Summary of Changes

Community input throughout the planning process reflected a range of opinions. On July 29, 2024, staff presented a proposed draft plan at City Plan Commission. The CPC took no action at that time in order to allow for additional time for community engagement and to consider changes to the plan based on resident and neighborhood group feedback.

DCD has made a number of adjustments to the Draft Plan based on the feedback received since July 2024. Feedback generally continued to support the overall plan goals. DCD also heard continued concerns that the Plan should be adjusted to elevate goals and policy recommendations related to support for homeownership, mitigating the potential for displacement of residents of vulnerable neighborhoods, and discouraging speculative investors who may engage in predatory development practices within residential neighborhoods. Through the additional outreach and public hearing, residents also expressed that the Plan should more explicitly reflect the goals of meeting the housing needs for existing residents, as well as the needs of those who will call Milwaukee home in the future. Multiple changes to the Plan have been made in response to this feedback. Additional information about some of the changes is contained within the Benefit and Harm Analysis that DCD has prepared to supplement the Plan. Not all public comments resulted in changes to the Plan. It is organized chronologically based on the section of the plan. Edits that were made to clarify language, correct typos, or other non-substantive edits that didn't result in impacts to the Plan recommendations, are not included in this memorandum.

Throughout the Plan

- Changed the name of the Plan to Housing Element (see below for additional information about the name change).

1. Introduction chapter

- Update to the intro to explain what the Plan is using the new name. (page 6)
- Added *7 Key Priorities* to better explain the goals of the Plan, which are broader than changes to the Zoning Code. (page 7)

7 Key Priorities

Increased Housing Choice & Access

Neighborhoods with a variety of housing types and a variety of price points are more likely to provide housing choices that meet the needs of all households across the income spectrum. Increasing the variety of housing types and housing supply will help create broader housing accessibility for all Milwaukeeans.

Repairing Homes & Neighborhoods

The quality of housing and neighborhoods plays a pivotal role as a social determinant of health and can have profound effects on individuals' physical and mental well-being. Repair and incremental improvements can significantly enhance the quality and stability of neighborhoods.

Commitment to Intergovernmental Collaboration & Legislative Advocacy

The City is committed to legislative advocacy and intergovernmental collaboration to help increase funding for affordable housing, support homeownership programs, increase accountability for landlords, and to enact legislation to protect tenant's rights.

Commitment to Homeownership

The City is committed to supporting homeownership, including supporting new households achieve homeownership, helping existing homeowners repair their homes, building new affordable homes, and deploying innovative homeownership strategies for a variety of housing types.

Commitment to Anti-Displacement

The City is committed to anti-displacement work through ongoing tracking, programs to help households buy and retain homes, advocating for legislative measures to provide additional resources, and collaborating with community partners.

Economic Resilience

New tax base from new development will spread the costs of City services across a larger group of taxpayers, helping stem future property tax increases or service cuts, and supporting investments in new neighborhood gathering spaces, safer streets, and other core services such as libraries. Increasing the number of people in neighborhoods can help attract businesses and services to neighborhoods.

Walkable Neighborhoods

More housing development near commercial districts and transit corridors creates vibrant walkable environments – increasing quality of life, supporting businesses, and providing health and environmental benefits. Central to walkability is housing density in close proximity to a range of amenities, enabling residents to conveniently meet their daily needs without a car.

- Added a new section to explain the reasoning to update the name of the Plan. (page 8)

  Why is there an updated Plan name?

  The Housing Element is an update to the City of Milwaukee's Comprehensive Plan to support Milwaukee's evolving housing needs. It includes strategies and policies to increase housing choice, affordability, and sustainability.

  Earlier drafts of the Housing Element were titled "Growing MKE." The title was updated to align with updates to the Plan's strategies and recommendations, and to better reflect the plan's goals of meeting the housing needs for existing residents, as well as the needs of those who will call Milwaukee home in the future.

  Meeting Milwaukee's evolving housing needs is key to the City's overall strategy to enhance the quality of life for current residents and make Milwaukee an even more attractive place for future residents in order to grow Milwaukee.

- Updated the Project Timeline to reflect the full process to date. (page 9)

- The *Housing Types Defined* information was expanded to include renderings of the housing types, additional photos, and people. The renderings, people, and longer descriptions of the housing types were in a later portion of the plan in the July 2024 version. (pages 17-20)
- Informational pages with the zoning story graphics and zoning history were removed based on feedback and to save space. This information is available digitally on the website.
- A new graphic was added to portray an example of a typical block in one of Milwaukee's earlier neighborhoods that has a mix of housing types. (page 21)

2. Overview chapter

- Updated the data for the most up-to-date years (2023 or 2024) and added additional infographics to explain the data and state of housing. (pages 24-28)
- Data was re-arranged to create room for infographics. (pages 24-27)

3. Engagement chapter

- Updated the numbers under the *Engagement Highlights*. (page 30)
- Updated and expanded on *Themes from Public Engagement* to reflect themes from the full engagement process. (pages 32-33)

4. Goals & Policies chapter

- The updates and new policies in this section reflect feedback from the community and changes made to the near-term zoning code strategies.
- Under section *I. Housing Choice & Access* (page 36)
    - Adjustments were made to the policies to reflect updates to the near-term zoning update strategies.
        - I.A.1 was updated – ~~*Update*~~ *Over time, continue to explore updates to the zoning code and area plans to permit or allow greater flexibility for a variety of housing types throughout city neighborhoods including single-family homes, accessory dwelling units, duplexes, triplexes, fourplexes, townhomes, and cottage courts.*
        - I.A.2 was updated – *Permit accessory dwelling units (ADUs) throughout the city~~,~~ ~~as well as other housing types that can~~ to better facilitate intergenerational households, aging in place, or rental income for homeowners.*
    - I.A.4 is new policy (see underlined text below) This also shifted the other policies down. A supplementary call-out box was added to explain the compatibility of RS and RT districts and how parcels were zoned in 2002. This new policy also aligns with recent action by the Milwaukee Common Council to create a new RT5 zoning district that would allow for additional missing middle styles of housing at appropriate locations via the zoning map amendment process including neighborhood and Common Council review.
        - *Explore opportunities including potential future zoning map amendments to allow smaller middle housing types such as duplexes, triplexes, and fourplexes at appropriate locations within residential neighborhoods such as sites in close proximity to transit, walkable commercial districts, or other neighborhood-serving amenities.*
    - I.B.5 – New policy regarding outreach by developers for zoning change proposals.

        - *Applicants for zoning changes should directly engage with potentially impacted neighbors and local neighborhood groups during the pre-development process to share information about pending proposals, seek feedback and respond to community concerns.*
- Under section *II. Neighborhood Repair, Connections & Health* (previously called *II. Social Connections & Health*) (page 41)
    - Policy II.A.9 was updated to reference adopting short-term rental regulations:
        - *Adopt new regulations to ensure that short-term rentals ("tourist rooming houses") are following applicable heath and safety requirements. Continue to monitor the impact of short-term rentals on local neighborhoods and housing markets and adjust regulations as needed ~~explore potential regulations~~ to address negative impacts.*
    - Policy II.A.10 is new and is related to the preservation of culturally sensitive areas.
        - *Consider establishing customized overlay zones when supported by historically disadvantaged or vulnerable communities to preserve culturally sensitive areas or districts that have been home to those communities.*
    - The policies under II.B were originally in section IV. of the policy section, but fit better under section II, so they were moved. No changes were made to the policy text.
- Under section *III. Walkable Neighborhoods & Transit-Oriented Development* (page 44)
    - The policy that was III.C.5 in the July 2024 draft was removed because was repetitive of policy III.C.2.
      ~~*Explore allowing increased height for new development in areas well served by transit*~~
- Under section *IV. Neighborhood Development & Urban Design* (page 47)
    - New policy IV.C.2 regarding 3rd floor fire escapes was added based on public input (This also shifts the numbers of the remaining policies in this section)
        - *Limit the placement of fire escapes on the street facades of buildings to minimize the visual impacts of the creation of new accessory dwelling units.*

5. Commitments to City Goals chapter

- This is a new section of the plan that explains the City's commitments and current programs related to homeownership, anti-displacement, and state legislative advocacy on related topics. (page 48)

6. Updates to the Zoning Code to Support Plan Goals chapter

- This section combined two sections (Recommendations & Implementation) from the July 2024 draft into one section. (pages 52-62)
    - The section contains Zoning Code updates that should be carried out in the near-term or explored further to support housing choice and access. The near-term strategies are actions staff should pursue in the next 1-3 years. The tables in this section contain implementation details, considerations, and other potential zoning code updates.
    - Due to the reorganization, the actions within the tables have been re-ordered. With the exception of adjustments made to reflect the near-term strategy for neighborhood-scale

housing (see below) and some clarifying language, the content in the tables is mostly the same as the July 2024 Draft Plan.

- The Near-term zoning recommendation/strategy for neighborhood-scale housing was updated. The chart below explains what is currently allowed to be built by-right in the current zoning code, what the July 2024 Draft Plan recommended allowing by-right, and what the Updated April 2025 Draft plan proposes. (page 53). The most significant proposed adjustment to the Plan was to remove the previous Plan recommendation to allow duplexes, triplexes and 4-unit homes in neighborhoods where they are not currently permitted. While some members of the public supported allowing additional housing options in single-family and two-family zoning districts, there was significant concern expressed about whether these changes may have the effect of encouraging predatory investment or limit future homeownership opportunities within those neighborhoods. While this adjustment to the Plan may limit certain opportunities for housing choice and lower-cost housing options, it acknowledges public feedback, input from Common Council members, and past neighborhood planning calling for prioritizing homeownership opportunities when balancing these policy goals.
    - RS = Residential Single-Family
    - RT = Residential Two-Family

Housing Type	Current Zoning Code	*July 2024 Draft Plan*	Updated April 2025 Draft Plan
Single-Family Detached Home	Allowed in all RS & all RT Districts	*Continue to allow – No change from current Zoning Code*	Continue to allow – No change from current Zoning Code
Single-Family Attached Home (fee simple townhome)	Allowed in all RT Districts	*Allow in all RS and RT Districts*	Allow in all RS and RT Districts
Accessory Dwelling Unit	Not defined	*Allow in all RS and RT Districts*	Allow in all RS and RT Districts
Cottage Court	Not defined	*Allow in all RS and RT Districts with standards*	Allow in all RS and RT Districts with standards
Duplex (2 dwelling units)	Allowed in all RT Districts	*Allow in RS and RT Districts*	**Recommendation removed** - No change from current Zoning Code
Triplex (3 dwelling units)	Allowed in only RT4 District	*Allow in all RS and RT Districts*	**Recommendation removed** - No change from current Zoning Code
Fourplex (4 dwelling units)	Allowed in only RT4 District (if lot is large enough)	*Allow in all RT Districts*	**Recommendation removed** - No change from current Zoning Code

Updated Language (page 53)

> ***Near-term Recommendation #1 - Neighborhood-scale Housing:*** (page 53)
>
> ***The City will update the Zoning Code to define more types of neighborhood-scale housing. In the near-term, with set standards, allow Accessory Dwelling Units, Cottage Courts, and Attached Single-family Homes (townhomes on separate properties), in all residential districts.***
>
> ***Why?*** *Defining additional housing types and setting standards will improve readability of the existing code and make it more feasible for these types of housing to be built, regardless of whether they can be built by-right or require a discretionary approval. Attached single-family homes are only allowed in some residential districts, but allowing them in more districts could provide more homeownership opportunities.*

Appendices Section

- The summaries of related plans were moved from the Goals & Policies section to an appendix. (page 64)
- The following terms were added to the glossary: commercial node, displacement, fee simple, gentrification, inclusionary zoning, legislative package, low-income housing tax credit, PRO Housing (Pathways to Removing Obstacles to Housing), Social Determinants of Health, Strategic Action Fund, Tax Incremental Financing (TIF), and Tax Incremental District (TID). (pages 66-69)