GROWING MKE

PLACE MAKERS

DPZ CODESIGN

Encouraging Housing Choice and Growth through Milwaukee's Zoning Code

Code Assessment and Recommendations

Prepared by

PlaceMakers and DPZ

Final Draft - October 31, 2023

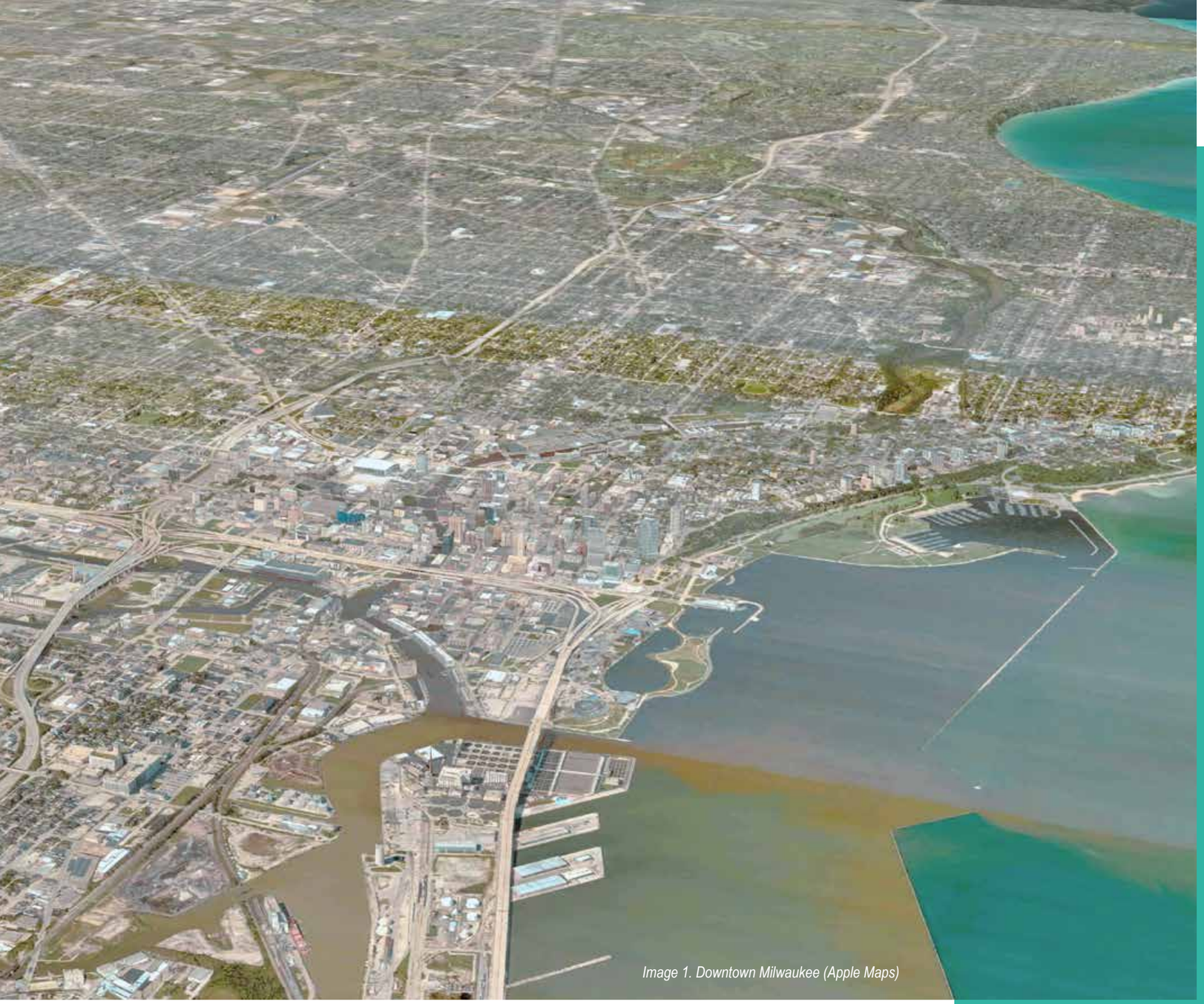


Image 1. Downtown Milwaukee (Apple Maps)

Growing MKE

> The goal is not just to critique the current code, but to ultimately provide actionable recommendations that can contribute to meaningful change.

Introduction

The City of Milwaukee is undertaking the Growing MKE initiative to amend the housing chapter of the Citywide Policy Plan and make updates to the elements of Milwaukee's zoning code that regulate housing development to advance the City's goals for housing growth and choice. As part of this initiative, the Department of City Development (DCD) engaged the consultant team of PlaceMakers and DPZ to carry out an analysis of Milwaukee's zoning code and make recommendations for code updates to achieve local goals. This report makes recommendations for how Milwaukee can update its zoning code to advance the local goals that have been called for in the City's Area Plans as well as recent plans such as the Collective Affordable Housing Plan, the City's Climate and Equity Plan, and the Equitable Growth through Transit Oriented Development Plan. In addition to past plans, these recommendations were informed by an extensive review of local housing development data, discussions with City staff, and local stakeholders. This report will be utilized by the Department of City Development and local policy makers in shaping the Growing MKE Comprehensive Plan amendment and subsequent updates to the zoning code. Here's a summary of the feedback and its implications for the recommendations:

Diverse Housing Types: A resonating theme was the necessity to diversify housing options. Specifically, there's an interest in facilitating 'middle' housing types – residential structures like townhouses, three- and four-plexes, and small apartment buildings that bridge the gap between single-family homes and large apartment buildings. Fostering these, Milwaukee can cater to a broader demographic, promoting inclusivity and replicating the historic housing types of the city.

Density: A review of city development data and initial interviews featured a consistent emphasis on reassessing the city's approach to how density is regulated within the zoning code. This encompasses both the number of dwellings on a lot (known as lot area per dwelling unit or LA/DU) and the volume of the building that can be developed in relation to the total space of the lot (known as the floor area ratio or FAR). An improved strategy could help Milwaukee maximize its urban areas and transit corridors, allowing more residents and businesses to flourish while preserving the distinctive charm of its neighborhoods.

Design Standards: With greater density comes a greater need for predictable and harmonious building designs. Appropriate standards could address a range of issues including the design of parking structures, activating the street front, and building materials. If design standards that are frequently utilized during discretionary reviews are built into the code, it's possible to achieve desired design goals while streamlining the review and approvals process and developing predictability for the applicant. This reduces delays and associated costs, delivering more homes more quickly.

Parking Evolution: Reflecting the evolving urban ethos, many participants advocated for rethinking the mandatory parking requirements. This suggests a growing inclination toward sustainable transportation alternatives, lessening the city's dependency on cars to achieve climate change goals. Current requirements are not excessive, but don't always reflect market demand. Developers struggle to get financing if their projects do not plan for enough parking, which tends to be a better way to determine the ideal amount of parking in each situation. For instance, dwellings along transit corridors usually require less parking than in remote locations. Removing parking requirements can expedite the review process by removing parking quotas and advance city goals for climate, affordability, and multi-modal transportation.

Process Simplification: Comments included the length and complexity of the current approval process for projects requiring discretionary reviews or the creation of Detailed Planned Development zoning districts. By cutting down on prolonged procedures, not only is there a reduction in administrative costs, but projects can also commence more swiftly. This time efficiency and greater clarity translates into monetary savings for developers, potentially resulting in the faster delivery of more housing units to the market and increasing the diversity in the development field.

Milwaukee aspires to a harmonious blend of progressive urban development while treasuring its rich heritage. Zoning changes are a piece of that puzzle, but zoning changes alone will not address the city's overall housing affordability goals. Other priority strategies recommended in the Milwaukee's Collective Affordable Housing Strategic Plan must continue to be implemented in tandem with zoning code updates to provide quality and accessible housing for every Milwaukeean.

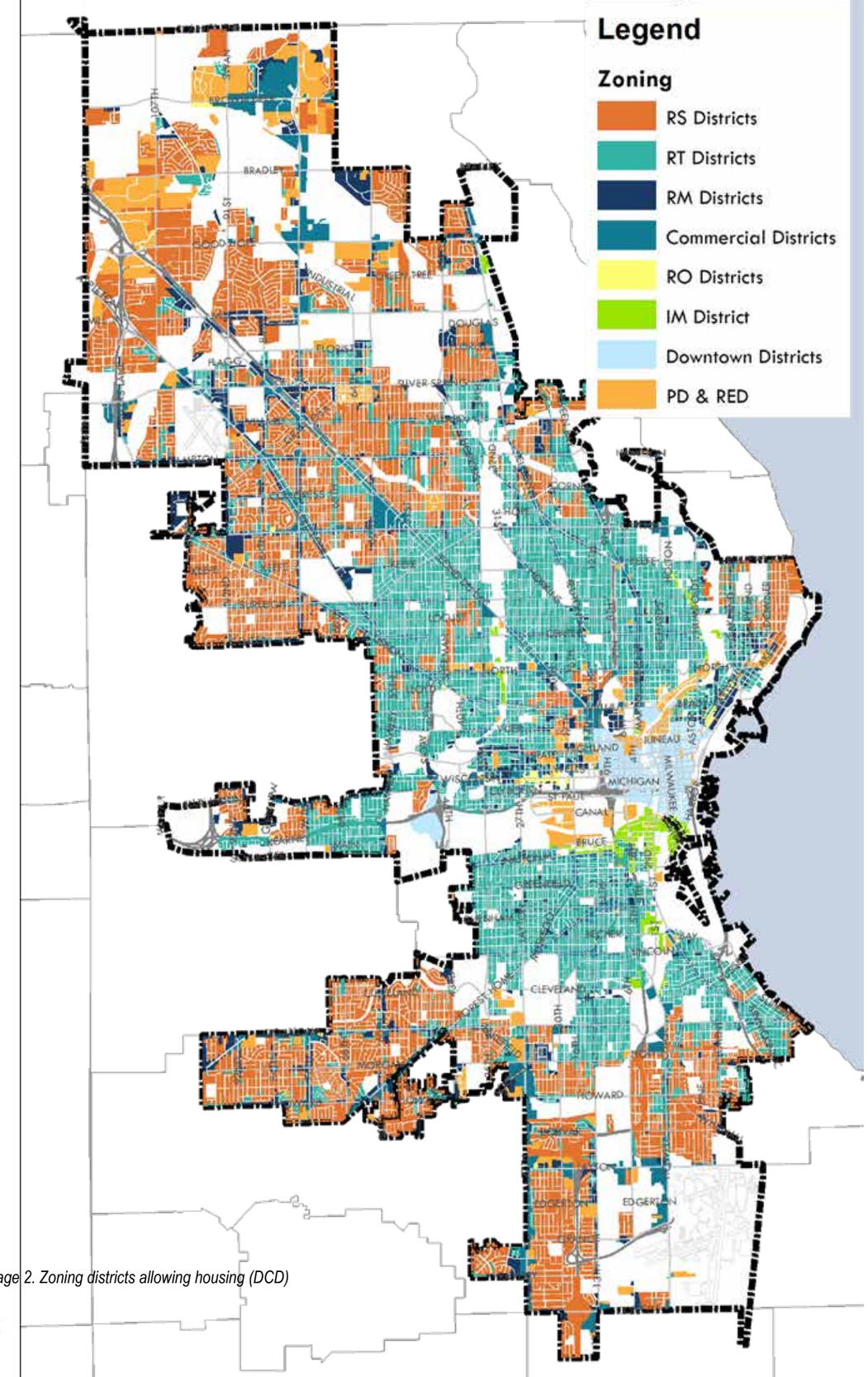


Image 2. Zoning districts allowing housing (DCD)

Housing Types

of the land zoned to allow housing

40%

is zoned single family and 30% is zoned to allow up to two-family.

Image 3. Riverwest residential street (Google Earth Pro, Landsat)

The tapestry of Milwaukee's urban evolution, from its founding in 1846 to today, tells a story of change not just in architectural styles but in the size and function of its residential buildings. The diversity of these structures mirrored the economic, demographic, and social shifts of the city.

Today's zoning landscape in Milwaukee bears imprints of this historical evolution. Of the Milwaukee land area zoned to allow housing development, 40% of land is zoned single-family residential 30% is zoned to allow up to two or four family residential development and the remaining 30% is zoned to allow multifamily housing (City of Milwaukee Master Property File, May 2023). However, the limited zoning for multi-family units and mixed-use buildings suggests a dissonance between the city's historical diversity of structures and its present-day regulations.

Historically, many neighborhoods in Milwaukee included a mixture of single-family, two-family, small multi-family buildings, and small neighborhood commercial uses on the corners. This mix is illustrated in the photo above.

Milwaukee's zoning code is divided into several residential districts, each with specific regulations regarding land use, building types, size, and density. Understanding these districts provides insights into the city's housing landscape and the opportunities and challenges associated with each.

Single-Family Residential Districts (**RS**): These districts accommodate single-family homes with a range of densities, although there is limited provision for two-family homes. The RS zones permit from 2 units per acre in R1 to 12 units per acre in R6, not accounting for specific site restrictions.

Two-Family Residential Districts (RT): These districts allow for a mix of single-family homes and two-family dwellings with some provisions for townhouses, triplex, fourplex and corner commercial uses. The RT zones permit 12 to 36 units per acre.

Multi-Family Residential Districts (**RM**): The seven RM districts permit single-family, duplexes, apartments and townhomes. Not including the reductions that accompany the parking minimums, multi-family zones permit from 18 to 290 units per acre.

Residential/Office Districts (**RO**): The two RO districts permit the conversion of residential buildings into offices. They permit a range of building types from single-family to multi-family and live-works. Both these districts are medium density with one being suburban in character, and the other urban. There are only two districts in the zoning type, and they permit from 18 to 109 units per acre, not accounting for parking and setbacks.

Business, Commercial, Downtown, Industrial Mixed, and Planned Development Districts (NS, LB, RB, CS, C9, IM, PD): Most commercial zones permit residential units to coexist with commercial and office uses. The range of densities are from 18 to 145 units per acre, with the highest density permitted in LB3 and downtown.

Gaps in Current Housing Options

Current zoning restricts housing types and choices, which can limit the availability of affordable housing options. Milwaukee's Collective Affordable Housing Strategic Plan (2021) acknowledges that these current zoning restrictions constrain the variety of housing options in the city and indicates a need for revising the code. There's a noticeable gap when transitioning from duplexes to the broad multi-family categories.

While Milwaukee's history boasts an array of middle-density housing, including duplexes, triplexes and small apartment buildings, the current zoning code does not clearly represent this diversity. Currently, the zoning code only includes single-family, two-family, and multi-family building types. **The broad-brush approach of grouping all multi-family housing into a singular use category misses out on the opportunity to more explicitly regulate and permit certain types of middle density housing into additional neighborhoods to meet the nuanced needs of urban residents.** There's a need to reintroduce and accentuate structures like live/work units, small apartment buildings, micro units, and courtyard apartments to bridge the housing spectrum's existing gaps. Creating these additional housing types in the code will help target and clarify where these styles are desired, and this clarity of intensity will assure neighborhoods that they can expect gentle densification in a manner that reflects the buildings already in existence while alleviating the need for discretionary review and BOZA hearings. Historically small multi-family buildings have seamlessly coexisted in many zones that are limited to 2-family dwellings today, while much larger multi-family buildings would be an imposition. By adding more nuanced ranges of multi-family building size, along with townhomes, greater housing type diversity can be enabled in a compatible way in many parts of the city.

See the illustrations on the facing page showing how residential buildings changed in Wisconsin from the early 20th century to the present. This comparison provided by the League of Wisconsin Municipalities and the Congress for the New Urbanism illustrates the loss of 3- and 4-plexes, and small apartment buildings across the state over the last half of the 20th century. It also illustrates the land consumption. In the first illustration 22 dwellings fit on .75 acres and in the second illustration 15 dwellings require 1.86 acres. This represents a loss of 21 dwellings per acre and significantly more impervious surface for the additional parking. These more expensive patterns of place translate into more expensive housing for residents.

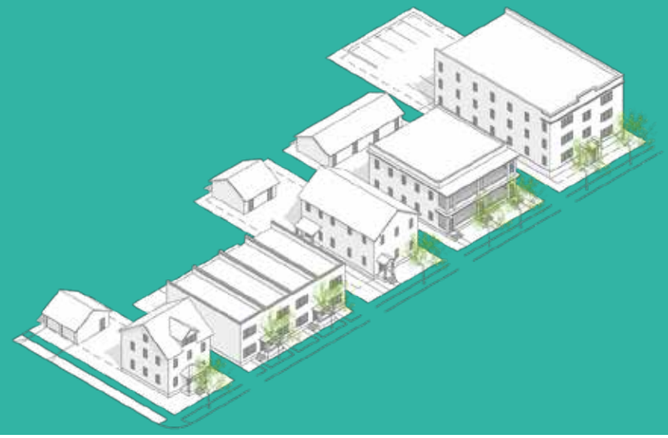


Image 4. Housing types: single family, rowhouse, duplex, fourplex, small apartment building
Wisconsin Building Types Over Time (CNU, LWM, 2022)

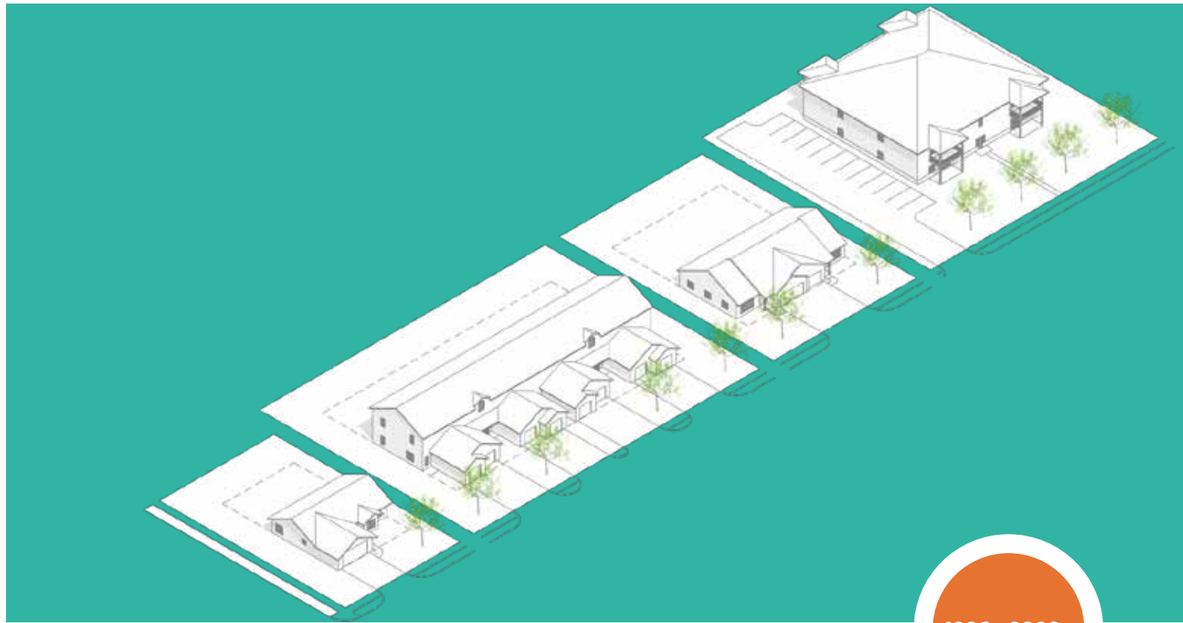


Image 5. Housing types: single family, townhouse, duplex, garden apartments
Wisconsin Building Types Over Time (CNU, LWM, 2022)

Image 6. Milwaukee range of housing (Google Earth Pro)

Recommendations

By drawing from its rich historical tapestry of varied types of housing, Milwaukee has the opportunity to refine its zoning code in a manner that is both reflective of its past and attuned to its future growth. To address the observed gaps - types of buildings not acknowledged within the current zoning code - and to realign with the city's evolving housing needs, targeted recommendations can help. These suggestions propose the integration of various historically common building types into specific zoning districts.

In addition to more explicitly defining the housing types within the code, the city should consider allowing up to three dwellings in all RS districts. Since the housing styles proposed to enable this have a similar form to single-family homes and won't require alterations to lot coverage or bulk standards, the districts' character will remain unaffected. There are various configurations of housing options that could produce three dwellings on a lot, including a tri-plex, or a duplex with detached accessory dwelling unit, and they should be carefully considered for each district in the next phase.

Each recommended building type is explained in more detail in the following pages, along with its advantages and best practices for integration into the proposed zoning districts. The objective is to facilitate a cityscape that not only resonates with Milwaukee's historic identity but also aligns with contemporary housing needs.

TABLE 1. RECOMMENDED RESIDENTIAL BUILDING TYPES

RESIDENTIAL BUILDING TYPES	ZONING DISTRICTS
ADUs: coach houses, detached cottages, attached accessory units, internal accessory dwelling units	RS, RT (all districts)
Back houses	RS6, RT (all districts)
Townhouses	RS, RT (all districts)
Duplex	RS, RT (all districts)
Triplex	RS, RT (all districts)
Fourplex	RT (all districts)
Cottage courts	RS, RT (all districts)
Small apartments	RT3, RT4

Accessory Dwelling Unit (ADU)

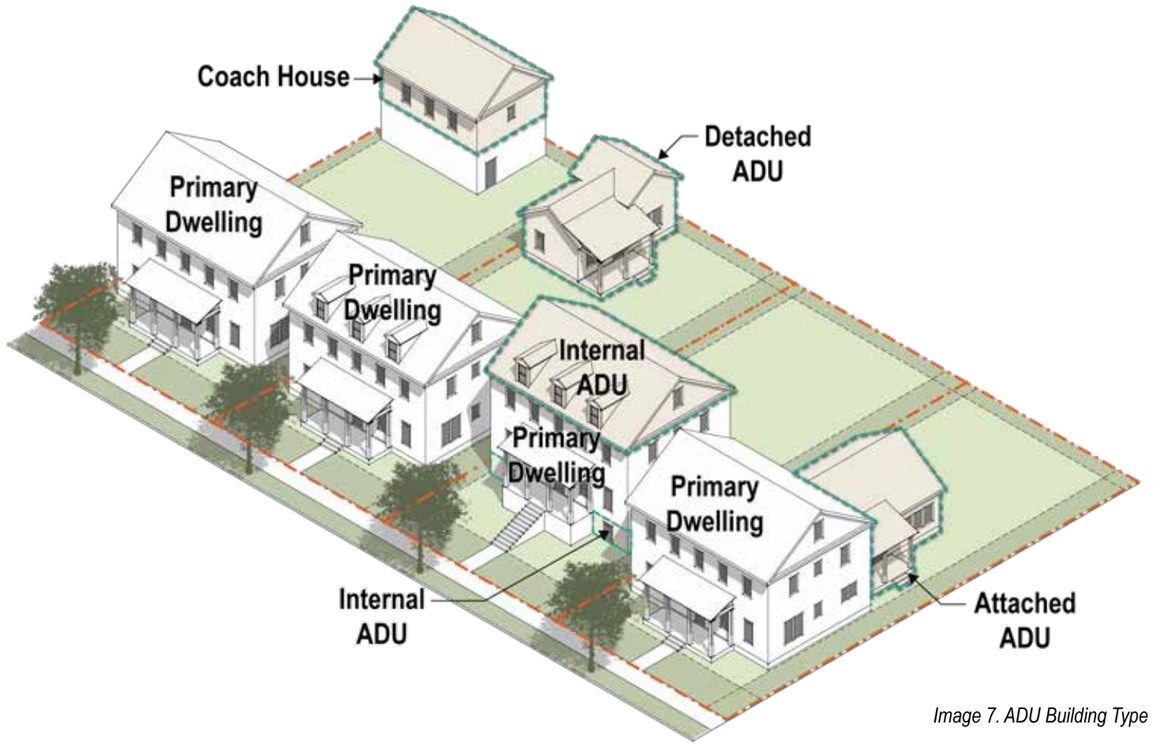


Image 7. ADU Building Type

ADUs are secondary living spaces on a property that are smaller in scale than the primary residence. Their design and location vary, offering a range of options tailored to homeowners' preferences and site conditions. Common types illustrated above include:

Coach Houses

Originating from the historic practice of housing carriages or stables, coach houses are typically located above or beside detached garages. Nowadays, they're transformed into living quarters, often featuring a bedroom, a living area, a compact kitchen, and a bathroom. Their elevation offers privacy, and their integration with garages makes them a discrete housing option.

Detached Cottages

These standalone structures are situated separately from the main house, often in the backyard. Their design can mirror the main house or have a unique aesthetic. These cottages can range from studio units to more expansive spaces, incorporating several rooms and amenities. AARP advocates for units like this since they're ideal for aging in place.

Internal Units

These units are conversions of portions of the primary residence, such as the attic or basement, versus the attached unit, which is an extension of the main house. They are ideal for families because of the proximity.

Attached Units

Attached units are extensions or conversions of existing spaces in the main house, like basements or attached garages. A popular variant is the 'Granny Flat,' designed with the elderly in mind. It provides an adjacent, accessible living space for aging parents, ensuring proximity to family while maintaining some independence.

Image 8. Upper East Side, Milwaukee (Google Earth Pro)

Advantages

There are multiple benefits to legalizing accessory dwelling units. An ADU offers homeowners an additional income stream. This income can provide significant relief for homeowners, helping to offset mortgage payments, property taxes, and maintenance costs.

ADUs can provide a compassionate solution for families with elderly members. They foster closeness, ensuring that aging parents are near, while also giving them a sense of independence. This model also mitigates the costs and emotional strains of external eldercare facilities. It works equally well for adult children who are establishing financial independence.

With the city's growing need for more affordable housing options, ADUs present a solution that respects the existing neighborhood context. Instead of erecting large apartment buildings with large swaths of parking, ADUs integrate seamlessly, preserving the charm of communities while accommodating more residents. States that have adopted legislation requiring municipalities to permit ADUs include Oregon, Washington, California, New Hampshire, and Vermont. Regional ADU initiatives exist within Washington, DC, Chicago, Denver, Boston, and Atlanta. Many types of ADUs exist throughout Milwaukee neighborhoods and are a part of the City's history, though current code regulations do not permit them "as of right" in most cases.

Recommendation

Accessory dwelling units (ADUs) should be allowed in all RS and RT zones. The lot's size itself can naturally limit the number of units in RT zones while only one per lot should be permitted in RS zones. When determining the size of an ADU, it's wise to set limits, either by setting a maximum square footage or by making the ADU's size a fraction of the main house's size.

Image 9. Murray Hill, Milwaukee (Susan Henderson)

Back House

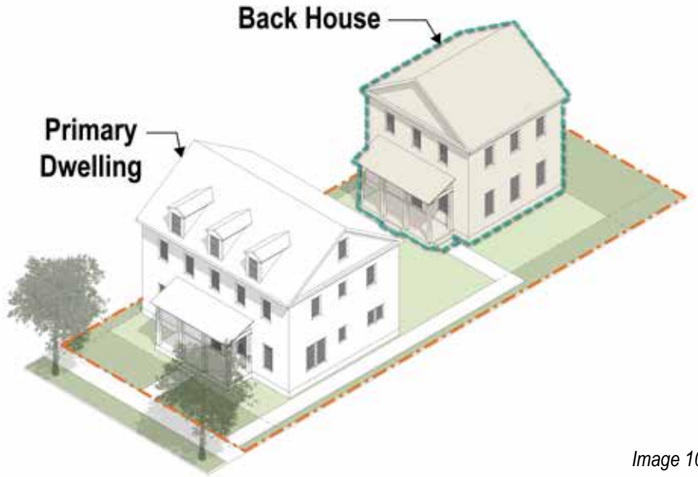


Image 10. Back House Building Type

A back house typically refers to a secondary structure located at the rear of a main property or lot. This secondary unit is larger than an ADU, often equivalent or nearly equivalent to the size of the main house. This is a very common historic residential building in Milwaukee neighborhoods, and appropriate in all of the RT zoning districts as well as RS6. Since the back house is larger than an ADU, it should be subject to the setbacks for main buildings rather than the accessory building setbacks which are often shallower.

Image 11. Walker Square, Milwaukee (Google Earth Pro)

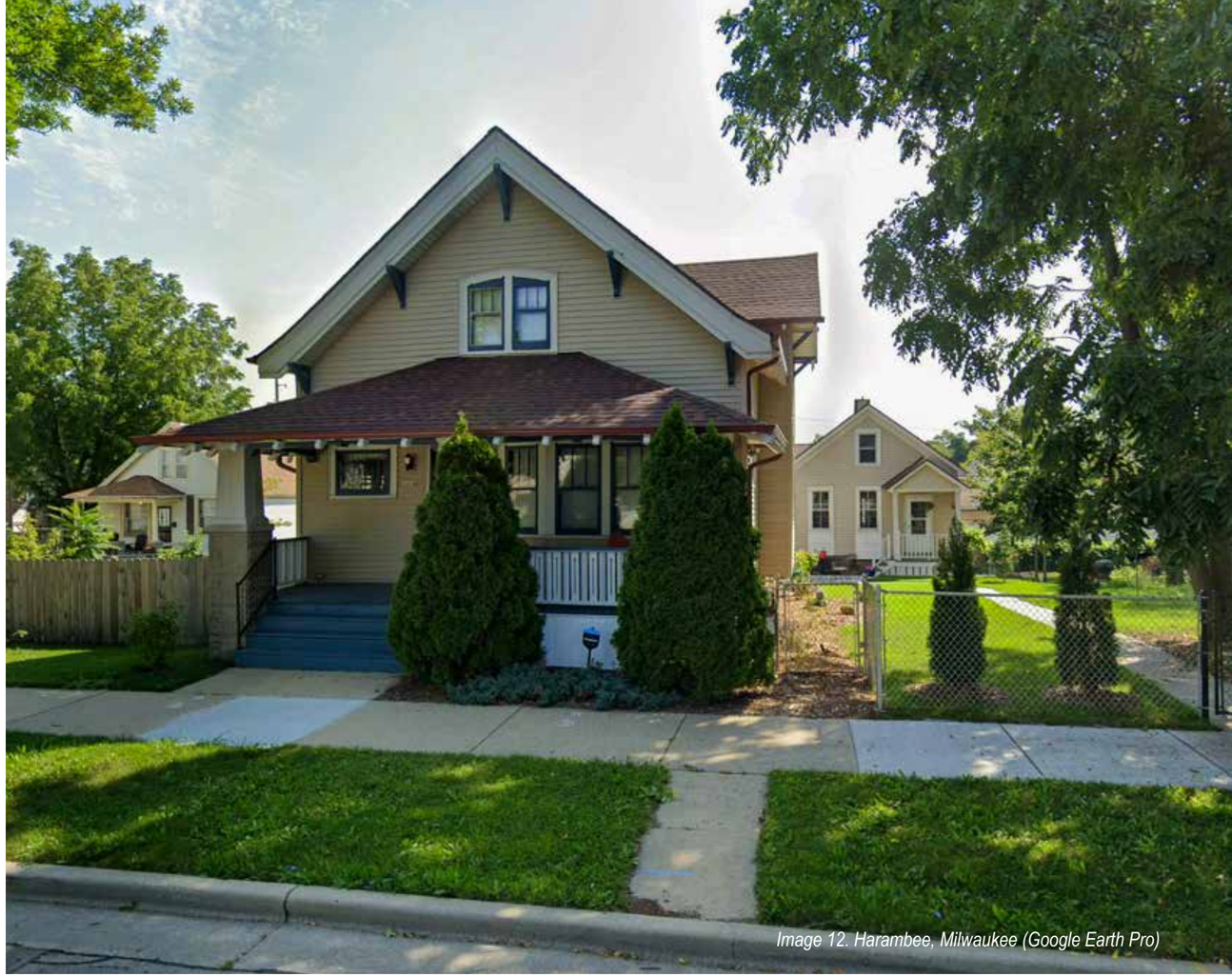


Image 12. Harambee, Milwaukee (Google Earth Pro)

Advantages

In addition to the advantages listed above under the category of accessory dwelling units, the inclusion of back houses offers multiple benefits. These secondary structures can effectively maximize the utilization of property space, providing homeowners with opportunities for more substantial additional rental income or extended family accommodations. Given Milwaukee's push for increased housing diversity and affordability, back houses also address the city's housing demands without significantly altering neighborhood character. Back houses accommodate families with children since their size isn't restricted like an ADU. Their integration can lead to enhanced community vibrancy, while simultaneously providing more housing options in areas with established infrastructure and transit access.

Recommendation

Back houses should be allowed in all RT zones and considered for inclusion in the RS6 zone. Back houses should not be subject to the ADU size limitations, but rather the bulk and coverage standards of the lot.

Townhouse

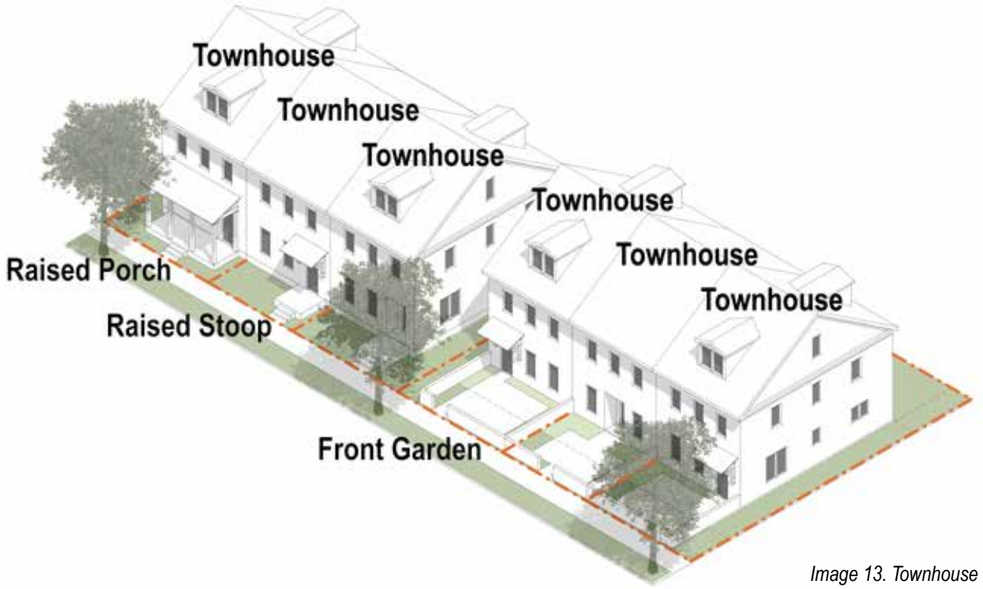


Image 13. Townhouse Building Type

Townhouses serve as ideal single-family homes tailored to urban settings. Milwaukee has few remaining historic examples of townhouses, most of which may have been removed during the era of urban renewal. Townhouses are an important scale of building between detached single-family homes and small multi-family buildings and are increasingly popular for residents who don't want to maintain a large yard. Given Milwaukee's abundant alleys, constructing townhouses is smooth since garages can be positioned along these alleys rather than fronting the street. When garages face the street, as is common for many new townhouse developments not sufficiently regulated, they often disrupt the pedestrian experience and can be risky for walkers and cyclists, turning sidewalks largely into driveways. With garages situated at the rear, townhouses present welcoming fronts of stoops or porches, fostering a sense of community and interaction.

Image 14. Townhouses in Milwaukee (Google Earth Pro)

Image 15. Townhouses in Milwaukee (Google Earth Pro)

Image 16. Townhouses in Milwaukee (Google Earth Pro)

Advantages

Townhouses come with a myriad of benefits, and their design is complementary to urban living. With smaller lots, land costs are often reduced, making them a more economical choice for potential homeowners. Additionally, townhomes provide an opportunity for homeownership and the associated wealth building opportunities which is a goal of Milwaukee policy makers. Their compact design often translates to less maintenance and utility costs, which enhances affordability and environmental performance. Townhouses tend to be strategically located, offering residents the convenience of proximity to city amenities, public transport, neighborhood retail, and parks. Collectively, these attributes make townhouses a compelling choice for those seeking the autonomy of single-family living without the hefty price tag and extensive upkeep of larger homes.

Recommendation

Townhouses, while essentially single-family homes that are attached, are currently only allowed in RT zoning areas. **Consider allowing townhouses in RS zones also since they are single-family dwellings.** If townhomes are more widely permitted, additional design standards should be added to the code to support Milwaukee's goals for walkable urban neighborhoods. For instance, garages should face the alleyway, homes should feature either a porch or a stoop, and there should be either a raised ground floor or a small front garden, as in the photos above and on the previous page.

Cottage Court

Image 17. Cottage Court Building Type

A cottage court consists of a cluster of small homes around a shared common green. This central garden acts as a communal area, encouraging interactions and forging strong neighborly connections that contribute to sociability and wellbeing. The individual cottages, with their compact design, offer a sense of charm and warmth, making them a fitting choice for both urban and suburban settings.

Image 18. Greenwood Avenue Cottages (Ross Chapin)

Image 19. Third Street Cottages (Ross Chapin)

Image 20. Gulfport, Mississippi (Ben Brown)

Advantages

There are many advantages to cottage courts. The small size of each house makes them an ideal option for first-time homeowners or those looking to downsize without compromising on the essence of home. This addresses the need of today's increasingly smaller households. These arrangements seamlessly merge the appeal of single-family living with economic practicality. Because they're a collection of small detached houses, they are compatible with adjacent single family properties. Whether in the form of fee-simple ownership overseen by a homeowners association, condominiums, or rentals, cottage courts offer flexibility in ownership models. Moreover, by ensuring shared spaces and fostering community, they strike a perfect balance between privacy, affordability, and a sense of community.

Recommendation

Cottage courts are suitable for all RS and RT districts, as they are essentially single-family homes centered around a common space. When cottages are on individual lots, typical lot area requirements of the zoning district shouldn't apply. The exterior setbacks should adhere to the district's standards, but distances between the cottages should meet fire code. Parking for cottage courts should ideally be in a communal lot accessible from an alley. There should be clear guidelines for the size and layout of the shared green space. Additionally, cottages that are along the street should face the street to maintain neighborhood cohesion and promote walkability.

Duplex

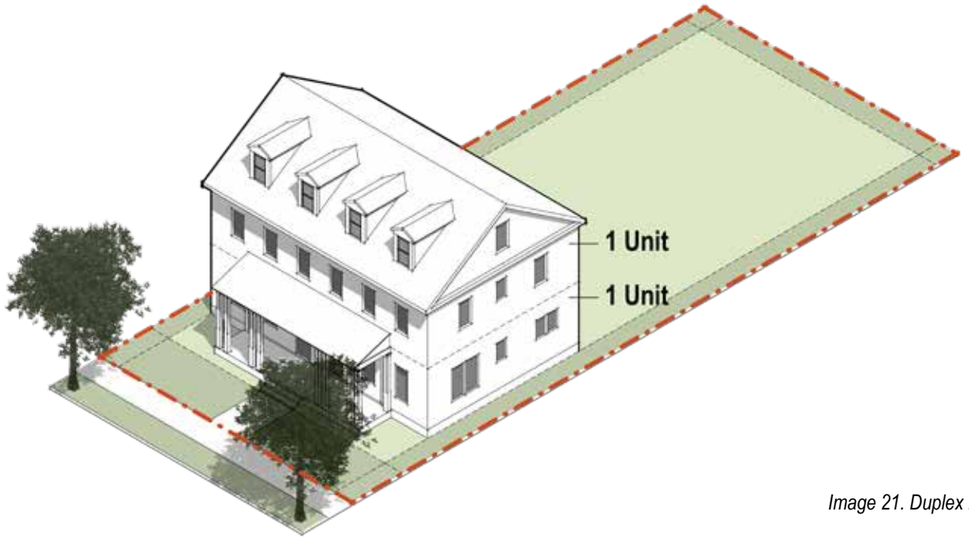


Image 21. Duplex Building Type

Duplexes represent a versatile and integrated housing option, seamlessly blending into various neighborhoods. Characterized by two independent living units situated within a single building structure, duplexes efficiently utilize space, promoting housing variety and availability. The living units can be arranged side-by-side or stacked vertically, providing design flexibility that can easily complement the prevailing architectural styles and neighborhood aesthetics.

In terms of functionality and form, duplexes echo the familiarity and comfort of single-family homes, preserving the neighborhood's character and charm. Their integration fosters diversity in housing choices, accommodating different household sizes and needs without disrupting the existing urban fabric. Duplexes symbolize a practical approach to gently increasing housing density, encouraging a vibrant, inclusive, and adaptive residential landscape.

Image 22. N. Cambridge, Milwaukee (Google)

Image 23. E. Vine St., Milwaukee (Google)

Image 24. S 2nd St., Milwaukee (Google)

Advantages

In Milwaukee's zoning update, duplexes serve as a crucial component, seamlessly integrating into existing neighborhoods to enhance housing diversity and density without sacrificing the inherent character of residential areas. Their efficient utilization of space fosters increased housing affordability and choice, marking them as a practical housing solution. The adaptability of these two-unit homes caters to a spectrum of lifestyle needs, presenting an array of living options to residents and enriching the housing market. Their integration is instrumental in the city's aim to cultivate sustainable, walkable communities, thus aligning perfectly with broader urban development goals geared towards inclusivity and versatility.

Recommendation

Duplexes should be permitted in all Single Family Residential Districts (RS), in addition to the existing allowances in Two-Family Residential Districts (RT). The natural constraints of lot sizes in RS zones can effectively regulate the number of units, ensuring that the introduction of duplexes remains sensitive to the prevailing neighborhood character. A conservative approach allowing only one duplex per lot would be judicious to maintain the district's intrinsic residential quality. This adjustment in zoning regulations would streamline the accommodation of duplexes, supporting a gradual and well-integrated enhancement of housing diversity in Milwaukee's neighborhoods.

Triplex

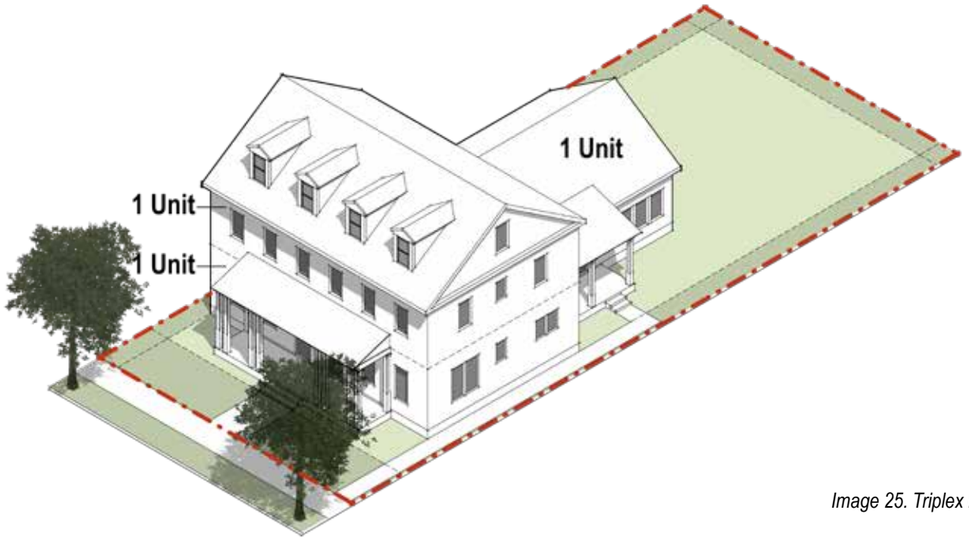


Image 25. Triplex Building Type

A triplex is a residential building that houses three distinct dwelling units, each with separate living facilities, entrances, and essential services. These units can be arranged in various configurations, either stacked vertically or spread horizontally, adhering to the building's overall design coherence and architectural integrity. Triplexes, like duplexes, maintain the appearance of a single-family residence, harmonizing effortlessly with the neighborhood's existing architectural vernacular, thereby preserving the intrinsic aesthetic and character of the community. Their thoughtful integration into residential zones offers a modest yet effective approach to incrementally enhancing housing variety and availability.

Image 26. E. Linnwood, Milwaukee (Google Earth Pro)

Image 27. N. Cramer, Milwaukee (Google Earth Pro)

Image 28. N. Humboldt Blvd. (Google Earth Pro)

Advantages

Triplexes manifest as a pivotal asset in diversifying housing options, facilitating modest density increments without disrupting the existing urban fabric or demanding significantly more servicing. Their incorporation aligns seamlessly with the city's objectives of fostering vibrant, mixed-density neighborhoods, enhancing the availability of affordable housing options. Triplexes subtly integrate into residential areas, maintaining the community's aesthetic appeal and ensuring compatibility with existing single-family homes. Their introduction could bolster the city's efforts in achieving sustainability and equity goals by providing varied housing opportunities, encouraging economic diversity, and promoting efficient land use, thus making communities more resilient and adaptable to changing housing needs.

Recommendation

Triplexes should be allowed in all Single Family Residential Districts (RS), in addition to the existing Two-Family Residential Districts (RT). By doing so, Milwaukee can promote a broader array of housing choices, meeting diverse resident needs and preferences. Such a policy adjustment would harness the potential of triplexes to gently increase neighborhood density, enabling more efficient land utilization while respecting community character. The introduction of triplexes in these districts would facilitate enhanced housing affordability and choice, fostering communities that are more inclusive and adaptable to evolving market demands and demographic shifts. By endorsing this recommendation, the zoning update would effectively be aligning with broader objectives of sustainable and equitable urban development.

Fourplex

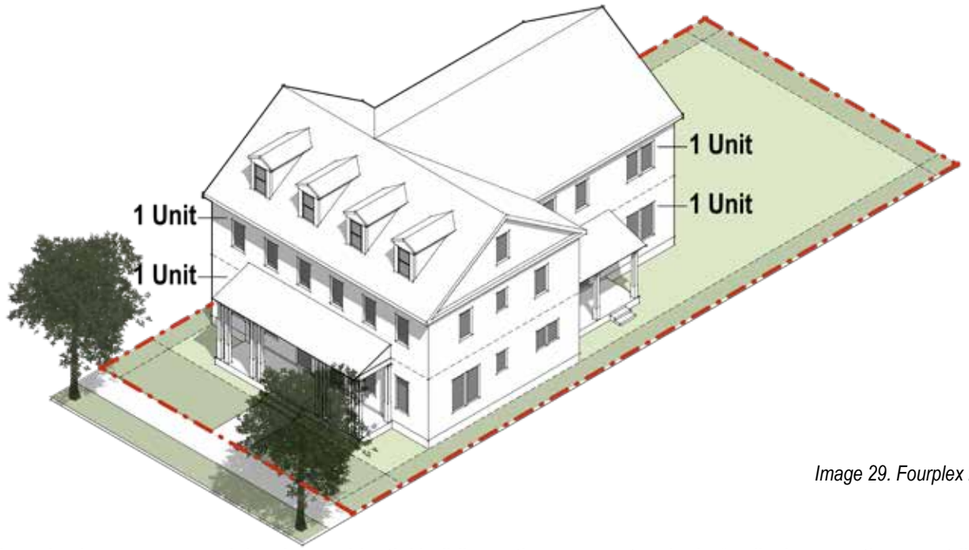


Image 29. Fourplex Building Type

A fourplex, also known as a quadplex, is a residential building that consists of four individual housing units within a single structure. Each unit has its own separate entrance, as well as its own living spaces. Fourplexes can be designed in various configurations, including units that are arranged side by side or stacked on multiple floors. This type of housing offers a multi-family living option that is more condensed than separate single-family homes, thus contributing to a more efficient use of land, urban, and energy resources. Fourplexes often blend well into residential neighborhoods, offering a form of gentle density that can help accommodate a growing population without drastically altering the character of existing communities.

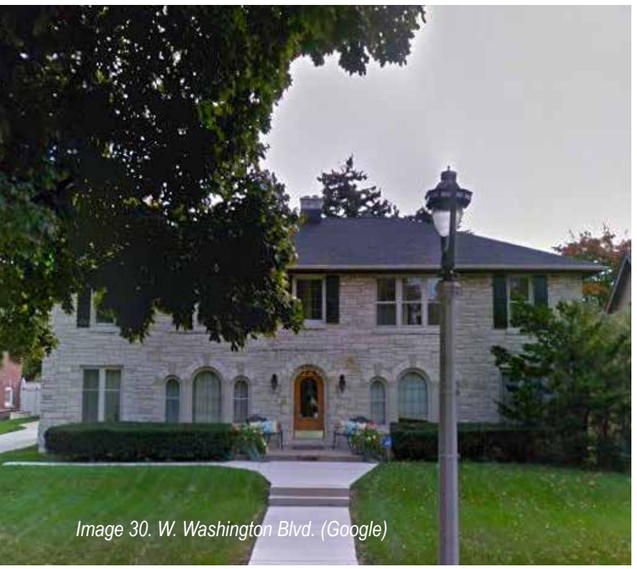


Image 30. W. Washington Blvd. (Google)

Image 31. N. Cambridge Blvd., Milwaukee (Google)

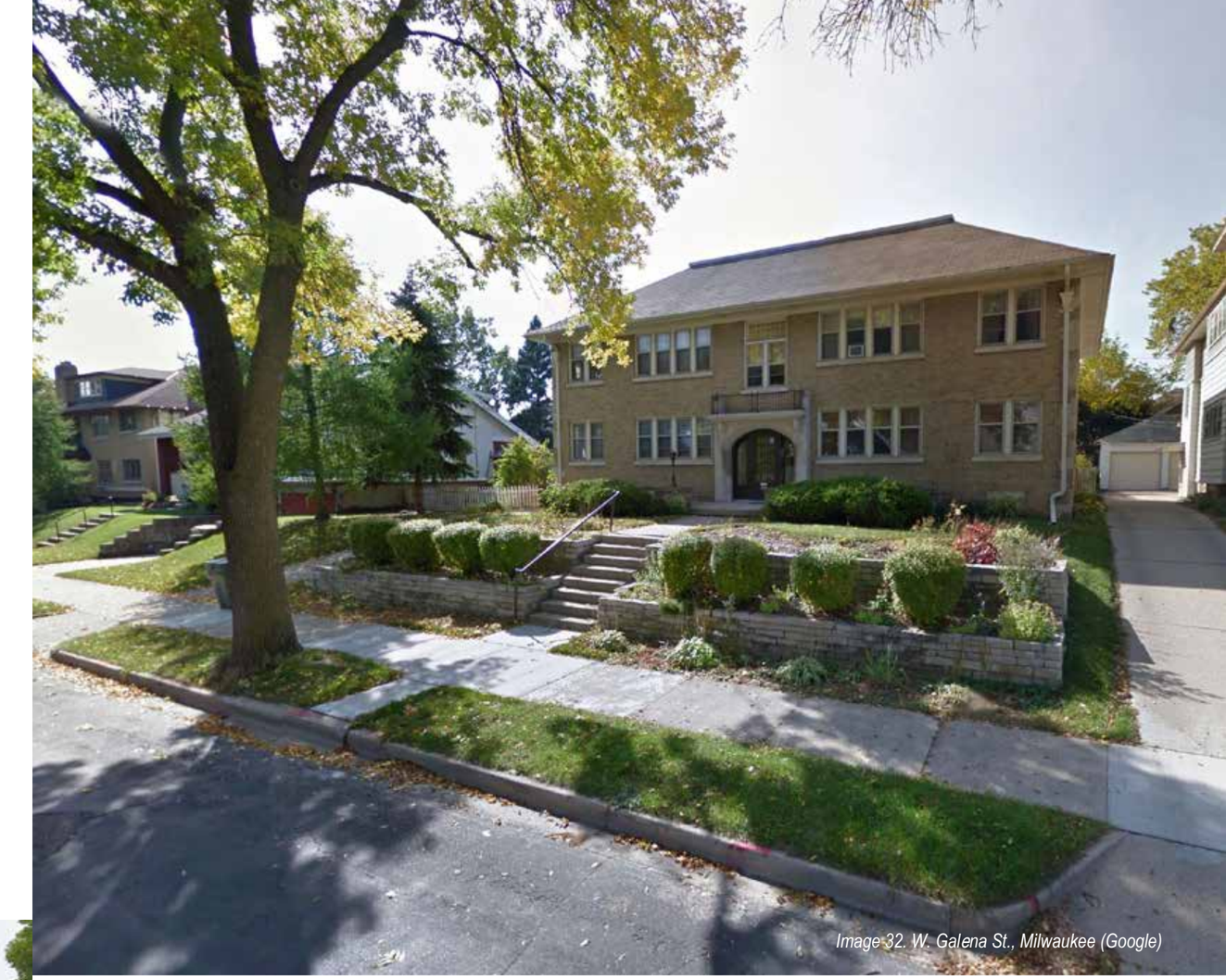


Image 32. W. Galena St., Milwaukee (Google)

Advantages

A fourplex serves as a beneficial housing model by promoting efficient land use and offering diverse housing options within a single structure. Hosting four individual units, it provides a multi-family residential setting that is subtly integrated into neighborhoods, enhancing community diversity without disrupting the existing character or scale. Fourplexes foster affordability by providing more cost-effective rental or purchase options compared to single-family homes, making them an attractive option for various demographics, including smaller families, couples, and individuals. By maximizing the utility of the land, fourplexes contribute positively towards urban density goals, supporting sustainable city planning by encouraging walkability and reducing the dependency on automobiles, aligning with environmental and infrastructural objectives.

Recommendation

Fourplexes should be allowed in Two-Family Residential Districts (RT). This modification would broaden housing options, facilitate better utilization of urban space, and promote a more resilient housing market, enabling the accommodation of varying household sizes and economic capacities. The introduction of fourplexes could subtly increase density, supporting local businesses and enhancing the viability of public transit, without disrupting the existing neighborhood fabric. This move would promote more sustainable and efficient land use, fostering communities that are conducive to walking and biking. In embracing the legalization of fourplexes in RT districts, Milwaukee would be taking a proactive step towards creating more inclusive, adaptable, and sustainable neighborhoods.

Small Apartment Building

Image 33. Small Apartment Building Type

Historic small apartment buildings are a common sight across the city, often housing up to 12 units. Typically situated on lots that aren't more than twice the average width of neighborhood lots, the units in these buildings are both side by side and stacked, spread across 2 to 3 stories. They share a common entrance that leads from the sidewalk, often giving the building the aesthetic of a sizable house. In Milwaukee, some of these configurations feature a central court. Parking is usually found at the rear of the building, with additional parking provided on-street.

Image 34. Small apartment building, Milwaukee (Google Earth Pro)

Image 35. Small apartment building, Milwaukee (Google Earth Pro)

Advantages

Small apartment buildings offer an array of benefits that blend seamlessly with Milwaukee's urban fabric. Their design, similar in scale to and frequently reminiscent of large houses, ensures compatibility with neighboring residences. This harmonious integration preserves the aesthetic character of neighborhoods while allowing for higher residential capacity.

Typically located conveniently close to retail hubs, local business areas, essential services, transit options, and parks, residents of these apartments enjoy a lifestyle rich in accessibility and sociability. The proximity to amenities not only enhances the quality of life but also fosters walkable and bike-friendly environments, and the additional residences increase the number of local business customers. This convenience encourages residents to often choose walking or biking over driving, which not only reduces their personal transportation expenses but also contributes to a decrease in citywide vehicular traffic and a reduction in carbon emissions.

The affordability of renting a flat in such strategically positioned buildings makes urban living accessible to a broader demographic. This ease of access to a walkable, bikeable environment could mean less reliance on automobiles for many residents, aligning well with Milwaukee's Climate and Equity Plan (2023). The plan emphasizes sustainable urban living, and small apartment buildings fit right into this vision, helping the city step closer to its eco-friendly and equitable goals.

Recommendation

The small apartment building type, while currently permitted in the RM districts (and RT4 if four units or smaller), should also be considered for inclusion in RT3 and RT4 districts. Numerous historical examples of this building style already exist within areas zoned as RT4, indicating their potential to blend seamlessly without disturbing the existing block rhythms. Given their width, these buildings demand larger lots, which inherently limits their overuse. With the average lot size in RT3 and RT4 being 30' x 120', this ensures that the building type remains a complementary addition rather than an overwhelming presence. In the next section a recommendation is made to set a maximum lot width for RT3 and RT4 that would disincentivize lot consolidation/ demolition. Small apartment buildings should be limited in height and setbacks along with surrounding properties to retain a compatible scale.

Image 36. N. Stowell Ave., Milwaukee (Susan Henderson)

Density

The current density control strategies — Lot Area per Dwelling Unit and Floor Area Ratio — present unwarranted constraints on producing homes that match the objectives of the respective zoning districts.

In Milwaukee, building density and volume are established via two primary metrics: Lot Area per Dwelling Unit (LA/DU) is used in most zoning districts and Floor Area Ratio (FAR) is utilized in the Downtown districts. Both these mechanisms play a pivotal role in shaping the urban fabric of the city.

Recent data from the Department of City Development (DCD) on housing developments seeking either a zoning change or variance based on their proposed density, along with feedback from the July 2023 public consultation, emphasizes the need to reevaluate the current density control strategies. These methods present unwarranted constraints on producing homes that match the objectives of the respective zoning districts.

Other building regulations, such as lot coverage, height restrictions, and setbacks, determine a predictable building volume within each zoning district. Termed collectively as 'bulk standards', these regulations are clearer to comprehend for neighborhood residents, potential applicants, and City staff overseeing the approval process. By focusing on these straightforward bulk standards and removing LA/DU and the complex FAR calculations, Milwaukee would be able to allow more dwellings to be built in a predictable and context sensitive manner. The scale and orientation of buildings is a far more important predictor of compatibility than the number of units in the building. Additionally, housing units are trending smaller in size for both matters of cost and changing demographics, which means that more housing units can be accommodated at a scale that is compatible with existing, surrounding housing and historic housing models.

As mentioned earlier, Milwaukee has many different kinds of homes that have been built over the years. However, many of the older buildings were not constructed under today's LA/DU and FAR regulations and would not comply with those requirements if they were built today. The city wants to encourage more housing growth and choice, but it's also important that new buildings are affordable and fit in with their surroundings. For example, increased densification along transit corridors needs to be shaped by how that density meets the adjacent neighborhoods, which is impacted by the shape of buildings, not the number of units within them. Infill within the neighborhood should be responsive to the massing and setbacks of other buildings nearby. The next section will illustrate the bulk standards currently in place within specific zoning districts along with an analysis of the degree of additional residences those standards could permit if density regulations were removed.

Predictable regulations

Bulk standard capacity

The majority of the single-family zoning districts do not have recommended changes at this time with the exception of permitting ADUs and townhomes in certain districts. The best potential for incremental density is in RT4, RM3 - RM7, downtown zones, LB2, LB3, and IM. Excluding density restrictions, existing building volume requirements offer clear guidelines for construction. The illustration below is an example of how these standards predictably control what may be built in each zoning district. Given that setbacks, lot coverage, and building heights vary across zones, they're already tailored to complement Milwaukee's existing neighborhood contexts.

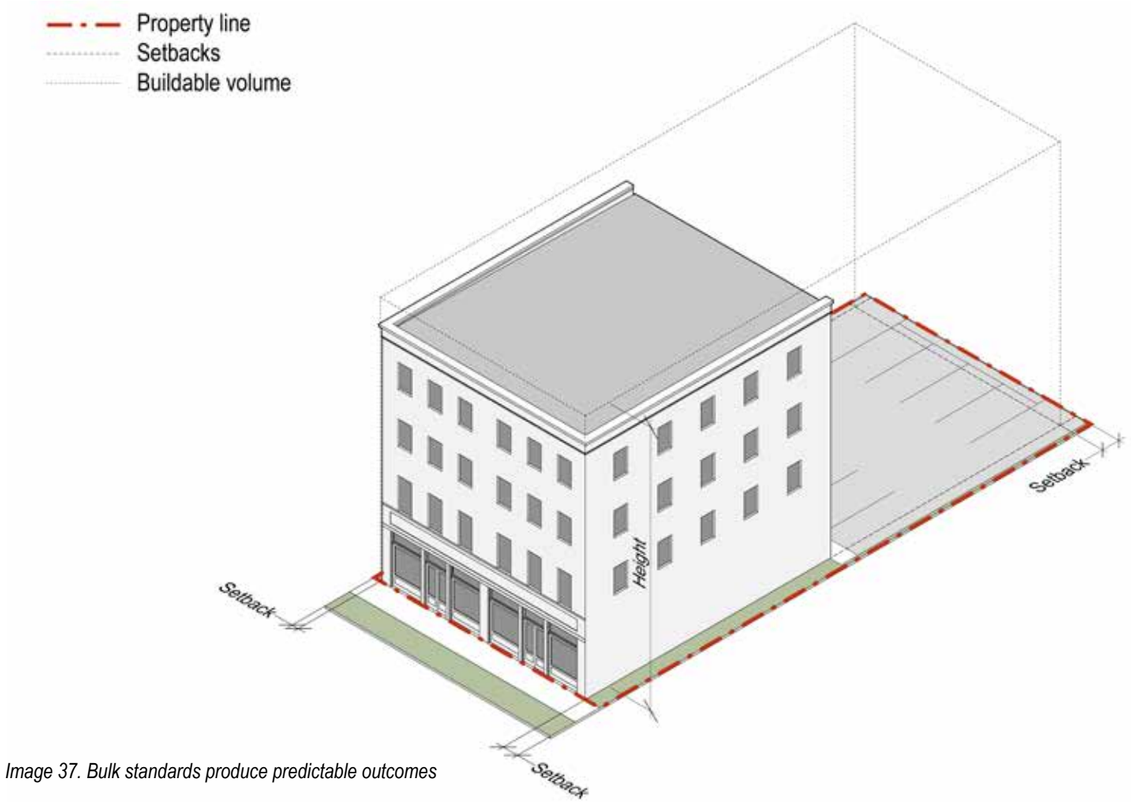


Image 37. Bulk standards produce predictable outcomes

Recommendations

Conflicts between current density regulations and bulk standards exist in many zoning districts. It's recommended that the City consider **removing the density controls** that apply to multi-family developments in favor of bulk standards. These standards offer a more transparent and consistent approach to managing development. Bulk standards such as minimum setbacks, lot coverage, and height limits within each zoning district should be evaluated during this process to ensure they are calibrated to support the desired building forms in each district. For small apartment buildings proposed to be permitted within RT districts, a maximum number of units within a building should still be established within those districts.

The City should also act on Recommendation 40 from *Connec+ing MKE: Downtown Plan 2040* by **eliminating the maximum Floor Area Ratio (FAR) requirements** downtown. Along with this recommended change, it is worth exploring changes to City ordinances related to demolition to allow for an expanded process to review the eligibility for local historic designation for older buildings downtown when demolition is proposed in downtown in order to bolster historic preservation efforts.

Review building height restrictions for RM4–7, and LB2 and LB3. There are certain types of construction that are regulated by the International Building Code restricting the number of stories according to a building's structural materials. Different construction types can make construction – and consequently housing – more affordable. It's essential to evaluate if building heights along transit corridors should match these structural system types - for instance, a height limit of 5 stories does not align with either wood construction or wood construction on top of an efficient concrete base of 2 stories. Where heights may be increased, it's crucial to ensure a seamless transition to adjacent neighborhoods by adding additional setbacks and building height restrictions in proximity to single family zoning districts. This would be in line with the *Equitable Growth through Transit Oriented Development Plan* (2018) and the *Climate and Equity Plan* (2023).

To ensure that potential height increases don't adversely affect nearby neighborhoods, a "step-down" method can be employed. The width for this step-down is typically equivalent to the average width of residential lots. The "step-down" height should align with that permitted in the neighboring residential district, as illustrated below.

Along historic main streets with consistent building heights, step-downs can ensure a harmonious streetscape even when height increases are being evaluated for the corridor. By requiring buildings to have step-down facades facing the street, additional housing can be incorporated without disrupting the street's established character. Refer to the illustration below: in this depiction, while the corner reaches the allowed maximum height, the primary street frontage aligns with the historic building height. As the city evaluates corridor intensification in the future, this approach merits deeper exploration.

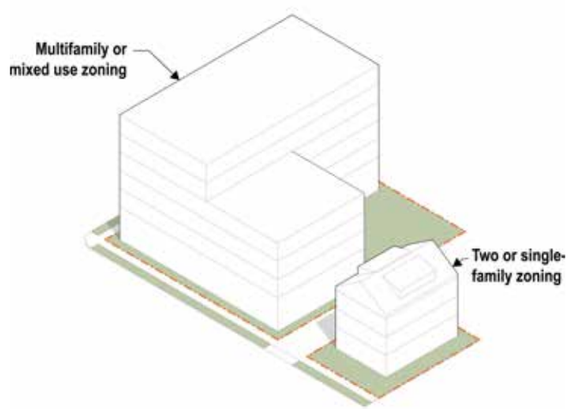


Image 38. Step-down example between LB3 and RT4

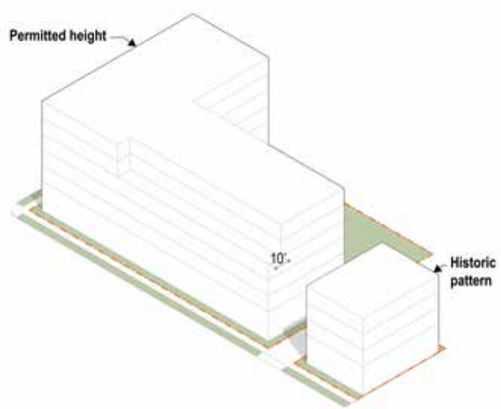


Image 39. Step-back example near historic buildings.

Image 40. N. Brady St., Milwaukee (visitmilwaukee.org)

Design Standards

Help achieve the City's Principles of Urban Design and ensure that new housing supports Milwaukee's goals for walkable urban neighborhoods that prioritize active street life and strong urban design.

Discussions with City staff and a review of Milwaukee's zoning code suggest opportunities to add additional design standards to the code to help achieve the City's Principles of Urban Design and ensure that new housing supports Milwaukee's goals for walkable urban neighborhoods that prioritize active street life and strong urban design. Many of the design standards proposed for addition to the code are similar to items that City Planning staff currently work to achieve through the discretionary review process for projects seeking reviews at the Board of Zoning Appeals or zoning changes including creation of Planned Developments.

Adding these design standards to the code will increase predictability for neighbors, architects, developers, and other participants in the development process, and ensure that these standards are applied whether or not a development requires discretionary review. While some of the other proposed modifications to the code may reduce the number of developments seeking PD zoning or BOZA variances related to lot area per dwelling unit, by introducing additional explicit design standards, the development review process can be streamlined while also ensuring that the quality of new development remains high, and is desirable and welcomed by the community.

Topics: Potential added design standards should focus on the architectural nuances of the building, the surrounding spaces, and the amenities offered to both residents and the broader community. As future zoning code amendments are considered, design standards should clearly guide the design of building facades, glazing, window depth, composition of the building, building width, building stepbacks, parking structure plinths and outdoor space. Oftentimes municipal design standards misdiagnose what contributes to undesirable outcomes - for instance, requiring that building facades be broken by numerous projections to reduce the flat appearance of a building when historic buildings do not follow this pattern is common, and the flatness is caused instead by surface-applied windows.

Design standards can increase predictability for the development community and improve outcomes for neighbors and should be developed with care to avoid common pitfalls. Milwaukee's zoning code already has several standards that influence urban design. The topics highlighted below are areas where additional standards should be considered to advance local goals. If the City and policy makers wish to pursue these updates, more detailed analysis of each item could occur during the drafting of specific zoning code text amendments, including ensuring that any new proposed standards can be codified for consistent administration by city plan examiners and do not create new unforeseen barriers to the type of housing development recommended by city plans.

Building Facades

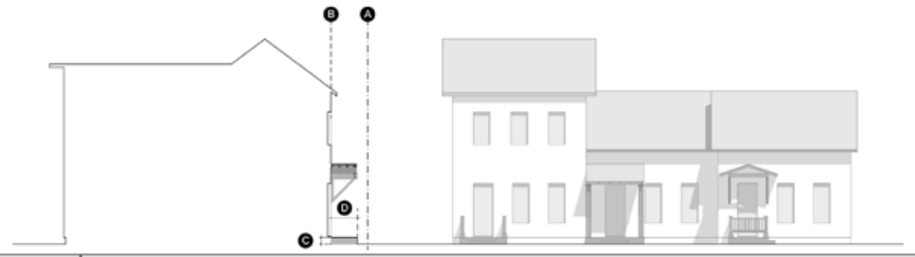
Ensure that building facades enhance the pedestrian experience, offer engaging streetscapes, and promote interaction between the building and the street. This includes **requiring elements like porches, stoops, or storefronts that actively engage with the sidewalk, and providing minimum standards such as the depth of a porch or stoop**. These elements would vary depending on the zoning district and the use of the building. Additional regulations on street-facing garages and curb cuts for townhomes and similar dense, small lot developments should also be explored.

Assure buildings face the sidewalks in a manner that encourages pedestrian activity.

Porch

A	Property Line	
B	Building facade	
C	Height above grade	12 in. min.
D	Depth	6 ft. min.

Stoop



A	Property Line	
B	Building facade	
C	Height above grade	12 in. min.
D	Depth	4 ft. min.

Image 41. Example of facade standards, SmartCode v.10

Glazing

Augment existing design standards to clarify measurements and add upper level criteria for glazing minimums.

Incorporate additional transparent glazing on ground-floor facades, especially in commercial and mixed-use areas, to activate streets and promote safety through natural surveillance. **Upper floors should also have minimums for glass to assure daylighting and cross ventilation assist with the City's climate goals.** Upper story glass is not currently required in the city's principal building design standards. Glazing should be regulated for at least those building elevations facing streets.

Image 42. Example of glazing measurement

Window Depth

Recessed windows add depth and shadow, enriching the facade's texture and detail. **Consider window depths that create a distinct play of light and shadow, enhancing the building's aesthetic appeal**. Recessed windows are common in historic buildings and provide a sense of substantial wall thickness while surface-applied windows commonly used today make a building feel flat and flimsy.

Augment existing design standards to require recessed windows to provide shadow lines.

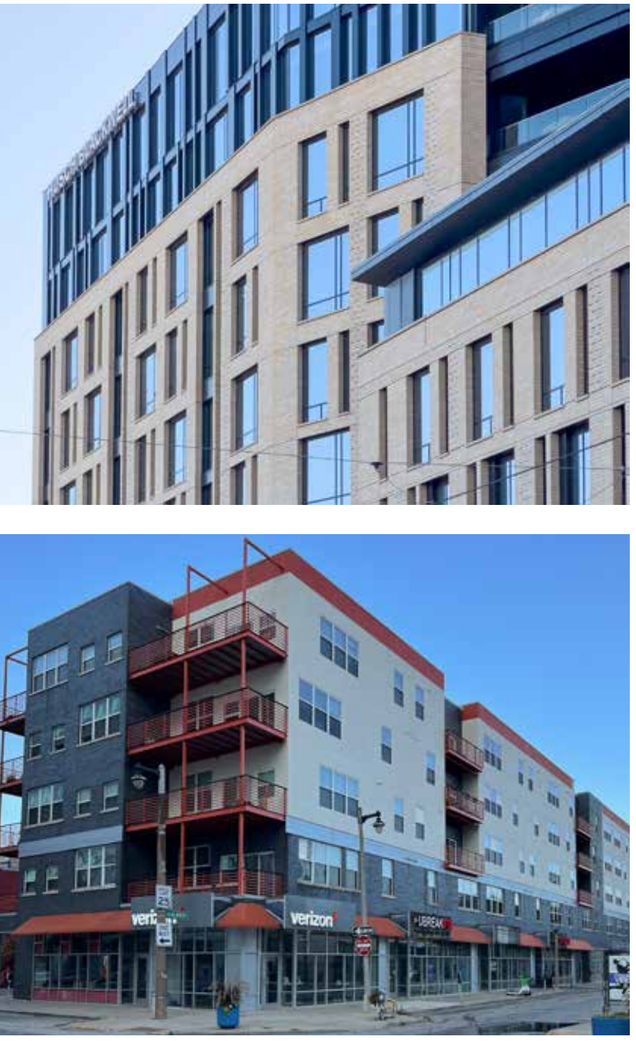
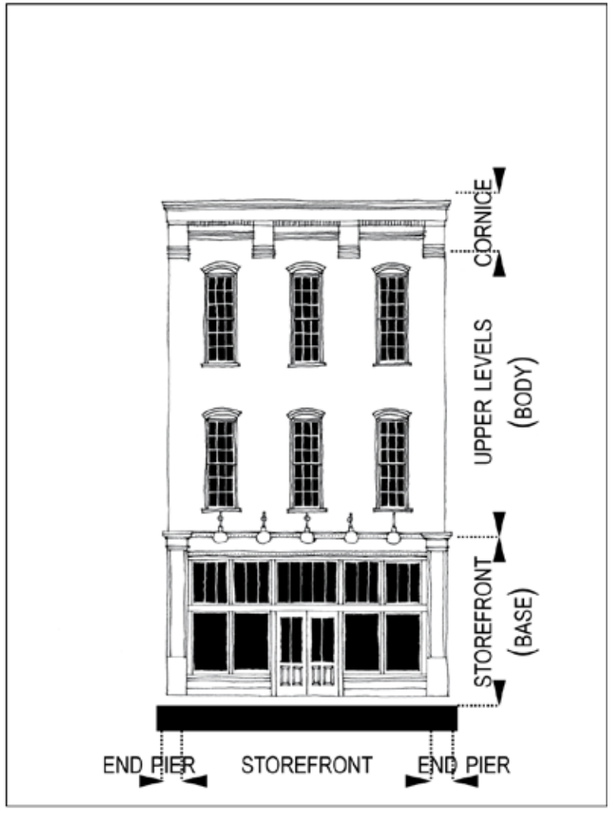


Image 43. Examples of the value of recessed windows above, and the flat appearance of surface mounted windows below.

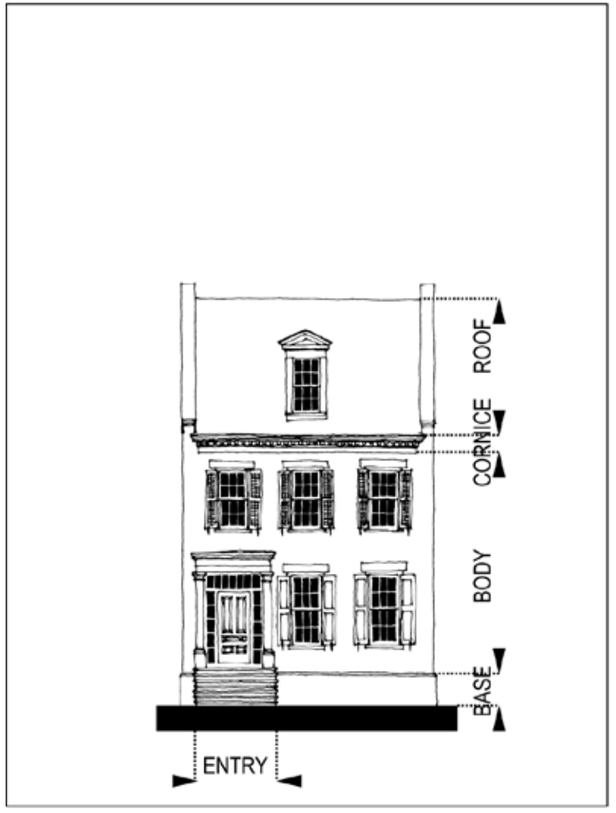
Building Composition (base, middle, cornice)

Assure buildings facades are composed of base, middle, and cap to help improve scale.

Clearly define these three elements in a building's facade. **The base should interact with the pedestrian level and provide protection from moisture and dirt, the middle should be simple and consistent, and the cornice should provide a distinct finish to the top, offering a visual cap to the structure.** This is not stylistic and is equally important in contemporary and historic facade compositions. Thoughtful composition provides scale and interest, particularly for larger buildings, without the need for facade projections which can be costly and incompatible with the surrounding context.



BUILDINGS WITH STOREFRONTS



BUILDINGS WITHOUT STOREFRONTS

Image 44. Examples of building composition (Mouzon, T5 Toolkit)

Reduce scale

Building Width

In areas with distinct historical or neighborhood patterns, new developments should respect and reflect the prevailing range of building widths, ensuring compatibility and preserving the character of the area. Monolithic buildings can be overwhelming at the street level and buildings over 200 feet wide should be required to provide some relief to the street with considerations like courtyards, corner plazas, and/or pedestrian passages. However, avoid excessive segmentation of building facades, ensuring that the design aligns with the historical continuity and established patterns of the neighborhood.

Very large buildings need regulations to reduce the scale and create a more pedestrian friendly environment along the street front.

Image 45. Examples of how a variety of building widths and heights can reduce the scale of large buildings while providing mixed use amenities.

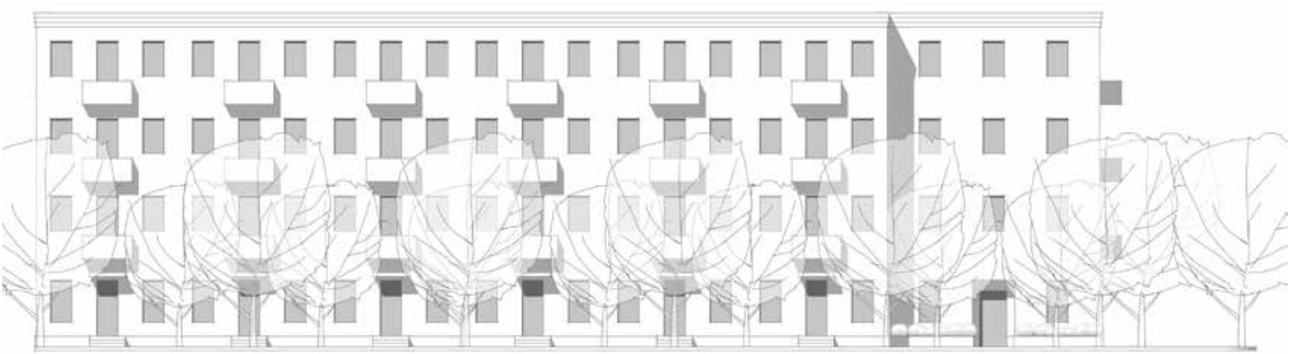


Image 46. Examples of how a corner garden, stoops, balconies, a recessed common entry, and landscaping can reduce the scale of large buildings while providing resident amenities.

Improve transitions

Building Stepbacks

Consider stepbacks in local business districts to maintain historic scales while allowing height increases, balancing housing growth and historical aesthetics.

In local business districts, building stepbacks could be considered to respect the historic scale of neighborhood main streets if corridors are being considered for height increases. Stepbacks require that building stories above a certain level are pushed back from the street facing facade. The location of the stepback requirement should be aligned with the historic main street buildings, typically stepping back at the 4th or 5th story. Resulting buildings can accommodate desired housing growth by achieving the full, allowable building height, while retaining the main street scale within the building composition and providing an open space amenity for residents. See Image 38. Step-down example between LB3 and RT4 and Image 39. Step-back example near historic buildings.

Enhance walkability & environmental benefits

Building Height

Maintain district heights that align with form objectives and promote environmental benefits.

To achieve desired urban forms, it's vital that district height limitations align with overarching form objectives. Particularly in zoning districts RM6 and RM7, potential height increases should be evaluated. Additionally, contemplating a shift from defining height in feet to stories will better promote proportionate building designs, enhanced daylight penetration, and improved air circulation.

Improve pedestrian scale

Lot Size

Respond to the historic scale of the context with maximum lot widths and reduced minimum lot widths.

In the context of fostering pedestrian-friendly environments, introducing maximum lot widths in the zoning code, likely focused on RS and RT districts, can be pivotal in promoting human-scaled buildings. With the potential elimination of the lot area per dwelling unit requirement, regulating maximum lot width will prevent a change in the rhythm and scale of historic neighborhoods. Simultaneously, reassessing and potentially lowering the minimum lot widths in lower-density districts can facilitate the development of smaller housing units. Such revisions would not only align with current market demand but also contribute to enhanced housing affordability.

Parking Structure Plinths

Camouflage the parking and enhance the pedestrian environment.

The city currently has design guidelines for parking structures as well as regulations for street activation. This ensures they're designed with active ground-floor uses or architectural treatments that camouflage the parking and enhance the pedestrian environment. **Additional regulations should be considered to require architectural facade treatment, ornamental screening, or green walls, entry locations, and design as part of the building base composition**. Much of the existing guidelines could be embedded in zoning regulations to assure structures contribute to the pedestrian environment.

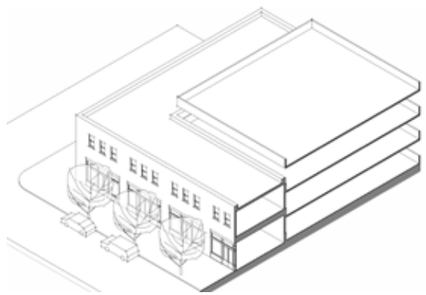


Image 47. Illustration of parking deck liner building

Image 48. Level, Los Angeles (image credit: lamag.com)

Outdoor Space

Augment existing design standards to clarify measurements and add upper level criteria.

As housing is added to the city the provision of usable outdoor spaces for residents, such as terraces, courtyards, or balconies should be considered. These spaces are most beneficial when well-connected to the indoors, enhancing the overall livability and appeal of the development. Another option is to provide civic spaces accessible to the neighborhood and residents. These provisions are most important for properties that are not within walking distance to a park. Special attention should be given to open space in affordable housing developments, as that is frequently a quality of life amenity that is omitted. The amount and type of required outdoor spaces should be proportional to the scale and context of the building; for example, outdoor space requirements may not be appropriate on commercial corridor sites. Smaller projects should be exempt from outdoor space requirements and care must be taken to avoid adding undue cost to new dwellings.

Recommendations

To ensure that increased density integrates harmoniously within the community, it's recommended that the City **codify some existing design guidelines and enhance current design standards** addressing several key components of urban architecture.

First, building facades should adhere to guidelines that promote visual appeal and cohesiveness with the surrounding environment.

Glazing standards should be analyzed for potential refinement, guaranteeing windows that provide both aesthetics and functionality.

The depth of windows, essential for architectural relief, shadow play, and combatting flat facades, should be specified to enhance building character.

The composition of buildings should be defined to ensure an interesting urban tapestry.

Standards on building width are crucial to prevent monolithic structures, promoting scale variations that resonate with the pedestrian experience.

Building stepbacks should be explored to preserve local business district character.

Parking structures should be aesthetically designed to blend with the urban fabric, featuring active uses on their ground floors.

Lastly, provisions for outdoor spaces should be considered, ensuring residents and the broader community enjoy accessible green or amenity spaces.

Implementing these standards assures that as Milwaukee grows, it does so with an eye on quality, aesthetics, and being a respectful and integrated neighbor.

Image 49. King Drive, Milwaukee (Susan Henderson)

Parking Minimums

The current zoning code requires a specific minimum amount of parking per residence for multi-family developments. These parking minimums can inadvertently deter higher-density projects and lead to increased vehicle usage, putting the city's environmental objectives at odds and failing to meet market preferences for decreased car usage. The 2022 *Climate and Equity Plan* emphasizes the importance of decreasing vehicle miles by promoting transit-oriented development and lessening parking provisions. Although the City's parking requirements are more lenient than many other cities, and the recent initiatives to reduce parking near transit corridors are commendable, there's room for further progress. This section recommends examining the potential benefits of completely eliminating parking minimums.

Eliminating parking minimums brings with it a plethora of benefits that cater to a holistic urban development approach. Foremost, reducing or removing parking lots cuts down on impervious surfaces, facilitating better stormwater management, reducing urban flooding risks, and facilitating passive cooling while reducing the urban heat island effect. This in turn creates more available space, offering developers an opportunity to construct additional housing units or design welcoming green spaces that enhance urban livability. Moreover, by not designating large plots solely for parking, land can achieve a higher economic productivity, giving rise to diverse establishments, services, and recreational areas.

Without municipal oversight dictating parking requirements, the free market will naturally step in to dictate the amount of parking that's truly needed. Developers, landlords, and businesses will evaluate parking provisions based on demand, cost, and their target audience. If a certain area or establishment requires parking to thrive, the market will ensure it is provided. On the flip side, in areas where alternative modes of transport are prevalent, or where land value is particularly high, developers may opt for fewer parking spaces. This market-driven approach ensures that parking aligns more closely with genuine needs and local conditions rather than arbitrary regulations. Ultimately, rethinking parking regulations can lead to more sustainable, economically vibrant, and community-centric urban landscapes.

If an incremental step is preferred, parking minimums could be removed from transit corridors, similar to downtown. Eliminating parking requirements for 3 – 4 unit buildings could also be considered.

Recommendations

In the future zoning update, **consider eliminating parking minimums for housing**. This move would align the City's site requirements with its goals for climate-friendly and equitable growth. By allowing developers the freedom to determine the right amount of parking based on actual demand and locality, it will open the way for more innovative and environmentally sustainable housing solutions, while also potentially increasing the availability of affordable housing options.

Consider removing parking minimums from the code altogether. A broader removal, encompassing not just housing but all aspects of the urban landscape, can unlock the full potential of the city. This should be carried out in collaboration with the Department of Public Works to implement coordinated curbside management and transportation demand management (TDM) strategies recommended in the Climate and Equity Plan and other City plans. It could foster greater flexibility in urban design, allow for more green spaces, and encourage a shift towards public transit and alternative transportation methods. Moreover, entrusting the market to determine parking needs ensures that our city's development remains responsive and resilient to changing conditions and needs. The City should regulate the location of parking and access to ensure that streets remain pedestrian-oriented and lined with active building facades, but the amount of parking need not be a consideration.

Image 50. Murray Hill, Milwaukee (Susan Henderson)

Proposed Process Changes

Streamline approvals, simplify review, make accessible tools, and create a dedicated zoning desk. Be efficient, fair and responsive.

As Milwaukee continues to grow and evolve, it is crucial to review and refine the processes guiding the city's development to ensure they are efficient, fair, and responsive to current needs and goals for housing growth, choice, and predictability. The following are proposed changes to consider for the current zoning process:

Streamlined Approvals for DPD Minor Modifications

For existing detailed plan developments (DPD), minor modifications should be streamlined to allow for approval by the City Plan Commission, rather than requiring multiple hearings and City Council review. This change would expedite minor adjustments, saving both time and resources. The code already has built in limitations for what types of changes qualify as a minor modification to ensure they remain consistent with the intent of the initial approval, ensuring that the Common Council's policy making role remains unchanged for larger changes that don't qualify as minor modifications.

Simplified Review for Compliant Overlay Applications

Proposals for projects within overlay districts (DIZ, SPROZ, NCO) that are proposing permitted uses and meet all of the design standards of the overlay should be eligible for staff approval. By complying with these prerequisites and meeting all of the design standards established by the City Plan Commission and Common Council, these applications could bypass the discretionary review process, further reducing potential delays. Projects seeking to deviate from approved overlay standards would still require the applicable public hearings and reviews. This change could be applied to all overlay reviews, or specific types of proposals (e.g., modifications to existing buildings).

Accessible Tools for Applicants

To ensure that all applicants, especially newcomers and those operating on a smaller scale, have equal opportunities, **additional graphical, user-friendly flow charts and checklists should be made available.** These tools can provide clarity and direction, making the zoning process more transparent and navigable.

Dedicated Zoning Desk

A dedicated Zoning Section should be established within the Department of Neighborhood Services (DNS) Development Center to review zoning compliance for permit applications. This would centralize and streamline reviews, offering a more focused expertise than the broader oversight traditionally provided by building code officials. This dedicated section would serve as the go-to hub for zoning inquiries, allow zoning review and potential BOZA referrals to occur more quickly upon plan submittal, ensuring both efficiency and accuracy.

Incorporating these changes can lead to a more streamlined, equitable, and user-friendly zoning process, driving growth while maintaining the quality and integrity of our city's developments.

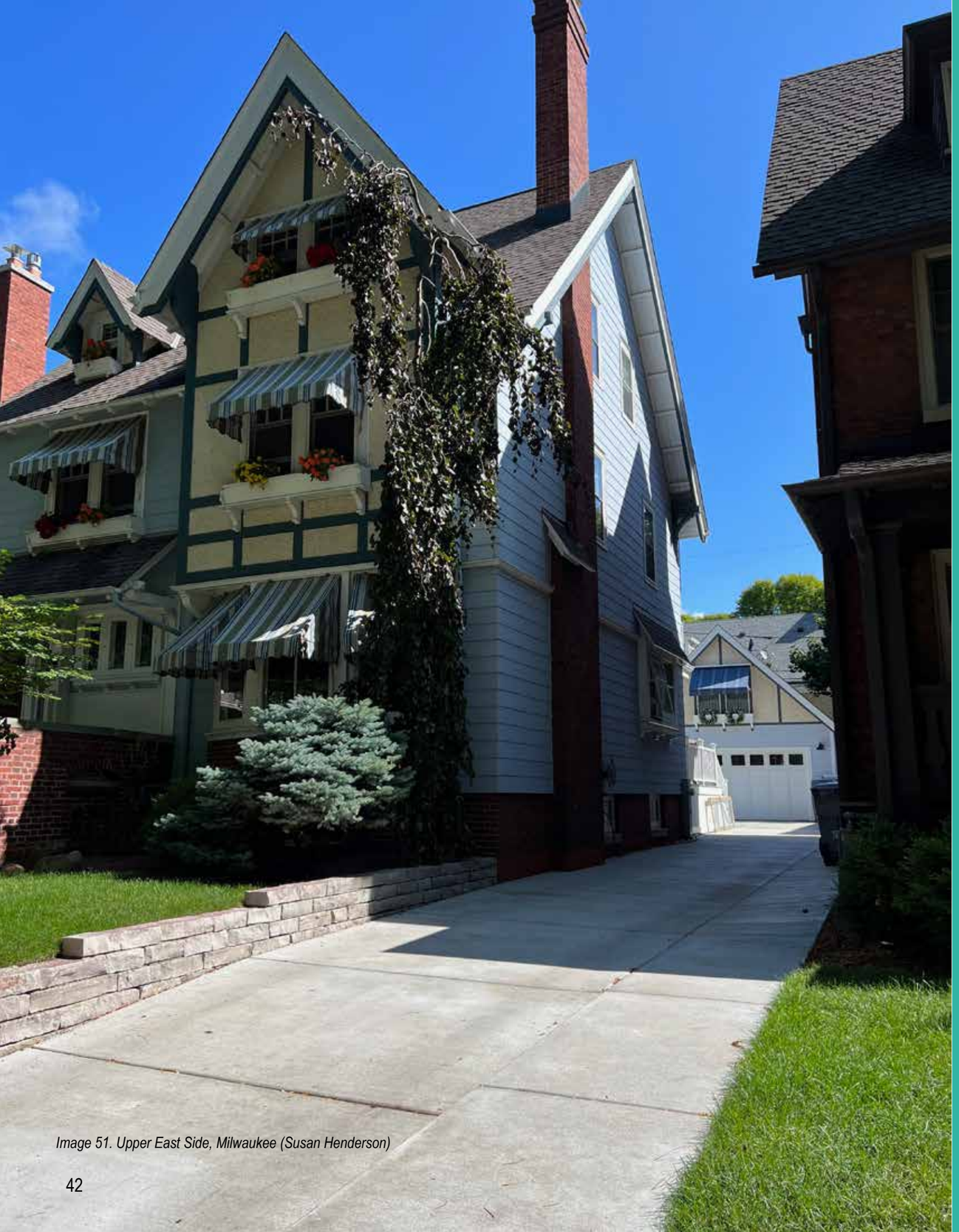


Image 51. Upper East Side, Milwaukee (Susan Henderson)

Conclusion

Enhance the city's built landscape with targeted adjustments to housing types, density, design standards, parking regulations, and zoning processes.

As Milwaukee continues to evolve, the zoning recommendations offered reflect a commitment to building a city that's both progressive and true to its roots. With a few targeted adjustments to housing types, density, design standards, parking regulations, and zoning processes, the potential to enhance the city's built landscape becomes evident, providing residents with more housing options and ensuring developments align seamlessly with existing neighborhoods.

The importance of these proposals lies not just in their individual impacts but in the collective benefit they bring to Milwaukee. By diversifying residential offerings and integrating design measures that prioritize both aesthetics and functionality, the city can offer choices that fit within Milwaukee's unique character while responding to the current demographics.

Adjusting parking minimums, for example, not only prioritizes green spaces but also helps reduce the carbon footprint by prioritizing walking, biking, and public transit, an essential step in achieving the goals outlined in Milwaukee's *Climate and Equity Plan*. Furthermore, the streamlined zoning processes aim to level the playing field for all applicants, including those entering the field. This simplification, by making the development process more accessible and less time-consuming, not only promotes equity but also has economic advantages. Faster approvals can lead to significant cost savings, ultimately making housing more affordable for Milwaukee's residents. Simplification of processes and further clarity in design standards and the expectations of applicants also opens the field of development to more residents, advancing opportunities for local and generational wealth creation.

The overarching ambition remains clear: to ensure Milwaukee grows in a manner that honors its neighborhoods and residents, old and new. With these changes, the city can become more vibrant and inclusive, echoing the development patterns of its past while setting the stage for growth.

Images

Index

Image 52. Kane Commons, Milwaukee (Susan Henderson)

Key Plans, Studies and Regulations

Referenced in this Report

City of Milwaukee Zoning Code

milwaukee.gov/ZoningCode

2021 City of Milwaukee Housing Affordability Report

bit.ly/CityMilwaukeeHousingAffordabilityReport

Citywide Policy Plan

milwaukee.gov/CitywidePlan

Equitable Growth through Transit Oriented Development Plan

milwaukee.gov/MovingMKEForward

Growing MKE

milwaukee.gov/growingmke

GROWING MKE

Growing MKE

Encouraging housing choice and growth through Milwaukee's zoning code
milwaukee.gov/growingmke

PLACE MAKERS

DPZ CoDESIGN