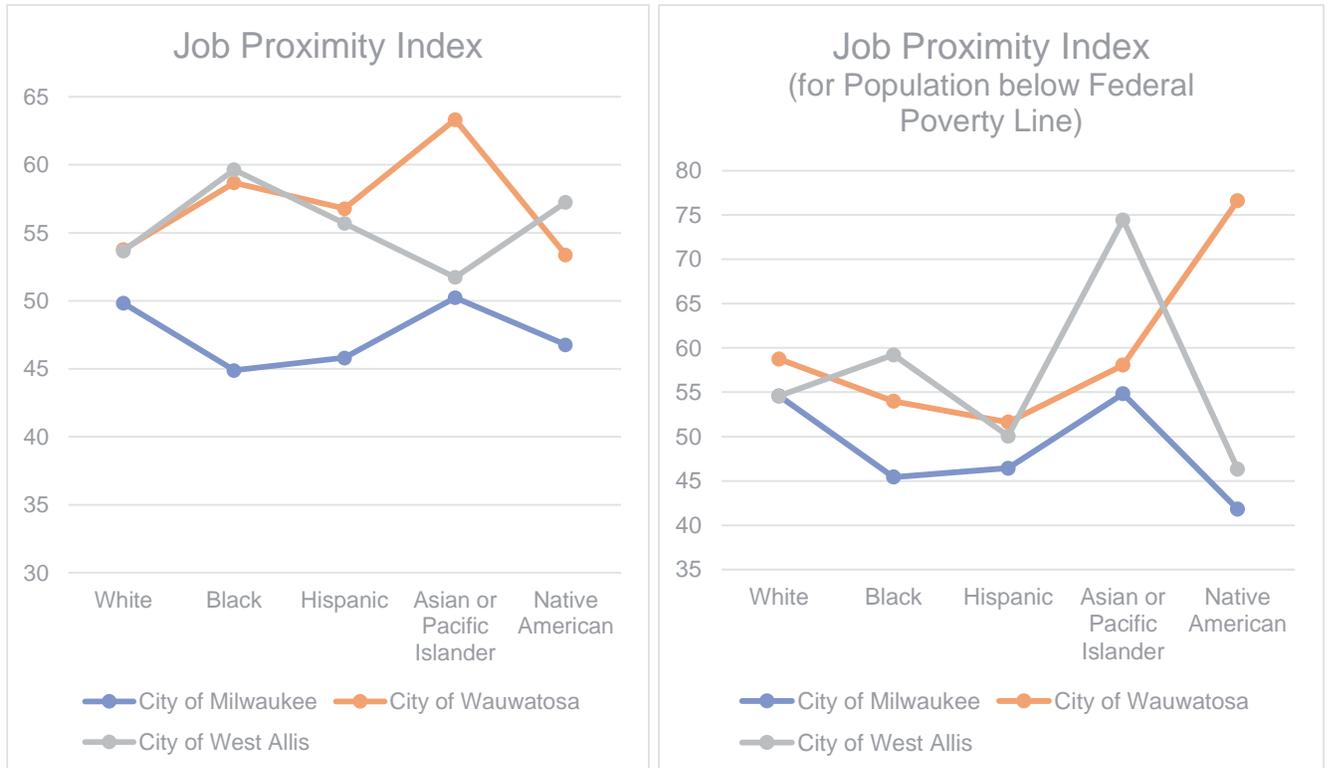


Source: Affirmatively Furthering Fair Housing Data and Mapping Tool, Raw Data, and Applied Real Estate Analysis, Inc.

The city of Milwaukee has the lowest access to jobs compared to Wauwatosa and West Allis with indices ranging from only 50 for White and Asians to 45 for African Americans.

Of all racial and ethnic groups in the three cities, Asians have the highest access to jobs with an index of 63. The access to jobs is about the same for both families with incomes above and below the poverty line.

EXHIBIT VII-6.
JOB PROXIMITY INDICES BY CITY



Source: Affirmatively Furthering Fair Housing Data and Mapping Tool, Raw Data, and Applied Real Estate Analysis, Inc.

Conclusions

- Compared to other counties in the Collaborative area, Milwaukee County has the highest concentration of minorities of all counties and has the lowest labor force engagement index and the most limited access to jobs for all non-White racial and ethnic groups.
- Similarly, compared to the other cities in the Collaborative, the city of Milwaukee has the same concentration of minorities and the same limitations as Milwaukee

County on labor force engagement and job access for non-White racial and ethnic groups.

- Each of the counties in the Collaborative area offer jobs that are accessible from residential areas within most of the Collaborative area. However, access to jobs varies somewhat by county and by racial and ethnic group. Given the location of many jobs outside of Milwaukee County, that county has the lowest job proximity index.

Transportation Indices

HUD provides two transportation indices, the “low transportation cost index” and “transit trips index.” These indices are based on the assumption that affordable, readily accessible public transportation provides access to jobs, educational facilities, health care facilities, and other activities that benefit area residents.

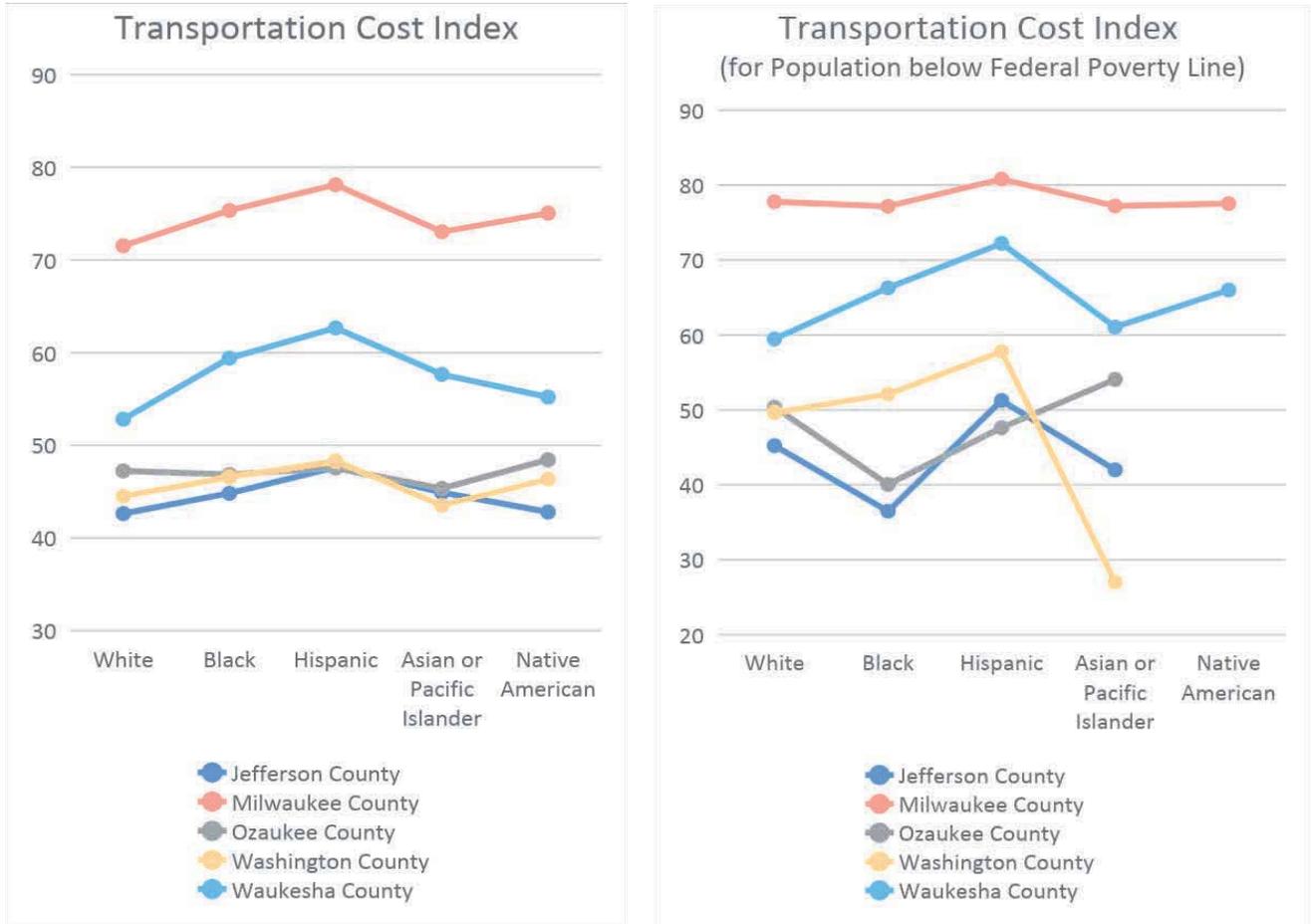
Low Transportation Cost. The low transportation cost index indicates transportation costs for families within a county by race and ethnicity. The HUD low transportation cost index estimates family transportation costs for a three-person single-parent family with income at 50 percent of the average median income for renters for that CBSA. The higher the index, the lower the transportation costs.

Of the counties in the Collaborative area, Milwaukee County has the highest transportation cost index, which indicates the lowest transportation costs, for the general population as well as those living below the poverty line. Hispanics had the lowest costs (with a score of 78.12), and Whites had the highest costs (71.54) in Milwaukee County. Waukesha County has the second-lowest transportation costs in the five-county Collaborative area, with Hispanic families having the lowest costs in that county (with a score of 62.67) and White families having the highest (52.84).

Lower-density Jefferson, Ozaukee, and Washington counties have similar high transportation costs. The indices for these counties are nearly half of the more urban Milwaukee County’s and show the disparities of access for all races within those counties, all of which have high transportation costs.

For families living below the federal poverty line within the Collaborative area, the transportation cost indices are slightly higher than those of the general population and more varied, indicating that their transportation costs are somewhat lower than those of the overall population.

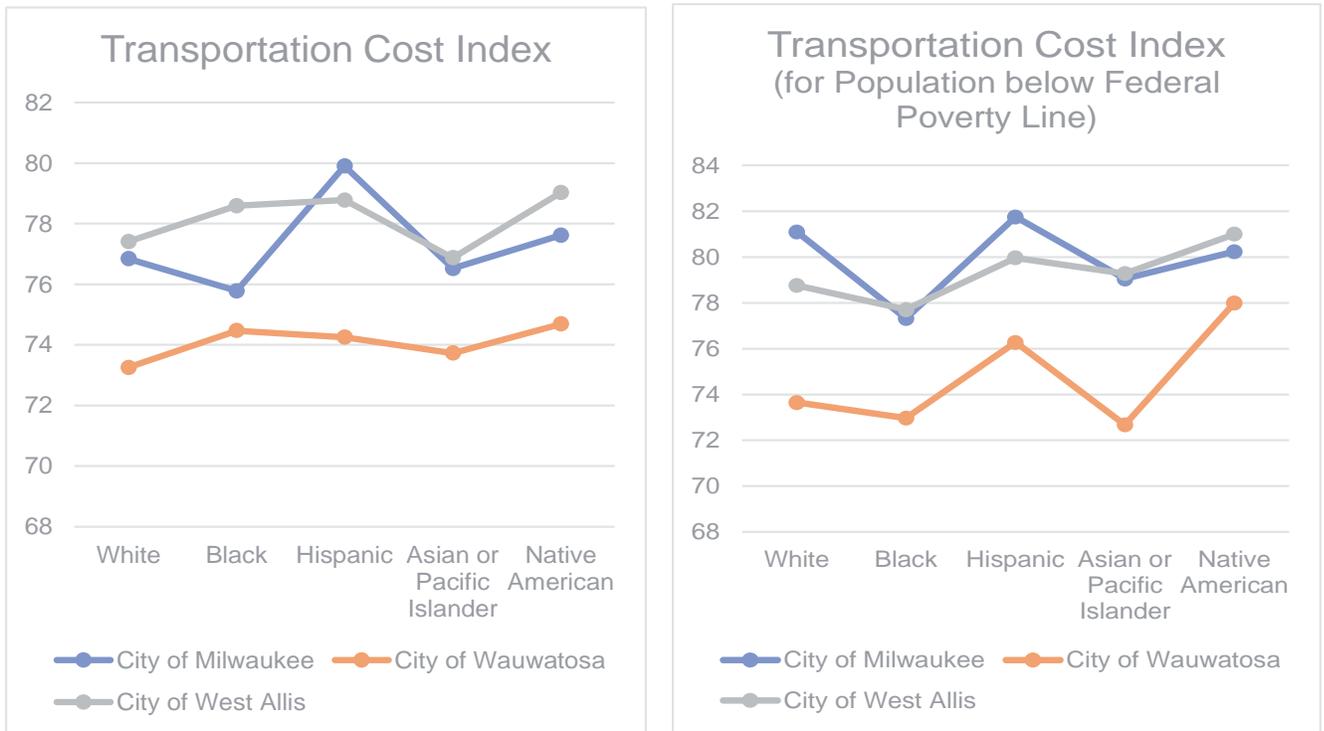
EXHIBIT VII-7.
TRANSPORTATION COST INDICES BY COUNTY



Source: Affirmatively Furthering Fair Housing Data and Mapping Tool, Raw Data, and Applied Real Estate Analysis, Inc.

Probably as a result of patterns of usage of public transportation versus cars, Hispanics have the lowest transportation costs of all racial and ethnic groups in the three cities, whereas Whites have the highest transportation costs. Both Milwaukee and West Allis generally have low transportation costs for most racial and ethnic groups except for African Americans who have higher costs than other population groups in the city. The transportation costs do not vary greatly in the three cities for families with incomes below the poverty level versus higher income families.

EXHIBIT VII-8.
TRANSPORTATION COST INDICES BY CITY

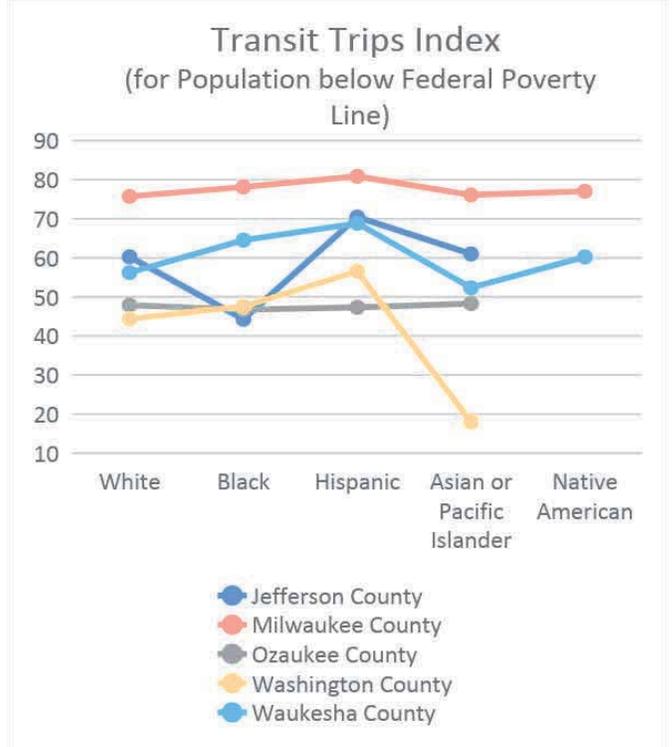
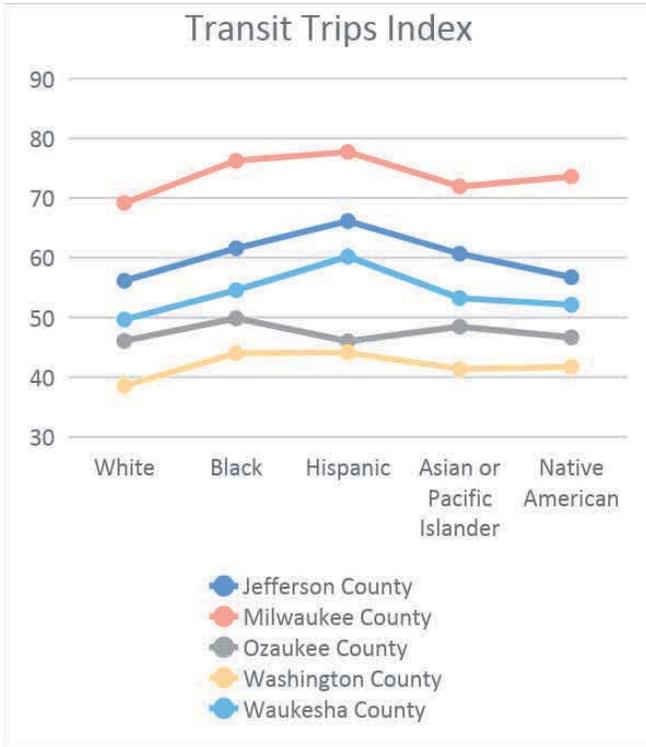


Source: Affirmatively Furthering Fair Housing Data and Mapping Tool, Raw Data, and Applied Real Estate Analysis, Inc.

Transit Trips. The transit trips index estimates transit trips taken by residents within a CBSA by race and ethnicity. The higher the transit trip index, the better the access to transit and the more likely residents use public transit versus other forms for transportation. HUD’s transit trips index estimates family transit trips for a three-person single-parent family with an income at 50 percent of the average median income for renters of that region.

Perhaps unsurprisingly, Milwaukee County has the highest transit trip index of all five counties for the general population as well as those living below the federal poverty line, as it is more densely populated and has a developed transit infrastructure. Conversely, Washington and Ozaukee counties have the lowest transit trip index for those living above the poverty line, indicating less availability of public transit.

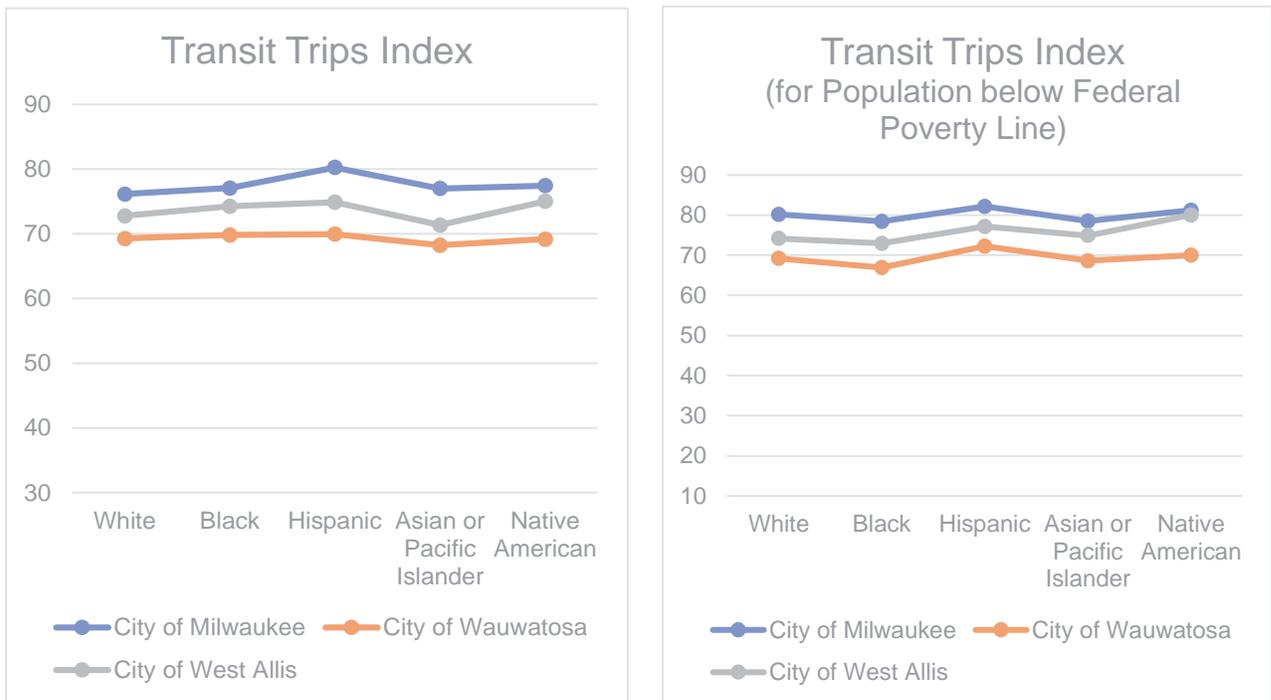
EXHIBIT VII-9.
TRANSIT TRIPS INDICES BY COUNTY



Source: Affirmatively Furthering Fair Housing Data and Mapping Tool, Raw Data, and Applied Real Estate Analysis, Inc.

Like Milwaukee County overall, the three Collaborative cities offer similar levels of access to public transit for all racial and ethnic groups with the highest access in Milwaukee, the second highest in West Allis, and the lowest in Wauwatosa. Both families below the poverty level and higher income families have about the same access to public transit.

EXHIBIT VII-10.
TRANSIT TRIPS INDICES BY CITY



Source: Affirmatively Furthering Fair Housing Data and Mapping Tool, Raw Data, and Applied Real Estate Analysis, Inc.

Conclusions

- As might be expected, Milwaukee County has the best public transportation system and the best transit access of the Collaborative area’s five counties.
- Similarly, within Milwaukee County, the city of Milwaukee has the best public transportation system and the best public transit access of the three Collaborative cities.

School Proficiency Index

The HUD “school proficiency index” measures high-performing and low-performing elementary schools based on school-level data on the performance of fourth-grade students on state exams. The higher the score, the higher the quality of the area’s school system. Lower proficiency indices can indicate the disparity in access to high-performing

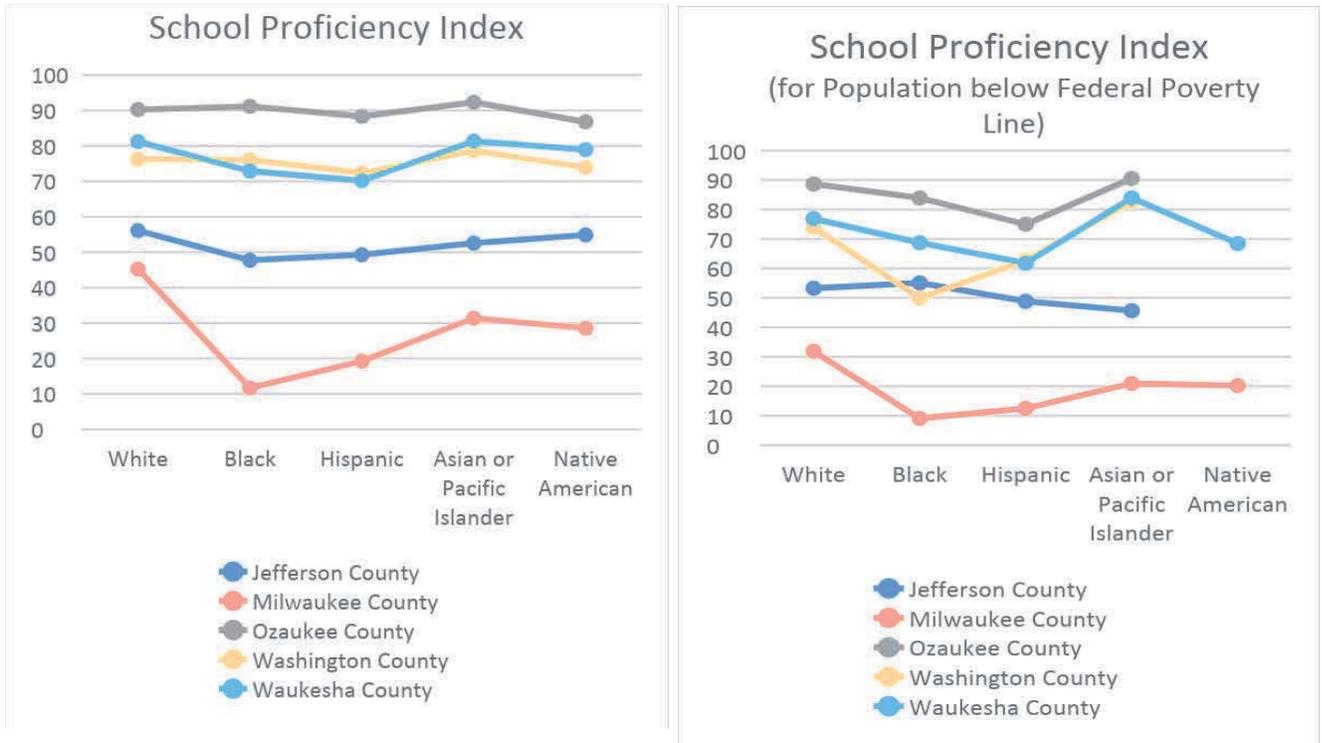
schools for underserved populations. Limited access to high-performing schools can create barriers to future job access, which can increase exposure to poverty.

For this index, HUD includes data from most but not all school districts. In the counties of the Collaborative area, data from 27 of 35 of Milwaukee County's school districts were included in the index; 6 of 8 of the districts in Washington County; 17 of 20 of the districts in Waukesha County; as well as data from all of Ozaukee County's 5 districts and Jefferson County's 7 districts.

In the five-county Collaborative area, the greatest disparity of access to high-performing schools by race and ethnicity is found in Milwaukee County, according to HUD-collected data. Schools in Milwaukee County have the lowest school proficiency index for the general population as well as those living below the poverty line throughout the study area, with African Americans and Hispanics having the poorest access to high-performing schools. The school proficiency index in Milwaukee County is only 11.9 for African-American residents, compared to 45.4 for White residents. Thus, Milwaukee County has the highest concentration of African Americans and Hispanics and the lowest access to proficient schools for those races/ethnicities.

In Jefferson, Ozaukee, Washington, and Waukesha counties, school proficiency indices across all races and ethnicities are about the same for those living above the poverty line, and all are higher than those of Milwaukee County. However, for those living below the poverty line, access to proficient schools varied by race and ethnicity. Hispanic and Black populations living in poverty had lower proficiency indices in Washington, Ozaukee, and Washington counties, most dramatically for Black students in Washington County. Also, Asians had better access to proficient schools than other racial and ethnic groups except in Jefferson County.

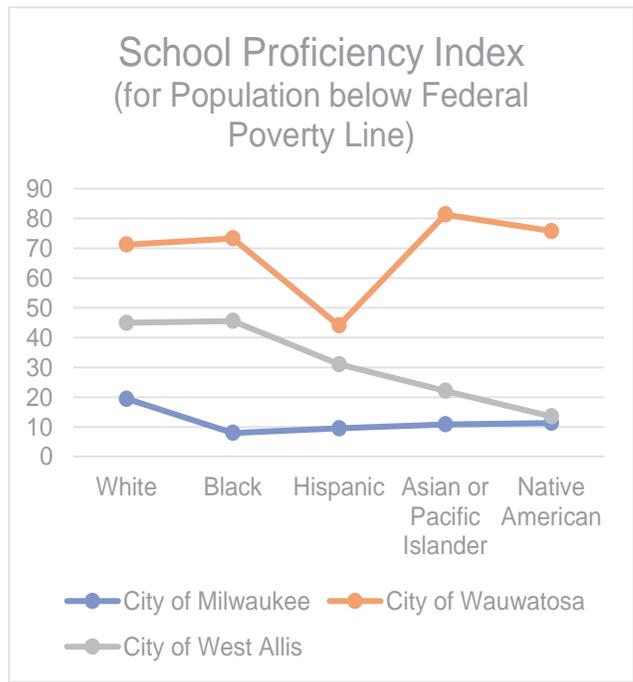
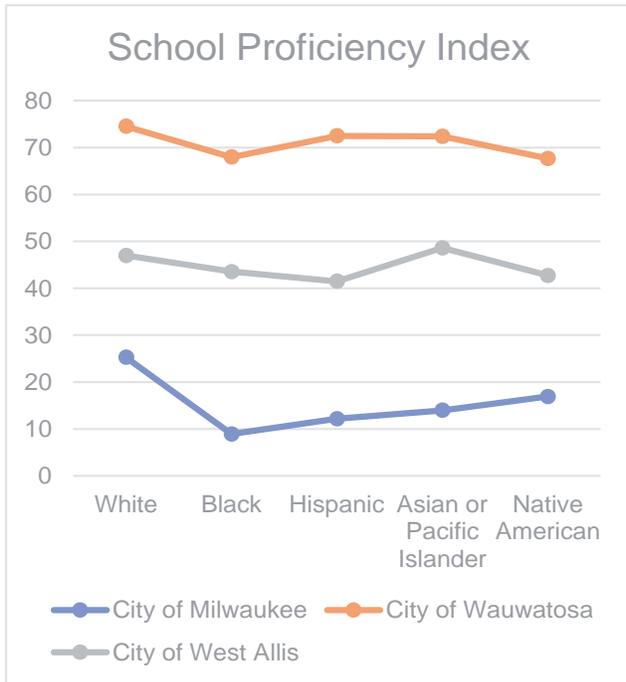
EXHIBIT VII-11.
SCHOOL PROFICIENCY INDICES BY COUNTY



Source: Affirmatively Furthering Fair Housing Data and Mapping Tool, Raw Data, and Applied Real Estate Analysis, Inc.

Of the three Collaborative cities, Wauwatosa offers the highest access to proficient schools for all racial and ethnic groups with an average index of 71 and Milwaukee offers the lowest access with an average index of only 15. For families with incomes below the poverty level in Wauwatosa, all racial groups have good access to proficient schools with an index above 72. However, for the ethnic group of poor Hispanic families in this city, the school access index is only 44.

EXHIBIT VII-12.
SCHOOL PROFICIENCY INDICES BY CITY



Source: Affirmatively Furthering Fair Housing Data and Mapping Tool, Raw Data, and Applied Real Estate Analysis, Inc.

Conclusions

- African Americans, Hispanics, and other racial and ethnic minority groups have better access to high-quality schools in sections of the Collaborative area outside of Milwaukee County.
- However, African-American and Hispanic households living below the poverty level in Jefferson, Ozaukee, and Washington counties have less access to high performing schools than White households.
- Of the three Collaborative cities, the city of Wauwatosa offers the best access to proficient schools for all racial and ethnic groups.

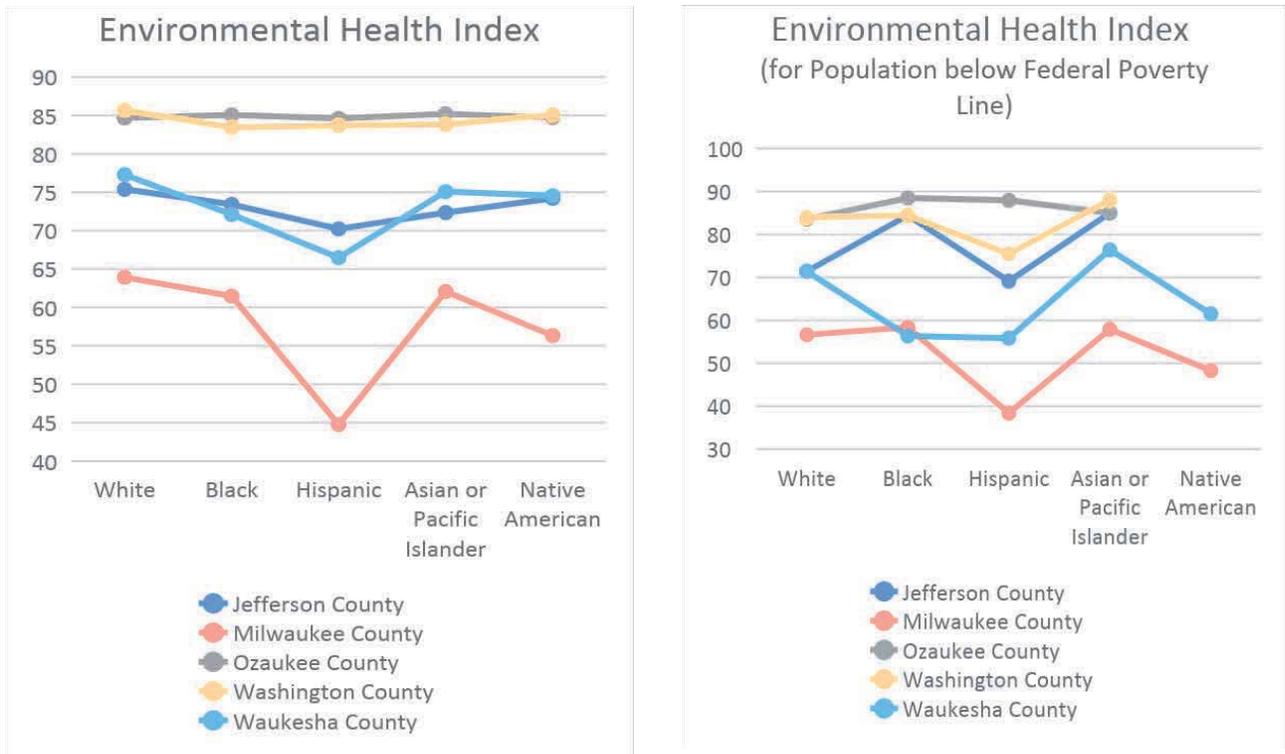
Environmental Health

HUD's "environmental health index" summarizes the prospective exposure to harmful toxins at the neighborhood level. This index focuses on harmful toxins as a proxy for general environmental problems. This index uses U.S. Environmental Protection Agency estimates of carcinogenic, respiratory, and neurological hazards to air quality from the National Air Toxics Assessment. (However, this index measures only outdoor hazards and not indoor exposure.) The higher the value, the better the environmental quality of an area, based on these specific measures.

In the five-county Collaborative area, the greatest disparity in prospective exposure to toxins is found in Milwaukee County. Hispanics in Milwaukee County face dramatically higher potential exposure to harmful toxins, irrespective of income; the same is true in Jefferson and Waukesha counties, though less markedly. Residents in Ozaukee and Washington were exposed to the least environmental hazards, having the most stable indices of all counties for those living above the poverty line.

For those living below the poverty line, exposure to toxins is increased across all races and ethnicities (except for Blacks and Asian Americans living in Jefferson County, whose indices are about the same for those not living in poverty). Asians living below the poverty line generally were exposed to less toxins than other races and ethnicities.

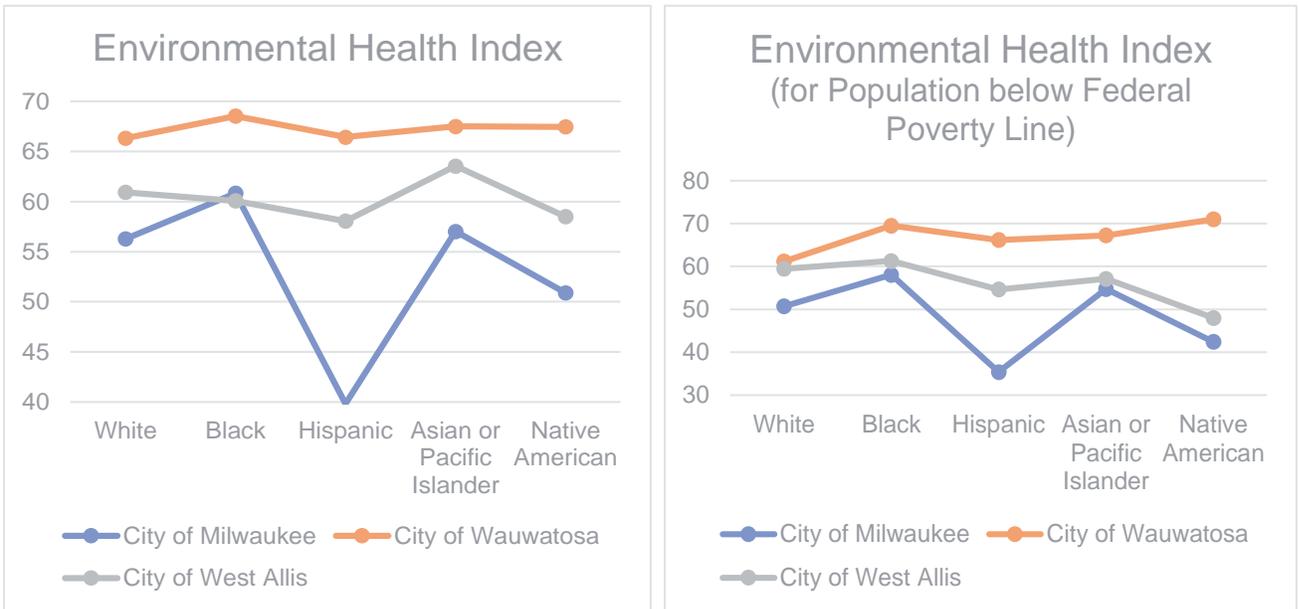
EXHIBIT VII-13.
ENVIRONMENTAL HEALTH INDICES BY COUNTY



Source: Affirmatively Furthering Fair Housing Data and Mapping Tool, Raw Data, and Applied Real Estate Analysis, Inc.

Of the three Collaborative cities, Wauwatosa has the least exposure to environmental toxins and Milwaukee has the greatest exposure. Generally, the exposure to environmental problems does not vary by racial groups or income levels within the three cities. However, Hispanics in Milwaukee have the greatest exposure to environmental toxins of all population and income groups in the three cities.

**EXHIBIT VII-14.
ENVIRONMENTAL HEALTH INDICES BY CITY**



Source: Affirmatively Furthering Fair Housing Data and Mapping Tool, Raw Data, and Applied Real Estate Analysis, Inc.

MEASURES OF SEGREGATION AND ITS IMPACTS

Although most overtly discriminatory policies and practices resulting in segregation, such as “separate but equal” schools and other facilities upheld during the past century, have been made illegal, segregation caused by structural and individual racism and disparate impacts of decisions remains. Residential segregation, in particular, still exists in many, if not most, parts of the country. To affirmatively further fair housing, it is important to understand the patterns of population and housing that exist and the extent to which they have been affected by discrimination.

Numerous measures are used by researchers to assess population patterns to determine levels of segregation and measure their impacts. The following free market analysis and dissimilarity index are two measures that are the focus of this report.

Patterns in Disparities/Free Market Analysis

Researchers suggests that minorities are typically concentrated in specific geographic areas within a community due to economic factors. Some minorities have lower average

incomes, which limits their housing choices. A free market analysis is a model for testing this hypothesis. The analysis requires a review of data on the income levels of households in a census tract by race and ethnicity, which is then compared to the data on income and race in the larger market, in this case, the Collaborative's five-county study area.

The results of the analysis indicate the racial and ethnic composition of that community if income, not race or ethnicity, were the predominant factor for households when selecting a community in which to live — that is, if there were no limits on where persons of a particular race or ethnic group would be able to live based on their income and their representation within the larger community. This result was then compared to the actual racial and ethnic composition of that community.

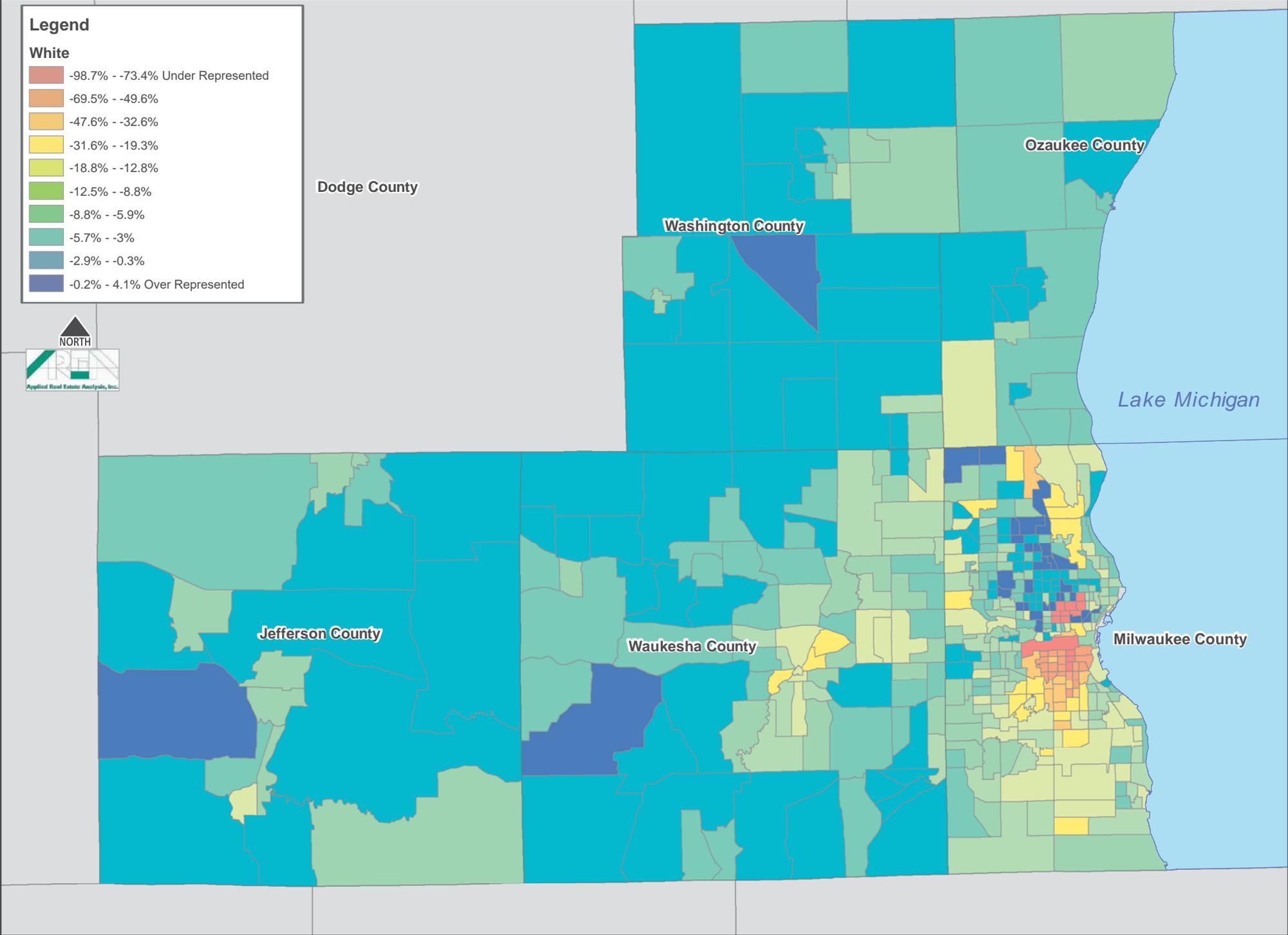
There are numerous reasons why minority populations tend to concentrate in certain geographic areas. The free market assessment captures some of these variables by acknowledging that household incomes influence where persons live. Even if a population is totally of one race or ethnicity, degrees of economic segregation will continue to exist as affluent households locate in one area where they then surround themselves with an aura of exclusivity and build housing that is unaffordable to the larger population. Households with more modest means, while priced out of more affluent sections of the community, still have a variety of choices as to where to live but may self-isolate in particular geographic areas.

The poorest households in any community have the fewest choices and typically live in areas their more prosperous neighbors deem undesirable. The free market assessment captures this dynamic. Because Black and Hispanic populations in the United States tend to have higher percentages of low-income households, there are bound to be some limitations on where they can afford to live. The free market assessment assumes that if every person were free to choose, they would live where they could afford to live and that members of minority groups would thus be dispersed somewhat proportionately over the entire geography.

This free market analysis indicates that taking income into consideration, minority populations would still be concentrated in certain sections of the Collaborative area but would be somewhat more dispersed than they are currently. Although the demographics in the previous section indicated the racial bias within the region, the free market analysis provides insight into the disparities based on income. The maps of the following pages show the difference between the percentage of members of a racial or ethnic group that would live in the census tract in a free market and the percentage of members of a racial or ethnic group that actually live in the census tract. For example, Whites households are over represented in many sections of Jefferson, Washington, Waukesha, and Ozaukee counties as well as some census tracts in the city of Milwaukee. Similarly, African-American and Hispanic households are over represented in the city of Milwaukee and under represented in most sections of the surrounding Collaborative area.

Economic factors, especially housing affordability, that influence population patterns will be discussed in sections on housing costs, employment, and transportation. The more institutional factors are discussed in sections on housing and land use.

Exhibit VII-15.
Free Market Analysis - White



Source: U.S. Census Bureau American Community Survey; Applied Real Estate Analysis, Inc.

Exhibit VII-16.
Free Market Analysis - African-American/Black

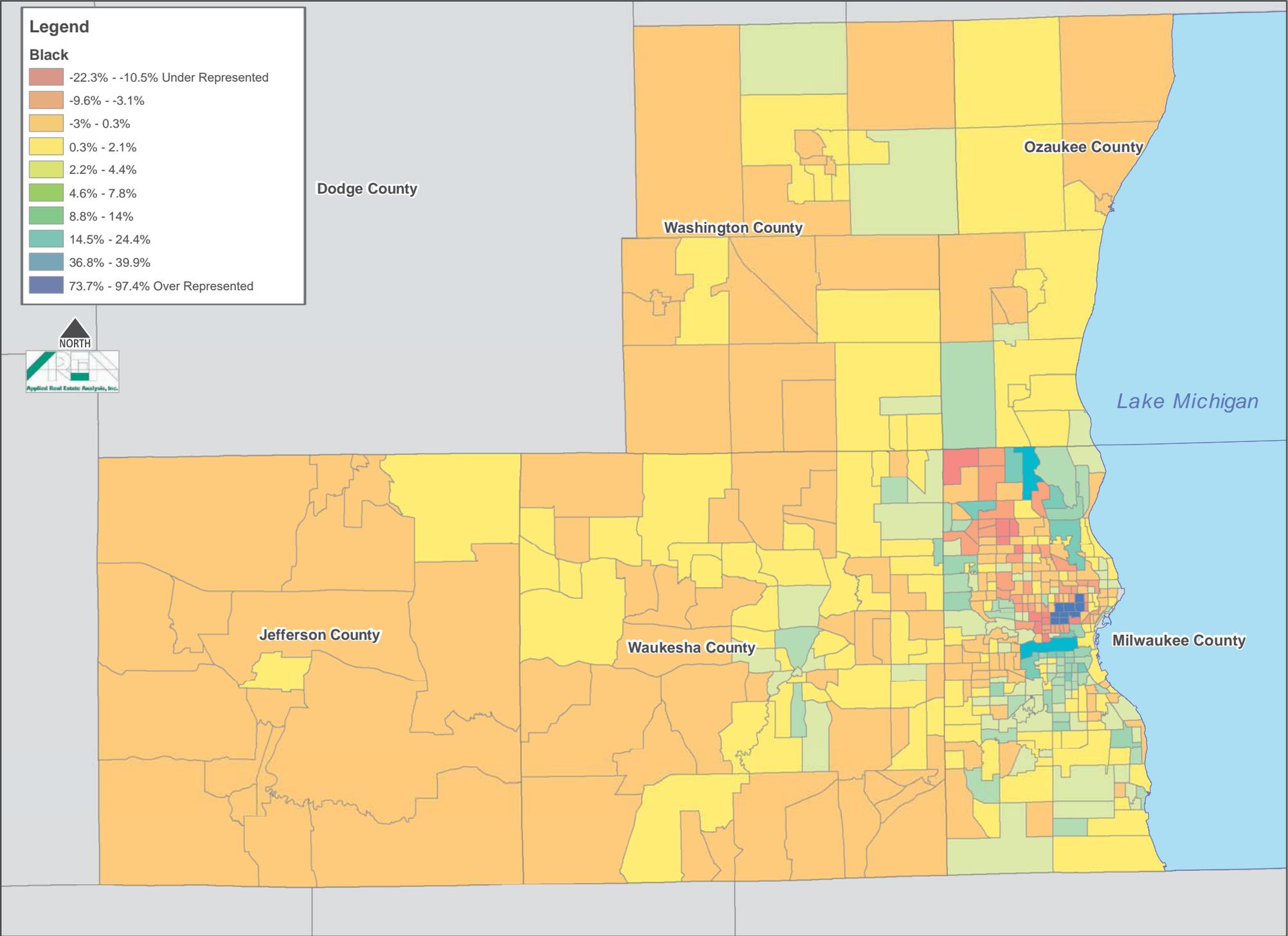


Exhibit VII-17.
Free Market Analysis - Hispanic

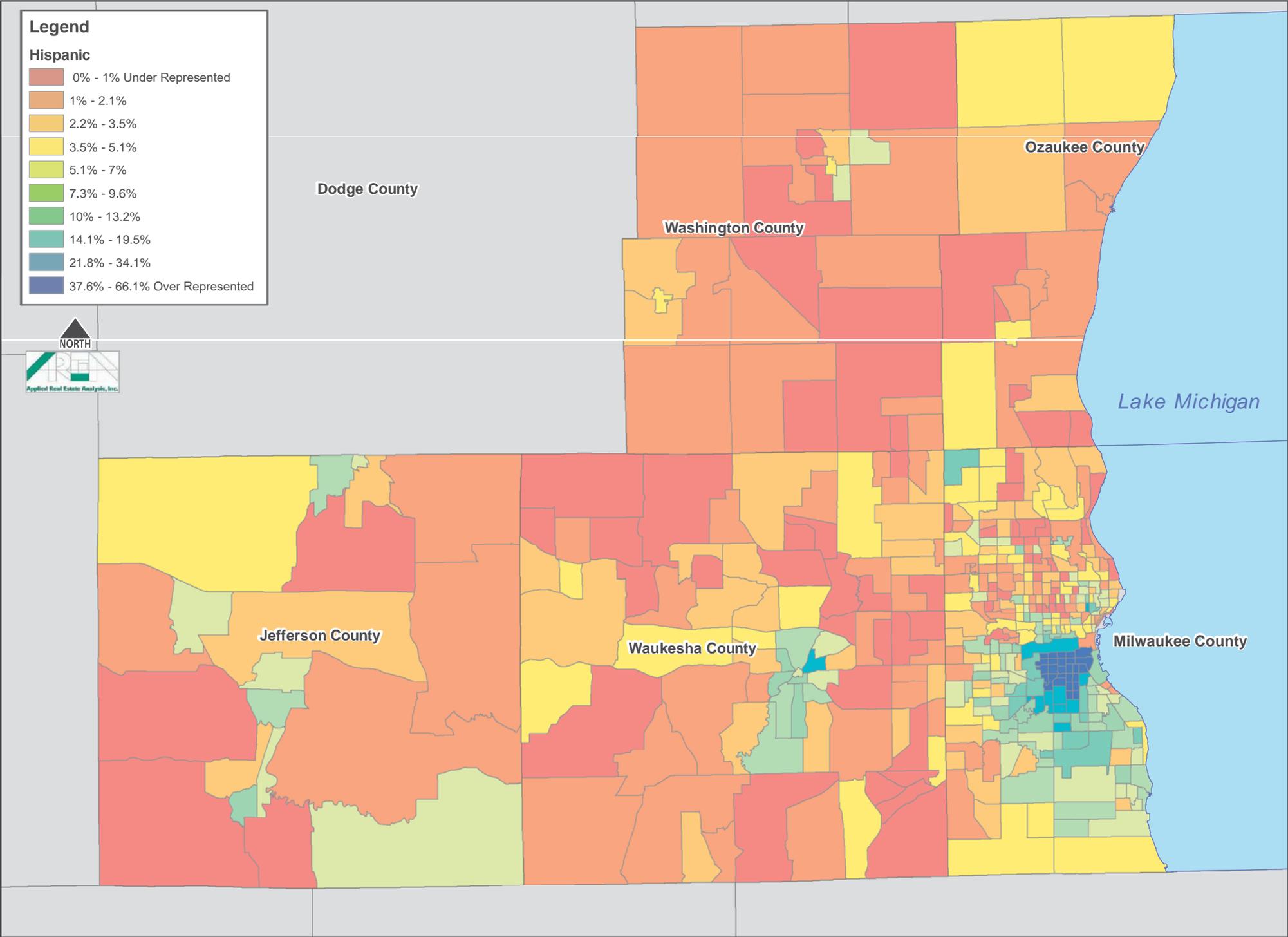
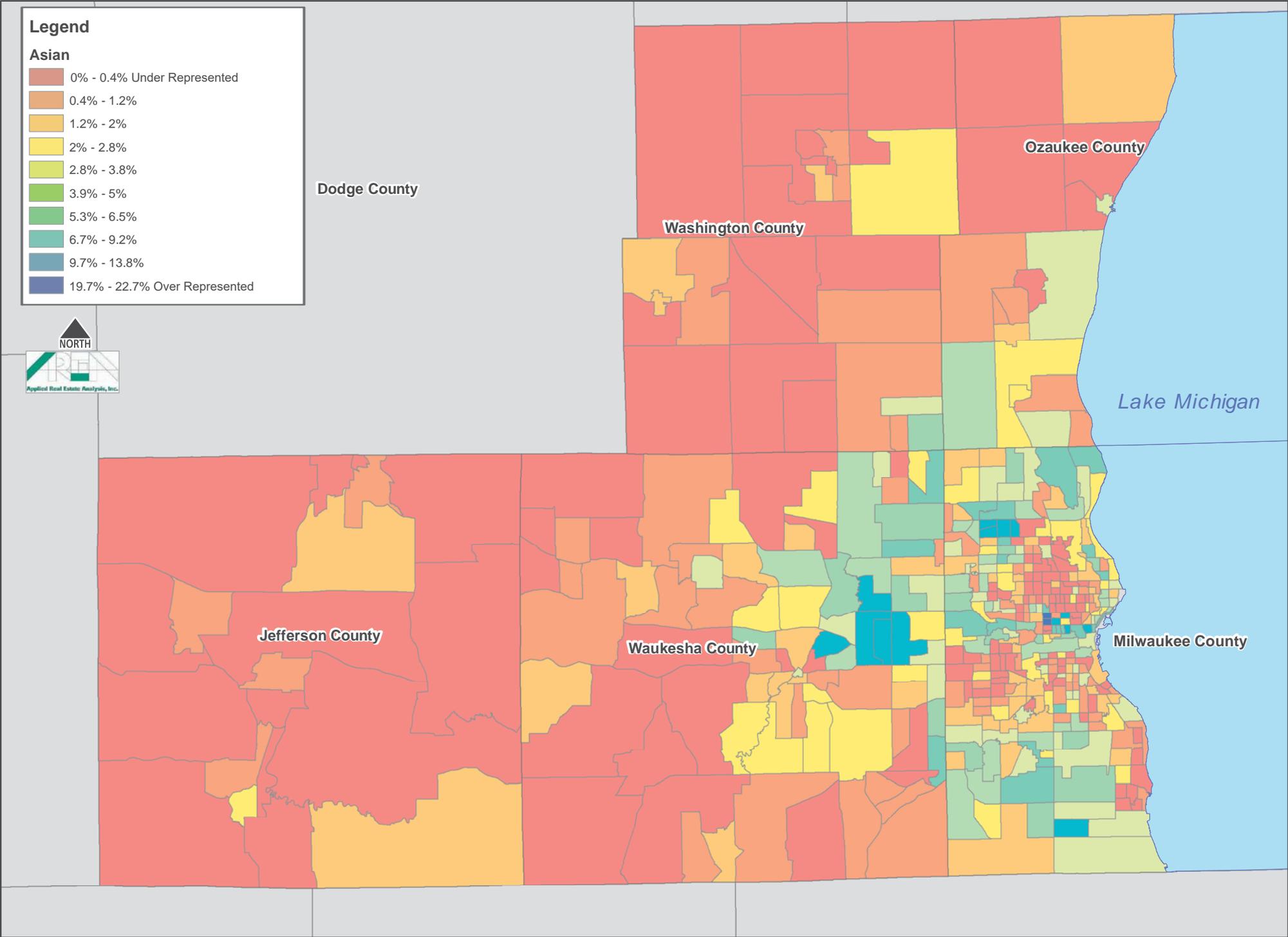


Exhibit VII-18.
Free Market Analysis - Asian or Pacific Islander



Source: U.S. Census Bureau American Community Survey; Applied Real Estate Analysis, Inc.

Dissimilarity Analysis of Segregation

Another method used to assess segregation is the dissimilarity index, which measures the distribution of racial and ethnic groups across a geographic area. This methodology measures the degree to which two or more population groups live separately from one another in a geographic area. It is a measure of the evenness with which two groups, such as African-American and White residents or White and all other non-White residents, are distributed across specific geographic areas. The index ranges from zero (complete integration) to 100 (complete segregation). The score can be interpreted as the percentage of specific population groups, such as Black or White residents, that would have to move to different areas to produce a distribution that matches the distribution of the larger area. Although the AFFH Tool provided by HUD has data on dissimilarity for the jurisdictions within the Collaborative area, the information is quite old covering the time periods from 2000 through 2010. Consequently, we have used more recent data sources.

Based on an analysis of segregation in metropolitan areas across the country conducted by Governing, the Milwaukee metropolitan area is the most segregated metropolitan area in the country with a White-Black dissimilarity index of .798.⁸ As shown in the following exhibit, the five other metropolitan areas with the highest segregation ratings are areas with the key central cities of New York, Chicago, Detroit, and Cleveland. Overall the State of Wisconsin had a White-Black dissimilarity index of .77 and a range of indices for all counties from .30 to .87.⁹

EXHIBIT VII-19.

DISSIMILARITY INDEX BY METROPOLITAN AREA

Metropolitan Area	White-Black Dissimilarity Index
Milwaukee-Waukesha, WI	.798
New York-Newark-Jersey City, NY-NJ-PA	.768
Chicago-Naperville-Elgin, IL-IN-WI	.753
Detroit-Warren-Dearborn, MI	.737
Cleveland-Elyria, OH	.729

Source: Governing analysis of 2013-2017 American Community Survey 5-year data.

⁸ Governing, the Future of States and Localities, “Residential Segregation Data for U.S. Metro Areas,” Accessed March 23, 2020. Available at: <https://www.governing.com/gov-data/education-data/residential-racial-segregation-metro-areas.html>

⁹ County Health Rankings & Roadmaps program, “Residential Segregation—Black/White,” 2019. Accessed March 25, 2020. Available at: <https://www.countyhealthrankings.org/app/wisconsin/2020/measure/factors/141/data?sort=sc-0>

Generally, HUD's AFFH Data and Mapping Tool considers any dissimilarity index level over .55 to be high segregation, .40 to .55 is moderate, and less than .40 is low. For the overall Collaborative area, based on all census tracts in the area, the level of White-Black segregation is high (.78). As shown in the following exhibit, of the five counties in the Collaborative, Milwaukee County has the highest level of White-Black segregation (.75) and Ozaukee County has the lowest (.35). However, Jefferson, Ozaukee, and Washington counties also have very small African-American populations compared to their White populations.

The city of Milwaukee has the highest level of White-Black segregation (.72) of the three cities in the Collaborative, both of which have low levels of segregation. Like many other suburban areas in the Collaborative region and in suburban Milwaukee County, both Wauwatosa and West Allis have very small African-American populations compared to their White populations.

The only racial group that is consistently highly segregated from Whites in the Collaborative area is Pacific Islanders. However, this population group is a very small percentage of the overall area's population. Four of the five counties have moderate levels of White-Native American segregation, however, again the Native American population in the region is very small—less than one percent in 2017.

Segregation between Hispanic ethnic groups and White racial groups is also low in four of the five counties. The exception is Milwaukee County where the White-Hispanic dissimilarity index is moderate (.47). White-Hispanic segregation is also moderate in the City of Milwaukee and West Allis.

Exhibit VII-20.
Measure of Segregation–Dissimilarity Index Values

	White-Black	White-Native	White-Asian	White-Pacific Islander	White-Other	White-Two or more	White-Hispanic
Dissimilarity Index Values (based on Census Tracts within each jurisdiction)							
COUNTIES							
Jefferson	0.45	0.50	0.35	0.87	0.41	0.25	0.27
Milwaukee	0.75	0.49	0.44	0.93	0.63	0.35	0.47
Ozaukee	0.35	0.51	0.34	0.86	0.61	0.18	0.22
Washington	0.47	0.50	0.48	0.94	0.53	0.26	0.26
Waukesha	0.48	0.58	0.43	0.89	0.58	0.30	0.36
Collaborative Area (Based on CTs in all five counties above)	0.78	0.55	0.47	0.91	0.65	0.38	0.50
Collaborative Area (Based on county-level segregation)	0.50	0.31	0.23	0.07	0.41	0.28	0.35
CITIES							
Milwaukee	0.72	0.51	0.54	0.94	0.60	0.35	0.46
West Allis	0.21	0.51	0.36	n/a	0.39	0.21	0.42
Wauwatosa	0.29	0.53	0.30	n/a	0.40	0.28	0.22
Qualitative Interpretation of Dissimilarity Values; Amount of Segregation in Jurisdiction ^[1]							
COUNTIES							
Jefferson	Moderate	Moderate	Low	High	Moderate	Low	Low
Milwaukee	High	Moderate	Moderate	High	High	Low	Moderate
Ozaukee	Low	Moderate	Low	High	High	Low	Low
Washington	Moderate	Moderate	Moderate	High	Moderate	Low	Low
Waukesha	Moderate	High	Moderate	High	High	Low	Low
Collaborative Area (Based on CTs in all five counties above)	High	High	Moderate	High	High	Low	Moderate
Collaborative Area (Based on county-level segregation)	Moderate	Low	Low	Low	Moderate	Low	Low
CITIES							
Milwaukee	High	Moderate	Moderate	High	High	Low	Moderate
West Allis	Low	Moderate	Low	n/a	Low	Low	Moderate
Wauwatosa	Low	Moderate	Low	n/a	Moderate	Low	Low
[1] per AFFH Data Documentation Standards:							
	Low Segregation	< 0.40					
	Moderate Segregation	0.40 to 0.55					
	High Segregation	> 0.55					

Sources: U.S. Census Bureau, 2013-2017 American Community Survey, 5-year estimates; HUD AFFH Data Documentation; AREA, Inc.

SECTION VIII.

FAIR HOUSING ACTIVITIES AND OUTREACH

Collaborative members of the cities of Milwaukee, West Allis, and Wauwatosa, and Milwaukee, Waukesha, Washington, Ozaukee, and Jefferson counties conduct various programs, activities, and outreach efforts. Due to the overlapping nature of service areas and constituents, many fair housing programs and activities are provided through a network of social service and advocacy organizations. There are a mixture of for-profit and nonprofit organizations in the Collaborative area that provide assistance on fair housing–related issues in the form of investigation, referrals, counseling, outreach, negotiation, and education. This section of the fair housing assessment discusses key agencies that address fair housing issues and major fair housing procedures and activities.

FAIR HOUSING ADVOCACY ORGANIZATIONS

The Metropolitan Milwaukee Fair Housing Council (MMFHC) is a private nonprofit organization that provides statewide assistance to promote fair housing. It is the largest fair housing organization in the Collaborative region and the state. The organization's headquarters in Milwaukee serves Milwaukee, Washington, Waukesha, and Ozaukee counties. MMFHC accepts fair housing complaints and provides counseling to residents and will also refer complainants to attorneys and government agencies to resolve the complaints.

MMFHC is the only organization in the state that receives Private Enforcement Initiative grants from HUD, which enables it to conduct intake of fair housing complaints that are filed with HUD, as well as paired testing¹, and investigation services for persons who allege housing discrimination. The grant also covers education and outreach activities to help educate the public, housing providers, and local governments about their rights and responsibilities under the Fair Housing Act.

MMFHC operates a statewide telephone hotline for those who wish to make fair housing complaints. MMFHC fights against the refusal to sell, rent, or finance housing to the protected classes, misrepresentations of the availability of housing, applying different terms or conditions to prospective buyers, and refusal to allow modifications or accommodations for persons with disabilities.

Legal Action of Wisconsin is a nonprofit law firm that provides legal assistance to low-income persons throughout Wisconsin. Its Housing Priority Committee handles cases that

¹ In a paired test, two individuals—one minority and the other white—pose as otherwise identical homeseekers, and visit real estate or rental agents to inquire about the availability of advertised housing units.

involve fair housing issues, such as public housing being denied to residents and evictions. The organization handles issues that are related to and can be caused by discrimination in the housing market. Legal Action of Wisconsin operates an Eviction Defense Project that provides free legal aid to tenants in Milwaukee County facing eviction, funded in part by the Legal Services Corporation. Legal Action of Wisconsin published a "Tenant Sourcebook" that provides Wisconsin renters with information on housing rights, including what to do in the event of mistreatment or discrimination. The organization also has a predatory lending project that has been highly effective in reducing the number of foreclosures and combating predatory lending in the city of Milwaukee.

IndependenceFirst is a resource for people with disabilities in the metropolitan Milwaukee area that advocates for residents of the metropolitan area with disabilities. Its service area includes all areas in the Collaborative region except for Jefferson County. In addition to providing personal caregiver and independent living services, the organization offers a wide range of services to empower people to achieve goals for independence. IndependenceFirst also advocates for accessible housing, employment, transportation, and educational facilities that benefit persons with disabilities. In the area of fair housing, IndependenceFirst provides referrals on its website for people with disabilities seeking to report housing complaints and receive housing information.

Disability Rights Wisconsin is a nonprofit organization designated under Wisconsin law as the protection and advocacy (P&A) organization for people with disabilities. It operates in the entire state of Wisconsin. Among other services, it provides information on the internet about the Fair Housing Act and how it protects people with disabilities. Disability Rights Wisconsin promotes housing rights by providing advocacy and legal assistance for people with disabilities who feel they have been a victim of discrimination or unfairly treated through housing. The organization's website contains detailed information about the Fair Housing Act and links to other fair housing advocacy organizations.

Legal Aid Society of Milwaukee is a public interest law firm that provides free legal assistance to low-income residents of Milwaukee County. Although it does not specialize in fair housing law, it commonly handles fair housing-related cases such as evictions caused by unfair and predatory practices.

Southeastern Wisconsin Regional Planning Commission (SEWRPC) is the official planning agency for the southeastern region of Wisconsin. The commission serves four of the five counties of the Collaborative, except Jefferson County. The commission offers information on the history of fair housing law and segregation in the Milwaukee area on its website, and by taking fair housing issues into account while creating regional plans.

The level of detail about fair housing law on SEWRPC's website is quite high, with citations to specific parts of legislation. SEWRPC provides information and recommendations to local governments on planning neighborhoods to facilitate the availability of fair housing. SEWRPC's 2035 regional housing plan contains

recommendations on how to promote fair housing in southeastern Wisconsin, among recommendations to alleviate other housing issues.

Housing Action Coalition of Waukesha County focuses on education and advocacy to raise awareness of homelessness and issues related to it. The coalition is comprised of 20 agencies, including local government agencies, businesses, and several nonprofit social service providers. The organization promotes fair housing by coordinating with other housing agencies and assisting those in need of housing in Waukesha County. The organizations work together to provide resources to low-income residents in Waukesha County. MMFHC, IndependenceFirst, and SEWRPC are among the organizations that comprise the coalition.

COUNSELING AND REFERRALS

Several local organizations assist residents by providing housing counseling to residents who feel they have been victims of discrimination and then referring them to legal services if warranted. Organizations certified by HUD to conduct housing counseling services within the Collaborative region include MMFHC, United Community Center, Acts Housing, Housing Resources Inc., and Greenpath Financial Wellness. However, there is no comprehensive list of all the organizations that provide housing counseling services in the Milwaukee area on any of the fair housing advocacy organization websites.

MMFHC refers residents to attorneys and government agencies to address complaints of fair housing violations. Many of the additional fair housing advocacy organizations have references listed on their websites for individuals looking to lodge a fair housing complaint.

INVESTIGATION AND TESTING

Investigation and testing involves organizations conducting research to determine if housing discrimination has taken place. Common methods of investigation and testing include conducting interviews with both parties and obtaining relevant documents. Often investigators send individuals of different races or ethnicities to apply for housing to determine if the response is different.

MMFHC is the only private organization in the state that conducts investigation and testing for housing discrimination. Aside from investigating individual cases of alleged violations of fair housing law, it also conducts systemic investigations of institutional discrimination. Additionally, MMFHC operates its Investigative Support for Testing and Enforcement Program, which helps other fair housing investigation organizations across the country improve the quality and consistency of their investigations.

HUD's Office of Fair Housing and Equal Opportunity and the Wisconsin Department of Workforce Development (DWD) fund the investigation of fair housing complaints within all areas of the Collaborative region.

NEGOTIATION AND LEGAL SERVICES

If a person feels they have been a victim of housing discrimination, then they may require legal services to take legal action. As a part of its HUD-funded Enforcement Program, MMFHC refers people with fair housing issues to attorneys and government agencies if it believes that violations of fair housing law have occurred. HUD and DWD will provide legal representation to complainants if reasonable or probable cause of discrimination is found in their investigations.

Legal Aid Society of Wisconsin and Legal Action of Wisconsin firms represent low-income residents in the Milwaukee area. Legal Aid Society of Milwaukee only operates in Milwaukee County, but Legal Action of Wisconsin represents residents in all areas of Wisconsin. The Legal Aid Society is most active in cases of fair housing that involve eviction. Legal Action of Wisconsin most commonly handles cases where public and subsidized housing is denied to residents, evictions, lockouts, and other issues that are related to fair housing.

EDUCATION AND OUTREACH

Fair housing education and outreach efforts can involve activities such as organizing meetings with people dealing with housing issues, training landlords and property owners in fair housing law, and disseminating information about fair housing online. The MMFHC is the main organization that provides direct education and outreach services to members of the Milwaukee Collaborative region. It is the only organization in the state that receives Education and Outreach Initiative grants from HUD. MMFHC uses these funds for their Outreach and Education program, which involves conducting presentations for the general public, fair housing training for property owners and real estate agents, and the distribution of fair housing education materials.

MMFHC also operates an application called Fair Housing Hunt, which allows users to record information about home rentals while searching for housing; compare different units based on cost, size, and location; and make informed decisions about housing. The application is free, and it also provides information about fair housing rights and what to do if you feel you have been involved in a fair housing violation.

Despite the wealth of information provided by MMFHC on the internet, there are not many events scheduled for the community through MMFHC's website or Facebook page. The information provided by MMFHC online does not go into specific detail regarding their outreach efforts, such as the number and locations of fair housing training sessions it conducts. However, on individual community websites, specific communities promote the

fair housing training seminars conducted by MMFHC. For example, the City of Wauwatosa advertised free training for rental property owners and managers at several dates and times.

Legal Aid Society of Milwaukee sends attorneys to various community meeting places in order to meet with individuals and provide legal advice to them. The organization focuses on providing services to low- and moderate-income residents of Milwaukee County. A list of their frequently scheduled events can be found on their website. Legal Aid Society conducts general intake for walk-in appointments twice a week, provides free legal consultation at the Marquette Volunteer Legal Clinic once a week, and attends the La Causa Community Enrichment Center once a week to provide social support to community members. Both locations are in the city of Milwaukee.

Each of the abovementioned advocacy organizations has a website that provides information about how to receive help for fair housing issues and the specific fair housing laws for Wisconsin. SEWRPC's information on fair housing laws in Wisconsin is quite detailed and informative, and Legal Action of Wisconsin has a Tenant Sourcebook available on its website that provides information on fair housing rights in an easily readable format. Many of the organizations refer readers to the MMFHC if they have fair housing concerns or complaints.

Several of the advocacy organizations are active on social media platforms such as Facebook, Twitter, and Instagram. The organizations that are most active on social media include MMFHC, Legal Aid Society of Milwaukee, IndependenceFirst, Disability Rights Wisconsin, and Legal Action of Wisconsin.

COMPLAINT PROCESS

To receive assistance for a case involving an allegation of violation of fair housing law, an individual must report the incident to an organization authorized to receive complaints. In Wisconsin, three options exist for those who wish to file a complaint if the incident occurs in Wisconsin: MMFHC, HUD's Office of Fair Housing and Equal Opportunity (FHEO), or the Wisconsin DWD. None of the individual members of the Collaborative have separate agencies, such as an Equal Rights Commission, that can investigate complaints and enforce fair housing regulations, including the City and County of Milwaukee, each of which has its own fair housing ordinance. In the past, the City of Milwaukee's Equal Rights Commission provided capacity to conduct intake and investigation of housing complaints; however, the commission no longer performs that function.

Most of the Collaborative area's fair housing complaints are made first to MMFHC. This nonprofit organization operates a statewide toll-free intake line for complaints, making it easy for victims of housing discrimination to receive help. Once a complaint has been filed with any of the three organizations, they will conduct an investigation to determine if housing discrimination has occurred in the case. This investigation could potentially

include testing to reveal how prospective clients of different races are treated by the alleged offender. If the investigating organization believes that housing discrimination has occurred, they will refer the victim to legal services. In many cases, the two parties will resolve the conflict without going to court, and the negotiation process can be facilitated through the organization that received the complaint.

Complaints can be filed under federal or state law, and federal complaints may be submitted to HUD's FHEO or settled in a civil action suit at the complainant's own expense. Complainants are required to file a complaint within one year of the violation in the state of Wisconsin. If HUD finds reasonable cause that a fair housing violation has occurred, it will represent the complainant in federal court for free. Complaints filed under state law must be sent to DWD's Equal Rights Division. DWD requires a stricter probable cause of discrimination before it can represent a complainant.

The specific instructions for filing a complaint are listed on the official complaint forms issued by DWD and HUD, which can be found on their respective websites. Detailed information on the complainant and the respondent must be included on the form, as well as when and how the discrimination occurred. To submit a state complaint, a basis for the complaint must be listed, which must be a basis of discrimination officially protected by the Wisconsin Fair Housing Act.

SECTION IX.

FAIR HOUSING SURVEYS, PUBLIC MEETINGS, ROUNDTABLES, AND INTERVIEWS

To better understand fair housing issues affecting members of the Milwaukee County Collaborative, AREA conducted several surveys, held roundtable discussions with local housing advocacy groups and real estate industry representatives, and conducted interviews and meetings with selected public officials, staff, and other persons familiar with housing issues and conditions in the region. AREA also participated in meetings arranged by public jurisdictions and/their consultants as part of the Consolidated Plan process.

As part of the analysis, AREA developed two distinct web surveys — one for residents, a second for real estate industry professionals — to understand their perspectives on fair housing issues. We also developed a third survey for municipal officials, however, we were not able to deploy the survey to a sufficient number of municipalities in the region. The residential survey was offered in two languages — English and Spanish — to solicit input from a wide range of stakeholders. The surveys were distributed to each member of the Collaborative, placed on the websites of each participant county, and e-mailed to various nonprofit housing service providers and advocacy agencies. The real estate industry survey was listed on each county’s website, provided to the Greater Milwaukee Association of Realtors, and circulated via e-mail to key potential respondents.

The residential surveys received a limited public response. The resident survey was available online for an extended time period from August 2019 until the end of February 2020. Although the resident survey was advertised by several community groups and discussed during public meetings, only 349 residents completed the English-language survey and no one completed the Spanish-language survey. The analysis below indicates the total number of respondents and the breakdown of responses for key questions. Additionally, survey questions and responses can be found in Appendix D.

The real estate industry professionals’ survey included 42 respondents all of whom were involved in real estate activities in Milwaukee County. Industry representatives in the other four counties in the Collaborative did not respond to the survey. Key objectives of the survey were to obtain information from real estate industry representatives regarding their familiarity with and understanding of fair housing regulations and issues, and to identify any concerns that they have when undertaking activities related to housing sales or rental in Will County and the jurisdictions within it.

AREA also conducted two roundtable discussions, one with nonprofit housing organizations and advocacy agencies and a second with real estate industry professionals, to ascertain additional first-hand perspectives on the impediments to furthering fair housing in the Collaborative area and related recommendations.

In addition, AREA conducted interviews with key elected officials and community representatives. Of the elected officials identified by members of the Collaborative for potential interviews, we were able to conduct interviews of 30 to 45 minutes with representatives from several communities. The major topics of discussion included a discussion of their familiarity with fair housing issues and regulations, their views on existing barriers to fair housing, and approaches that they thought were necessary to improve access to fair housing choice.

Most importantly, as part of the Consolidated Plan process, AREA participated in 13 community meetings that were conducted in each of the five counties by other consultant and public staff teams that were primarily responsible for scheduling the meetings and encouraging community participation. During each meeting, AREA led discussions of fair housing issues.

RESIDENT SURVEY FINDINGS

Key findings from the resident survey are:

- In general, respondents to the resident survey did not feel that there was extensive housing discrimination in the Collaborative region. When asked if they feel housing discrimination is common in the area, about 15 percent of all respondents indicated that discrimination is extremely common and approximately 33 percent indicated that it is somewhat common.
- The response to questions regarding discrimination in the area might have been affected by the lack of diversity among survey respondents. The vast majority of survey respondents (87 percent) were White, less than 2 percent were African American, less than 2 percent were Hispanic, and only 1 percent were another racial or ethnic group. Consequently, we had insufficient survey responses to differentiate among responses by various racial and ethnic groups.
- When asked why they lived in the community in which they currently reside, the most frequent response (18 percent) was that the location was close to work. Overall, 14 percent located because of the availability of their desired housing type, and 14 percent chose the location to be close to their family.
- For those respondents who do not currently live in their preferred location, 19 percent indicated that they do not live there because they cannot afford the housing and/or cannot afford to move. This suggests that the availability of a greater variety of housing price options, including affordable housing, in a wider variety of the Collaborative region's communities would provide more housing choices to some area households.

Additional findings are discussed below.

Total Survey Responses. As shown in the following exhibit, only 349 persons responded to the resident survey, all of whom completed the English-language survey. No one responded to the Spanish-language survey, which was available at the same time between August 2019 and the end of February 2020. The largest percentage of respondents were from Waukesha County (38 percent). Over 33 percent were from Jefferson County and 24 percent from Milwaukee County. Less than three percent were from Ozaukee County and less than two percent from Washington County.

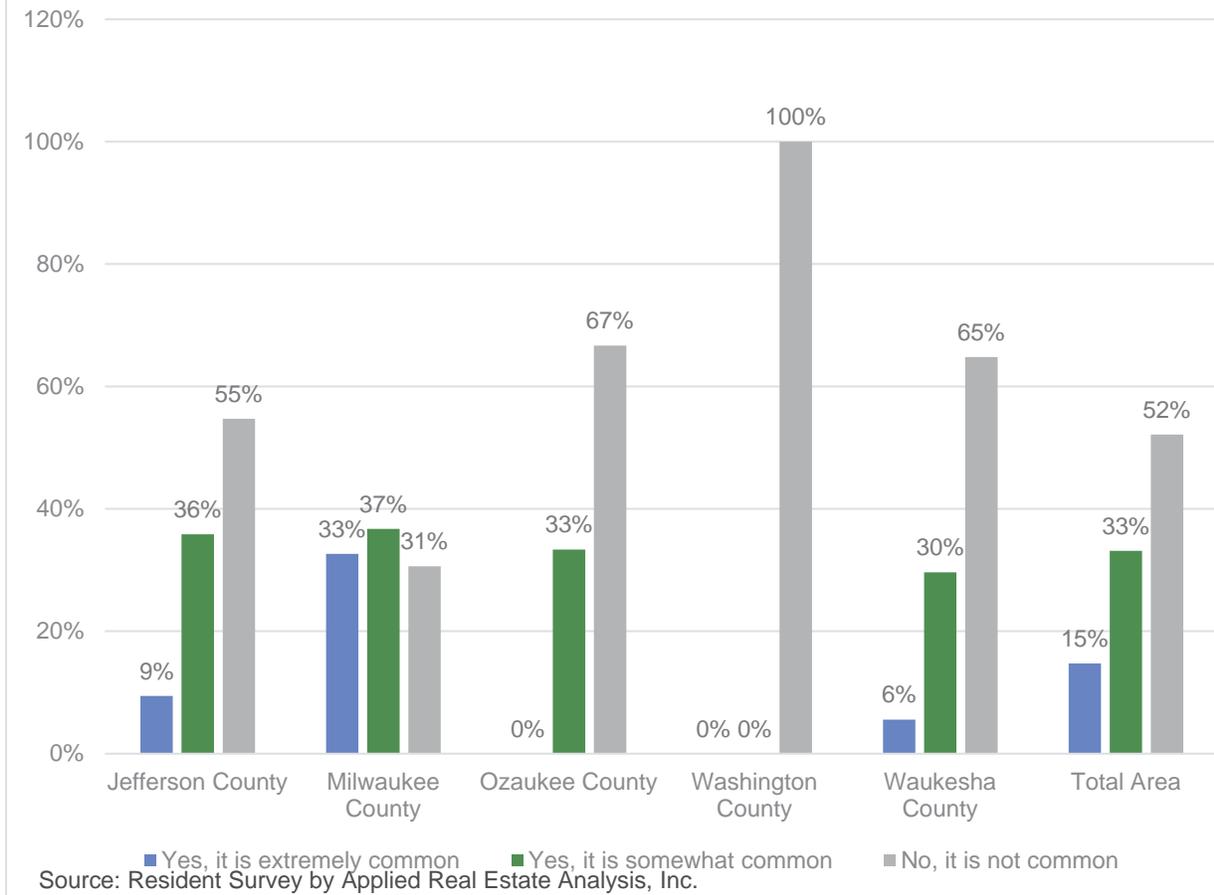
Exhibit IX-1.
Survey of Residents (English-Language Survey)

	Number	Percent of Total Surveys
Jeffersonson County	116	33.2%
Milwaukee County	85	24.4%
Ozaukee County	9	2.6%
Washington County	6	1.7%
Waukesha County	133	38.1%
Total	349	100.0%

Source: Survey of Collaborative Region residents, Applied Real Estate Analysis, Inc.

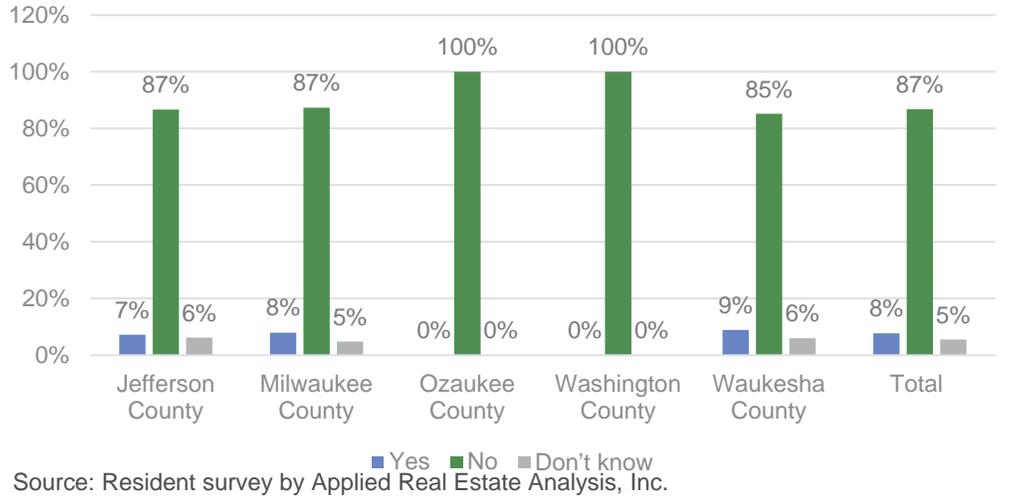
Responses to Questions about Discrimination. Survey respondents were asked if they feel that housing discrimination is common in the county in which they live. For the overall Collaborative area, approximately 15 percent of the respondents to this question indicated that housing discrimination is extremely common in the county in which they reside and 33 percent indicated that it is somewhat common. The universe of respondents to the question was, however, somewhat small given that less than 50 percent of all respondents to the questionnaire answered this question. As shown in the following exhibit, Milwaukee County residents indicated that housing discrimination was a problem more frequently than other area residents. Approximately 33 percent of Milwaukee County respondents stated that housing discrimination is extremely common and 37 percent stated that it is somewhat common. In contrast, none of the small sample of Washington County residents perceive that discrimination is a problem in their county.

Exhibit IX-2. Existence of Housing Discrimination



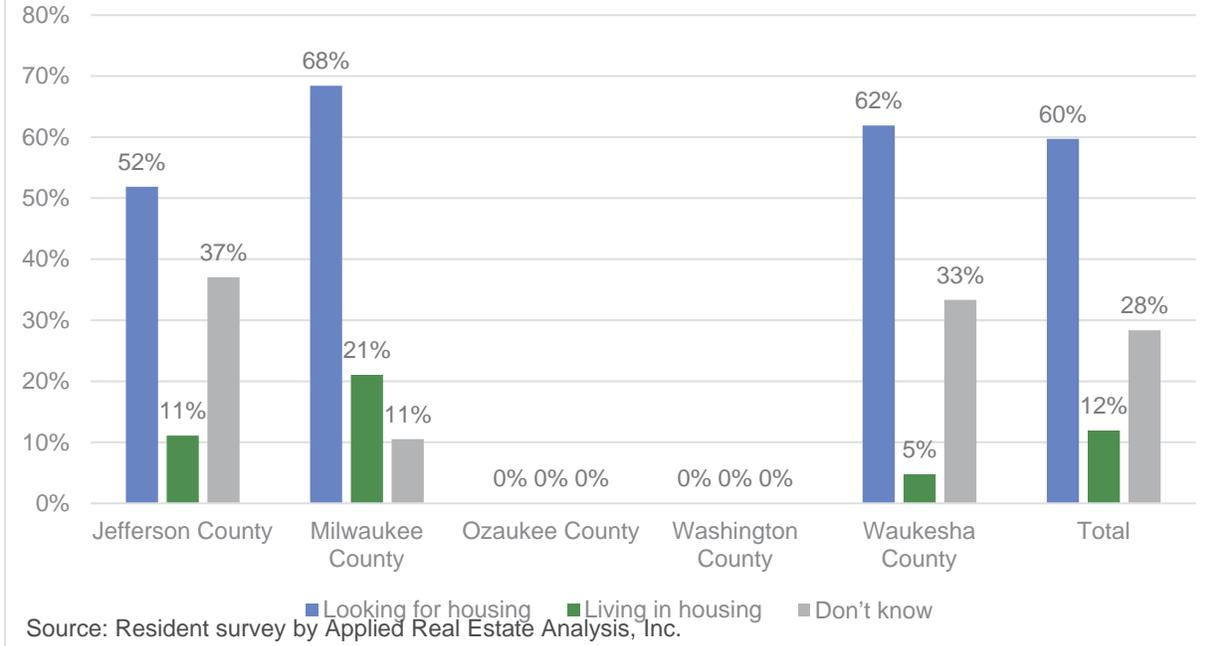
When respondents were asked if they have experienced housing discrimination while looking for or while living in housing in the county where they live, the vast majority indicated that they have not. About 87 percent of all Collaborative area respondents to this question stated that they have not experienced discrimination. The percentage did not vary significantly among the six counties.

Exhibit IX-3. Do You Feel You Have Experienced Discrimination?



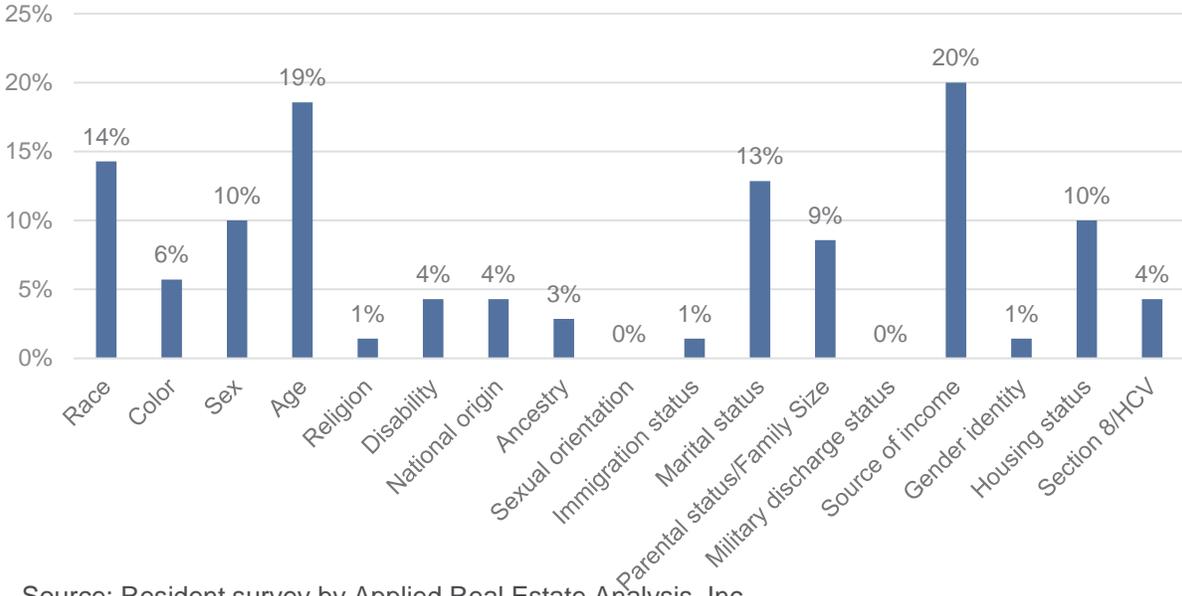
Most survey respondents also indicated that they experienced housing discrimination while looking for housing. Of the respondents who had experienced discrimination, about 60 percent stated that they experienced discrimination while looking for housing. Approximately 68 percent of the Milwaukee County residents who had experienced discrimination stated that it occurred while they were looking for housing and 21 percent indicated that it occurred while they were living in housing. None of the respondents in the small samples for Ozaukee and Washington counties indicated that they had experienced discrimination.

Exhibit IX-4.
When You Experienced Discrimination, Were You Looking for or Living in Housing?



Residents were asked, “If you have experienced housing discrimination, what do you think it was based upon?” The factor most frequently identified by respondents as the perceived reason for discrimination was the source of income provided when renting housing. As shown in the following exhibit, 20 percent of the survey respondents who experienced discrimination indicated that they thought the discrimination was based on their source of income, which could include Section 8/Housing Choice Vouchers as well as other income sources. About 19 percent of respondents indicated that they thought the experienced discrimination was based on their age, 14 percent indicated that it was based on their race, and 13 percent stated it was based on their marital status.

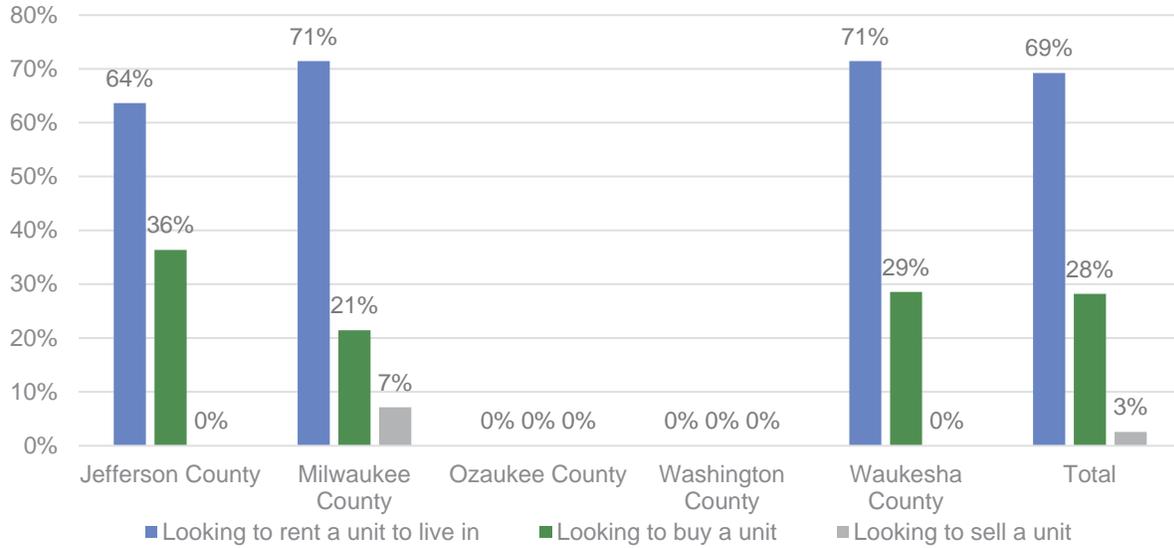
**Exhibit IX-5.
Preceived Basis of Discrimination
Total Collaborative Area**



Source: Resident survey by Applied Real Estate Analysis, Inc.

Based on survey findings, residents experienced housing discrimination more frequently when seeking housing to rent than when attempting to buy or sell a home. For residents of the overall Collaborative area that have experienced housing discrimination, 69 percent encountered discrimination while looking to rent a unit and 28 percent while attempting to purchase a unit. Only three percent encountered discrimination when trying to sell a unit. The experience with discrimination did not vary greatly among the six counties; however, a slightly higher than average percentage of Jefferson County respondents (36 percent) indicated that they experienced discrimination when trying to purchase a home.

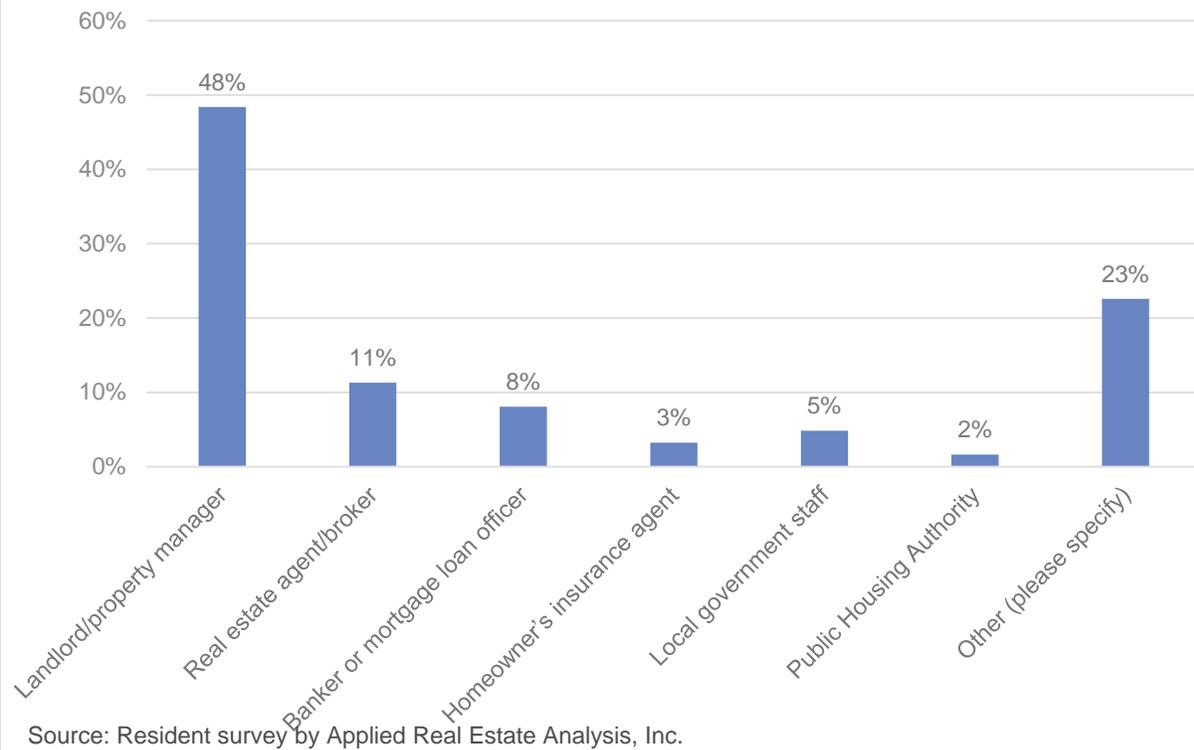
Exhibit IX-6.
**Which of the Options Describe Your Actions When
 Discrimination Occurred?**



Source: Resident survey by Applied Real Estate Analysis, Inc.

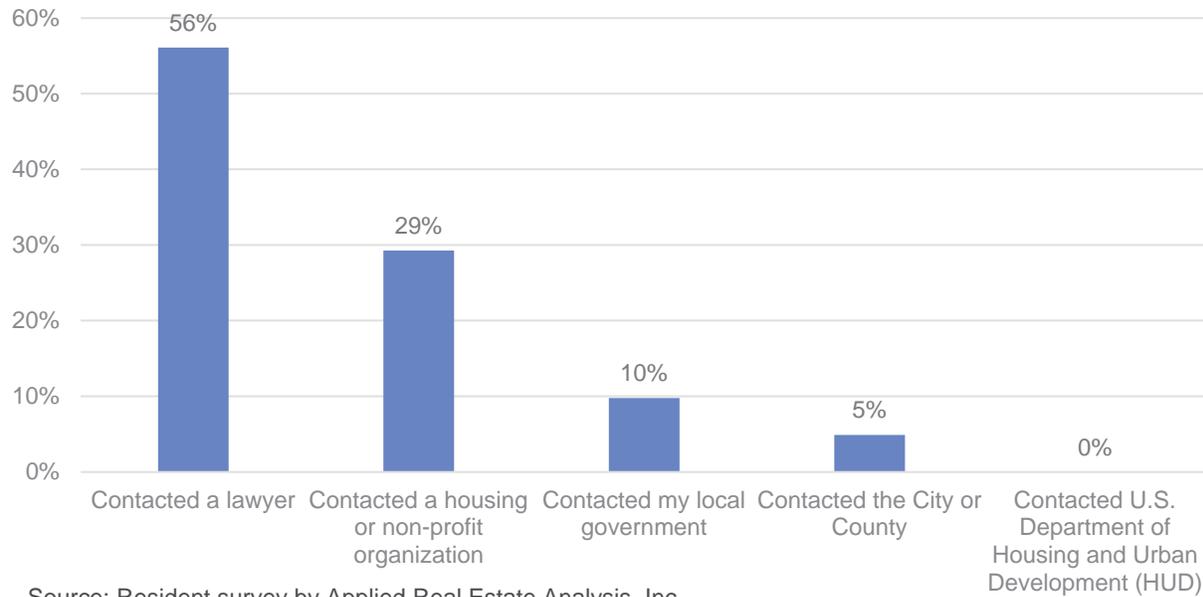
Housing discrimination appears to be a greater problem for renters than for home buyers. When asked, “Which best describes the person who discriminated against you?” 48 percent of the respondents to this question indicated that a landlord or property manager was the guilty party. Only 11 percent of respondents stated that a real estate agent or broker discriminated against them.

Exhibit IX-7.
Which Best Describes the Person Who Discriminated
against You?
Total Collaborative Area



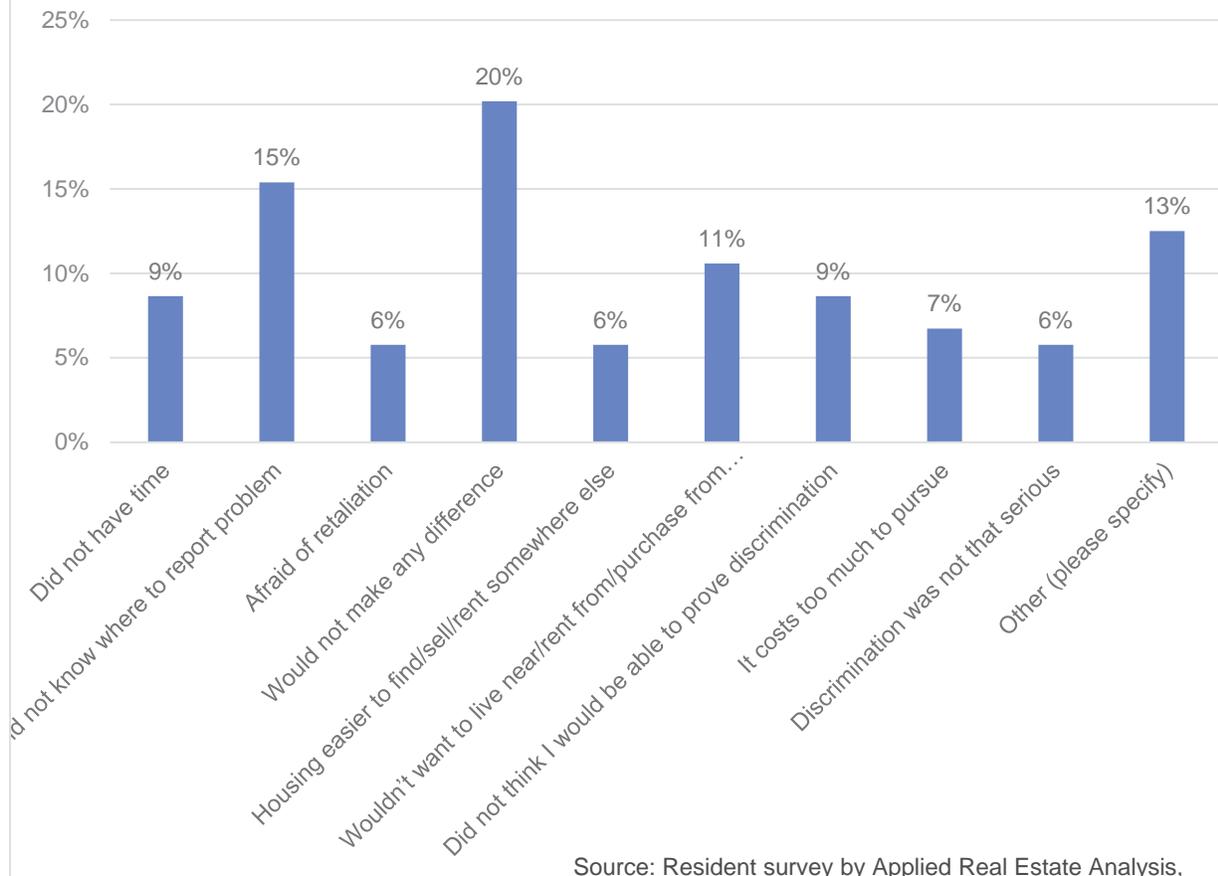
Of the relatively small number of survey respondents who experienced discrimination, 56 percent attempted to address the problem by contacting a lawyer and 29 percent contacted a housing or non-profit organization. Only a total of 15 percent contacted a government agency.

Exhibit IX-8.
Action Taken in Response to Discrimination
Total Collaborative Area



For those survey respondents in the Collaborative area who indicated that they had experienced discrimination but did not seek recourse, 20 percent stated that they believed that taking action would not make a difference. An additional 15 percent indicated that they did not know where to report the problem.

Exhibit IX-9.
Why No Action in Response to Discrimination
Total Collaborative Area

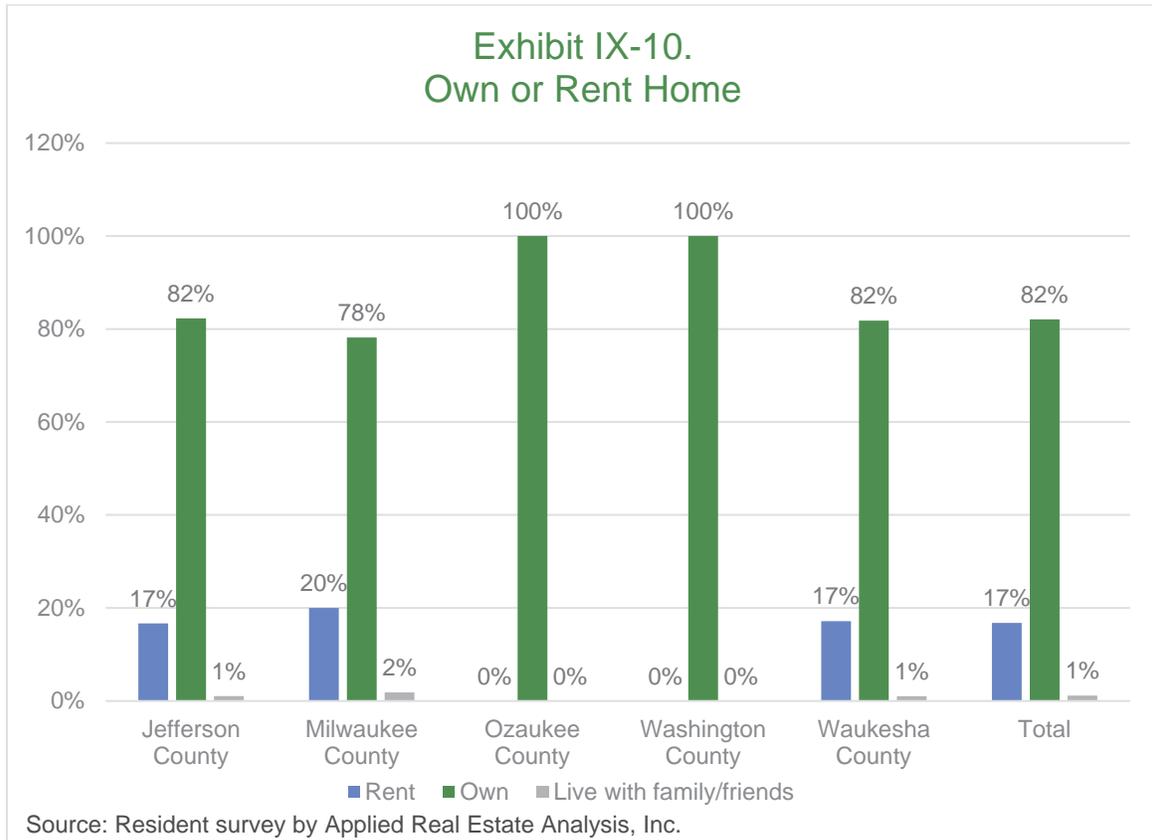


Source: Resident survey by Applied Real Estate Analysis,

Demographic Characteristics of Survey Respondents. The characteristics of the survey respondents probably influenced many of their responses. In particular, there was limited racial diversity among survey respondents. Approximately 87 percent of all survey respondents were White and less than 2 percent were African American. Similarly, less than 2 percent were Hispanic ethnicity. In contrast, in 2017 about 74 percent of Collaborative area residents were White, about 16 percent were African American, and over 10 percent were Hispanic ethnicity, suggesting that the survey is not as representative of the local population as would be preferable. The sample of survey respondents with a disability was also limited. Although about nearly 12 percent of the region's population over age 18 in 2017 had a disability, only 1 percent of the survey respondents indicated that they have a disability and only about 4 percent of those surveyed live in a household with a person with disabilities. As a result, the survey provides few perceptions of access to housing by this group.

As shown in the exhibits below, 82 percent of the respondents were homeowners and only 17 percent were renters, whereas only 61 percent of Collaborative area households are homeowners. As in other aspect of the sample, we were not able to attract the

preferred number of renters to complete the survey and provide their perspectives on availability and affordability of rental housing.



Approximately 70 percent of the survey respondents identify themselves as female and only 30 percent of respondents indicated that they are male. The largest percentage of survey respondents (24 percent) were age 50 to 59. Many of the respondents had substantial household incomes. Approximately 60 percent had incomes of \$75,000 or more and 12 percent had household incomes over \$150,000. In contrast, less than 50 percent of all households in the Collaborative area had incomes of \$60,000 or more in 2017. Many of the survey respondents have also lived in the county in which they currently reside for a long time. About 60 percent of all respondents have lived in the same county for more than ten years suggesting that they might not have recent experience in seeking housing and, consequently, might not have recent experience with the presence or absence of discrimination in the housing market.

Exhibit IX-11. Respondent Female or Male Total Collaborative Area

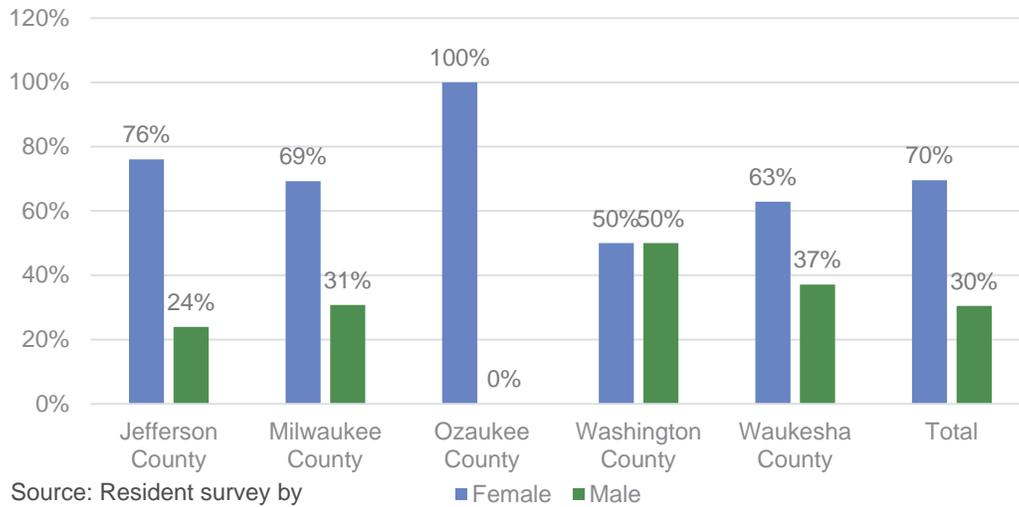
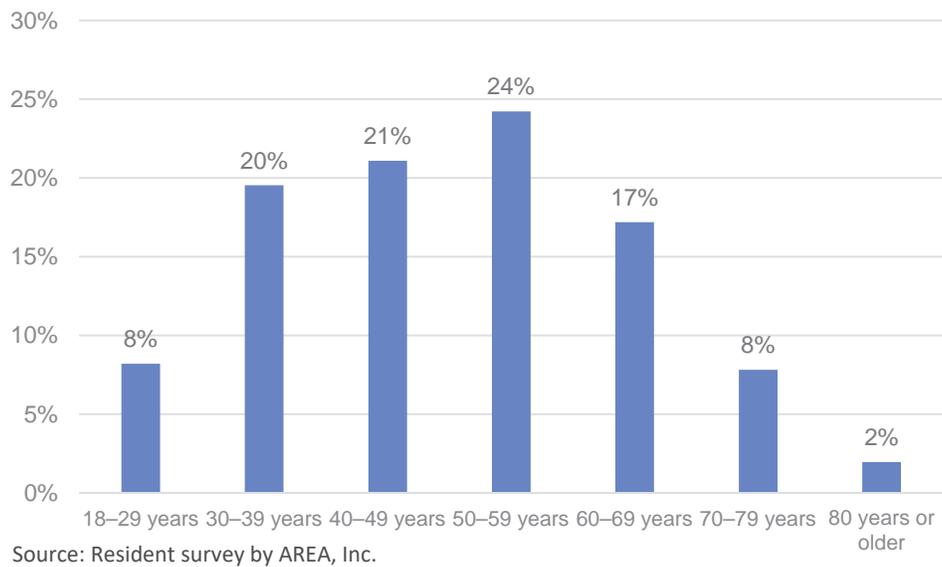
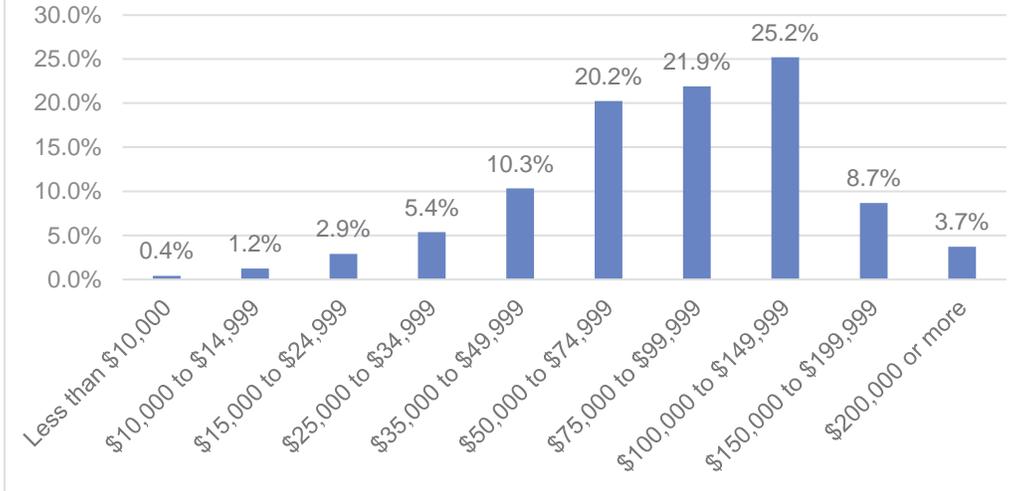


Exhibit IX-12. Respondent's Age Total Collaborative Area



**Exhibit IX-13.
Respondent's Household Income
Total Collaborative Area**



Source: Resident survey by Applied Real Estate Analysis, Inc.

**Exhibit IX-14.
Length of Time Residing in County of Current
Location
Total Collaborative Area**



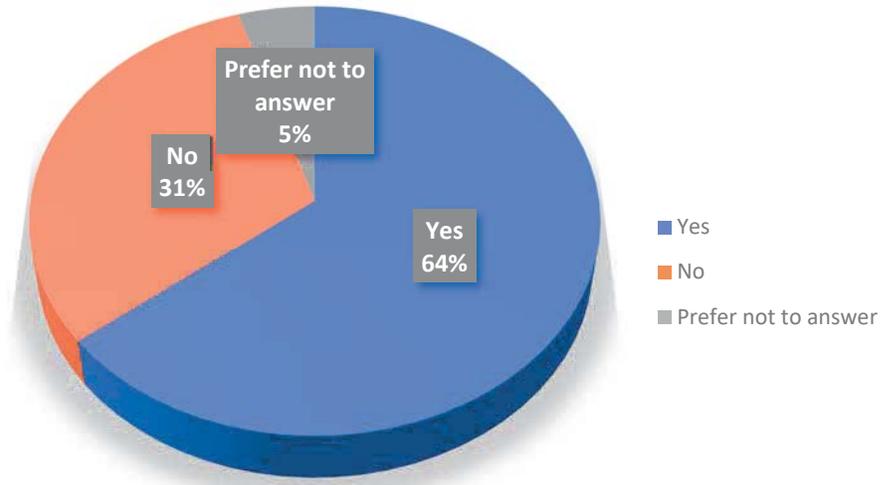
Source: Resident survey by Applied Real Estate Analysis, Inc.

REAL ESTATE INDUSTRY SURVEY FINDINGS

The survey of real estate professionals was posted on the internet and promoted to members of the Greater Milwaukee Association of Realtors (GMAR). Despite efforts by GMAR to encourage its members to respond, only 42 real estate industry representatives who are active in Milwaukee County responded to the survey. There were no responses to the online surveys for real estate industry professionals located in Jefferson, Ozaukee, Washington, and Waukesha counties.

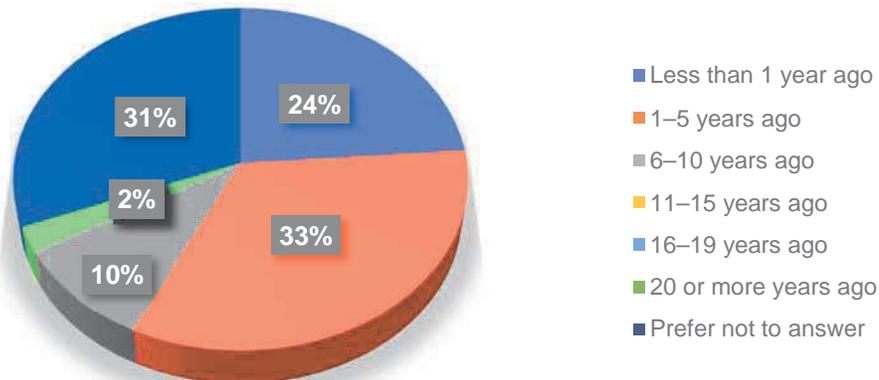
Fair Housing Training. The majority of the survey respondents (64 percent) indicated that they have participated in training sessions on housing rights, and at least 57 percent have participated in this training within the last five years.

Exhibit IX-15.
Attended Training on Housing Rights



Source: Real estate industry survey by Applied Real Estate Analysis, Inc.

Exhibit IX-16.
Time Period of Housing Rights Training



Source: Real estate industry survey by Applied Real Estate Analysis, Inc.

Understanding of Fair Housing Laws, Best Practices, and Rights. When asked about the local real estate community's understanding of fair housing laws and best practices, 74 percent of the real estate professionals stated that the industry's understanding was very strong or strong. Only five percent of the respondents indicated that the local industry's understanding was poor. Survey respondents also believe that their clients understand their housing rights under fair housing laws. About 38 percent of respondents rated that their clients' understanding of these laws as very strong or strong, and an addition 38 percent rated their understanding as somewhat strong. About 24 percent rated their clients' understanding of fair housing laws as somewhat poor, poor, or very poor.

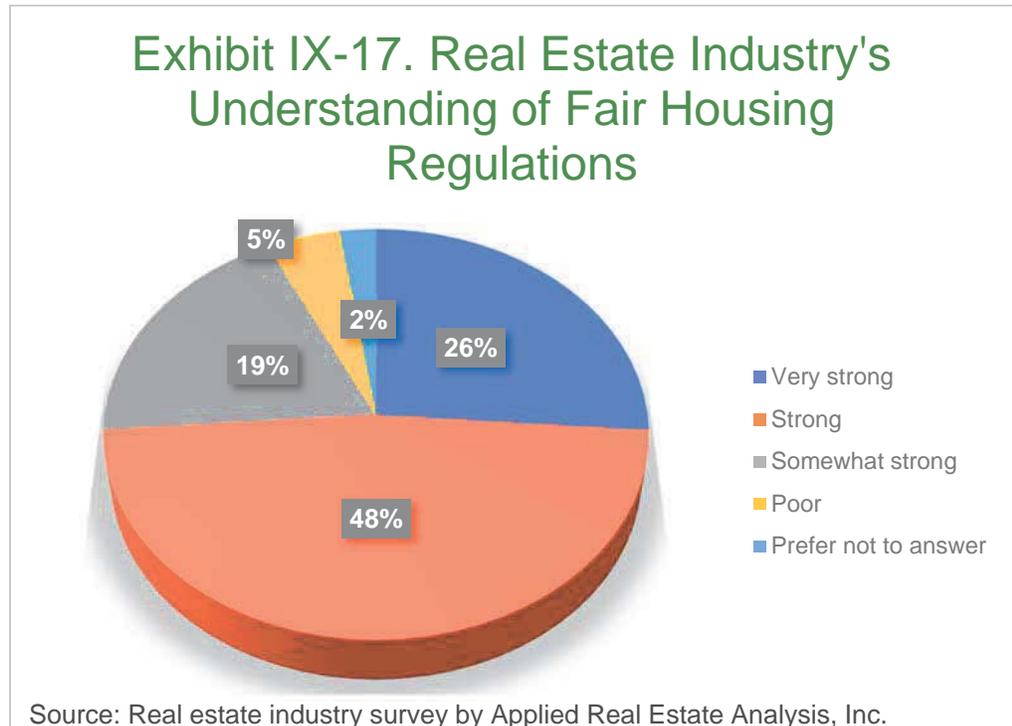
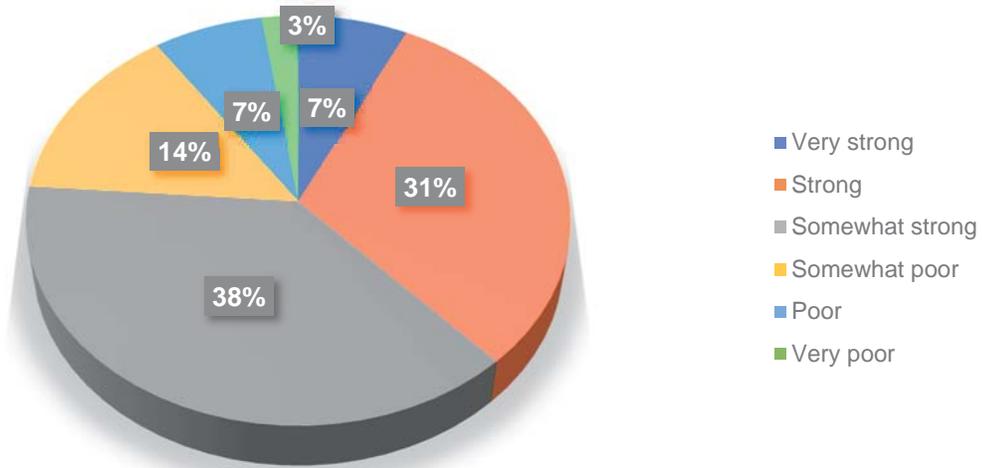


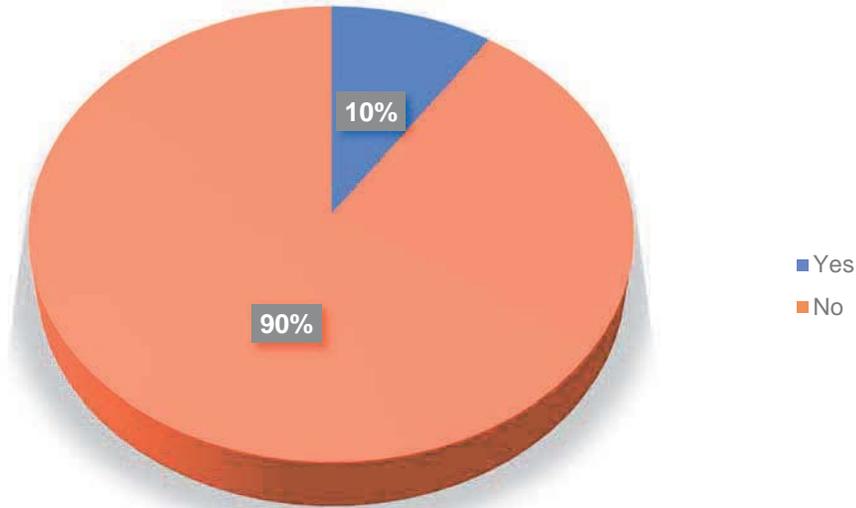
Exhibit IX-18. Real Estate Clients' Understanding of Housing Regulations



Source: Real estate industry survey by Applied Real Estate Analysis, Inc.

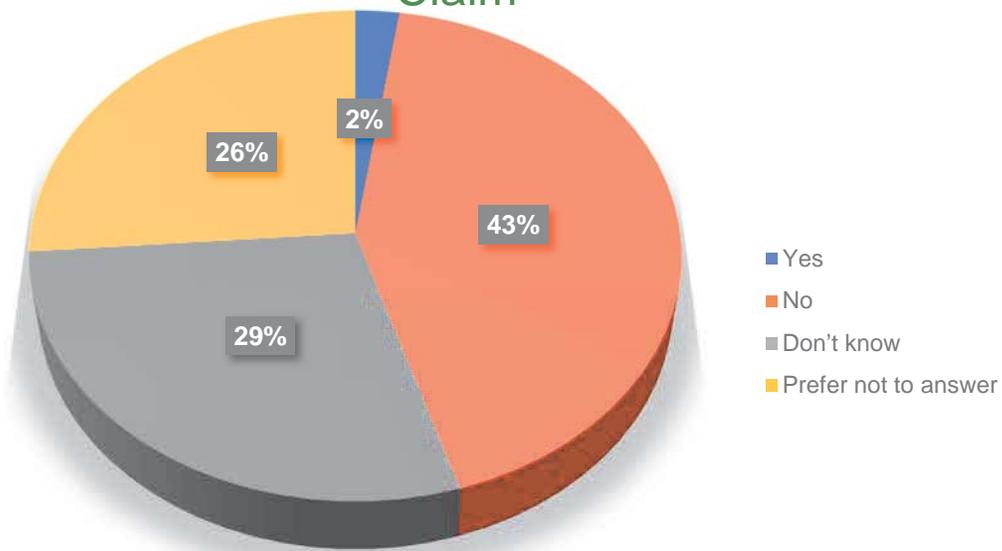
Experience with Housing Discrimination Complaint Process. The vast majority of survey respondents (90 percent) indicated that they had not had any clients who have raised a housing discrimination complaint against anyone or any entity. Of those few respondents who had clients that raised a housing discrimination complaint, only one person indicated that the client had taken action to report the claim.

Exhibit IX-19. Clients Have Raised a Housing Discrimination Complaint



Source: Real estate industry survey by Applied Real Estate Analysis, Inc.

Exhibit IX-20. Client Reported Housing Discrimination Claim



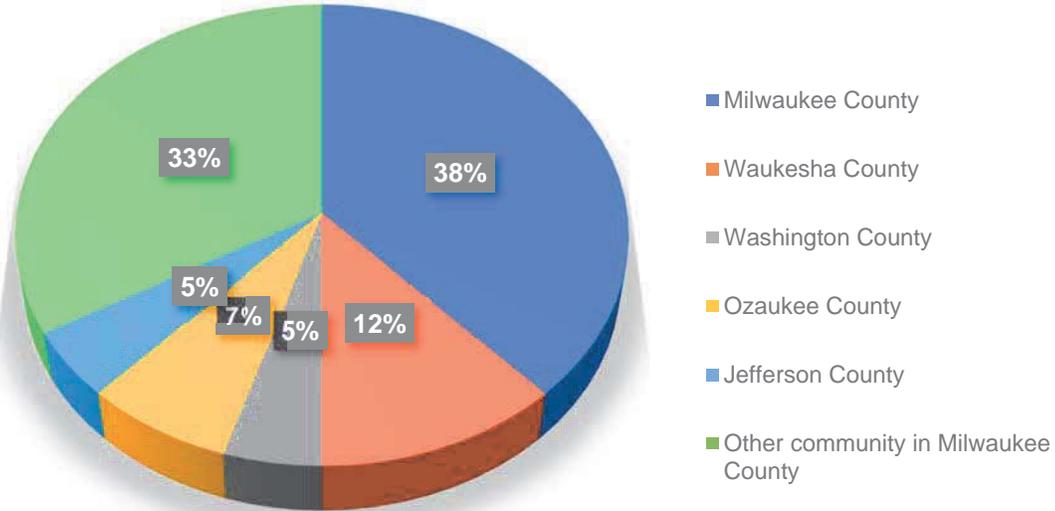
Source: Real estate industry survey by Applied Real Estate Analysis, Inc.

Opinion Regarding Housing Discrimination in Local Area. Approximately 57 percent of the real estate professionals stated that housing discrimination is not at all common in the counties and/or communities in the Collaborative area. Only 14 percent responded that discrimination is extremely or somewhat common. A larger percentage of survey respondents (38 percent) believe that housing discrimination is common in Milwaukee County than in other counties in the Collaborative area. About 12 percent felt that it is a problem in Waukesha County and five to seven percent believe it is a problem in Ozaukee, Jefferson, and Washington counties.



Source: Real estate industry survey by Applied Real Estate Analysis, Inc.

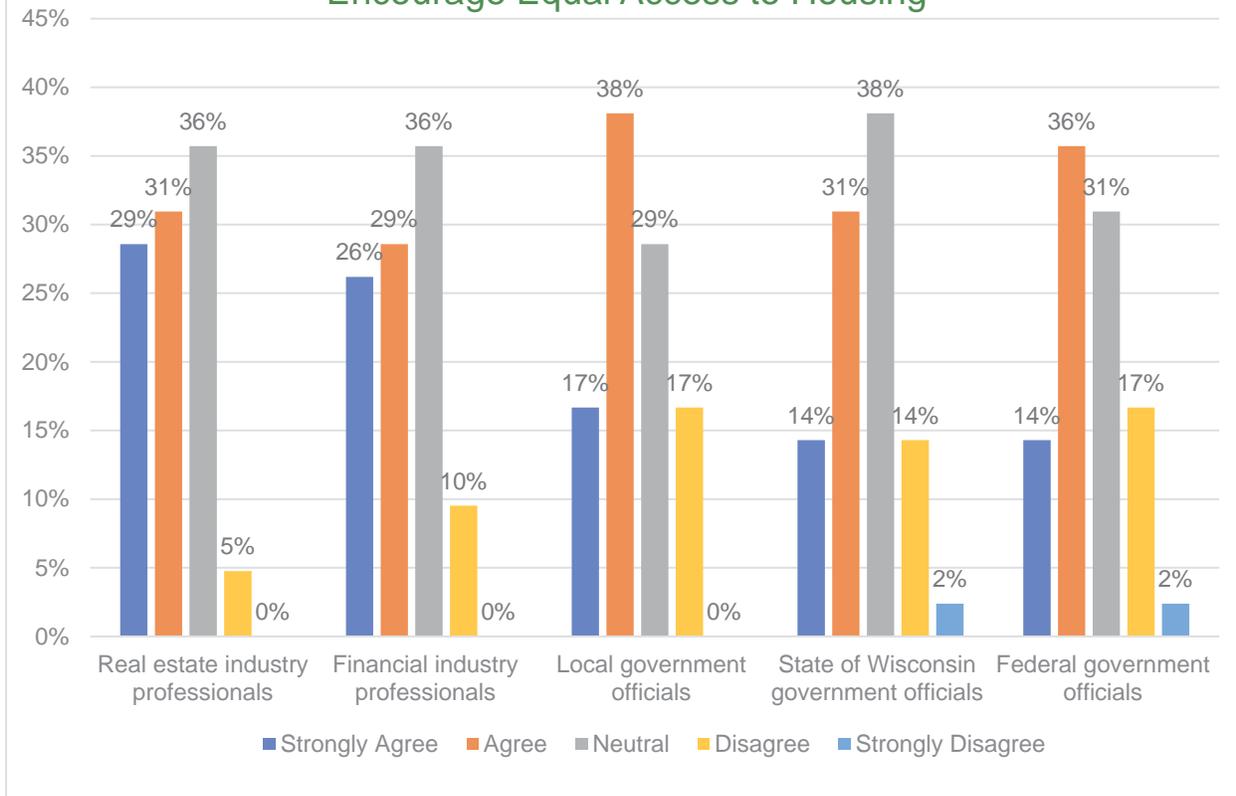
Exhibit IX-22. Believes Housing Discrimination is Common in County



Source: Real estate industry survey by Applied Real Estate Analysis, Inc.

Local Activities to Encourage Equal Access to Housing. When asked about the activities by various professionals to encourage access to housing, survey respondents rated their real estate industry colleagues highest for encouraging housing access. About 60 percent of the respondents strongly agreed or agreed that real estate industry professionals encourage equal access to housing. For both financial industry professionals and local government officials, about 55 percent of survey respondents strongly agreed or agreed that these professionals encourage equal access to housing; however, only 17 percent of respondents strongly agreed that local government officials encourage fair housing compared to 26 percent of respondents who strongly agreed that financial industry professionals do so. Overall, 14 to 19 percent of survey respondents generally disagree or strongly **disagree** that local, state, or federal government officials encourage fair housing access. In contrast, only 5 to 10 percent of respondents disagree that their real estate industry colleagues encourage equal housing access.

Exhibit IX-23.
Agree or Disagree with Statement About Activities to Encourage Equal Access to Housing



Source: Real estate industry survey by Applied Real Estate Analysis, Inc.

Impediments to Access to Housing. When asked to identify impediments to fair housing choice, survey respondents' answers were not necessarily consistent with their answers to earlier questions. Despite stating earlier that real estate industry professionals are aware of fair housing laws and encourage equal housing access, when asked to rate various impediments to fair housing choice, respondents most frequently identified the "lack of awareness of housing rights by real estate agents." The next most important impediment was "lack of awareness of housing rights by banks and mortgage companies," although in response to an earlier question 26 percent of respondents strongly agreed that financial industry professionals encourage equal access to housing. They also indicated a lack of awareness of housing rights by property insurance companies.

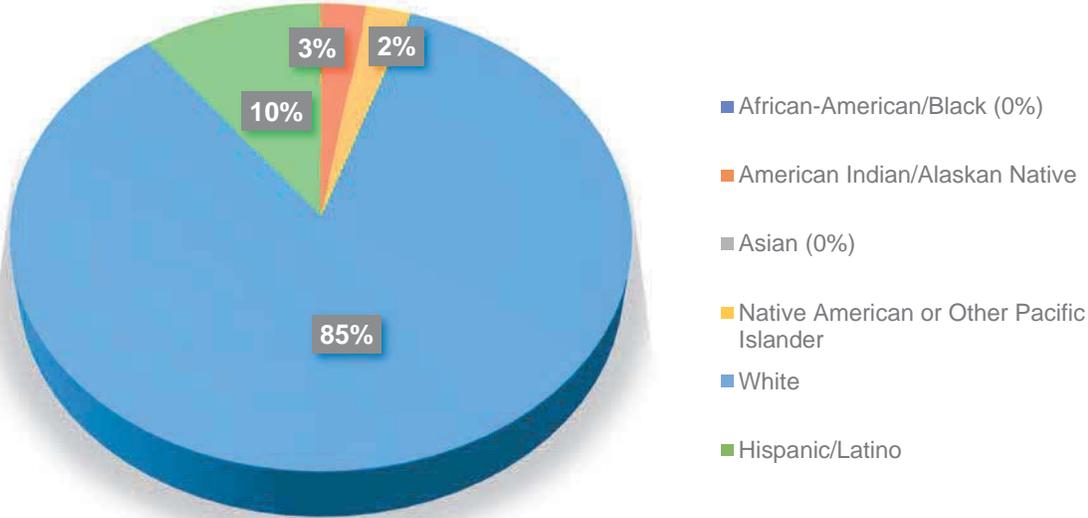
Exhibit IX-24.
Identification of Impediments by Real Estate Industry Professionals (Weighted Average)



Source: Real estate industry survey by Applied Real Estate Analysis, Inc.

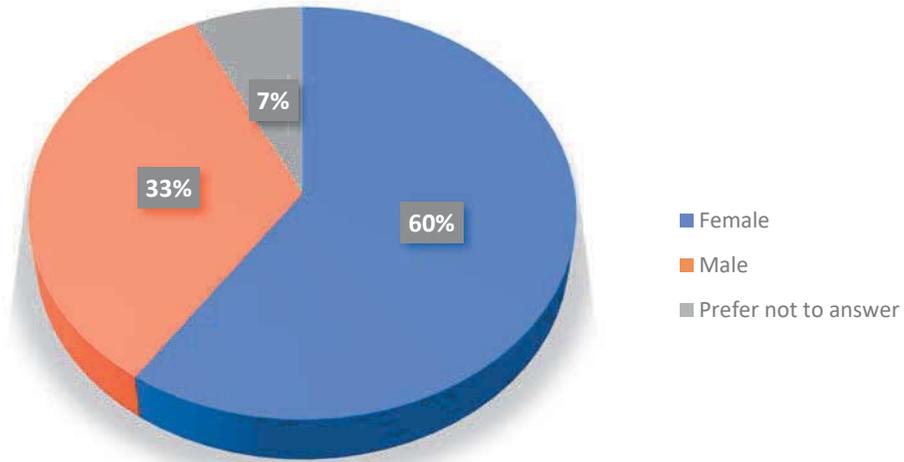
Characteristics of Real Estate Industry Survey Respondents. Like the resident survey, the vast majority (85 percent) of respondents to the real estate industry survey were White, none were African American or Asian. Also, only 10 percent of the respondents were Hispanic. About 60 percent of the respondents identified themselves as female. The largest group of respondents (31 percent) were age 50 to 59 and the largest group (17 percent) were age 30 to 39.

**Exhibit IX-25.
Racial or Ethnicity of Survey Respondents**



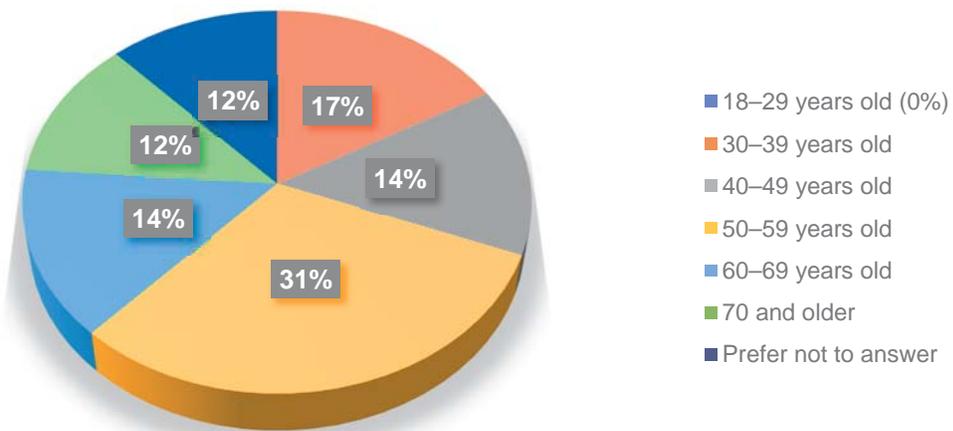
Source: Real estate industry survey by Applied Real Estate Analysis, Inc.

Exhibit IX-26. Sex of Real Estate Industry Survey Respondents



Source: Real estate industry survey by Applied Real Estate Analysis, Inc.

Exhibit IX-27. Age of Survey Respondents (Real Estate)



Source: Real estate industry survey by Applied Real Estate Analysis, Inc.

Unfortunately, the survey group was not very diverse in terms of race or ethnicity, which might influence the respondents' perceptions of the presence or absence of discrimination in the Collaborative area and their responses to the survey questions. Real estate

professionals did not respond to surveys for Jefferson, Ozaukee, Waukesha, or Washington counties. However, the real estate professionals who responded to the Milwaukee County survey are active in numerous communities located throughout that county and are familiar with housing conditions in a wide variety of the county's communities.

ROUNDTABLE GROUP FINDINGS

Real Estate Professionals Roundtable

On December 2, 2019, AREA staff members facilitated a roundtable discussion with representatives of the Milwaukee area real estate industry. The Greater Milwaukee Association of Realtors® (GMAR) helped AREA staff to organize and advertise the roundtable. Despite broad circulation of a flyer advertising the event and email invitations, especially to GMAR members, only five people were able to attend. The participants included three real estate brokers and two representatives of financial institutions. All participants had at least 10 years of experience in the real estate industry and were familiar with real estate markets in the city of Milwaukee as well as numerous communities located through the Collaborative area. Roundtable participants expressed their views as individuals and not as representatives of the financial institutions, real estate firms, or trade associations with which they are affiliated.

Impediments to Furthering Fair Housing. A wide range of issues and concerns were raised by roundtable participants, however, the key impediments to fair housing that were emphasized include:

- **Past housing discrimination.** The real estate professionals indicated that the city of Milwaukee had experienced significant racial and ethnic discrimination in the past that still influence the housing choices available today. In the past, for example, both Interstate 94 and Oklahoma Avenue served as perceived borders between neighborhoods with mostly White households versus those with African-American households, dividing the city into north and south side areas. The participants recalled the Milwaukee area's history, including the riots of 1967, that still influence perceptions and attitudes towards housing options and neighborhoods.
- **Past discrimination lawsuits.** Participants also mentioned a number of past lawsuits involving suburban communities, including the city of New Berlin in Waukesha County that was charged by the U.S. Justice with blocking development of affordable housing in violation of the Fair Housing Act.
- **Discrimination against specific religious groups.** According to the roundtable participants, Moslem households in particular face discrimination in the Milwaukee area because of their faith.

- **Perception of crime.** Although the level of crime varies considerably within the city of Milwaukee, the general public in the Milwaukee area perceives that crime is high throughout the city. As a result, it is often easier for real estate professionals to steer clients away from the city to suburban locations rather than address the stigma of crime in some neighborhoods.
- **High costs of assisting homebuyers.** Roundtable participants stated that many real estate brokers are reluctant to provide substantial assistance to homebuyers in locating desired housing and identifying numerous housing options, because it requires lots of time, which the Realtors® lack. In particular, the time required to help low- and moderate-income homebuyers is costly in terms of labor hours compared to resulting compensation from home sales. Although Realtors® focus mainly on financial returns, their focus also leads to subtle discrimination.
- **Continued reluctance to show suburban housing options to homebuyers who are racial and ethnic minorities.** Regardless of incomes and financial means, some real estate professionals are reluctant to show African-American and other racial or ethnic minorities housing in many locations outside of the city of Milwaukee.
- **Financing for home purchases limited.** The roundtable participants indicated that large financial institutions have more resources than small banks to assist low- and moderate-income homebuyers. Even though small financial institutions have greater flexibility in addressing the needs of a wide variety of borrowers, they are less willing to take risks. As a result, participants believe that low- and moderate-income homebuyers have limited financing options.
- **Loans for veterans discouraged.** Because home loans through the U.S. Department of Veterans Affairs are perceived to require time consuming application procedures, veterans are steered away from these types of loans.
- **High job-related travel costs and lack of nearby affordable housing.** One key problem discussed by the group was the lack of affordable housing near key employment locations in the region and the lack of adequate public transportation to jobs in often remote locations. Participants indicated that many households are forced to live in under-resourced, central city neighborhoods where most affordable housing is located, because they cannot afford housing close to their employment. They then have high travel costs, because of limited public transportation.
- **High Milwaukee County property taxes.** High property taxes in Milwaukee County compared to those of surrounding counties are perceived as a problem that limit housing affordability for low- and moderate-income homebuyers.

- **Restrictions against families with children.** Some families with young children are discouraged from living in rental housing units above the first floor in some large apartment complexes.
- **Limited housing options for persons with disabilities.** Roundtable participants noted that there are limited housing options for persons with disabilities in many sections of the Milwaukee Collaborative area.

Nonprofit Housing/Advocacy Organization Roundtable

On September 17, 2019, AREA participated in discussion of fair housing issues as part of a meeting hosted by Independence First for members of a housing coalition group. The housing coalition's member organizations include housing advocacy groups that address issues such as legal aid and civil liberties, fair housing, and housing for persons with disabilities. Eight people attended the roundtable discussion.

Impediments to Furthering Fair Housing. Members of the housing coalition group raised a wide variety of issues related to fair housing. Key among them were the following, which are presented based on the discussion and are not necessarily in order of importance:

- **Zoning restrictions.** Several meeting participants indicated that local zoning restrictions greatly reduce the amount of rental housing, especially affordable housing.
- **Changes recommended by Southeastern Wisconsin Regional Planning Commission (SEWRPC) not addressed.** The report entitled "A Regional Housing Plan for Southeastern Wisconsin: 2035" was issued by SEWRPC in 2013, which recommended changes in zoning and other local controls that would facilitate affordable housing development, especially for renters. The report covered most of the geographic area included in the Collaborative region. According to the housing coalition members, most of those recommendations have not been addressed by local jurisdictions.
- **Lack source of income protections.** Except for Milwaukee County, most jurisdictions in the Milwaukee area do not prevent landlords from excluding certain tenants because of their source of income, especially Housing Choice Vouchers/Section 8 and other public subsidies. Roundtable participants were also concerned that many landlords in Milwaukee County also do not comply with the recent source of income regulations and reject households with vouchers or require security deposits equal to two or three months of rent.
- **Legal issues.** Participants noted that lawsuits have been filed against several communities in the area for violations of fair housing rights. For instance, the

Metropolitan Fair Housing Council reached a settlement in 2017 in a case against Waukesha County for alleged engagement in illegal housing discrimination on the basis of race, color, and national origin when deploying Community Development Block Grant and HOME funds. In another case, the City of New Berlin was accused of blocking development of affordable housing in a lawsuit that was settled in 2012. The participants mentioned numerous other examples of fair housing violations by area communities that had led to legal actions.

- **Highly segregated communities.** Coalition group members indicated that the Milwaukee area is highly segregated by race and ethnicity with concentrations of African Americans and Hispanics in the city of Milwaukee and very low percentages of racial and ethnic minorities in most suburban communities, including Waukesha.
- **Limited support for affordable/workforce housing.** Participants indicated that most suburban communities resist affordable or workforce housing for families. Most are willing to accept only affordable housing for seniors. In particular, members of the housing coalition suggested that additional rental housing is needed that is funded using Low-Income Housing Tax Credits, given that they believe that most of this housing is currently concentrated in the city of Milwaukee.
- **Affordable housing in the City of Milwaukee located in neighborhoods with limited resources.** Although there are numerous affordable housing options in the city of Milwaukee, housing coalition members indicated that much of the affordable housing is located in neighborhoods with limited resources and numerous affordable rental units are in poor condition and need repairs and improvements.
- **Limited transportation to suburban job centers.** According to the participants, areas outside of the city of Milwaukee lack adequate transportation to employment centers. The participants also noted that numerous previously existing bus routes have eliminated in recent years, including routes that serve industrial areas. They noted that the lack of a regional transportation authority has constrained transportation planning for the region. Efforts to extend bus routes are often resisted by local residents. An example given was an effort by the Elmbrook Campus of Ascension Southeast Wisconsin Hospital in Brookfield. The hospital encouraged the extension of bus lines to improve the location's accessibility for employees. However, the community objected to both transportation improvements and affordable housing development.
- **Tenant evictions.** Tenant evictions are perceived as a problem in the Milwaukee area. Participants indicated that tenants are reluctant to request housing repairs for fear of being evicted. They noted the research that has been conducted regarding the eviction process in Milwaukee by Matthew Desmond, which often has long-term negative impacts for tenants.

- **Nuisance Ordinances.** Related to evictions are nuisance ordinances. Roundtable participants noted that “crime free” or nuisance ordinances in some communities negatively affect renters. The ordinances limit crimes or disturbances, including requests for police assistance with problems, such as domestic abuse. When repeated disturbances or requests for police assistance occur, they can result in citations and/or penalties for landlords when the violations occur on their properties. Landlords often react by penalizing and/or evicting the tenants involved.
- **Housing needed for persons with disabilities.** One key issue identified by housing coalition members was the lack of affordable housing for persons with disabilities. Participants stated that the area lacks housing accessible by persons with disabilities throughout the Collaborative area. They also noted that much of the housing stock, especially in the city of Milwaukee, is older and difficult and/or costly to retrofit to provide accessibility. Group homes are also discouraged by neighborhood residents, including residents of many Milwaukee neighborhoods as well as neighborhoods in surrounding communities.

On a positive note, housing coalition members indicated that persons with disabilities are generally more aware of their rights under fair housing regulations than other protected classes.

- **Gentrification displacing some low- and moderate-income households.** Roundtable participants noted that in some gentrifying neighborhoods in the city of Milwaukee as well as other cities in the Collaborative area, some racial and ethnic groups that have been long-term residents are being displaced and need additional public resources to remain in their preferred neighborhoods.
- **Housing for the homeless.** According to the roundtable participants, a variety of factors have led to the increasing visibility of homeless persons in the Collaborative region, including the appearance of tent cities. Factors mentioned included the rising costs of housing, income stagnation, and limited services, including public health services for persons with disabilities. Participants stressed the need for additional permanent affordable housing as opposed to temporary shelters for the homeless.

CONSOLIDATED PLAN COMMUNITY MEETINGS AND INTERVIEW FINDINGS

To maximize the benefits of conducting a region-wide assessment of fair housing issues, AREA staff members coordinated with each of the Collaborative members and their representatives who were conducting community meetings as part of efforts to update their Consolidated Plans. By combining fair housing meetings with Consolidated Plan meetings, we were able to ensure that the fair housing analysis received valuable input from the community representatives who participated in the Consolidated Plan process and that information obtained for the fair housing analysis was conveyed to local staff

members and consultants involved in updating each of the Consolidate Plans. We were also able to reduce the number of community meetings required to complete both the fair housing and Consolidate Plan processes and minimize community members’ fatigue in attending meetings over the course of several months.

AREA staff members worked along with James Hill, with The Common Good, LLC, to coordinate and conduct discussions with various stakeholder groups regarding fair housing issues. As shown in the following exhibit, we led these discussions as part of numerous community meetings covering the five counties that are members of the Collaborative as well as the City of Milwaukee and the City of Wauwatosa. We were not able to coordinate with the City of West Allis to hold a joint fair housing and Consolidated Plan meeting.

The Consolidated Plan and fair housing meetings were organized by the Urban Economic Development Association of Wisconsin, Inc., (UEDA), a consultant to the City of Milwaukee for preparation of the City’s Consolidated Plan; Community Planning and Development Advisors, a consultant to Milwaukee County and the Milwaukee County Housing Division for preparation of the County’s Consolidated Plan; the City of Wauwatosa; and Waukesha County, which coordinated activities in Waukesha, Washington, Ozaukee, and Jefferson counties and their municipalities for the development of the consolidated plan covering these jurisdictions.

EXHIBIT IX-28.
JOINT CONSOLIDATED PLAN AND FAIR HOUSING COMMUNITY MEETINGS

DATE (2019)	LOCATION
May 20	Delafield (Waukesha County)
May 21	Jefferson (Jefferson County)
June 25	Brown Deer (Milwaukee County)
June 27	St. Francis (Milwaukee County)
September 17	City of Milwaukee
September 19	City of Milwaukee
September 24	City of Milwaukee
November 14	City of Milwaukee
December 2	Milwaukee County (Housing Division)

Many of the Consolidated Plan meetings addressed topics relating specifically to fair housing and AI issues. In many instances, fair housing was discussed at these special housing issues sessions of the Consolidated Plan meetings versus meetings that addressed broader community planning concerns, such as youth services and job creation. People who attended the meetings included representatives of community and neighborhood organizations, housing advocacy groups, legal aid organizations, senior

and youth services organizations, economic development entities, employment training programs, faith-based organizations, ethnic group organizations, business and merchant groups, and other non-profit organizations. Elected officials and employees of various local jurisdictions also attended some of these meetings. In addition, the meetings were advertised to the general public and numerous community residents attended the sessions.

In addition to joint Consolidated Plan and fair housing meetings, roundtable discussions with selected groups, and online surveys, AREA staff members conducted in-person or telephone interviews with a variety of local public staff, community leaders, housing advocates, and real estate industry professionals. We discussed a broad range of issues related to fair housing trends and conditions, efforts to further fair housing, and impediments to fair housing choice. Many of the interviewees' comments were similar to those mentioned by the participants in the joint community meetings. Consequently, the discussion below presents key comments and issues identified by both interviewees and participants in the community meetings.

- **Lack of affordable housing for rent or for sale in most suburban communities.** The overwhelming majority of persons in community meetings and interviews identified the lack of affordable housing in most suburban communities as the major problem affecting housing choice in the Collaborative area. In meeting after meeting, participants emphasized this as a major issue. In particular, they noted a lack of rental housing, but also indicated that affordable housing for sale is not available in many communities. During one community meeting, participants discussed an attempt by Habitat for Humanity to construct affordable, single family homes for owner-occupants in Waukesha County, which was opposed by existing area residents and was not ultimately built.
- **Housing and jobs imbalance.** The next most commonly cited issue was the lack of affordable housing near employment opportunities. In particular, meeting participants and interviewees stated that workforce housing or housing that is affordable by low- or moderate-wage employees is not available in most suburban locations where employment is concentrated. Hospitals, shopping centers, and other entities that employ numerous low-skill workers have few affordable housing options nearby. In Jefferson County, for example, meeting participants expressed concern that low- and moderate-income households cannot locate near the county's agricultural and food processing facilities. Similarly, participants in meetings in Waukesha County commented that the community accepted affordable housing construction for seniors, but the low-wage employees needed to operate these facilities are unable to live nearby.
- **Rejection of multifamily housing.** Meeting participants and interviewees also commented that community residents and public officials often object to any multifamily housing development, which consequently restricts cost-effective housing construction. Several participants complained that communities frequently

oppose even market-rate rental and condominium units, including upper-income developments.

- **Exclusionary zoning and local controls.** Community and neighborhood representatives and local residents often agreed that local zoning codes, other land use regulations, and building impact fees often enable communities to restrict housing development that they do not desire. A major topic of discussion at several meetings was the past legal battles in New Berlin and other communities that have been cited for discriminatory housing policies.
- **Jobs, housing, and public transportation disconnection.** A major problem identified during most of the meetings and interviews was a lack of adequate public transportation in many parts of the Collaborative area outside of the city of Milwaukee. Numerous interviewees and meeting participants indicated local awareness of the decades long problem of inadequate transportation to suburban employment locations. According to participants, in many locations even minimal existing bus service options have been reduced in recent years. For example, several interviewees noted that public transit service to industrial parks in New Berlin has been reduced in recent years.

Because many low- and moderate-income workers lack cars, participants concluded that the limited public transportation was especially problematic for these workers. Although some local corporations have attempted to provide private transportation for workers, who all too frequently cannot live near their place of work, many participants questioned whether this solution was workable or equitable for some employees.

- **Affordable housing concentrated in needy neighborhoods.** Many people commented that most of the Collaborative area's affordable housing is concentrated in neighborhoods that have suffered from disinvestment and where much of the housing stock requires rehabilitation. Many of these areas are located in the City of Milwaukee.
- **Lack of regional housing strategy.** Representatives of communities that are members of the Collaborative as well as interviewees and meeting participants indicated that the region lacks a strategic approach to affordable housing and housing choice. They applauded the effort by the counties and cities that formed the Collaborative and supported the idea of a coordinated effort to address the region's housing needs and issues.
- **Limited housing options for persons with disabilities.** Interviewees and meeting participants indicated a number of factors limiting the availability of housing for persons with disabilities, including the following:
 - Many higher income sections of the Collaborative area lack affordable housing that is accessible.

- Group homes are concentrated in some parts of the Collaborative area, especially northern sections of Milwaukee County, but are lacking in most other communities.
 - Many communities restrict development of group homes.
 - Because of the age of the housing stock, especially in the city of Milwaukee, much of the existing housing is difficult to retrofit for accessibility.
 - Some landlords are not willing to provide repairs needed to make units accessible or to accept special requirements of some persons with disabilities, such as service animals.
- **Evictions result in hardships for low-income renters.** Numerous interviewees and meeting participants commented that the eviction process causes difficulties for renter, especially low- and moderate-income households, who have problems finding replacement housing once they have an eviction on their record. Several persons interviewed suggested limiting access to legal records on evictions and the need for a separate court to handle evictions.
 - **Negative impact of nuisance ordinances.** One factor discussed as a frequent cause of evictions is nuisance ordinances. As mentioned earlier, calls for police assistance to prevent domestic abuse and other legitimate requests for assistance often result in violations of nuisance ordinances. Landlord often evict tenants in properties where these violations occur.
 - **Discrimination in mortgage lending and insurance.** Many meeting participants suggested that racial and ethnic discrimination occurs for borrowers whose mortgage loan applications are rejected or who receive loans with adjustable rates that vary substantially over time.

Several people also indicated that residential insurance rates vary greatly by neighborhood and are based on “sophisticated algorithms” that they believe are used to justify discriminatory practices.

- **Discriminatory appraisal practices.** Several meeting participants also expressed concern that appraisers do not accurately value properties in some neighborhoods of Milwaukee and other cities, because they lack knowledge of the local housing market. As a result of inaccurate appraisals, homes are undervalued and mortgage financing can be jeopardized.
- **Limited homeownership by African Americans.** A number of interviewees and meeting participants expressed concern that African Americans, in particular, have lower homeownership rates than White households in the Collaborative area, because of a host of factors that limit their access to affordable housing and home financing.
- **Limited number of real estate brokers willing to work in some Milwaukee neighborhoods.** In the city of Milwaukee, participants stated that it is often difficult

to find real estate brokers that are willing to work in some neighborhoods. Even the City's program to sell foreclosed properties has encountered problems attracting brokers for some areas of the city.

- **Limited fair housing training and access to information.** Several people commented that fair housing training opportunities are somewhat limited and information resources are not readily available. For example, many senior citizens lack access to information about fair housing, which is available on the Internet, because they only have landlines for phone service. Other real estate industry participants in the general community meetings also stated that they had not received recent fair housing training. Meeting participants also indicated the need for additional fair housing training for the general public to increase awareness of their rights.

SECTION X.

FAIR HOUSING COMPLAINTS

Within the five-county consortium, individuals have multiple options for filing complaints if they believe their fair housing rights have been violated. Complaints can be filed with either a public sector entity or nonprofit housing organizations, including:

- U.S. Department of Housing and Urban Development (HUD)
- Wisconsin Department of Workforce Development (DWD)
- Metropolitan Milwaukee Fair Housing Council (MMFHC)

From January 2010 until November 2019, the total number of fair housing complaints filed with HUD for the five-county consortium was 274. There were 187 complaints filed in Milwaukee County, 50 complaints were filed in Waukesha County, 15 complaints were filed in Jefferson County, 9 complaints were filed in Ozaukee County, and 13 complaints were filed in Washington County. The most frequent bases of all the complaints in the five-county consortium were disability (39.4 percent or 139 complaints) and race (23.8 percent or 84 complaints).

The DWD provided complaint information from 2014 to 2019, and 158 complaints were documented at that time. Some complaints had multiple bases and there was a total of 298 bases. Approximately 22.8 percent of complaints (or 68 complaints) had a racial basis and 18.8 percent of complaints (or 56 complaints) had a disability basis.

The Metropolitan Milwaukee Fair Housing Council (MMFHC), a private non-profit organization that promotes fair housing throughout the state of Wisconsin, reported 374 complaints filed from 2015 to 2019. There were 261 complaints filed in Milwaukee County, 89 complaints filed in Waukesha County, 16 complaints filed in Washington County, and eight complaints filed in Ozaukee County. Of the 261 complaints in Milwaukee County, 178 were in City of Milwaukee, seven were in the City of Wauwatosa, and 19 were in the City of West Allis. The most frequent bases filed with MMFHC were disability (35.9 percent of 169 complaints) and race (28.7 percent or 135 complaints).

Although it appears there are very few fair housing complaints in Southeast Wisconsin, the number of complaints does not fully represent the level or extent of housing discrimination in the Collaborative area. Sometimes people who seek housing are unaware of the resources available to assist them when they encounter discrimination; and they do not always know that housing discrimination has legal ramifications. Additionally, discrimination can be covert, and a person seeking housing may not be aware that they have been discriminated against.

Exhibit X-1 presents the numbers of fair housing bases in Southeast Wisconsin recorded by the Wisconsin Department of Workforce Development (DWD), Department of Housing and Urban Development (HUD), and Metropolitan Milwaukee Fair Housing Council

(MMFHC). It is possible that a complaint may have been filed with multiple agencies. All data from each agency is included in the following table.

EXHIBIT X-1.

FAIR HOUSING BASES IN SOUTHEAST WISCONSIN

FILED WITH DEPARTMENT OF WORKFORCE DEVELOPMENT, DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD), AND METROPOLITAN MILWAUKEE FAIR HOUSING COUNCIL (MMFHC)

Basis	DWD	HUD	MMFHC	Total	Percentage
	2014-2019	2010-2019	2015-2019		
Age	19		17	36	3.2%
Color	7	3	3	13	1.2%
Disability - Housing Only	56	139	169	364	32.4%
Domestic Abuse	7		2	9	0.8%
Family Status - Housing	30	44	42	116	10.3%
Lawful Income - Housing	15		27	42	3.7%
Marital Status	9		7	16	1.4%
National Origin/Ancstry	14	31	22	67	6.0%
Race	68	84	135	287	25.6%
Religion/Creed	10	13	6	29	2.6%
Retaliation	18	15		33	2.9%
Sex	28	24	31	83	7.4%
Sexual Orientation	15		10	25	2.2%
Null	2			2	0.2%
Total Bases*	298	353	471	1,122	

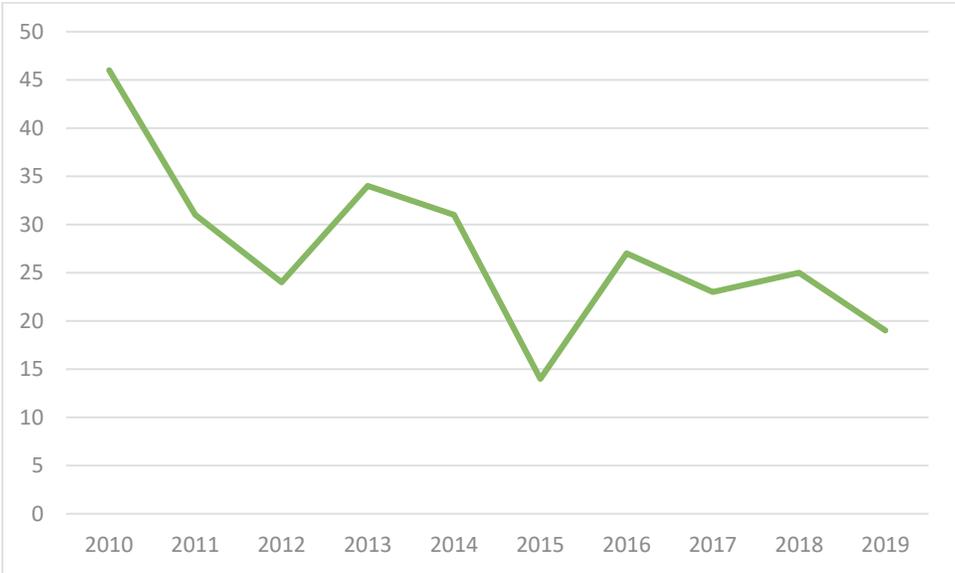
Source: Wisconsin Department of Workforce Development, Department of Housing and Urban Development (HUD), Metropolitan Milwaukee Fair Housing Council (MMFHC), and Applied Real Estate Analysis, Inc.

* Complaints can be filed under multiple bases so the total number of protected classes bases will be greater than the total number of complaints received.

For the years 2010-2019, an average of approximately 27 fair housing complaints were filed per year with HUD for the Collaborative study area. The most complaints took place in 2010 and declined thereafter. Within the ten-year period, most of the HUD complaints concerned the City of Milwaukee, with 118 complaints; the City of Waukesha had 25 complaints; and the City of West Allis had 13 complaints. All other cities within the five-county Collaborative area had fewer than ten complaints.

Exhibit X-2 shows the federal level complaints. Data for DWD and MMFHC are not included, because the complaints are limited to the years 2014 to 2019 and MMFHC complaints do not include Jefferson County.

EXHIBIT X-2.
HUD FAIR HOUSING COMPLAINT DATA BY YEAR
FOR COLLABORATIVE REGION: 2010-2019



Source: Department of Housing and Urban Development.

Of the 274 complaints filed with HUD, approximately 24.8 percent of cases, or 68 complaints, were withdrawn after resolution; 24.5 percent of cases, or 67 complaints, had conciliation/settlement; and 23.7 percent of cases, or 65 complaints, found no cause. The remaining complaint completion statuses included those where the complainant failed to cooperate (8 percent), the complaint was dismissed for the lack of jurisdiction (2.9 percent), HUD was unable to locate the complainant (1.8 percent), or the complaint was charged or caused by the Fair Housing Assistance Program (1.8 percent).

SECTION XI.

FINDINGS/IDENTIFIED IMPEDIMENTS AND RECOMMENDED ACTIONS

An impediment to fair housing choice consists of any factor that can discourage or prevent a person or household from having equal access to housing because of membership in a protected class as defined by federal, state and local laws. As discussed earlier in this report, protected classes include members of racial and ethnic groups as well as a variety of other special population groups. Impediments may be caused by policies, practices, or procedures of government agencies, real estate industry practices, or general societal attitudes and actions.

This report assessed a number of conditions identified by HUD that often limit housing choice and that affect the Collaborative region. They are:

- Patterns of segregation and integration
- Racially and ethnically concentrated areas of poverty
- Disparities in access to opportunity
- Location of publicly supported housing
- Disproportionate housing needs
- Fair housing enforcement, outreach capacity, and resources

This section of the report provides an initial list of the impediments to fair housing choice identified during the course of this analysis. The impediments were identified after thorough analysis of the various data sources showing patterns of segregation highlighted in the preceding chapters, discussions with stakeholders, and reviews of previously conducted studies of fair housing for the members of the Collaborative. This list of impediments is not intended to be all inclusive: there are possibly other impediments that exist that were not revealed in our discussions or in the review of data.

The five counties and three cities that formed the Collaborative recognize the importance of assessing problems and opportunities at the regional level to encourage access to housing choice most effectively. To address the Collaborative's objective to affirmatively further fair housing throughout the region, we have grouped the identified impediments and recommended actions at the regional level and noted specific issues and actions for individual members of the Collaborative. There is, of course, overlap among the impediments that are issues for the region and the impediments affecting housing opportunities of individual Collaborative members. To avoid repetition, we have listed impediments only once that might apply to multiple jurisdictions.

The impediments identified through the analysis are:

Collaborative Region

- Impediment 1: Lack of a Regional Housing Strategy or Plan
- Impediment 2: Lack of Regionally Dispersed Affordable Housing
- Impediment 3: Restrictive Local Land Use Regulations and Other Ordinances
- Impediment 4: Restrictive Zoning Regulations for Group Homes and Community Living Facilities
- Impediment 5: Prevalent “Fear of Others” among Residents, including NIMBYism¹
- Impediment 6: Strong Jobs-Housing-Transit Mismatch
- Impediment 7: Lack of Fair Housing Guidance and Enforcement
- Impediment 8: Lack of Accessible Housing for Persons with Disabilities
- Impediment 9: Gap in Homeownership by Racial and Ethnic Minorities Compared to White Households
- Impediment 10: Overcrowded Housing
- Impediment 11: Extensive Use of Evictions

City of Milwaukee

- Impediment 12: Lack of Private Investment in Specific Neighborhoods
- Impediment 13: Gentrification of Some Neighborhoods Surrounding Downtown

Private Sector Real Estate Market

- Impediment 14: Racial and Ethnic Disparities in Mortgage Lending, Insurance, and Appraisal Practices
- Impediment 15: Lack of Fair Housing Knowledge

Following each impediment is a set of recommended actions. The majority of these actions were developed through discussions with representatives of members of the Collaborative and contractors assisting the communities with preparation of Consolidated Plans. Some of the recommended actions may require additional staff and funding support. Although members of the Collaborative, similar to other communities around the

¹ NIMBY is an acronym for “not in my back yard,” a term used to indicate resistance to unwanted development.

country, are facing budget shortfalls, proposed cuts should not be made at the expense of the protected classes.

ALL COLLABORATIVE MEMBERS

IMPEDIMENT 1: LACK OF A REGIONAL HOUSING STRATEGY OR PLAN

The major factor that led to creation of the Collaborative is also the major impediment identified when analyzing fair housing issues in the area. The Collaborative region currently lacks a regionwide strategy to address fair housing and affordable housing issues. The Collaborative region's affordable housing is presently concentrated in the city of Milwaukee, including publicly subsidized as well as most naturally occurring affordable housing. Because many of the region's publicly subsidized units are concentrated in one community, Milwaukee has a high concentration of poverty among racial and ethnic minorities. Over 88 percent of the Collaborative region's African-American population and 65 percent of the area's Hispanic population are located in the City of Milwaukee, suggesting very limited housing opportunities outside of the central city for many of these households with low and moderate incomes. As a result, the Milwaukee metropolitan area has the dubious distinction of being the most segregated metropolitan area in the country.

Housing opportunity and choice is a regional issue that requires a coordinated regional solution. As other identified impediments indicate, policies, practices, and procedures implemented by communities throughout the region have led to the current conditions that limit housing choice and opportunity in the Collaborative region. Opposition to multifamily housing, families with children, and affordable housing and the exclusionary zoning that facilitate this opposition have resulted in the current conditions.

RECOMMENDED ACTION 1

- The Collaborative should work together at the regional level to ensure that all communities expand housing options, especially housing for low- and moderate-income households.
- The Collaborative, as a body, should endorse and pursue a state legislative change that would include a fair housing plan as part of the housing element currently required by Wisconsin's Smart Growth and Comprehensive Planning Law (Section 66.1001(2) (b)).
- Members of the Collaborative should establish a mobility program to help households that would like to move to opportunity areas to locate market-rate rental or for-sale housing, identify a variety of neighborhoods that potential movers might find attractive, provide information about landlords and/or real estate agents active in a wide variety of areas within the Collaborative region, and offer tours of desirable home locations.

- Members of the Collaborative should work with local public housing authorities to develop a region-wide affordable rental housing mobility program to expand use of Housing Choice Vouchers to opportunity areas in the region.

IMPEDIMENT 2: LACK OF REGIONALLY DISPERSED AFFORDABLE HOUSING

The key component required for a regional housing strategy is a more equitable distribution of affordable housing opportunities throughout counties and individual communities within the Collaborative region. The majority of the region's publicly subsidized housing is located in the City of Milwaukee, including 18,357 units funded using Project Based Section 8, Low Income Housing Tax Credits (LIHTC), and public housing programs. Very few publicly subsidized units are located in other communities in the Collaborative region. In addition, naturally occurring affordable housing is located primarily in the central city and in Milwaukee County. In particular, of the three cities in the Collaborative, only the City of Milwaukee has a median gross rent that is affordable by renter households with less than the median income for renters. Similarly, of the five Collaborative counties, only Milwaukee County and, to a lesser extent, Jefferson County have median rents that are affordable by median income renters.

Unfortunately, many of the communities that lack affordable subsidized or naturally occurring affordable housing are also communities that rank highest in terms of HUD's opportunity ratings, which are discussed in Section VII. Counties with low poverty concentrations, and high ratings for employment opportunities, school quality, and good environmental health quality also lack affordable housing options.

RECOMMENDED ACTIONS 2

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

IMPEDIMENT 3: RESTRICTIVE LOCAL LAND USE REGULATIONS AND OTHER ORDINANCES

Past analyses of fair housing choice by members of the Collaborative have acknowledged that a key factor affecting patterns of racial and ethnic segregation in the region has long been local land use regulations that limit multifamily housing, housing for families with

children, and publicly subsidized affordable housing. Numerous lawsuits have been successfully brought against municipalities on the basis of fair housing discrimination resulting largely from restrictive land use regulations. In its 2013 regional housing plan for Southeastern Wisconsin, SEWRPC stated that “Local zoning ordinances often preclude the development of housing affordable to lower-income households, including minorities, because of large minimum lot and/or home sizes.”² Furthermore, the Analysis of Impediments to Fair Housing Choice completed in 2014 for Waukesha County and the HOME Consortium of Jefferson, Ozaukee, Washington, and Waukesha counties concluded that “Several communities do not permit multifamily housing by right – some require a conditional use permit and others do not allow it at all. Housing mix ratios also explicitly restrict the share of multifamily housing within a community. While density is limited in some cases by a lack of infrastructure (e.g., sewers), several villages in the study area have sewer service yet still require at least 70% of residential units to be single-family.”³ Based on the current review of zoning regulations for jurisdictions included in the Collaborative for this fair housing assessment, very few improvements are evident since the SEWRPC study and the Waukesha fair housing studies were completed.

The negative impacts of restrictive land use regulations on housing affordable by many families, including racial and ethnic minorities, have been well documented. The report on “America’s Rental Housing 2020” by the Joint Center for Housing Studies at Harvard University states that, “The rising costs of construction, land, and labor, along with restrictive land use regulations, impede production of both subsidized and market-rate rental housing.”⁴ In addition, a 2018 joint study by the National Association of Home Builders and the National Multifamily Housing Council concluded that regulations and fees imposed by all levels of government, including local, state, and federal agencies, account for 32.1 percent of the cost of an average multifamily development.⁵

Members of the Collaborative recognize that communities located throughout the region must work together to ensure fair housing choice, including affordable housing development, and to address exclusionary zoning codes and impact fees that restrict housing development.

RECOMMENDED ACTIONS 3

- Members of the Collaborative, especially jurisdictions located outside of the City and County of Milwaukee, should continue to address exclusionary zoning requirements, such as:

² Southeastern Wisconsin Regional Planning Commission, “A Regional Housing Plan for Southeastern Wisconsin: 2035,” 2013, page 317.

³ WFN Consulting, 2015-2019 Analysis of Impediments to Fair Housing Choice: Waukesha County, Wisconsin, and the HOME Consortium including Jefferson, Ozaukee, Washington, and Waukesha Counties, November 3, 2014, page 8.

⁴ Joint Center for Housing and Urban Studies of Harvard University, “America’s Rental Housing 2020,” https://www.jchs.harvard.edu/sites/default/files/Harvard_JCHS_Americas_Rental_Housing_2020.pdf

⁵ Dr. Paul Emrath, and Caitlin Walter, National Association of Home Builders and National Multifamily Housing Council, “Multifamily Cost of Regulation: 2018 Special Study,” <https://www.nmhc.org/contentassets/60365effa073432a8a168619e0f30895/nmhc-nahb-cost-of-regulations.pdf>

- Residential zoning district maximum density and/or minimum floor area ratio requirements that might restrict affordable multifamily housing development.
 - Regulations that restrict higher densities and mix of housing types.
 - Restrictions on alternative types of affordable housing, such as accessory dwellings and manufactured homes.
 - Design regulations that do not promote flexibility in development and construction costs.
- Communities should promote integrated neighborhoods through inclusionary zoning. This tool is designed to increase the economic integration of communities by mandating that a percentage (often 15 to 20 percent) of housing units in projects above a given size be affordable by low- and moderate-income households. A change in the State of Wisconsin's prohibition on inclusionary zoning would be required to undertake this effort.

IMPEDIMENT 4: RESTRICTIVE ZONING REGULATIONS FOR GROUP HOMES AND COMMUNITY LIVING FACILITIES

Some communities in the Collaborative region continue to have zoning requirements that restrict the development or adaptive reuse of dwellings for persons with disabilities. In some cases, narrow definitions of “family” limit the number of unrelated individuals who can live in a single-family structure. Other regulations necessitate special use permits for community living facilities/group homes, resulting in potential constraints on group homes.

RECOMMENDED ACTIONS 4

- Communities in the Collaborative area should review community living arrangements/group homes sections of their zoning ordinances to determine if the regulations limit development of these facilities.
- The City of Wauwatosa should redefine “family” as suggested in the City’s 2019 Housing Affordability Report.

IMPEDIMENT 5: PREVALENT “FEAR OF OTHERS” EXISTS AMONG RESIDENTS, INCLUDING NIMBYISM

NIMBY is an acronym for “Not in my backyard,” a sentiment that continues to exist in parts of the Collaborative region. Housing choice is limited for protected classes in part because racism and prejudice still exist, individuals are stereotyped based upon various socioeconomic characteristics, and there is a fear of people who are dissimilar in some way living in areas that have been largely homogenous. The consequence is that individuals and households often self-segregate by locating in community areas with others who are of the same racial or ethnic background. Upon seeing communities with concentrations of a particular race, ethnicity, or national origin, those who are not a

member of the predominant racial, ethnic, or income group often develop ideas of that neighborhood that prevent them from considering living there.

In addition, there is a belief that an increase in the number or percentage of minorities in a community will result in decreased property values, which results in some communities desiring to minimize or prevent diversification. We are aware of no credible research that documents this belief. These beliefs and fears then perpetuate historical patterns of segregation throughout the specific communities and the Collaborative region.

The most frequent complaints of housing discrimination filed with the State of Wisconsin, HUD, and the Milwaukee Metropolitan Fair Housing Council for the Collaborative area cited race and disability as the basis of unfair treatment. Fewer complaints cited source of income, sexual orientation, or marital status, suggesting that the community may not be as aware of these local protections.

RECOMMENDED ACTIONS 5

Behaviors rooted in fear are rarely directly mitigated. Through implementation of the other recommended actions, the hope is that increased understanding of fair housing and interaction with diverse groups of individuals will decrease this impediment. The Collaborative members should continue to engage in various activities to promote societal harmony and understanding. Efforts to combat persistent discrimination must rely primarily on education, training and the dissemination of information about fair housing rights and options for redress of rights violations, which are discussed in the recommended actions for other impediments.

Each Collaborative member should undertake activities such as the following:

- Develop a diversity awareness curriculum and make it available to a variety of public employees, who are involved in policy and planning, as well as frontline staff, who might receive discrimination complaints.
- Work with local nonprofit organizations and subrecipients of CDBG and HOME funds to integrate diversity awareness into organizational training.
- Provide training programs for local leaders, elected officials, and the general public about the benefits of population and housing diversity.
- Provide fair housing training for key public staff responsible for receiving initial complaints from the public about potential fair housing violations.

IMPEDIMENT 6: STRONG JOBS-HOUSING-TRANSIT MISMATCH

During interviews, meetings with realty groups and community organizations, and community meetings as part of the Consolidated Plan process, stakeholders repeatedly identified an imbalance between the locations of affordable housing and job centers. This imbalance is viewed as likely to impede continued economic growth in the Collaborative

region as businesses find it difficult to locate low-cost employees who can efficiently and cost-effectively travel to jobs or afford to live nearby.

In addition to few affordable housing options near suburban employment centers, public transportation is not available in many suburbs, and transit schedules outside of Milwaukee County are not conducive to many work schedules. According to data collected by the Center for Neighborhood Technology (CNT), the combined impacts of housing and transportation costs in the Collaborative area are high in most areas outside of the city of Milwaukee. CNT's housing and transportation affordability index in 2015 was lowest in the city of Milwaukee, where an average household spent 41 percent of its income on housing and transportation, and highest in Ozaukee and Waukesha counties, where an average household spent 61 percent of its income on the combined costs. In some geographic areas within each of these counties the index was 75 percent or higher. Given that racial and ethnic minority households often have lower incomes than White households, the negative effect of these costs greatly decreases their housing, job, and trip to work choices limiting many to neighborhoods in the city of Milwaukee where these costs are affordable.

RECOMMENDED ACTIONS 6

- Encourage development of new affordable and/or mixed income housing near job centers in communities throughout the Collaborative region.
- Facilitate affordable and workforce housing development near existing and planned transportation facilities.
- Provide incentives for affordable housing development, such as density bonuses and fee waivers, to spur development.
- Educate elected officials and local leaders of communities in the Collaborative region about the need for affordable and workforce housing to ensure continued economic growth.

IMPEDIMENT 7: LACK OF FAIR HOUSING GUIDANCE AND ENFORCEMENT

Of the members of the Collaborative, only the City and County of Milwaukee and the cities of Wauwatosa and West Allis have ordinances that address fair housing issues, although numerous communities within Milwaukee County also have ordinances to protect individuals' rights to housing. Waukesha, Jefferson, Ozaukee, and Washington counties currently do not have county-level fair housing laws. Although the existence of fair housing ordinances is not sufficient to ensure access to equal housing opportunities, they provide a starting point for clarification of protected classes; prohibited areas of discrimination in the housing market, such as insurance and lending; enforcement powers; and penalties for violations.

Even though all real estate transactions must comply with the federal Fair Housing Act and the Wisconsin Fair Housing Law, many communities choose to actively encourage

fair housing by developing an ordinance or statement to address this issue for their jurisdiction. As members of the Collaborative, Jefferson, Ozaukee, Washington, and Waukesha counties could develop county-level fair housing ordinances and/or policies to provide guidance for municipalities and other jurisdictions.

RECOMMENDED ACTIONS 7

- **Develop fair housing ordinances.** Jefferson, Ozaukee, Washington, and Waukesha counties should develop fair housing ordinances to affirmatively state their desire to provide equal access to housing.

A fair housing ordinance typically includes:

- A definition of the protected classes
 - Types of real estate transactions that are subject to the ordinance
 - Identification of the entity responsible for receiving fair housing complaints
- **Support fair housing enforcement.** Members of the Collaborative should continue to support efforts by the Metropolitan Milwaukee Fair Housing Council to further fair housing efforts. MMFHC is a key link in the process to advance fair housing. Sufficient resources are needed by MMFHC and/or other organizations to conduct fair housing activities, including investigations, enforcement, coordination, advocacy, training, awareness raising, and testing. The latter refers to the investigative tool where matched pairs of home seekers, usually a White home seeker and a non-White home seeker, apply for housing or housing services to determine if providers comply with fair housing regulations.

IMPEDIMENT 8: LACK OF ACCESSIBLE HOUSING FOR PERSONS WITH DISABILITIES

Based on interviews and discussions with local housing advocacy groups, public sector staff, and other stakeholders, accessible housing for persons with disabilities is limited in the Collaborative area. Demographic information suggests that the need for housing for persons with disabilities will increase as Baby Boomers age. Between 2010 and 2017 the number of persons in the Collaborative area age 55 to 61 increased by 17 percent and the number of persons age 62 to 74 increased nearly 35 percent. Defined as needing assistance with an activity of daily living, persons with a disability, regardless of age, are a slightly lower percentage of the total population in the Collaborative area (11.8 percent) compared to the state of Wisconsin (11.9 percent) and the nation (12.6 percent). However, the median income of persons with a disability is consistently lower than the median income of persons without a disability. In Ozaukee County, which has the greatest disparity in income for persons with disabilities versus the rest of the population, the median income for persons with a disability is only \$13,182 compared to \$40,267 for persons without a disability.

The availability of accessible housing units in the Collaborative area is difficult to measure. In the city and county of Milwaukee, in particular, the age of the housing stock limits the availability of accessible units. Elsewhere in the Collaborative area, regulatory

barriers restrict some forms of housing for persons with disabilities. For example, codes that define “family” very narrowly often necessitate special use permits for community living facilities resulting in potential constraints on group homes. Given the growing number of seniors and the low incomes of many persons with disabilities, continued increase in demand is likely for accessible and/or special needs housing for persons with disabilities, especially affordable units.

RECOMMENDED ACTIONS 8

- Members of the Collaborative should use available federal resources to encourage new development and/or rehabilitation of housing to accommodate persons with disabilities.
- County members of the Collaborative should also encourage jurisdictions within each county to facilitate new development and/or rehabilitation to accommodate persons with disabilities.
- Counties that are members of the Collaborative and have established zoning ordinances should ensure that their zoning codes do not have regulations restricting community living facilities/group homes. They should also encourage other jurisdictions in each county to refine their regulations to better accommodate community living facilities/group homes.
- In the past, some members of the Collaborative have considered using special funding sources, such as Tax Increment Financing, to increase the production of accessible housing. Members of the Collaborative should continue to consider this funding mechanism.
- Members of the Collaborative and other jurisdictions in the area should consider other mechanisms to encourage accessible housing, such as density bonuses for residential developments that include accessible units.
- Members of the Collaborative should consider a housing trust fund for special needs housing similar to that implemented by Milwaukee County.

IMPEDIMENT 9: GAP IN HOMEOWNERSHIP BY RACIAL AND ETHNIC MINORITIES COMPARED TO WHITE HOUSEHOLDS

Homeownership is vital to communities’ well being. Recognizing the value of owner occupancy, the Fair Housing Act protects the rights of buyers as well as renters to live in the communities of their choice. Many factors affecting homeownership opportunities are driven by the private market, such as mortgage loan and insurance availability. However, local communities can also facilitate homeownership for a wider variety of households by encouraging affordable for-sale housing options.

In 2017, access to homeownership in the Collaborative region varied greatly by race and ethnicity. Only 28 percent of African-American households were homeowners compared to 68 percent of White households. Similarly, only 38 percent of Hispanic households and 49 percent of Asian households were homeowners.

RECOMMENDED ACTIONS 9

- Members of the Collaborative should consider developing a Housing Trust Fund similar to that implemented by the City of Milwaukee, as a new source of revenue to support affordable housing.
- Training/counseling programs to encourage current renters to become homeowners could help to increase the number of minority households in the region who are homeowners.

IMPEDIMENT 10: OVERCROWDED HOUSING

Overcrowded housing in the Collaborative region occurs mainly in the rental housing stock in the city and county of Milwaukee.⁶ Although overall only 3.3 percent of the rental housing in the Collaborative region is overcrowded, in the city of and county of Milwaukee, 4.6 percent and 3.8 percent, respectively, of the rental housing stock is overcrowded. Only 1.7 percent of the rental housing in Ozaukee County is overcrowded and 1.9 percent of the renter-occupied housing in the City of Wauwatosa is overcrowded. Less than one percent of the owner-occupied housing in the Collaborative region is overcrowded.

During meetings and interviews with stakeholders in the region, participants noted that overcrowded housing is a problem, especially in communities with sizeable immigrant populations. Participants expressed concern that new immigrant households may be doubling up or have larger or extended families who share housing in part to reduce housing costs.

RECOMMENDED ACTION 10

The city and county of Milwaukee need a larger share of new and/or existing housing in good condition with larger units. In particular, these members of the Collaborative should focus available public resources to encourage production of units suitable for larger households.

IMPEDIMENT 11: EXTENSIVE USE OF EVICTIONS

Members of the Collaborative are aware of the high number of evictions in the city and county of Milwaukee. In 2016, Matthew Desmond published a book, *Evicted: Poverty and*

⁶ Overcrowding occurs when a housing unit has more than one person per room.

Profit in the American City,⁷ which drew on his earlier research published in 2012 in which he examined eviction records from the City of Milwaukee. Unfortunately, little has changed since Desmond's book placed a spotlight on the city. Milwaukee's eviction rate is still high (4.25 percent in 2016 compared to 4.64 percent in 2012). However, the city is not unusual. Many other large cities have higher rates of evictions than Milwaukee's rate, which places the city in 60th place behind other large cities with populations of 100,000 or more, including the top five cities on the list: North Charleston, South Carolina (16.5 percent); Richmond, Virginia (11.44 percent); Hampton, Virginia (10.49 percent); Newport News, Virginia (10.23 percent); and Jackson, Mississippi (8.75 percent).⁸

Milwaukee County's eviction rate is substantial at 3.26 percent and much higher than rates for the other four counties in the Collaborative area. Of the other counties, Jefferson's rate of 1.11 percent is the highest. However, evictions are a serious problem that needs to be addressed in the Collaborative area. Desmond found that black women are evicted at significantly higher rates than black men or other categories of household heads; and he states, "in poor black neighborhoods, eviction is to women what incarceration is to men: a typical but severely consequential occurrence contributing to the reproduction of urban poverty."⁹ As a result of evictions, African-American women lose existing housing stability, often move to poorer neighborhoods, and—because of the stain on their records—lose the chance to move to better housing in opportunity areas.

RECOMMENDED ACTION 11

- According to the City of Milwaukee, a number of initiatives are already underway that need to be completed to address the problem of evictions. They include:
 - A partnership led by the City of Milwaukee and CommonBond Communities of Wisconsin has engaged the Wisconsin Policy Forum to carry out research and encourage local stakeholders to address issues related to evictions.
 - Community Advocates Public Policy Institute worked to create a Tenant Leadership Team to advocate for public education and policies to reduce eviction.
- As Desmond points out, a key factor affecting the number of evictions is lack of legal counsel for renters. Although 90 percent of landlords are represented by attorneys, 90 percent of tenants are not.¹⁰ One key to reducing the number of evictions is access to free legal counsel for tenants. Members of the Collaborative could use CDBG funds to provide legal assistance for tenants, and counties in the

⁷ Matthew Desmond, *Evicted: Poverty and Profit in the American City*, Crown Publishers, New York, 2016.

⁸ Princeton University's Eviction Lab,

<https://evictionlab.org/rankings/#/evictions?r=United%20States&a=0&d=evictionRate&l=59>

⁹ Matthew Desmond, *Eviction and the Reproduction of Urban Poverty*, The University of Chicago, 2012, page 88.

¹⁰Matthew Desmond, *Evicted: Poverty and Profit in the American City*, Crown Publishers, New York, 2016, page 303.

Collaborative could also encourage communities within each county to use CDBG funds for this purpose.

CITY OF MILWAUKEE

As the central city for the metropolitan area and the Collaborative region, Milwaukee has some distinguishing characteristics that—although shared by other older suburban cities in the area—deserve special attention when identifying fair housing issues.

IMPEDIMENT 12: LACK OF PRIVATE INVESTMENT IN SPECIFIC NEIGHBORHOODS

Local community representatives, affordable housing advocates, public officials, and other interviewees and community meeting attendees noted that some neighborhoods in the city of Milwaukee suffer from lack of private investment and focus. Problems identified include limited resources to maintain and rehabilitate the older housing stock in many Milwaukee neighborhoods, lack of willingness of some real estate agents to market for-sale or rental housing in many lower-income neighborhoods, and reluctance of investors and property developers to invest in new or rehabilitated housing in these areas. As a result, the low- and moderate-income racial and ethnic minority households living in many central city areas have few choices for quality housing.

Although many of the identified problems involve the private sector, the public sector can help to address these issues. Both financial assistance and coordination of investments by public agencies can facilitate neighborhood improvements. Many different agencies work in these neighborhoods, including federal and state governments, city agencies, neighborhood groups, foundations, and nonprofit and for-profit developers. Coordination of diverse efforts could further neighborhood revitalization.

RECOMMENDED ACTION 12

Continue to provide financial assistance to private property owners and developers to encourage housing development and rehabilitation through programs such as the Targeted Investment Neighborhood Rental Rehabilitation Loan Program, the ME2 Energy Improvement Program, the Milwaukee Shines program, the Childhood Lead Poisoning Prevention Program, the Strong Neighborhoods Rental Rehabilitation Loans, the Milwaukee Employment/Renovation Initiative, the Challenge Fund, Tax Increment Financing, the Housing Trust Fund, and numerous programs for owner occupants.

IMPEDIMENT 13: GENTRIFICATION OF SOME NEIGHBORHOODS SURROUNDING DOWNTOWN

In contrast to Milwaukee neighborhoods that lack private investment, some areas are experiencing substantial private investment that threatens to displace existing low- and

moderate-income households, especially racial and ethnic minorities. Based on interviews and comments by community residents, affordable housing advocates, real estate industry representatives, and public staff, some neighborhoods that previously offered affordable housing are experiencing gentrification as households who can afford higher market-rate rents and home prices are attracted to areas surrounding downtown Milwaukee. In addition to qualitative feedback from stakeholders, the City of Milwaukee Department of City Development's 2018 report, "A Place in the Neighborhood: An Anti-Displacement Plan for Neighborhoods Surrounding Downtown Milwaukee," evaluated demographic, socioeconomic, and housing stock trends in census tracts surrounding the central business district and identified areas experiencing displacement and gentrification. According to that analysis, the majority of neighborhoods surrounding downtown retain a stable or growing number of households that are racial or ethnic minorities, and household incomes remain stable or declining in most neighborhoods in the greater downtown area. However, the Riverwest, Brewers Hill, the southern portion of Harambee, and portions of Walker's Point neighborhoods appear to be experiencing gentrification and displacement.¹¹

RECOMMENDED ACTIONS 13

As part of its 2018 analysis of gentrification, the City of Milwaukee has already identified a variety of actions that it is planning to address gentrification and displacement in the selected problem areas surrounding downtown. Proposed local initiatives include:

- Activities, including affordable housing strategies, related to a transit-oriented development plan for these areas in partnership with the Historic King Drive Improvement District; Harbor District, Inc; and Walker's Point Association.
- MKE United Greater Downtown Action Agenda, a comprehensive planning process to assist all area residents by increasing home ownership, addressing segregation, and minimizing displacement.
- Data You Can Use, an effort to undertake improved data collection for use in measuring displacement.
- Common Council Affordable Housing Ordinance, a proposed ordinance that would require developments receiving direct financial assistance from the City of Milwaukee to provide a specific percentage of affordable units or pay an "in-lieu" fee to the City's Housing Trust Fund.
- Multiple initiatives that are underway to reduce tenant evictions throughout the city, including areas surrounding downtown.

¹¹ Milwaukee Department of City Development, "A Place in the Neighborhood: An Anti-Displacement Plan for Neighborhoods Surrounding Downtown Milwaukee," 2018, page 27.

PRIVATE SECTOR REAL ESTATE INDUSTRY

IMPEDIMENT 14: RACIAL AND ETHNIC DISPARITIES IN MORTGAGE LENDING, INSURANCE, AND APPRAISAL PRACTICES

In addition to a higher rate of mortgage denials, members of the protected classes tend to be offered subprime loans more often than others. These limited financing options reduce the chance of homeownership, and when homeownership is achieved, it may be unaffordable. Real estate professionals and housing advocacy group representatives who participated in roundtable discussions indicated that despite some improvement in the general availability of mortgage credit, funds are still limited for households located in low- and moderate-income neighborhoods in the Collaborative region, especially in the city of Milwaukee. They also cited examples in which banks work with prospective homebuyers with comparable financial backgrounds that belong to different races, but may introduce subjective interpretations during the underwriting process that result in favoring one applicant over another.

Evidence of racial disparities in lending has been documented in numerous reports, including a 2016 report by the National Community Reinvestment Coalition with assistance by the Metropolitan Milwaukee Fair Housing Council, which concluded that local lenders favored White mortgage applicants, and that loans in the Milwaukee metropolitan area are heavily concentrated in majority White and middle- and upper-income neighborhoods.¹²

One factor affecting mortgage lending activity is the residential appraisal process. Several interview respondents and community meeting participants indicated that few appraisers are familiar with low-income neighborhoods, especially those in the city of Milwaukee and some Milwaukee County communities. As a result, appraisers often have difficulty obtaining reliable comparable units for use in appraising properties, which results in underestimates of property values that do not reflect true market conditions. Attention has recently been paid to the role of appraisals in predatory lending and over-valuing residential real estate; however, little research exists on the impact of the lack of sales data or access to sales data in minority neighborhoods on the accurate valuation of homes in these areas. A recent article begins to address the issue of whether racial inequality exists in the contemporary appraisal industry. Entitled, “Neighborhoods, Race, and the Twenty-first-century Housing Appraisal Industry,” by Junia Howell and Elizabeth Korver-Glenn, the analysis concludes that in the study area that they examined, “variation in appraisal methods coupled with appraisers’ racialized perceptions of neighborhoods perpetuates neighborhood racial disparities in home values.”¹³

¹² National Community Reinvestment Coalition, “Home Mortgage Lending in St. Louis, Milwaukee, Minneapolis and Surrounding Areas,” July 2016, pages 22.

¹³ Junia Howell and Elizabeth Korver-Glenn, “Neighborhoods, Race, and the Twenty-first-century Housing Appraisal Industry,” *Sociology of Race and Ethnicity*, 2018, Volume 4, pages 473 to 490, <http://journals.sagepub.com/doi/full/10.1177/2332649218755178>.

Participants in the community meetings and roundtable discussions also frequently noted that disparities exist in the availability of homeowners' insurance in the Collaborative region. In particular, stakeholders perceive that insurance rates vary greatly by neighborhood with higher rates in areas whose residents are predominately racial and/or ethnic minorities. Most recent research and complaints documenting insurance discrimination date back to the 1980s and 1990s; however, stakeholders commented that algorithms frequently used by the insurance industry appear to negatively assess homes in many low- and moderate-income neighborhoods in which minority households reside. Because homeowners' insurance is required for home mortgages, the impact of racial and ethnic discrimination in the provision of insurance can both limit fair housing choice and lead to disinvestment and deterioration of minority neighborhoods.

RECOMMENDED ACTIONS 14

- Members of the Collaborative should support efforts by the Metropolitan Milwaukee Fair Housing Council (MMFHC) to investigate predatory lending and provide information to potential borrowers on how to avoid predatory loans.
- To reduce the impact of past predatory lending on borrowers, many of whom are racial and ethnic minorities, the Collaborative should consider working with MMFHC and local lenders to establish a Consumer Rescue Fund to remediate and refinance predatory loans for borrowers.
- Continued local work is needed to ensure that lenders who do business with members of the Collaborative and/or jurisdictions within them fully conform to the Community Reinvestment Act and provide an annual statement of goals for community investments.
- Support for financial literacy education and training by local nonprofit organizations would enable potential home buyers to make more informed decisions when reviewing housing financing options.
- Seek state legislative and/or state administrative approval to require agents who sell insurance to undergo training that includes fair rating and marketing practices.
- Home buyers who receive funds through HOME, CDBG, or local programs should be offered home buyer education.
- Members of the Collaborative should encourage professional organizations that offer educational training sessions to appraisers to emphasize not only fair housing issues affecting appraisals, but also offer specialized training in the valuation process in low-income residential areas. MMFHC could also assist with the fair housing training.

IMPEDIMENT 15: LACK OF AWARENESS OF FAIR HOUSING LAWS

What is arguably the primary impediment to fair housing in the Collaborative region is a lack of awareness and understanding of local, county, state, and federal housing laws by residents, government officials, and real estate industry members. Our research found that because there is limited understanding of fair housing laws, additional impediments are generated.

The general public does not have a strong understanding of fair housing. As a result, if their rights have been violated, they may recognize that they have been treated unfairly, but they do not equate it with a violation of a law. In some cases, residents only become aware of a fair housing violation after informing municipal officials of a problem with the physical condition of a housing unit. When reporting problems, residents have mentioned comments or other disparaging remarks related to race, source of income, marital status, or familial status.

Many real estate industry representatives have concerns related to fair housing. Changes in real estate professional standards in the last few years have resulted in real estate agents and brokers refraining from making any comments or assessment of a neighborhood's quality, socioeconomic characteristics, schools, and crime rates, among other factors. As a result, many are "scared" to consider issues related to fair housing. While some local associations discuss fair housing as a topic in training sessions, others do not.

Some private sector individuals are unaware that they may be violating fair housing laws. In recent years, the types of individuals who become landlords have shifted. There are more investor landlords who do not live in the same community (or sometimes even the same state) as their rental properties, individuals entering the rental market for the first time (often referred to as "mom-and-pop landlords"), and condominium unit owners or condominium associations that have obtained control of units that are then rented. Many of these groups are not knowledgeable of fair housing laws, and as a result, renters are more likely than owners to have their fair housing rights violated. In some cases, condominium associations have stated that they are not subject to fair housing laws.

Widespread confusion exists regarding the difference between affordable housing and fair housing. Many individuals and organizations with whom we spoke equated providing affordable housing with affirmatively furthering fair housing. A consequence of this is that the solutions proposed for fair housing then end up focused almost exclusively on the lower-income populations within the protected classes instead of the larger protected class. Organizations also then assume that they are affirmatively furthering fair housing simply by providing affordable housing independent of the housing's location or services offered.

RECOMMENDED ACTIONS 15

- **Offer fair housing training to local real estate professionals.** Members of the Collaborative can provide fair housing training on an annual or semiannual basis

to real estate professionals. While the agenda will most likely be similar to the ones offered to funding recipients, limiting the class to real estate industry professionals would allow a focus on issues specific to their field. These training sessions should be in addition to those already offered by the Greater Milwaukee Association of Realtors®.

- **Participate in training sessions of professional realtor organizations.** Members of the Collaborative should also contact professional real estate organizations, including the Greater Milwaukee Association of Realtors, to offer training sessions and provide dates of public training sessions. The training sessions should include those that focus exclusively on fair housing as well as providing fair housing as a topic during a larger training session.
- **Distribute materials on fair housing to landlords.** In response to the increased number of new landlords, members of the Collaborative as well as jurisdictions within each of the five counties should enlist the assistance of organizations representing landlords in providing information on fair housing to new landlords.
- **Encourage municipalities to contact MMFHC.** MMFHCA has a wealth of information on fair housing, including training sessions, promotional materials, and best practices. Municipalities should recognize MMFHC as a resource as they work to further fair housing.