

MEMORANDUM

TO: Plan Commission
City of Manitowoc

Copies to: Paul Braun, Community Development
Adam Tegen, Community Development
Zoning Rewrite Working Group

FROM: GRAEF

DATE: August 28, 2026

SUBJECT: Summary of Major Changes in the Proposed Chapter 35 Zoning Ordinance

Overview

The consultant team GRAEF/Civi Tek has shared the first complete working draft of the proposed zoning ordinance. This memorandum summarizes the major policy and organizational changes between existing Chapter 15 and proposed Chapter 35 Zoning Ordinance. It focuses on the most consequential changes in the proposed draft rather than every minor revision.

The proposed ordinance is still a working draft. Although the file is dated August 21, 2026, individual articles and appendices contain earlier discussion-draft dates, staff comments, strikeouts, incomplete blanks, and placeholders. Those items should be resolved before adoption and may affect some of the conclusions summarized below.

Executive Summary

The proposed Chapter 35 draft represents a comprehensive modernization and reorganization of the Zoning Ordinance. It uses a modular format with separate articles and appendices for districts, uses, dimensional requirements, architecture, site design, landscaping, environmental protection, parking, and administration. Some of the most relevant changes include:

- **ADUs:** Establishing accessory dwelling units as a defined and regulated housing option
- **Parking:** Eliminating general off-street parking minimums and establishing maximum parking limits for designated uses
- **Districts:** Renaming, consolidating, and creating zoning districts
- **Housing:** Allowing smaller residential lots and a broader range of housing configurations
- **Building design:** Establishing citywide architectural standards for designated development
- **Downtown:** Expanding downtown design requirements into more detailed and objective standards based on the Downtown Master Plan and Design Guidelines
- **Site design:** Creating comprehensive site design standards in Article 21
- **Graphics:** Creating a series of graphics, illustrations, and tables to improve ease-of-use and interpretation
- **Land use:** Consolidating all land uses into a use table and adding emerging and previously unlisted uses,

including emergency warming shelters and data centers

- **Landscaping:** Replacing the existing parking-oriented landscape point system with broader landscaping and bufferyard standards
- **Natural resource protection:** Establishing a more integrated framework for natural resource protection and mitigation
- **Environmental regulations:** Updating wetland, environmental, drainage, stormwater, and infrastructure provisions to align with State requirements
- **Administration:** Expanding and clarifying zoning administration, review procedures, and approval criteria

1. Overall Organization and Administration

Existing Chapter 15 follows a traditional district-based structure. Each zoning district contains its own permitted and conditional uses, dimensional requirements, and related standards. Supplemental use, yard, parking, landscaping, overlay, and administrative provisions appear in separate sections, but many requirements are repeated or cross-referenced throughout the ordinance.

Proposed Chapter 35 separates regulatory subjects into coordinated articles and appendices. District provisions, land-use permissions, supplemental use standards, dimensional standards, architecture, site design, landscaping, parking, environmental regulations, and procedures are addressed through distinct components. Land-use permissions are consolidated into a land-use table (Appx A), while detailed use standards (Appx B) and dimensional requirements (Appx C) are placed in separate appendices.

This structure is intended to reduce repetition, improve consistency among districts, and make future amendments easier to administer. It also creates a clearer distinction between:

- Whether a land use is allowed
- What review process applies
- What dimensional requirements apply
- What supplemental use standards apply
- Whether architectural or site plan review is required

The rewrite also provides a more formal framework for administrative adjustments, site plan review, architectural review, conditional uses, zoning amendments, appeals, and other zoning decisions. The result is a more comprehensive ordinance, but one that will require familiarity with multiple coordinated articles and appendices rather than reliance on a single district section.

2. Zoning District Consolidation

Existing Chapter 15 establishes one conservancy district, seven residential districts, four business districts, one commercial district, and two industrial districts. These include P-1; R-1 through R-7; B-1 through B-4; C-1; and I-1 and I-2.

Proposed Chapter 35 replaces that structure with residential, city center, commercial, industrial, and special-purpose district families. The draft identifies the following general conversions:

Existing	Proposed
R-1 and R-2	RR-1
R-3	RR-2
R-4	RR-3
R-5 and R-6	RR-4
R-7	CC-1
B-2	B-1
B-3	B-2
C-1	B-3
B-4	CC-2

**The table above represents a general conversion of properties, but several parcel-specific changes have been made and continue to be worked through with staff. GRAEF previously engaged the Plan Commission around this approach in the Downtown “CC” districts. Other changes have been made citywide.*

District framework.

Residential: RR-1 Single-Family Suburban Residential; RR-2 Single-Family and Two-Family Urban Residential; RR-3 Urban Neighborhood; RR-4 Multi-Family Residential; RR-9 Manufactured Home Neighborhood; MRH Mixed Residential Housing.

City center: CC-1 City Center Transition; CC-2 Central Business.

Commercial: B-1 Neighborhood Business; B-2 Community Business; B-3 General Business.

Industrial: I-1 Light Industrial; I-2 Heavy Industrial; I-3 Urban Industrial.

Special purpose: AE Aviation Enterprise; CPE Commercial Port Enterprise; INST Institutional; P-1 Conservancy; RLRD Railroad; UT Urban Transition.

The consolidation of several residential, business, and commercial districts reduces minor variations between parcels in the same locations. Such changes are aimed at reducing the need for zoning changes at the district level when desirable development is proposed. The proposed districts also recognize airport-related development, port operations, institutional campuses, rail corridors, mixed housing, manufactured home neighborhoods, transitional urban land, and urban industrial contexts that are not currently addressed in Chapter 15.

3. Accessory Dwelling Units

Existing Chapter 15 does not establish accessory dwelling units as a distinct residential use. Proposed Chapter 35 expressly defines and regulates ADUs to increase housing supply, promote housing choice and affordability, and create opportunities for residents to age in place.

Proposed Chapter 35 allows an ADU as a detached structure; through conversion of a detached or attached garage; through conversion of an upper floor or part of the first floor of the principal dwelling; or through construction above a detached or attached garage.

Standards. The building containing the ADU must comply with applicable district setbacks. No more than one ADU may be located on a property. The draft limits an ADU to no more than 65 percent of the principal dwelling’s floor area and no more than 800 square feet. It also requires compatible exterior materials and architectural treatment.

The working draft includes struck language and revisions affecting ADU locations and size.

4. Parking

Existing Chapter 15 establishes minimum off-street parking requirements by land use and permits the Plan Commission to approve reductions when demonstrated demand is lower.

Proposed Chapter 35 changes that approach. Section 35.2905 states that the City will not require a minimum number of off-street parking spaces for any land use, except accessible spaces required by state and federal law.

Designated commercial uses are instead subject to maximum parking limits intended to discourage excessive parking areas. There are not limits placed on parking structures.

Key takeaways. This approach may reduce impervious surface, lower development and redevelopment costs, provide flexibility on constrained or infill sites, allow more land for buildings or landscaping, and reduce the need for case-by-case parking reductions.

The proposed ordinance continues to regulate accessible parking, parking-lot dimensions, access aisles, loading facilities, driveways, surfacing, drainage, snow storage, lighting, landscaping, screening, and circulation. Standard stalls are generally 9 feet wide and 18 feet long, with aisle dimensions varying by parking angle.

The draft gives pedestrian circulation precedence over vehicular circulation and requires layouts that minimize conflicts among vehicles, bicycles, and pedestrians.

5. Dimensional Standards and Smaller Lots

Existing Chapter 15 establishes dimensional standards within each zoning district.

Proposed Chapter 35 consolidates dimensional standards to Appendix C. In urban residential contexts, the proposed standards allow smaller lots, reduced widths, reduced setbacks, or a greater variety of building types. The draft also distinguishes standards for principal buildings, attached garages, accessory buildings, parking lots, and loading areas with greater detail than the current code.

Key takeaways. The changes are intended to better accommodate existing small lots of record, infill construction, traditional neighborhood patterns, two-family dwellings, townhouses, other attached housing, small-scale multi-family development, and a wider range of housing sizes and price points.

The dimensional changes should be reviewed with the proposed zoning map. Multiple Appendix C entries remain incomplete or include staff discussion notes and should be finalized before the requirements are presented as definitive.

6. New Architectural Standards

Existing Chapter 15 includes limited architectural regulations in certain districts, uses, historic preservation, and downtown overlay provisions.

Proposed Chapter 35, Article 20 establishes architectural standards for uses identified in Appendix A as requiring architectural review.

Key standards. Four-sided architecture; building massing and scale; flat roofs and parapets; fenestration and entrances; exterior materials; façade articulation; roof materials; exterior colors; and building-mounted mechanical equipment are all regulated more specifically under the proposed code.

7. Codified Downtown Design Overlay Standards

Existing Chapter 15 relies on broad findings concerning historic character, architectural coordination, entrances, façade relationships, scale, and consistency with the Downtown Manitowoc Design Guidelines.

Proposed Chapter 35, Article 10 retains downtown design review but formalizes the more detailed and measurable standards for building height, façade composition, storefronts, entrances, transparency, rehabilitation, new construction, proportions, windows, colors, lighting, prohibited styles, and demolition from the City’s design guidelines into objective, enforceable standards.

Key standards. Street-facing façades must contain a visually distinct lower level, upper levels, and building top. Front entrances must incorporate at least two specified design features. At least 60 percent of the lower level must generally be transparent, while upper-level transparency may not exceed 40 percent. A decorative cornice is sometimes required. New buildings fronting the public right-of-way must generally be at least two stories. Wider façades must be divided into smaller bays. No more than four exterior colors may be used. Colonial motifs, mansard roofs, and other tourist-themed styles are prohibited.

The proposed ordinance allows minor deviations when strict compliance is impractical or an alternative design meets or exceeds the overlay district’s objectives. Historic preservation requirements control where they conflict. Overall, downtown review shifts from a primarily findings-based process to a more objective design-standard framework.

8. Site Design

Proposed Chapter 35, Article 21 consolidates site improvement and design standards that are distributed across existing Chapter 15 district, parking, landscaping, use, and supplementary provisions.

Key standards. Building placement and orientation; vehicle access and circulation; pedestrian routes; parking and loading; landscaping and buffers; natural resource protection and mitigation; outdoor lighting; utilities; fire access; transit facilities; signs; mechanical equipment; refuse and recycling; mail delivery; stormwater facilities; and right-of-way encroachments are all regulated under the proposed ordinance.

The article requires a continuous internal pedestrian walkway at least five feet wide between the public sidewalk or right-of-way and primary building entrances. Buildings must generally be oriented parallel to the street or toward a public area. Service and loading areas must reduce visibility and impacts, and utilities must generally be underground.

Article 21 also introduces standards for fire lanes, cross-access connections, transit stops, cluster mailbox units, and other site features that often came up in staff reviews in the past but were missing objective standards in the code.

9. Land Uses

Existing Chapter 15 lists allowable land uses under each district separately, with additional land use regulations scattered in relevant parts of the code.

Proposed Chapter 35, Appendix A consolidates land uses into standardized series and assigns each use a common definition, parking information, review classification, and supplemental standards. This reduces repeated descriptions and provides a clearer method for emerging uses.

New or more specifically defined uses are added including emergency warming shelters, homeless shelters, data centers, commercial ports, direct-air carbon capture facilities, battery storage and energy facilities, utility installations, and large and small equipment rental.

Emergency Warming Shelters. The proposed ordinance defines an emergency warming shelter as a short-term overnight facility operating during periods of extreme cold or inclement weather and distinguishes it from a homeless shelter and transitional housing center. Key standards include:

- Document operator capability
- Provide qualified on-site staffing whenever open
- Activate only during designated hazardous cold-weather events
- Limit hours to 5:30 p.m. through 8:00 a.m.
- Limit occupancy to 12 residents or the fire-code limit, whichever is less
- Comply with other governmental licensing or authorization requirements
- Do not classify the facility as a dwelling unit
- Require no minimum off-street parking

The draft contains a blank effective date in the provision addressing previously operating shelters. That date should be completed before adoption.

Data Centers. The draft defines a data center as a facility of no more than 100,000 square feet containing computer, network, storage, cooling, and backup power systems used to store, process, and distribute digital data and applications. A larger facility would require consideration through a future text and map amendment under the draft language.

- Document electric utility capacity or provide an allowable on-site generation facility
- Document water utility capacity or provide an allowable on-site water facility
- Submit a sound study sealed by a qualified acoustical professional
- Evaluate existing and projected operational and mechanical noise
- Provide Fire Department-required access lanes

These standards respond to the distinctive electrical, water, noise, cooling, backup power, and emergency-access considerations associated with data centers.

10. Landscaping

Existing Chapter 15 primarily regulates parking-lot landscaping through a point system.

Proposed Chapter 35, Article 22 establishes a broader landscaping and bufferyard system for nonresidential development subject to site plan review and residential buildings containing five or more dwelling units.

Key standards. Bufferyard landscaping; building foundation landscaping; parking-lot landscaping; interior landscaping; sign landscaping; refuse-area screening; ground-mounted mechanical-equipment screening; and proposed street-frontage landscaping are all included in the new draft.

The article establishes buffer types based on the relationship between adjoining uses and addresses plant size, acceptable and prohibited species, invasive plants, plant hardiness, species diversity, utilities, hydrants, driveways, intersections, natural amenities, stormwater facilities, maintenance, replacement, and administrative adjustments.

The proposed standards emphasize urban tree canopy, shade, groundwater recharge, stormwater control, heat-island mitigation, and protection from noise, glare, and incompatible development.

11. Environmental Features Protection

Existing Chapter 15 protects environmental resources through the P-1 Conservancy District, floodplain regulations, shoreland-wetland regulations, Lake Michigan setbacks, erosion hazard provisions, and site-specific review requirements located in several sections.

Proposed Chapter 35 creates a more integrated approach by requiring natural resources and topographic features to be identified during site planning and preserved where they contribute to the beauty or utility of a site. Natural resource protection and mitigation areas must be shown on the site plan.

The proposed ordinance carries forward and reorganizes shoreland-wetland protections in line with State requirements.

The proposed structure more explicitly connects resource protection to site plan review, landscaping, dimensional standards, and mitigation rather than treating environmental regulation solely as a separate overlay matter.

12. Environmental, Drainage, and Stormwater Standards

Drainage, floodplain, shoreland-wetland, and erosion standards are updated to comply with State regulations.

Proposed Chapter 35 requires parking lots and loading areas to be graded for drainage in accordance with City standards and City Engineer approval. Stormwater generated on a site must be accommodated consistently with City requirements. Site plans must identify stormwater facilities, and detention and retention facilities must be physically, functionally, and visually integrated into the landscape.

The proposed topography standard prohibits changes that create slopes steeper than two horizontal to one vertical within 20 feet of a property line, subject to exceptions. It also prohibits alterations that adversely affect adjoining drainage or topography and requires erosion protection for slopes.

The proposed shoreland-wetland regulations continue to coordinate with Wisconsin Department of Natural Resources requirements and Wisconsin statutory and administrative-code provisions.