

Regional Analysis of Impediments to Fair Housing Choice

DRAFT – March 2019

REGIONAL ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Draft – March 2019

LEAD AGENCY

City of La Crosse, Wisconsin
Community Development and Housing Department



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Monroe County, Wisconsin
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La Crosse County Housing Authority
Tomah Housing Authority
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Prepared with assistance from Mosaic Community Planning, LLC



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CHAPTER I.

INTRODUCTION

AFFIRMATIVELY FURTHERING FAIR HOUSING

Equal access to housing choice is crucial to America’s commitment to equality and opportunity for all. Title VIII of the United States Civil Rights Act of 1968, more commonly known as the Fair Housing Act, provides housing opportunity protection by prohibiting discrimination in the sale or rental of housing on the basis of race, color, religion, sex, and national origin. The Act was amended in 1988 to provide stiffer penalties, establish an administrative enforcement mechanism and to expand its coverage to prohibit discrimination on the basis of familial status and disability. The U.S. Department of Housing and Urban Development (HUD), specifically HUD’s Office of Fair Housing and Equal Opportunity (FHEO), is responsible for the administration and enforcement of the Fair Housing Act and other civil rights laws.

Provisions to affirmatively further fair housing (AFFH) are basic long-standing components of HUD’s housing and community development programs. The AFFH requirements are derived from Section 808(e) (5) of the Fair Housing Act which requires the Secretary of HUD to administer the Department’s housing and urban development programs in a manner to affirmatively further fair housing.¹

In 2015, HUD published a final rule on Affirmatively Furthering Fair Housing, which outlines procedures that jurisdictions and public housing authorities who participate in HUD programs must take to promote access to fair housing and equal opportunity. This rule stipulates that grantees and housing authorities take meaningful actions to overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected class characteristics. Under HUD’s final rule, grantees must take actions to:

- Address disparities in housing need;
- Replace segregated living patterns with integrated and balanced living patterns;
- Transform racially and ethnically concentrated areas of poverty into areas of opportunity; and
- Foster and maintain compliance with civil rights and fair housing laws.

To assist grantees and housing authorities affirmatively further fair housing, HUD provides publicly-available data, maps, and an assessment tool to use to evaluate the state of fair housing within their communities and set locally-determined priorities and goals. HUD’s final rule mandated that most grantees begin submitting to HUD an assessment developed using these tools in 2017; however, a 2018 HUD notice extended that deadline until at least October 2020. The notice further required that grantees instead prepare and keep on file a current “Analysis of Impediments to Fair Housing Choice” (AI).

In an AI, local communities that receive HUD entitlement grant funds evaluate barriers to fair housing choice and develop and implement strategies and actions to overcome any identified impediments based

¹ U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Chapter 1: Fair Housing Planning Historical Overview, Page 13)*. March 1996.

on their individual histories, circumstances, and experiences. Through this process, local entitlement communities promote fair housing choices for all persons, including classes protected under the Fair Housing Act, and provide opportunities for racially and ethnically inclusive patterns of housing occupancy, identify structural and systemic barriers to fair housing choice, and promote housing that is physically accessible and usable by persons with disabilities.

HUD will presume that the grantee is meeting its obligation and certification to affirmatively further fair housing by taking actions that address the impediments, including:

- Analyzing and eliminating housing discrimination within the jurisdiction;
- Promoting fair housing choice for all persons;
- Providing opportunities for racially and ethnically inclusive patterns of housing occupancy;
- Promoting housing that is physically accessible to all persons to include those persons with disabilities; and
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.

Through its Community Planning and Development (CPD) programs, HUD's goal is to expand mobility and widen a person's freedom of choice. The Department also requires Community Development Block Grant (CDBG) program grantees to document AFFH actions in the annual performance reports that are submitted to HUD.

Mosaic Community Planning assisted the City of La Crosse, together with La Crosse and Monroe Counties, the City of La Crosse Public Housing Authority, the La Crosse County Housing Authority, the Tomah Housing Authority, and the Monroe County Housing Authority, with the preparation of this Analysis of Impediments to Fair Housing Choice. This AI follows the requirements in HUD's *Fair Housing Planning Guide* but is also compliant with the regulations and assessment tool established in HUD's 2015 final rule. In several chapters, it incorporates the maps and data developed by HUD for use by grantees as part of the Affirmatively Furthering Fair Housing final rule.

DEFINITIONS

Affirmatively Further Fair Housing – In keeping with the latest proposed guidance from HUD, to Affirmatively Further Fair Housing Choice (AFFH) is to comply with “the 1968 Fair Housing Act’s obligation for state and local governments to improve and achieve more meaningful outcomes from fair housing policies, so that every American has the right to fair housing, regardless of their race, color, national origin, religion, sex, disability or familial status.”²

Fair Housing Choice - In carrying out this Analysis of Impediments to Fair Housing Choice, the City of La Crosse and its partners used the following definition of “Fair Housing Choice”:

- The ability of persons of similar income levels to have available to them the same housing choices regardless of race, color, religion, sex, national origin, familial status, or handicap.

² U.S. Department of Housing and Urban Development. “HUD Publishes New Proposed Rule on Affirmatively Furthering Fair Housing Choice.” Press Release No. 13-110. July 19, 2013.

Impediments to Fair Housing Choice - As adapted from the HUD *Fair Housing Planning Guide*, impediments to fair housing choice are understood to include:³

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices.
- Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin.

Protected Classes – The following definition of federally protected classes is used in this document:

- Title VIII of the Civil Rights Act of 1968 prohibits housing discrimination based on race, color, national origin or ancestry, sex, or religion. The 1988 Fair Housing Amendments Act added familial status and mental and physical handicap as protected classes.

Affordable – Though local definitions of the term may vary, the definition used throughout this analysis is congruent with HUD’s definition:

- HUD defines as "affordable" housing that costs no more than 30% of a household's total monthly gross income. For rental housing, the 30% amount would be inclusive of any tenant-paid utility costs. For homeowners, the 30% amount would include the mortgage payment, property taxes, homeowners insurance, and any homeowners’ association fees.

DATA SOURCES

Decennial Census Data – Data collected by the Decennial Census for 2010 and 2000 is used in this Assessment (older Census data is only used in conjunction with more recent data in order to illustrate trends). The Decennial Census data is used by the U.S. Census Bureau to create several different datasets:

- 2010 and 2000 Census Summary File 1 (SF 1) – This dataset contains what is known as “100% data,” meaning that it contains the data collected from every household that participated in the Census and is not based on a representative sample of the population. Though this dataset is very broad in terms of coverage of the total population, it is limited in the depth of the information collected. Basic characteristics such as age, sex, and race are collected, but not more detailed information such as disability status, occupation, and income. The statistics are available for a variety of geographic levels with most tables obtainable down to the census tract or block group level.
- 2000 Census Summary File 3 (SF 3) – Containing sample data from approximately one in every six U.S. households, this dataset is compiled from respondents who received the “long form” Census survey. This comprehensive and highly detailed dataset contains information on such topics as ancestry, level of education, occupation, commute time to work, and home value. The SF 3

³ U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Chapter 2: Preparing for Fair Housing Planning, Page 2-17)*. March 1996.

dataset was discontinued for the 2010 Census, but many of the variables from SF 3 are included in the American Community Survey.

American Community Survey (ACS) – The American Community Survey is an ongoing statistical survey that samples a small percentage of the U.S. population every year, thus providing communities with more current population and housing data throughout the 10 years between censuses. This approach trades the accuracy of the Decennial Census Data for the relative immediacy of continuously polled data from every year. ACS data is compiled from an annual sample of approximately 3 million addresses rather than an actual count (like the Decennial Census’s SF 1 data) and therefore is susceptible to sampling errors. This data is released in two different formats: single-year estimates and multi-year estimates.

- ACS Multi-Year Estimates – More current than Census 2010 data, this dataset is one of the most frequently used. Because sampling error is reduced when estimates are collected over a longer period of time, 5-year estimates will be more accurate (but less recent) than 1-year estimates. The 2012-2016 ACS 5-year estimates are used most often in this assessment.

Previous Works of Research – This AI is supported by, and in some cases builds upon, previous local plans and works of research conducted for the City of La Crosse and La Crosse and Monroe Counties, including:

- City of La Crosse 2015-2020 Five-Year Consolidated Plan and Annual Action Plans – This plan outlines the City’s goals for addressing priority community development and housing needs over the five-year period. The City’s funding priorities included neighborhood revitalization, affordable housing, and public investment in priority neighborhoods, including Powell-Poage-Hamilton, Washburn, and Lower Northside Depot neighborhoods. The plan also includes data related to housing and community development needs, existing housing supply, and resources available to address affordable housing, homelessness, and other community issues. The City’s Annual Action Plans identify specific projects the City will undertake each year to work toward achieving its five-year goals.
- City of La Crosse 2011 Analysis of Impediments to Fair Housing Choice – This study is the immediate predecessor to this AI, although its study area was limited to the city of La Crosse. It includes demographic and economic data, an overview of the housing stock, a transportation assessment, data regarding mortgage loan applications, a review of local programs and policies, and an analysis of fair housing complaint data. The study culminates with identification of impediments to fair housing in six categories (administrative, regulatory, quality, spatial, affordability/financial, and discriminatory) and recommendations to address each impediment.

RECENT FAIR HOUSING ACTIVITIES

Following the City of La Crosse’s 2011 Analysis of Impediments to Fair Housing Choice, the City has worked to expand fair access to housing and to improve affordability. To promote knowledge about fair housing rights and resources, the City distributed brochures to over 10,000 city of La Crosse households and conducted fair housing training for 76 local advocates. The City also updates its Fair Housing Ordinance to better define protected classes and add new protected classes to ensure consistency with State of Wisconsin standards. Additionally, the City established the Human Rights Commission to replace the

former Equal Opportunities Commission. In early 2019, the City of La Crosse passed an ordinance that more clearly defines the Commission's complaint handling process, and the City plans to provide continued support and training for Commission members.

To address housing quality and maintain the existing stock of affordable units, the City of La Crosse provided housing rehabilitation assistance for 46 owner-occupied units and 16 rental units since 2015. Through Community Development Block Grant (CDBG) funds, the City provided assistance for the development of 27 new affordable units for homeownership and 114 new affordable rental units. To target resources to neighborhoods most in need, the City of La Crosse created two Neighborhood Revitalization Strategy Areas and invested about 60-70% of its CDBG funds in these areas.

Both the City of La Crosse and La Crosse County are members of the Greater La Crosse Area Diversity Council, whose mission is to strengthen communities in the La Crosse area by cultivating diversity, access, inclusion, and equity through collaboration. Recent events include learning sessions regarding inclusion and accessibility in the workplace, a Dr. Martin Luther King, Jr. holiday celebration, and a presentation by Joanne Bland, co-founder of the National Voting Rights Museum.

This AI will build on the work the City of La Crosse and its partners in the region have completed since its 2011 fair housing analysis with the goal of continuing to further fair and affordable housing in the La Crosse region.

CHAPTER 2.

COMMUNITY PARTICIPATION PROCESS

COMMUNITY ENGAGEMENT OVERVIEW

An important component of the research process for this Analysis of Impediments to Fair Housing Choice involved gathering input regarding fair and affordable housing conditions, perceptions, and needs in the La Crosse region. The project team used a variety of approaches to achieve meaningful public engagement with residents and other stakeholders, including public meetings, focus groups, interviews, and a communitywide survey.

NEARLY 900 RESIDENTS AND OTHER STAKEHOLDERS GAVE INPUT FOR THIS AI THROUGH MEETINGS, FOCUS GROUPS, INTERVIEWS, AND A SURVEY.

Public Meetings

Two meetings open to the general public were held to inform the public about and gather information for the Analysis of Impediments to Fair Housing Choice. Each meeting began with a short presentation providing an overview of the AI followed by an interactive discussion of fair housing, neighborhood conditions, and community resources in the La Crosse region. A total of 47 members of the public attended the two meetings. Meeting dates, times, and locations are shown below:

Public Meeting #1

Tuesday, July 17, 2018
2:30 PM
La Crosse City Hall, Third Floor Conference Room
400 La Crosse Street, La Crosse, WI 54601

Public Meeting #2

Tuesday, July 17, 2018
6:30 PM
Forest Park Apartments
1230 Badger Street, La Crosse, WI 54601

Focus Groups

In addition to the public meetings, six focus groups were held to collect input from groups of residents and professionals with specific backgrounds and unique perspectives on fair housing. As with the public meetings, these groups typically began with an explanation of the Analysis of Impediments to Fair Housing Choice. The focus group leader then facilitated a discussion of fair and affordable housing needs, neighborhood conditions, and community resources in the La Crosse region. In most cases, the AI project team worked with local agencies and organizations to host and promote the focus groups to their respective members or clients, resulting in a total of 38 participants. A list of the focus groups with their sponsoring organizations is provided below.

- Public Housing Residents – coordinated by the La Crosse County Housing Authority
- Mortgage Lenders – coordinated by Marine Credit Union and the City of La Crosse
- Low-Income Families with Young Children (two different groups) – coordinated by the La Crosse Area Family Collaborative

- People with Disabilities – coordinated by Independent Living Resources
- County Government Staff – coordinated by La Crosse County

Participation in Community Events

Members of the AI project team sought opportunities to join existing community meetings and events to engage groups of residents and local policymakers in the study. The organizations listed below all set aside considerable time on the agendas of their regularly-scheduled meetings allowing for a brief informational introduction to the AI project and discussion questions designed to elicit input for consideration in the Analysis of Impediments. In the case of Hamilton Elementary, the project team joined a back-to-school open house event and hosted a table with interactive opportunities for engagement. Taken together, participation in these existing meetings and events allowed for engagement with approximately 70 people.

- Monroe County Housing Coalition
- La Crosse Area Planning Committee
- City of La Crosse Human Rights Commission
- Hamilton Elementary School Open House
- Powell-Poage-Hamilton Neighborhood Association

Stakeholder Interviews

During the week of July 16, 2018, individual and small group stakeholder interviews were held at locations in La Crosse and Tomah. For people unable to attend an in-person interview, telephone interviews were offered. Stakeholders were identified by the local government and housing authority staff and represented a variety of viewpoints including fair housing/legal advocacy, housing, affordable housing, banking/lending, community development and planning, education, employment, homelessness, people with disabilities, and others.

Interview invitations were made by email and/or phone to a list of stakeholders compiled by the project team with input from the City of La Crosse, the Monroe County Housing Authority, and the Tomah Public Housing Authority. Twenty people participated in an interview, and many other invitees participated in other manners, such as by attending a public meeting, hosting a focus group, or taking the community survey. Organizations from which one or more representatives participated in the development of this AI include:

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| <ul style="list-style-type: none"> • 7 Rivers Alliance • AIDS Resource Center of Wisconsin • Altra Federal Credit Union • BMO Harris Bank • Bremer Bank • Brighter Tomorrows • Cia Siab, Inc. • City of La Crescent • City of La Crosse | <ul style="list-style-type: none"> • City of La Crosse Human Rights Commission • City of Onalaska • Consumer Credit Counseling Service • Co-Op Credit Union • Coulee Bank • Couleecap • Families First of Monroe County • Firefighters Credit Union |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

- GECU
- Great Rivers United Way
- Healthcare for Homeless Vets
- Hmoob Cultural and Community Agency
- Ho-Chunk Nation
- Housing Authority of the City of La Crosse
- Independent Living Resources
- La Crosse Area Family Collaborative
- La Crosse Area Planning Committee
- La Crosse County Zoning, Planning, and Land Information
- La Crosse County Health Department
- La Crosse County Housing Authority
- La Crosse County Human Services Department
- La Crosse County Justice Support Services
- La Crosse School District
- La Crosse Tribune
- Legal Action of Wisconsin
- Marine Credit Union
- Monroe County Economic Development
- Monroe County Housing Authority
- Monroe County Housing Coalition
- New Beginnings Christian Fellowship
- Powell-Poage-Hamilton Neighborhood Association
- Sacred Grounds
- State Bank Financial
- Tomah Chamber and Visitor's Center
- Tomah Public Housing Authority
- Town of Campbell
- Town of Medary
- Town of Shelby
- Verve, a Credit Union
- Village of Holmen
- Village of West Salem
- Workforce Connections

Community Survey

The fifth method for obtaining community input was a 27-question survey available to the general public, including people living or working in La Crosse and Monroe Counties, and other stakeholders. The survey was available online and in hard copy, in English and Spanish, during July and August 2018. Paper copies were available at the public meetings and other related events held throughout the study area. A total of 710 survey responses were received.

Public Comment Period and Hearing

The City of La Crosse and its partners will hold a 45-day public comment period and public hearings to receive input on the draft Analysis of Impediments in April and May of 2019. Further information about the comment period, including any public comments received, will be included here in the final draft of this document.

Publicity for Community Engagement Activities

A variety of approaches were used to advertise the AI planning process and related participation opportunities to as broad an audience as possible. Notice was given to residents through a public notice in the *La Crosse Tribune*, on the City's website, through a press release to local news outlets, and through flyers placed in public places. Flyers were also emailed to all stakeholder organizations invited to participate in interviews. In all meeting advertisements, information for anyone needing special accommodations was provided, but none were requested.

COMMUNITY ENGAGEMENT RESULTS

A total of nearly 900 people participated in some way in the community engagement process used to develop this AI. Twenty participated in interviews; 156 attended a public meeting, focus group, or community event at which the AI was discussed; and 710 responded to the survey.

For the community participation process, the consulting team developed a standard question set for use in public meetings, focus groups, and interviews. Listed below are the summarized comments from interview participants and meeting/focus group attendees, as well as a summary of survey results. All input was considered in development of this AI, and no comments or surveys were not accepted. Note that these comments do not necessarily reflect the views of the City of La Crosse, La Crosse County, Monroe County, or any of the local public housing authorities.

Input from Meetings with Housing Industry and Related Professionals

1. What are the greatest fair housing needs in the community? Are there parts of the region that are particularly affected?
 - Housing that is affordable, decent, and safe.
 - The quality of housing in the city of La Crosse is an issue.
 - There is a need for low-barrier rental housing that is affordable to people with low incomes.
 - Affordable housing needs to actually be affordable to low-income households, not just subsidized using on a standard formula based on average income levels across the region.
 - Competition from students limits the supply of available housing.
 - Some landlords refuse to take Section 8 vouchers, but Section 8 tenants can also have a lot of issues like credit, rental history, and criminal backgrounds.
 - Landlords willing to work with programs (like Section 8, TBRA, RRH) and willing to give people their second, third, and sometimes fourth chance.
 - The city of La Crosse needs more affordable housing for large families living in poverty. Options should include single family homes and not just apartments.
 - Supportive housing for people experiencing homelessness.
 - Transitional housing options to bridge homeless persons to permanent/independent housing.
 - Economic and racial integration is the top housing issue facing the area.
 - Stronger enforcement of the law related to discrimination based on race.
 - Housing in the La Crosse region is too expensive.
 - Housing with access to public transportation.
 - 1-bedroom units and units with 4+ bedrooms for larger families are needed in Monroe County.
2. What parts of the La Crosse region are generally seen as areas of opportunity? What makes them attractive places to live? What barriers might someone face in moving to one of these high opportunity areas?
 - Onalaska and Holmen are desirable places to live and have lower tax rates than the city of La Crosse, but transportation is a factor limiting who can live there.
 - West Salem, Onalaska, and Bangor all have lower taxes than the city of La Crosse.

- Holmen has most of the newer development. These step-up homes attract families from other more affordable homes elsewhere in the region and free up those units for other households.
 - Cass Street and the campus area; Southern Bluffs.
 - Within La Crosse County: Onalaska, Holmen, Bangor, Shelby, and West Salem; within the city of La Crosse: Weigent Hogan, Grandview Emerson, and Bluffside.
 - Holy Trinity and Longfellow.
 - Wherever there is a house for sale. Inventory is so limited that supply controls a household's decision about where to live.
 - Areas with elementary schools, hospitals, and convenience stores are desirable.
 - Some areas that are desirable have actively worked to impede housing diversity; for example, by opting not to offer public transportation.
3. Do residents of similar incomes generally have the same range of housing options? Are there any barriers other than income/savings that might impact housing choices?
- Housing decisions may be based on income and credit history but race and looks/perception can also influence housing decisions.
 - There are cultural differences in Native Americans' approach to saving. They put money into caring for elders, "sharing back" rather than saving for themselves. Lack of access to personal savings limits housing options for this population.
 - Landlords are reluctant to rent to veterans for fear of mental health and substance abuse issues.
 - More transparency is needed at the City's Housing Authority; Leadership has been in place for years and should be more representative of the community.
 - Application fees and deposits can be barriers to obtaining housing.
 - Mental health and substance abuse can be barriers to obtaining housing; there isn't enough housing with supportive services.
4. Are you aware of any housing discrimination? What are some things that can be done to overcome discrimination?
- Not aware of any – discrimination really doesn't happen here.
 - Yes – it's subtle but is something but something he hears about a lot; Landlords find ways to deny an application based on other factors.
 - Feel like race and ethnicity could result in landlord prejudice; landlords may not know the laws.
 - Discrimination is often not reported because households are in vulnerable financial positions and don't want to raise a red flag, so they just move on. People don't have the time or information to file a complaint, which may end up not going anywhere.
5. Is there an adequate supply of housing that is accessible to people with disabilities?
- The Housing Authority of the City of La Crosse has several high-rise properties that were designed to be accessible but may not meet current ADA standards.
 - Nursing homes provide residential living with supportive services.
 - If you can find a ground-level 1-2 bedroom apartment for rent, it is probably too expensive for someone with a disability living on SSI or other public assistance.

- Buildings in the city of La Crosse are old and not required to be accessible; renovations are very expensive.
 - A lot of accessibility modifications are done between the tenant and the landlord; funding and the landlord's willingness to work with the tenant may be barriers. While a landlord may be required to allow a modification, this is difficult to enforce if a tenant isn't aware of it or chooses not to pursue it.
6. What types of fair housing services (education, complaint investigation, testing, etc.) are offered in the area? How well are they coordinated with the work of other organizations in the community?
- Human Rights Commission's role and authority is unclear. There are in the process of determining what their role should be and how they can be most helpful to residents. They may not have the capacity to act in a judicial role but may opt for more of an advocacy role related to fair housing. The Commission could promote engagement with the community.
 - The City of La Crosse recently held two fair housing trainings.
 - The City of La Crosse tracks fair housing complaints that it receives, but there has only been a handful. Landlord tenant issues are common.
 - The state association of housing authorities provides fair housing workshops and other resources; housing authority staff are generally trained on fair housing.
7. Are public resources (e.g., parks, schools, roads, police and fire services, etc.) available evenly throughout all neighborhoods?
- The City of La Crosse does a good job addressing equity considerations.
 - Powell-Poage-Hamilton has lots of public investment going there now, but it is moving more to the Northside and Depot neighborhoods.
 - The City of La Crosse has done a good job of investing in areas of the city that need revitalization, but sometimes forgets to ask people what they would like to see and what the needs are, which can have unintentional consequences.
8. What policies and programs could feasibly be implemented in order to make an impact on housing in the region?
- Modular housing should get more consideration as a viable source of affordable housing, especially for first time homebuyers. Financing is relatively easy but finding the land and infrastructure can be challenging. Many neighborhood covenants prohibit modular construction, so existing examples tend to be located in rural areas.
 - La Crosse Promise is a great example of a program that is already established, is working well, and could potentially be expanded.
 - If low- and moderate-income households are to buy a home, there have to be intensive credit counseling programs offered, lenders knowledgeable of the wide range of alternative mortgage programs, and a willingness on the part of the buyer that they are entering a 1-2 year process of improving credit score, saving for a down payment, and working on a budget.
 - The neighborhood-based social service delivery system is a great model – just wish it could be implemented all over the city.

- Incentive options for landlords to create/manage mixed-income properties and neighborhoods.
- Open up admissions criteria in rental housing – adopt a “housing first” model.
- Focus on efforts to increase wages, making a living wage standard the goal.
- Provide more subsidized single-family rental homes.
- Homeownership or housing co-ops.
- Development of a formal eviction diversion program.
- Pockets of tiny homes for individuals that would open up houses currently rented by the room for families as cooperative housing.
- Expand bus service to Onalaska, Holmen, and West Salem to give more people an option to access and live in those areas.
- The City and County staffs and boards should be more diverse and representative of the local population in terms of race and economic class.
- More consistent code enforcement is needed at the city and county level. Many housing units aren’t kept up to code.
- There are home loan programs offered by several local lenders for buyers with low incomes (including FHA and USDA loans), but they come with lots of red tape. It takes a good loan officer and a cooperative buyer to make them work.
- Bring back private HAP contracts between landlords and the government, tied to specific properties with deep subsidies.
- Better landlord participation in RRH and Section 8 program could be achieved through peer-to-peer education. A community “insurance” program for support to repair a damaged apartment could help landlords take greater risks in housing vets and tenants with eviction or criminal histories.

9. Is there anything we haven’t discussed that you feel is important to our research?

- Flood insurance is a big barrier to affordable homeownership.
- Property tax differentials between municipalities in the region can play a big factor in driving housing choice. Taxes can be as much as \$600 monthly expense, even on a paid-for home.
- People want to own their own house, but their expectations are not realistic. Mortgage payment calculators on the internet are misleading. When a mortgage payment itself is a stretch, adding escrow and property maintenance expenses on top of it busts the budget.
- Low credit scores are a real drag on one’s ability to find housing. A lender will either turn you down or you will be approved with a requirement for mortgage insurance that is unaffordable.
- Some soft-second programs (e.g. for weatherization or home repairs) don’t add value to a property and have to be paid off at time of sale. Homeowners whose homes are paid for but who have a soft second through one of these programs can sell and walk away with nothing.
- There is an assumption that there’s no bottom to the demand for dilapidated rental units because of the growing student population in the city of La Crosse. But new corporate multifamily housing is coming online and students will move toward those options. Who will then occupy the older homes?

Input from Meetings with Residents and the General Public

1. What factors led you to choose the neighborhood where you currently live? What about your neighborhood keeps you from moving elsewhere?
 - Northside of the city of La Crosse is a good place to raise a family.
 - The mountains and rivers – beautiful surroundings.
 - Country lifestyle – fishing, skiing, boating.
 - The community is quiet and friendly, easy to make friends, and there's no noise and congestion.
 - Live on the bus route, with good access to jobs.
 - La Crosse Promise was the draw to the Powell-Pogue-Hamilton neighborhood.
 - Believe in the vision and progress happening in the neighborhood.
2. If you could afford to live anywhere in the La Crosse region, would you move somewhere else? Where would you choose to go? Why?
 - On the bluff, the southside.
 - Onalaska – there is no crime there, no kids, it's quiet and close to the mall; it's beautiful and has access to jobs.
 - A houseboat on the river – near the parks and with great views.
 - The city of La Crosse because it has the best transportation access.
 - There are better opportunities in Onalaska (retail, shopping, etc.), but you need a car there.
 - French Island and the Town of Campbell are nice, but bus service is limited and there aren't many parks or activities for kids there.
3. What are the greatest fair housing needs in the community? Are there parts of the region that are particularly affected?
 - The condition of housing is not good but has improved since the City of La Crosse began rental inspections.
 - Double-income household reports being unable to afford decent housing. Paying \$600 per month for a 1-bedroom unit that has bugs, holes, a water leak, and no smoke detector. If she complains to the landlord, she fears retaliation and a bad landlord reference that will keep her from finding other housing elsewhere. The system is built to keep you in one place.
 - Housing that is affordable is often low quality and owned by slumlords who do not do any maintenance or repairs. Even if you take the necessary steps to report it, nothing is done or what is done is only a band-aid. There's also a fear that continuing to report issues could lead to housing being closed down or retaliatory eviction. Slumlords also may try to blame tenants for existing damage.
 - Landlords all know each other so you don't want to be seen as a problem tenant. Renters have no power behind them.
 - Affording housing is difficult; landlords want you to make at least 3 times the rent and also ask for several upfront costs (security deposit, first and last month's rent).
 - It's hard to find a single-family home for large families to rent because landlords choose to rent them out by the bedroom to college students.

- Inspections (including Section 8 inspections) are not rigorous enough.
 - “Doubled up” households are not considered homeless and may have trouble getting assistance. The way social service agencies define what is a problem limits who they are able to help and mean that people who need help aren’t able to receive it. Trying to get assistance can involve lots of waiting during walk-in hours without ever being seen; they should offer appointments.
 - Length of time you have to use a Section 8 voucher is not enough to find somewhere to live.
4. Do residents of similar incomes generally have the same range of housing options? Are there any barriers other than income/savings that might impact housing choices?
- If residents have the same income, they have the same housing options.
 - A landlord may choose a quiet couple over a family with young kids.
 - The process for obtaining a Section 8 voucher from the City Housing Authority is not transparent. You can be denied without understanding the reason. The process is also very slow and people can become homeless while waiting.
 - Working with the City’s Housing Authority is very difficult. Rules don’t seem to be applied consistently. Staff is difficult to talk to.
 - Racism can affect where you would want to live. For example, ability to have a party or family gathering is different for different people; even after landlord said a party was ok, the police were called versus college kids who routinely have parties.
5. Are you aware of any housing discrimination? What are some things that can be done to overcome discrimination?
- Yes, landlords treat you differently if you have children. They may assume you are on assistance (i.e., Section 8) and not want to rent to you. May say something like “you wouldn’t want to live here with kids.”
 - A lot of landlords refuse to take Section 8, have a bias against people with Section 8, or don’t know what Section 8 is.
 - Landlords’ responses can vary base on who is requesting information. They sometimes get different responses based on whether they are talking to landlords or a social worker is.
 - Have heard stories of housing discrimination by neighbors being unwelcoming or unfriendly to people different from themselves.
 - The City of La Crosse Housing Authority has a reputation for retaliating against tenants who complain – told it is sometimes better not to file.
 - A Section 8 applicant experienced discrimination when her application was lost and she had to reapply and move to the bottom of the waiting list.
 - A friend’s family moved to Minnesota to find affordable housing. Was told by a landlord that she could not rent a 2-bedroom apartment because it wasn’t big enough for all her kids.
6. Is there an adequate supply of housing that is accessible to people with disabilities?
- Assisted living facilities are an option for people needing extra services and support.
 - It is very difficult to find a first-floor apartment.

- If a new apartment needs some sort of modification, the landlord has to approve it first. Collecting proof of the need from a doctor and also finding the money to cover the cost can be prohibitive.
 - There ought to be places that cater more to people who are not elderly but require special assistance. What about young professionals who have disabilities?
 - No, there isn't an adequate supply. The supply is particularly inadequate for people who don't have physical disabilities that are easily apparent.
7. What types of fair housing services (education, complaint investigation, testing, etc.) are offered in the area? How well are they coordinated with the work of other organizations in the community?
- Would report housing discrimination through the social work program, who would likely know who to contact to make a complaint.
 - The La Crosse County Housing Authority gives new residents a handbook at move-in that contains fair housing information.
8. Are public resources (e.g., parks, schools, roads, police and fire services, etc.) available evenly throughout all neighborhoods?
- Getting to a job by bus is difficult, particularly after 6 PM; there are no buses to Onalaska and Holmen.
 - French Island roads are not the first to be plowed.
 - Resource distribution seems equitable.
 - Some people think Powell-Pogue-Hamilton gets more than other neighborhoods, but it has a robust and active association of residents. Neighbors willing to go to meetings and navigate city processes get more from the city.
 - Some children have had difficult times at schools in the city of La Crosse; have faced racism from a principal; this would probably be worse in Holmen and Onalaska. City of La Crosse schools can be more focused on punishment than teaching. For example, if a student is late they may spend time in in-school suspension when they should be in a classroom to learn.
 - There is need for a grocery store on the Northside; Kwik Trip is the only option now. Northside is neglected a lot.
 - Crime is generally low in the city of La Crosse, although there is some drug use, and kids can ride bikes to school.
 - There are good resources here – social worker program, food pantries at schools, summer programs for kids.
 - There are employment opportunities here, although many pay a wage that isn't enough to afford adequate housing; the job you can get may be below your credentials.
9. Is there anything we haven't discussed that you feel is important to our research?
- The City and County should consider merging their public housing authorities.
 - The family advocates and social workers at the neighborhood centers are so helpful. Families have been able to access housing and other resources with the help of social workers.

Stakeholder Interviews

1. What are the greatest fair housing needs in the community? Are there parts of the region that are particularly affected?
 - Rental discrimination based on race is the biggest fair housing issue, particularly for Black residents.
 - People without knowledge of fair housing laws or access to lawyers to help them are vulnerable to housing discrimination.
 - There is a great need for more subsidized low-income housing. There are a lot of jobs that pay \$10 an hour, but a severe lack of housing that is affordable at that income. People who need assistance end up on long wait lists.
 - There is big demand for housing in the \$120,000 to \$140,000 range, but housing is not built in that price range. There are some opportunities for infill and downtown residential development but there are not a lot of small contractors to do this work and bigger companies are not usually interested.
 - The supply of affordable housing is a regional need – affordable housing in the city of La Crosse is different from the need in Black River Falls.
 - Conditions in some housing units are horrible and there is no one monitoring the landlords. Property upkeep varies by landlords and neighborhoods.
 - The housing market in the La Crosse region is the second-tightest market in Wisconsin. Available housing is scarce. New multifamily units are expensive.
 - There are not a lot of options for single-family rental homes, particularly for larger families.
 - With three colleges in the area, there is a market for properties that rent by bedroom, typically to students, which limits the availability of multi-bedroom units for families.
 - There is not much new construction happening, except in the suburbs.
 - Access to transportation and access to childcare are the biggest needs; childcare is the biggest. These are layered into so many housing choices.
 - The balance of housing and transportation costs: some households seek suburban communities with lower taxes, but housing there is newer, bigger and costs more. And transportation costs increase as well. You can't save money by moving out of the city of La Crosse. Other households are pushed to rural areas because of lower costs but then have trouble accessing resources and jobs available in the cities.
 - There is a lack of housing to assist seniors with the transition from independent living to nursing homes, so they continue living in family neighborhoods and occupy dwellings that could otherwise be available for young families.
 - Seniors want to stay in their communities as they age, so there is a need for assisted living/senior housing throughout the area.
2. What parts of the La Crosse region are generally seen as areas of opportunity? What makes them attractive places to live? What barriers might someone face in moving to one of these high opportunity areas?
 - Downtown La Crosse is popular because of the access it provides to jobs, services, and restaurants.

- Southside of the city of La Crosse because of access to groceries, Walmart, and desirable housing. Southside also has access to Gunderson, hospitals, colleges, and other employers.
 - Opportunity is relative. Some say the Near Southside isn't safe, others feel safe there.
 - Northside of the city of La Crosse is more affordable but most jobs in the area are in retail. There is limited childcare and transportation may be an issue.
 - For a modest sized home and reasonably affordable housing costs, the city of La Crosse is the best place to be.
 - The urban areas of La Crosse and Monroe Counties – they need more wage growth, but have transportation and jobs available.
 - Jobs, transportation, and many social services are in city of La Crosse, but for many people in Monroe County moving there would mean leaving their existing support networks, schools, etc., which may be prohibitive for someone in crisis.
 - Holmen, Onalaska, and West Salem are newer and offer opportunity, but prices are also higher there and they are harder for people to afford.
 - Some opportunities in Tomah and Sparta with Fort McCoy and manufacturing employment, less in smaller cities in the region. People would like to live in Sparta but there is a long waiting list for housing assistance.
 - Monroe County has top notch healthcare providers, a good school district, interstate accessibility, and employment opportunities. Rental market is very tight, so it could be difficult to find a rental unit.
 - Homeownership opportunities are less in areas with more households of color. Areas with a high share of rental housing correlate with populations of color.
3. Do residents of similar incomes generally have the same range of housing options? Are there any barriers other than income/savings that might impact housing choices?
- Housing choice is dependent on having knowledge of the range of housing options available to you. For people who aren't aware of different options (housing programs; homeownership options; different neighborhoods; how to rent, buy, or maintain a home; etc.), there may be limitations. Options also depend on having someone you trust give you relevant information.
 - Banks and lenders need to be more respectful of Native American customs and traditions around personal financial management and willing to work with Native American borrowers.
 - People generally have the same housing choices. Where choice is limited, it is primarily a function of socioeconomic status.
 - There are long waiting lists and limited availability of housing assistance. Sometimes service providers are hemmed in by program rules in who they can assist (example: requiring a client to be in "financial crisis" before assistance is provided).
 - People typically have the same choices but finding available housing can be difficult in general.
 - Undocumented Latino residents may face difficulty accessing some housing.
 - People's range of options are impacted by poor rental histories, poor credit histories, past convictions and evictions. Victims of domestic violence may have eviction histories because of attempts to escape violence. Legal Action of La Crosse can help people with these issues, but many people don't know these services are available.

4. Are you aware of any housing discrimination? What are some things that can be done to overcome discrimination?
 - Yes, there is discrimination happening. People don't want to come forward, because their complaints will become public and there may be retaliation.
 - Yes, housing discrimination impacts Black renters.
 - People are busy surviving and discrimination cases can be difficult to prove – sometimes there's just not the time to fight it.
 - Some landlords will screen tenants based on their name, skin color, and hair length – all factors that can stand in for protected class status.
 - Remember hearing of a landlord sued a few years ago for refusing to rent to a Black woman – said the unit wasn't available when it really was.
 - Not aware of any housing discrimination. The big barrier to housing is income.
 - Housing quality may impact household of color disproportionately; cities are typically better with code enforcement than the villages.
 - Discrimination was more of a factor 20 years ago.

5. Are people in the area segregated in where they live? What causes this segregation to occur?
 - People of color do not live on the bluff or south of La Crosse Street past the Walmart.
 - Many Native families live on French Island.
 - People of color face barriers and tend to be clustered in a few neighborhoods. One of the causes is higher poverty rates among these populations and the availability of more affordable housing in certain neighborhoods. There is income segregation in the area.
 - Low income areas and areas where minorities live don't necessarily overlap in the region. The city of La Crosse's low-income areas are in the south where students live. People of color primarily live between the River and West Avenue.
 - There is segregation, although it's not as distinct as somewhere like Milwaukee. There is still a sense of racism that affects where people choose to or are able to live.
 - The Hamilton school district is a diverse area in the city of La Crosse.
 - In Onalaska, there is a tract with a relatively high minority population.
 - Among immigrants have been resettling in the La Crosse region for 40 years now and as they have become established, their communities are beginning to spread into the suburbs rather than La Crosse's central city.
 - Monroe County has a faster-growing Hispanic population due to the manufacturing mix there.
 - In the city of La Crosse, there are clusters of racial/ethnic groups driven by their own desire to be together. This pattern is also driven by locations where rental units are available.

6. Is there an adequate supply of housing that is accessible to people with disabilities?
 - Accessible housing for people with disabilities is not available on the market. Occupants would expect to have to make modifications to make housing accessible.
 - The city of La Crosse has quite a few options – group homes – for people with cognitive and developmental disabilities.
 - The development pattern in Onalaska is not conducive to navigation by people using wheelchairs – large parking lots, curbs, etc.

- There are more options now than in the past and this has been a market-driven issue because of the aging population.
 - A lot of accessible housing is in housing designed for seniors, which may be age-restricted or not where someone younger with a disability would choose to live.
 - Supportive housing is available, but there's not enough. The challenge is that funding models all depend on government funding and there is never enough to meet needs.
 - Seniors and people with disabilities who do not have someone to assist with their care may face barriers staying in their homes and need assistance (examples: snow shoveling, transportation, etc.).
 - There are frequent NIMBY challenges to these housing types – in almost any development, in almost any neighborhood. Many of them are ultimately completed, but they are very often challenged.
 - Has not heard about accessibility as an issue.
7. What types of fair housing services (education, complaint investigation, testing, etc.) are offered in the area? How well are they coordinated with the work of other organizations in the community?
- The Human Rights Commission in the city of La Crosse, which is involved to some degree with education.
 - The City of La Crosse provides fair housing information through water bills, but those often go to a landlord so tenants likely did not receive it. The City also held a fair housing training this year. Overall, there is not a big education push.
 - Fair housing enforcement is lacking and lacks accountability; Encouraging someone to bring a complaint gives them a false sense of power if there is no process to adequately deal with the complaint and no teeth to enforce fair housing laws.
 - There is a race relations board that seems to work in fits and starts.
 - Tomah Housing Authority may be helpful if someone had a complaint but not sure they do education.
 - HUD and USDA Rural Development.
 - Not familiar with any fair housing services.
8. Are public resources (e.g., parks, schools, roads, police and fire services, etc.) available evenly throughout all neighborhoods?
- Neighborhoods with people of color get patrolled more frequently.
 - Resource officers in Powell-Pogue-Hamilton and Downtown La Crosse do a great job, but they are not evenly distributed in the community.
 - In the city of La Crosse, fire and police services are evenly provided. Level of service may be different in smaller towns.
 - Transportation is an issue and impacts job access in the La Crosse region. It can be difficult to access industrial park employment from the southside of the city of La Crosse.
 - In Monroe County, transportation is a barrier. There is no public bus or vanpools so you would need a car or bike to get to a job. People may stay in the city of La Crosse for access to the bus system.
 - Availability of sidewalks can be a barrier that impacts walkability, particularly to Walmart and Aldi.

- Schools are pretty evenly provided and quality is generally good.
- There has been a lot of efforts around park revitalization.
- The region's social service and affordable housing needs are taken care of by the City of La Crosse. The suburban communities don't have a good understanding of or interest in the issues because they don't have to face them.

9. Is there anything we haven't discussed that you feel is important to our research?

- For a household with an eviction record, there is little forgiveness in the rental market. These families typically must rent from slumlords if they are to find any housing.
- Applying for housing through the City of La Crosse Housing Authority is too difficult. Applications must be completed on-premises and their office closes for lunch, which is when many people would have the opportunity to stop by.
- The city of La Crosse's population hasn't grown much, yet housing is in demand. Sense that people are moving around the region, some to the suburbs for step-up housing, some to the city of La Crosse for more affordable options, but the net result is a stable total population.
- Competition for daycare slots is tight in the La Crosse region. Daycares can't find workers because they can't afford to pay them well enough; they can't afford to pay higher wages because parents can't afford more expensive childcare.
- Employer involvement in housing is something beginning to be explored. Gunderson and others are interested; if housing and childcare needs could both be included, these would be extremely strong incentives for attracting top employees.

Community Survey

The following includes a sample of questions and responses from the community survey. Complete results are provided as an appendix to this report.

Participant Demographics

- Survey takers represent several cities and villages in La Crosse and Monroe Counties. About 75% of respondents live in the city of La Crosse, 7% in the city of Onalaska, 4% in the village of Holmen, 2% in the village of West Salem, and 1% in the city of Sparta. Approximately 10% of respondents reside in other areas within La Crosse and Monroe Counties. Survey respondents that live in the city of La Crosse represent a variety of neighborhoods with 13% from Logan Northside, 10% from Holy Trinity-Longfellow, 9% from Powell-Poage-Hamilton, and 7% from Lower Northside and Depot. Other neighborhoods represented in the survey include Bluffside, Downtown, Goosetown-Campus, Grandview-Emerson, Hintgen, Springbrook-Clayton Johnson, Washburn, and Weigent-Hogan.
- About 27% of respondents are between the ages of 25 and 34. People age 35 to 44 make up 26% of survey takers and the population between the ages of 45 and 54 make up 29%.
- The household incomes among respondents are evenly distributed for the most part. Household incomes between \$50,000 and \$74,999 was the most common comprising 18% of participants. 14% of the respondents reported household incomes of \$100,000 and above. Nearly 10% of respondents reside in public housing or receive Section 8 rental assistance.

- The majority of survey respondents (86%) are white. African American or Black and Asian or Pacific Islander each comprise 4% of survey participants. 3% of the respondents identify as multiracial.
- 6% of survey respondents speak a language other than English at home.
- Over a quarter of survey takers (27%) have a member in their household with a disability.
- Half of the respondents are homeowners while 37% are renters. 4% of respondents live with a relative and 1.7% are homeless.

Respondents' Thoughts about their Neighborhoods

- When asked how satisfied they are with the neighborhood where they live, 47% of respondents are “very satisfied,” and another 42% are “somewhat satisfied.” About 11% are “not very satisfied” or “not at all satisfied.”

- What survey takers like best about their neighborhoods is represented in the word cloud to the right. Some of the top responses include quiet and well-maintained neighborhoods, friendly neighbors, and close proximity to amenities.



- The majority of respondents (70%) did not express interest in moving to another area in La Crosse or Monroe Counties.

- Most participants reported having access to community resources like quality public schools, shopping, banking, parks, and a clean environment. In comparison, respondents believe reliable bus service, affordable housing, and jobs are less accessible than other community resources.

- Responses when asked what improvements participants would like to see are visualized in the word cloud. The most frequent responses pertain to infrastructure improvements, affordable housing, access to amenities, and public safety.

- Survey participants expressed need for more affordable housing options for low-income, disabled, and senior populations, however, about 30% of respondents feel more apartments are not needed. Responses also indicated need for first-time homebuyer assistance programs and housing that accepts Section 8 vouchers.



- The majority of survey participants believe services like schools, banking and lending, parks and trails, garbage collection, and police and fire protection are provided equally across La Crosse and Monroe Counties. Conversely, 47% of respondents feel property maintenance is not equally provided.

Respondents' Thoughts about Fair Housing

- 42% of survey respondents reported understanding fair housing rights. 38% of participants reported somewhat understanding fair housing rights. However, 20% of people do not understand their fair housing rights and a significant percentage (47%) do not know where to file a housing discrimination complaint.
- 84% of survey participants have not experienced housing discrimination while living in La Crosse or Monroe Counties. Of the 16% of respondents that experienced housing discrimination, 82% reported discrimination by landlords or property managers. Others experienced discrimination by real estate agents, city or county staff, and mortgage lenders. Respondents reported familial status, race, and disability as the most common bases for discrimination.
- 15% of the respondents who experienced discrimination filed a report. Reasons for not reporting included not knowing what good it would do, not knowing where to file, fear of retaliation, and not knowing it was a violation of the law.
- Survey participants were asked whether they think housing discrimination is an issue in La Crosse and Monroe Counties. 38% of respondents expressed housing discrimination as an issue and 28% believe housing discrimination may be an issue. 8% of survey participants do not believe housing discrimination is an issue and a quarter of the participants do not know.
- Asked to select any factors that are barriers to fair housing, respondents most commonly identified the following impediments:
 - Not enough affordable rental housing for individuals (62%)
 - Not enough affordable rental housing for large families (57%)
 - Discrimination by landlords or rental agents (56%)
 - Displacement of residents due to rising housing costs (51%)
 - Not enough affordable rental housing for small families (51%)
 - Neighborhoods that need revitalization and new investment (49%)
 - Community opposition to affordable housing (45%)
 - Lack of housing options for people with disabilities (44%)

CHAPTER 3.

SOCIOECONOMIC PROFILE

DEMOGRAPHIC PROFILE

According to US Census data, the total population of the city of La Crosse is 51,484, which accounts for 44.9% of the population of La Crosse County (114,638). Monroe County's population is 44,673. From 1990 to 2010, the population of the city of La Crosse decreased slightly (-2.4%), while La Crosse County and Monroe County experienced growth in population at rates of 17.2% and 22.0%, respectively.

Race and Ethnicity

The population of the city of La Crosse is predominately non-Hispanic white (88.7%). Asian and Pacific Islander residents make up 4.8% of the city's population, followed by African Americans (2.1%), Hispanics (1.9%), and people of two or more races (1.9%).

From 1990 to 2010, the city's population decreased very slightly but also become more diverse. The non-Hispanic white population fell from 49,291 in 1990 (when it constituted 93.5% of the city) to 45,664 in 2010 (then 88.7% of the city's total population). During the same time, the population of all other racial and ethnic groups increased. The African-American population increased the most and at the fastest rate, adding about 1,200 residents over the two-decade period.

La Crosse and Monroe Counties are slightly less diverse than the city. Non-Hispanic white residents make up more than 90% of the population in each county. In La Crosse County, remaining population shares are similar to those in the city: Asian and Pacific Islanders make up 4.2% of La Crosse County, followed by Latinos (1.5%), African Americans (1.4%), and people of two or more races. In Monroe County, Latinos are the second largest population group, comprising 3.7% of the county. No other population group makes up more than 1.1%.

Both counties became more diverse from 1990 to 2010. While their overall population shares remained low, each non-white population segment more than doubled its numbers. In La Crosse County, the number of Black residents grew roughly by a factor of 6, from 395 in 1990 to 2,295 in 2010. The Latino population nearly tripled, going from 628 to 1,741. In Monroe County, Hispanic residents were the fastest growing population segment – with their number increasing by a factor of more than 7 from only 231 in 1990 to 1,661 in 2010.



NON-HISPANIC WHITE RESIDENTS MAKE UP THE MAJORITY OF THE CITY OF LA CROSSE AND LA CROSSE AND MONROE COUNTIES.

THE CITY OF LA CROSSE IS SLIGHTLY MORE DIVERSE THAN EITHER COUNTY. PEOPLE OF COLOR MAKE UP 11% OF THE CITY OF LA CROSSE AND 8-9% OF LA CROSSE AND MONROE COUNTIES.

National Origin

Foreign-born residents of the city of La Crosse make up a small but significant share (4.0%) of the total population. The foreign-born population decreased from 1990 to 2000 and then increased from 2000 to 2010. Consequently, the percentage and absolute number of foreign-born residents were similar in 2010 and 2000. In the city, the largest shares of foreign-born residents are from Southeast Asia (Laos and Thailand) and China, which account for 24%, 16%, and 6% of the foreign-born population, respectively. Residents from India, Korea, and Canada each account for about 4% of the foreign-born population, and those from Germany, Saudi Arabia, and the UK each account for about 3%.

In La Crosse County, foreign-born residents make up 3.6% of the population. Their share remained relatively steady from 1990 to 2000 at around 2.6%, but increased by 2010. As in the city, the largest shares of foreign-born residents are from Laos and Thailand (25.4% and 13.3%, respectively). Other common countries of origin for foreign-born residents include Korea, Germany, China, Canada, India, Mexico, Poland, and the Philippines.

The foreign-born population of Monroe County, though smaller, has increased more consistently, going from 1.0% in 1990 to 1.8% in 2000 to 2.5% in 2010. The largest group of foreign-born residents are from Mexico (37.4%) followed by Germany (9.4%). Other common countries of origin for foreign-born residents in Monroe County include Korea, the Philippines, Canada, India, Thailand, Poland, Laos, and China.

Limited English Proficiency

Population dynamics for people with Limited English Proficiency (LEP) often resemble those of foreign-born residents in a community. This is true for the city of La Crosse with one exception. In 1990, the LEP population (3.4%) was slightly less than the foreign-born population. In 2000, both the LEP and foreign-born population shrank by a roughly proportional amount. However, in 2010, while the foreign-born population rebounded nearly to the same level as in 1990, the LEP population fell slightly. This could indicate an increase in the number of English-speaking immigrants, or it could indicate that established foreign-born residents no longer have limited English proficiency.

In La Crosse County, the LEP population followed a similar pattern, decreasing from 2,114 (2.2%) in 1990 to 1,995 (1.9%) in 2000, before rebounding to 2,279 (2.0%) in 2010. In Monroe County,

The breakdown of languages spoken by the LEP population is consistent with the national origins of foreign-born residents. In the city of La Crosse and La Crosse County, Hmong is the most common language spoken among the LEP population. There are also significant numbers of Spanish and Chinese speakers. In Monroe County, Spanish and German are the most common languages in the LEP population, which is consistent with the patterns related to national origin.

Disability

According to the data provided by the American Community Survey, 10.5% of the total population in the city of La Crosse reported having a disability. The most common was ambulatory difficulty, which makes up 53.1% of the disabled population, followed by cognitive difficulty, which makes up 40.3%. Hearing and vision difficulties affect 3.6% and 1.7% of the total population, respectively. Disabilities that require

extensive assistance such as difficulties with independent living or self-care make up 36.4% and 21.3% of the disabled population, respectively.

In La Crosse County, 10.0% of the population reported having a disability. As in the city of La Crosse, the most common was ambulatory difficulty, which makes up 51.7 % of the disabled population, followed by cognitive difficulty, which makes up 37.3%. Disabilities that require extensive assistance such as difficulties with independent living or self-care make up a 36.3% and 20.4% of the disabled population, respectively.

In Monroe County, 11.6% of the population reported having a disability. As in the other jurisdictions, the most common was ambulatory difficulty, which makes up 52% of the disabled population, followed by cognitive difficulty, which makes up 37.0%. Disabilities that require extensive assistance such as difficulties with independent living or self-care make up a 34.2% and 20.0% of the disabled population, respectively.

Age

The city of La Crosse population is generally normally distributed regarding age. The largest segment of the population (70.8%) is between the ages of 18 and 64. The population under the age of 18 (16.5%) is slightly larger than the population that is 65 and over (12.8%). Between 1990 and 2010, the middle segment of the population increased both in terms of absolute numbers and as a share of the population, while both the younger and older segments of the populations decreased both in absolute numbers and as a share of the population.

In La Crosse County, the distribution is similar, as are the general patterns from 1990 to 2000, with the share of the population aged 18-64 increasing from 62.6% to 65.4% during that time. However, a closer evaluation shows that the absolute number of people aged 65+ increased during this time, and this share of the population increased from 12.6% in 2000 to 13.3% in 2010. Also, though the share of the population under 18 decreased overall from 1990 to 2000, the absolute number of people in this category increased during the same time as well.

In Monroe County, the population is noticeably younger than in La Crosse city or county, though it has aged somewhat since 1990. The share of the population under 18 is 26.1%. This share of this segment the population has decreased slightly, though the absolute numbers have increase since 1990. The group aged 18-64 has increased since 1990 in terms of its share and absolute numbers and was the largest segment of the population in 2010 at 60.0%). The population aged 65+ increased from 1990 to 2010, but the share of this segment decreased from 14.6% to 13.9%. However, the senior population is anticipated to grow according to Wisconsin Department of Administration projections.

Sex

The gender distribution of the city of La Crosse is fairly proportional between males and females. The female population is the slight majority and comprises 51.9% of the population. La Crosse County is virtually the same, with females comprising 51.8% of the population. In Monroe County, the population is proportional as well, but males are the slight majority and comprise 50.7% of the population.

Family Type

The city of La Crosse experienced a steady decline in the number of families with children in both absolute numbers and as a percentage of total families between 1990 and 2010, decreasing from 5,282 (45.8%) in 1990 to 4,245 (43.1%) in 2010 in the city of La Crosse and

In La Crosse County, the number of families with children decreased from 12,244 (50.8%) in 1990 to 12,206 (44.6%) in 2010. Unlike in the city of La Crosse, the 2010 figure represents an increase from the number of families with children in 2000, 11,315 (48.2%).

In Monroe County, the absolute number of families with children increased from 5,020 in 1990 to 5,223 in 2010, but this share of the population decreased from 52.1% to 44.5%, indicating either a faster increase of families without children or singles, or families with fewer children.

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TABLE 1 – DEMOGRAPHIC OVERVIEW

Demographic Indicator	City of La Crosse		La Crosse County		Monroe County				
	#	%	#	%	#	%			
Race/Ethnicity									
Non-Hispanic									
White	45,664	88.7%	104,417	91.1%	41,260	92.4%			
Black	1,103	2.1%	1,553	1.4%	475	1.1%			
Asian or Pacific Islander	2,461	4.8%	4,754	4.2%	321	0.7%			
Native American	254	0.5%	438	0.4%	464	1.0%			
Two or More Races	968	1.9%	1,650	1.4%	477	1.1%			
Other	43	0.1%	85	0.1%	15	0.0%			
Hispanic	991	1.9%	1,741	1.5%	1,661	3.7%			
National Origin									
#1 country of origin	Laos	508	1.0%	Laos	1,038	1.0%	Mexico	411	1.0%
#2 country of origin	Thailand	326	0.7%	Thailand	543	0.5%	Germany	103	0.3%
#3 country of origin	China*	124	0.3%	Korea	295	0.3%	Korea	76	0.2%
#4 country of origin	Mexico	93	0.2%	Germany	262	0.2%	Philippines	51	0.1%
#5 country of origin	India	76	0.2%	China*	261	0.2%	Canada	27	0.1%
#6 country of origin	Korea	74	0.2%	Canada	161	0.2%	India	19	0.1%
#7 country of origin	Canada	73	0.2%	India	156	0.1%	Thailand	13	<0.1%
#8 country of origin	Germany	63	0.1%	Mexico	153	0.1%	Poland	11	<0.1%
#9 country of origin	Saudi Arabia	58	0.1%	Poland	153	0.1%	Laos	5	<0.1%
#10 country of origin	Other UK	54	0.1%	Philippines	113	0.1%			
Limited English Proficiency (LEP) Language									
#1 LEP Language	Hmong	694	1.4%	Hmong	1,356	1.3%	Spanish	701	1.7%
#2 LEP Language	Spanish	316	0.6%	Spanish	568	0.5%	German	205	0.5%
#3 LEP Language	Chinese	141	0.3%	Chinese	141	0.1%	Russian	37	0.1%
#4 LEP Language	Arabic	48	0.1%	German	90	0.1%	Korean	8	<0.1%

* Excluding Hong Kong and Taiwan.

TABLE 1 – DEMOGRAPHIC OVERVIEW (CONTINUED)

Demographic Indicator	City of La Crosse		La Crosse County		Monroe County				
	#	%	#	%	#	%			
Limited English Proficiency (LEP) Language (continued)									
#5 LEP Language	French	33	0.1%	Russian	61	0.1%	Other Asian language	2	<0.1%
#6 LEP Language	Laotian	27	0.1%	Korean	48	<0.1%			
#7 LEP Language	Vietnamese	25	0.1%	Other West Germanic language	27	<0.1%			
#8 LEP Language	Korean	23	0.1%						
#9 LEP Language	German	22	<0.1%						
Disability Type									
Hearing difficulty		1,735	3.6%		3,980	3.7%		1,738	4.3%
Vision difficulty		800	1.7%		1,694	1.6%		664	1.6%
Cognitive difficulty		2,183	4.5%		4,270	4.0%		1,921	4.7%
Ambulatory difficulty		2,879	6.0%		5,911	5.5%		2,704	6.6%
Self-care difficulty		1,153	2.4%		2,338	2.2%		1,041	2.6%
Independent living difficulty		1,975	4.1%		4,153	3.9%		1,775	4.4%
Sex									
Male		24,782	48.1%		55,961	48.8%		22,648	50.7%
Female		26,703	51.9%		58,677	51.2%		22,025	49.3%
Age									
Under 18		8,483	16.5%		24,462	21.3%		11,670	26.1%
18-64		36,429	70.8%		74,975	65.4%		26,780	60.0%
65+		6,573	12.8%		15,201	13.3%		6,223	13.9%
Family Type									
Families with children		4,245	43.1%		12,206	44.6%		5,223	44.5%

Note: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total families. The most populous places of birth and languages at the city and county levels may not be the same and are thus labeled separately.

Data Sources: Decennial Census; ACS

TABLE 2 – DEMOGRAPHIC TRENDS

Demographic Indicator	1990		2000		2010	
	#	%	#	%	#	%
City of La Crosse						
Race/Ethnicity						
White, Non-Hispanic	49,291	93.5%	47,425	91.1%	45,664	88.7%
Black, Non-Hispanic	326	0.6%	976	1.9%	1,558	3.0%
Hispanic	455	0.9%	600	1.1%	991	1.9%
Asian or Pacific Islander, Non-Hispanic	2,368	4.5%	2,609	5.0%	2,722	5.3%
Native American, Non-Hispanic	229	0.4%	403	0.8%	492	1.0%
National Origin						
Foreign-born	2,160	4.1%	1,687	3.2%	2,076	4.0%
Limited English Proficiency						
Limited English proficiency	1,770	3.3%	1,343	2.6%	1,333	2.6%
Sex						
Male	24,584	46.6%	24,447	46.9%	24,782	48.1%
Female	28,212	53.4%	27,630	53.1%	26,703	51.9%
Age						
Under 18	10,912	20.7%	10,535	20.2%	8,483	16.5%
18-64	33,987	64.4%	34,006	65.3%	36,429	70.8%
65+	7,896	15.0%	7,536	14.5%	6,573	12.8%
Family Type						
Families with children	5,282	45.8%	4,619	45.6%	4,245	43.0%
La Crosse County						
Race/Ethnicity						
White, Non-Hispanic	93,942	95.9%	100,328	93.7%	104,417	91.1%
Black, Non-Hispanic	395	0.4%	1,283	1.2%	2,295	2.0%
Hispanic	628	0.6%	988	0.9%	1,741	1.5%
Asian or Pacific Islander, Non-Hispanic	2,534	2.6%	3,720	3.5%	5,224	4.6%
Native American, Non-Hispanic	321	0.3%	679	0.6%	852	0.7%
National Origin						
Foreign-born	2,633	2.7%	2,706	2.5%	4,080	3.6%
Limited English Proficiency						
Limited English proficiency	2,114	2.2%	1,995	1.9%	2,279	2.0%
Sex						
Male	46,985	48.0%	51,664	48.2%	55,961	48.8%
Female	50,917	52.0%	55,454	51.8%	58,677	51.2%


TABLE 2 – DEMOGRAPHIC TRENDS (CONTINUED)

Demographic Indicator	1990		2000		2010	
	#	%	#	%	#	%
La Crosse County (continued)						
Age						
Under 18	24,052	24.6%	26,103	24.4%	24,462	21.3%
18-64	61,318	62.6%	67,535	63.1%	74,975	65.4%
65+	12,532	12.8%	13,480	12.6%	15,201	13.3%
Family Type						
Families with children	5,020	52.1%	5,158	49.3%	5,223	44.5%
Monroe County						
Race/Ethnicity						
White, Non-Hispanic	35,835	97.8%	39,136	95.7%	41,260	92.4%
Black, Non-Hispanic	133	0.4%	233	0.6%	657	1.5%
Hispanic	231	0.6%	739	1.8%	1,661	3.7%
Asian or Pacific Islander, Non-Hispanic	130	0.4%	276	0.7%	430	1.0%
Native American, Non-Hispanic	285	0.8%	490	1.2%	644	1.4%
National Origin						
Foreign-born	359	1.0%	751	1.8%	1,099	2.5%
Limited English Proficiency						
Limited English proficiency	723	2.0%	1,405	3.4%	1,189	2.7%
Sex						
Male	18,347	50.1%	20,627	50.4%	22,648	50.7%
Female	18,288	49.9%	20,274	49.6%	22,025	49.3%
Age						
Under 18	10,788	29.5%	11,762	28.8%	11,670	26.1%
18-64	20,518	56.0%	23,445	57.3%	26,780	60.0%
65+	5,329	14.6%	5,694	13.9%	6,223	13.9%
Family Type						
Families with children	5,020	52.1%	5,158	49.3%	5,223	44.5%

Note: All % represent a share of the total population within the jurisdiction or region for that year, except family type, which is out of total families.

Data Sources: Decennial Census; ACS

RACIALLY AND ETHNICALLY CONCENTRATED AREAS OF POVERTY



THERE ARE NO RACIALLY OR ETHNICALLY CONCENTRATED AREAS OF POVERTY IN THE CITY OF LA CROSSE OR LA CROSSE OR MONROE COUNTIES.

This study uses a methodology developed by HUD that combines demographic and economic indicators to identify racially or ethnically concentrated areas of poverty (RECAPs). These areas are defined as census tracts that have an individual poverty rate of 40% or more (or an individual poverty rate that is at least 3 times that

of the tract average for the metropolitan area, whichever is lower) and a non-white population of 50% or more. Using a metric that combines demographic and economic indicators helps to identify a jurisdictions' most vulnerable communities.

The racial and ethnic composition of neighborhoods with concentrations of poverty is disproportionate relative to the U.S. population overall. According to the U.S. Department of Health and Human Services, Black and Hispanic populations comprise nearly 80% of the population living in areas of concentrated poverty in metropolitan areas, but only account for 42.6% of the total poverty population in the U.S.⁴ Overrepresentation of these groups in areas of concentrated poverty can exacerbate disparities related to safety, employment, access to jobs and quality education, and conditions that lead to poor health.

Identification of RECAPs is significant in determining priority areas for reinvestment and services to ameliorate conditions that negatively impact RECAP residents and the larger region. Since 2000, the prevalence of concentrated poverty has expanded by nearly 75% in both population and number of neighborhoods. The majority of concentration of poverty is within the largest metro areas, but suburban regions have experienced the fastest growth rate.⁵

There are no census tracts in the city of La Crosse, La Crosse County, or Monroe County that meet HUD's RECAP definition, and there were not any RECAP tracts in 1990 or 2000.

⁴ United States, Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation. "Overview of Community Characteristics in Areas with Concentrated Poverty." ASPE Issue Brief, May 2014, https://aspe.hhs.gov/system/files/pdf/40651/rb_concentratedpoverty.pdf.

⁵ Kneebone, Elizabeth. "The Growth and Spread of Concentrated Poverty, 2000 to 2008-2012." *The Brookings Institution*, 29 July 2016, www.brookings.edu/interactives/the-growth-and-spread-of-concentrated-poverty-2000-to-2008-2012/.

CHAPTER 4.

SEGREGATION AND INTEGRATION

Communities experience varying levels of segregation between different racial, ethnic, and socioeconomic groups. High levels of residential segregation often lead to conditions that exacerbate inequalities among population groups within a community. Increased concentrations of poverty and unequal access to jobs, education, and other services are some of the consequences of high residential segregation.⁶

RACIAL AND ETHNIC SEGREGATION IS LOW IN THE CITY OF LA CROSSE AND LA CROSSE AND MONROE COUNTIES. SEGREGATION LEVELS IN EACH GEOGRAPHY DECLINED SINCE 1990.

Federal housing policies and discriminatory mortgage lending practices prior to the Fair Housing Act of 1968 not only encouraged segregation, but mandated restrictions based on race in specific neighborhoods. The Fair Housing Act of 1968 outlawed discriminatory housing practices, but did little to address the existing segregation and inequalities. Other federal housing policies and programs, like Section 8 and HOPE VI, have been implemented in an effort to ameliorate the negative effects of residential segregation and reduce concentrations of poverty. Despite these efforts, the repercussions of the discriminatory policies and practices continue to have a significant impact on residential patterns today.

RACE AND ETHNICITY

According to Figure 1, the most densely populated neighborhoods in the city of La Crosse are located in the southern half of the city below La Crosse Street. The spatial distribution of the population by race and ethnicity indicate low levels of segregation within the city. The spatial distribution patterns of all racial and ethnic groups are consistent with the overall population distribution and is relatively uniform throughout the city and proportionate with population density of specific areas.

The overall population distribution in the city of La Crosse has shifted slightly since 1990 as population density has increased in the northern neighborhoods of Logan Northside and Lower Northside and Depot. Aside from overall growth of minority populations, racial and ethnic groups have remained evenly distributed throughout the city of La Crosse between 1990 and 2010.

The spatial distribution pattern of the non-Hispanic white population is uniform throughout the La Crosse and Monroe Counties and proportionate with population density of specific areas. Racial and ethnic minority populations are primarily concentrated in densely populated areas of La Crosse and Monroe Counties like the city of La Crosse, Holmen, Onalaska, West Salem, Sparta, and Tomah. The Asian or Pacific

⁶ Massey, D. (1990). American Apartheid: Segregation and the Making of the Underclass. *American Journal of Sociology*, 96(2), 329-357. Retrieved from <http://www.jstor.org/stable/2781105>

Islander population is concentrated in the northwest section of La Crosse County. Compared to other racial and ethnic minority groups, the Hispanic population has more presence outside of dense population centers and Monroe County.

In 1990, minority populations were almost exclusively limited to the city of La Crosse. Since 1990, minority populations have started to expand outside of the city of La Crosse and concentrations are found in Onalaska, Holmen, West Salem, Sparta, and Tomah.

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FIGURE 1 – POPULATION BY RACE AND ETHNICITY IN THE CITY OF LA CROSSE, 2010



FIGURE 2 – POPULATION BY RACE AND ETHNICITY IN THE CITY OF LA CROSSE, 2000

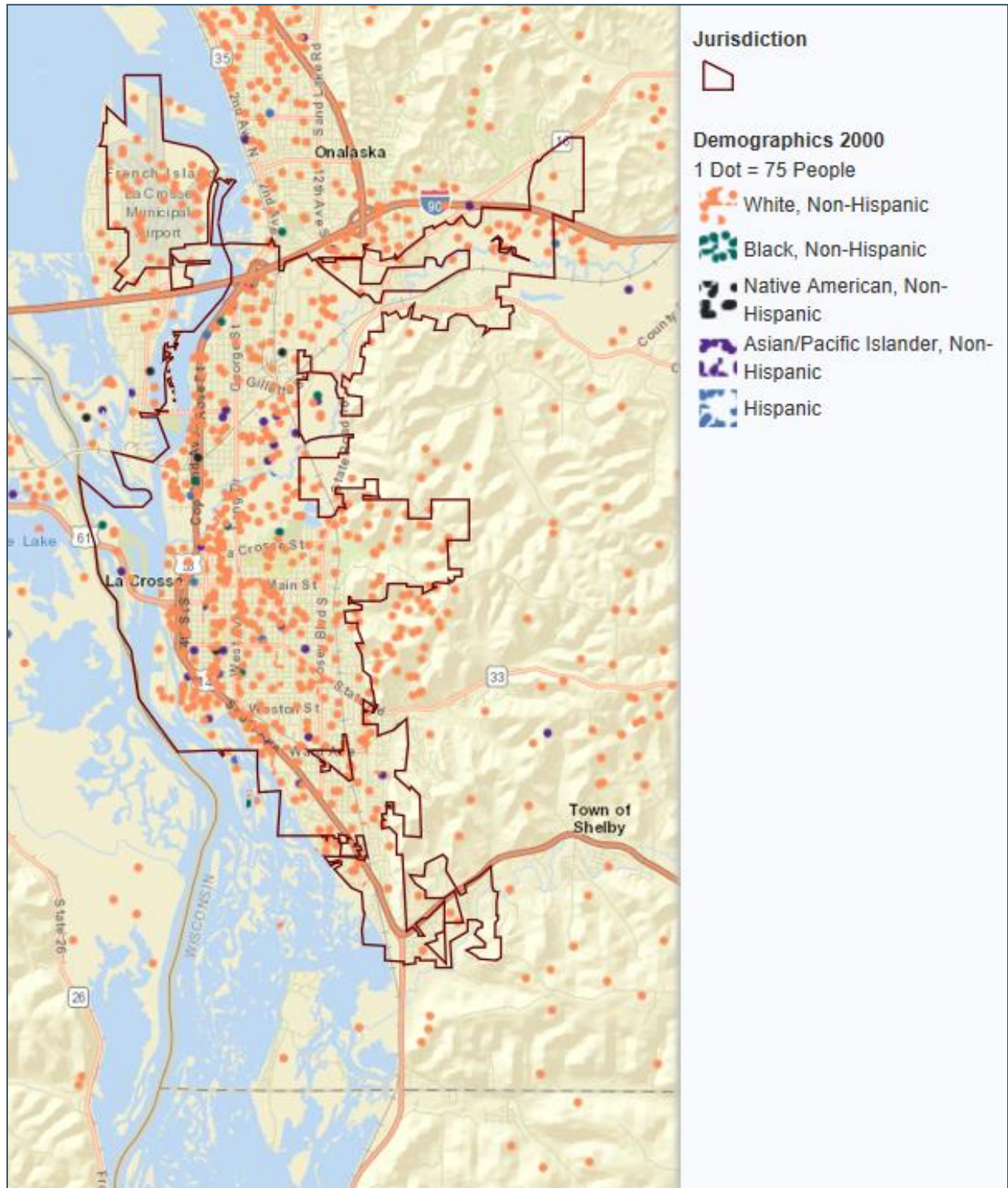


FIGURE 3 – POPULATION BY RACE AND ETHNICITY IN THE CITY OF LA CROSSE, 1990

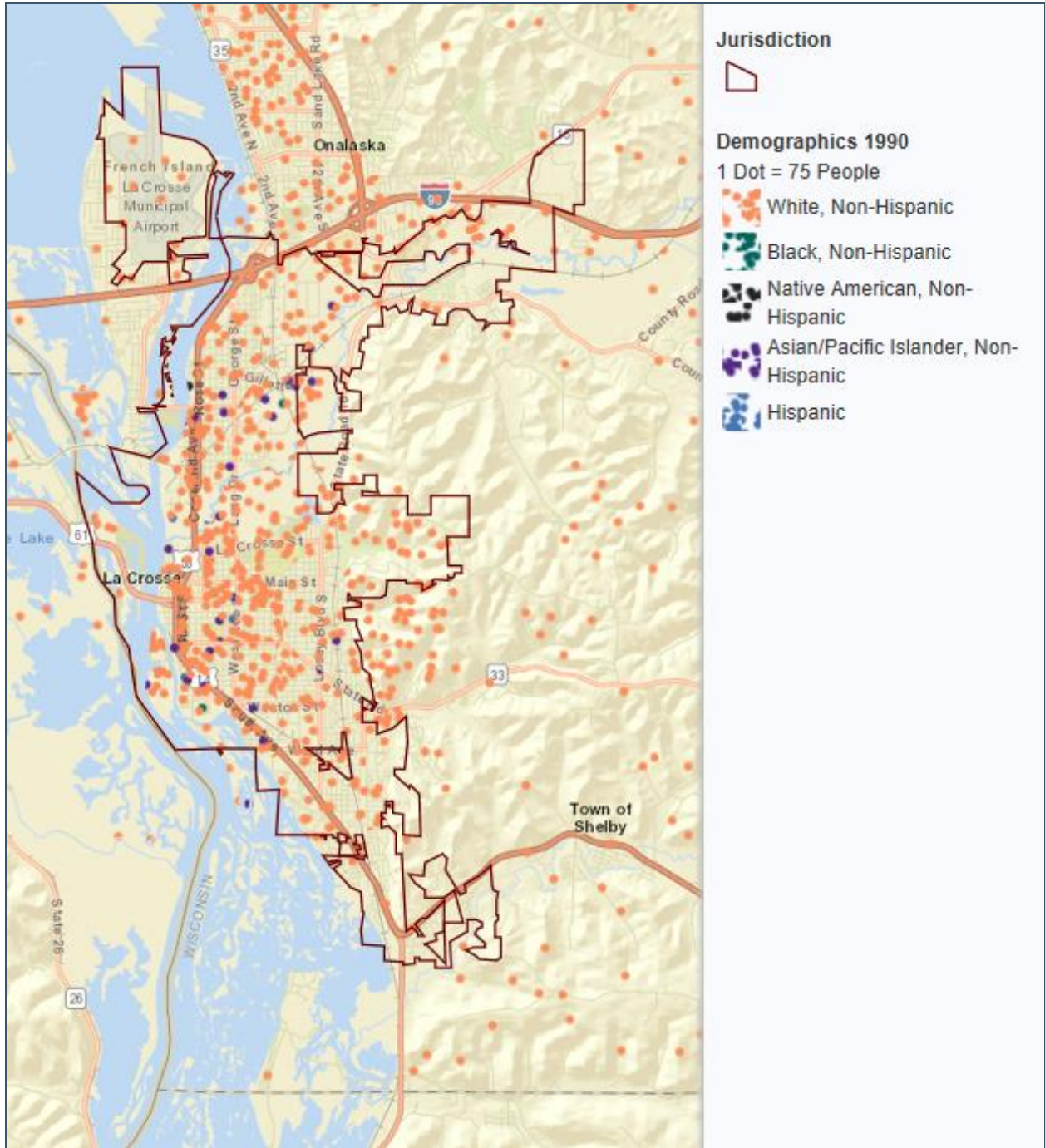


FIGURE 4 – POPULATION BY RACE AND ETHNICITY IN LA CROSSE AND MONROE COUNTIES, 2010

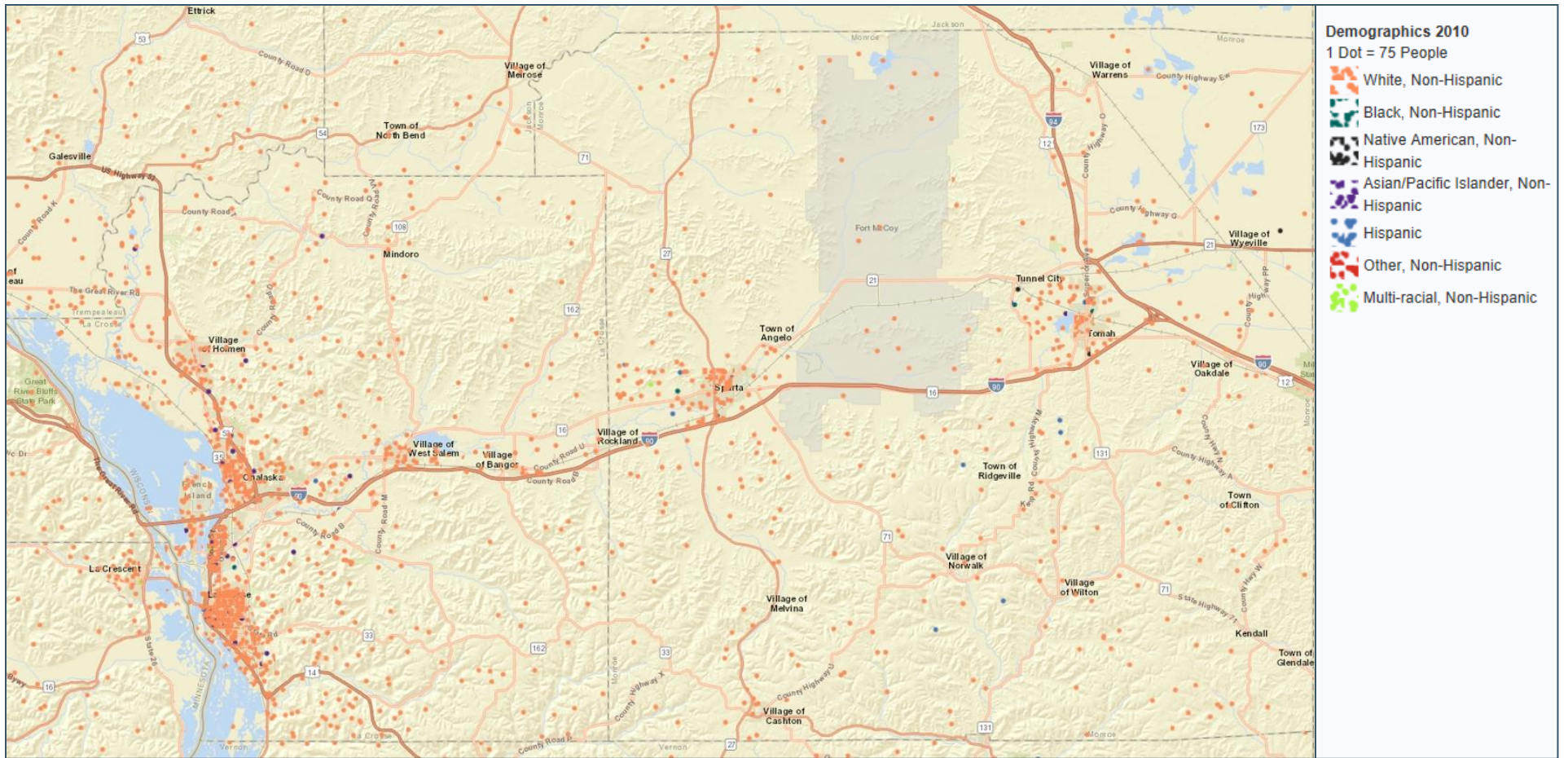


FIGURE 5 – POPULATION BY RACE AND ETHNICITY IN LA CROSSE AND MONROE COUNTIES, 2000

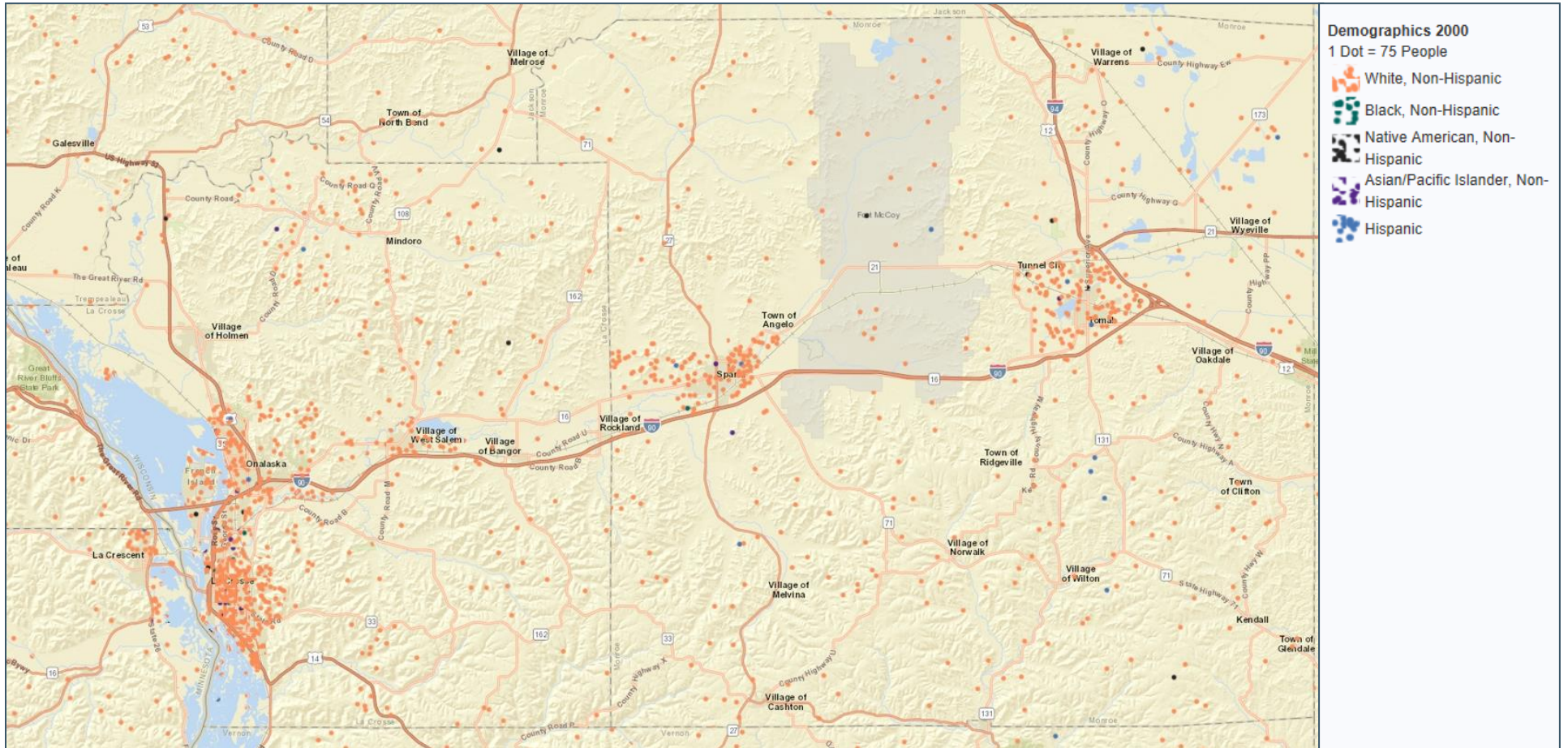
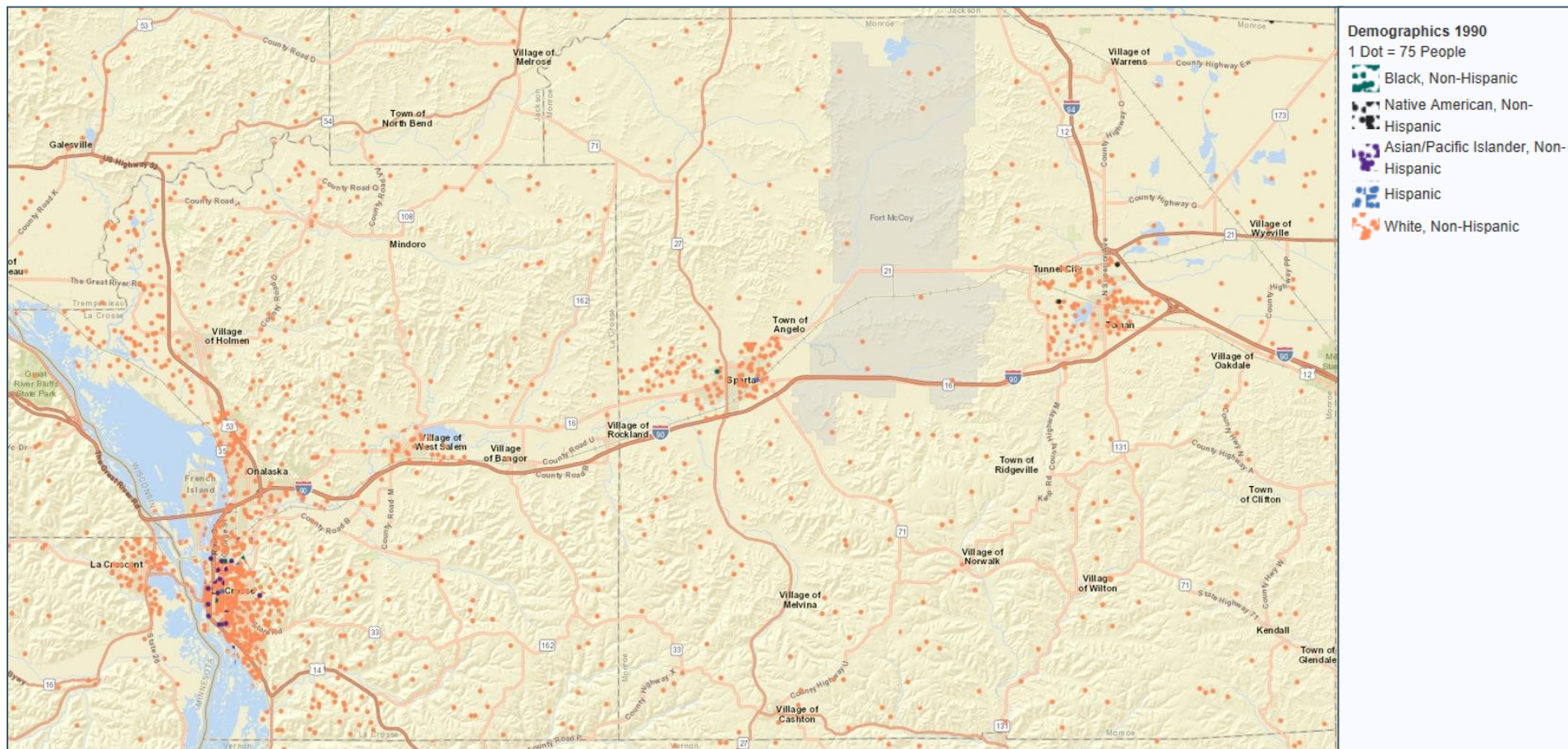


FIGURE 6 – POPULATION BY RACE AND ETHNICITY IN LA CROSSE AND MONROE COUNTIES, 1990



SEGREGATION LEVELS

In addition to visualizing the racial and ethnic composition of the area with the preceding maps, this study also uses a statistical analysis – referred to as dissimilarity – to evaluate how residential patterns vary by race and ethnicity, and how these patterns have changed since 1990. The Dissimilarity Index (DI) indicates the degree to which two groups living in a region are similarly geographically distributed. Segregation is lowest when the geographic patterns of each group are the same. For example, segregation between two groups in a city or county is minimized when the population distribution by census tract of the first group matches that of the second. Segregation is highest when no members of the two groups occupy a common census tract. The proportion of the minority population group can be small and still not segregated if evenly spread among tracts or block groups.

Evenness is not measured in an absolute sense, but is scaled relative to the other group. Dissimilarity Index values range from 0 (complete integration) to 100 (complete segregation). HUD identifies a DI value below 40 as low segregation, a value between 40 and 54 as moderate segregation, and a value of 55 or higher as high segregation. When calculated from population data broken down by race or ethnicity, the DI represents the proportion of one group that would have to change their area of residence to match the distribution of the other.

The table below shares the dissimilarity indices for four pairings. This table presents values for 1990, 2000, and 2010, all calculated using census tracts as the area of measurement. The 2010 dissimilarity indices calculated for each pairing show low levels of segregation in the city of La Crosse. The highest DI value of 25.6 was for the Black/white pairing. The Hispanic/white pairing resulted in the lowest DI of 14.5. DI for all pairings declined significantly from 1990 to the lowest levels in 2010. DI for Non-white/white and Asian or Pacific Islander/white pairings decreased steadily, going from a moderate level of segregation in 1990 to a low level in 2010.

TABLE 3 – RACIAL AND ETHNIC DISSIMILARITY TRENDS

Race/Ethnicity	City of La Crosse			La Crosse County			Monroe County		
	1990	2000	2010	1990	2000	2010	1990	2000	2010
Non-White/White	41.3	28.0	21.2	47.4	29.3	20.3	21.3	16.5	18.1
Black/White	32.4	30.5	25.6	41.4	36.1	31.5	41.9	29.2	29.5
Hispanic/White	24.9	16.0	14.5	26.5	17.5	16.9	15.0	31.7	28.0
Asian or Pacific Islander/White	46.8	32.5	23.0	57.7	33.9	23.1	23.2	22.8	18.9

Data Sources: Decennial Census

Segregation levels for all pairings in La Crosse County in 2010 were similar to the city and in the low segregation range. The 57.7 DI calculated for the Asian or Pacific Islander/white pairing in 1990 for La Crosse County indicates high segregation, but drastically decreased to 23.1 in 2010. DI calculated for pairings in Monroe County also indicate similarly low levels of segregation. Compared to La Crosse County,

the DI for Hispanic/white is higher while the DI for the Asian or Pacific Islander/white pairing is lower. Segregation levels have decreased for most pairings in both La Crosse and Monroe Counties since 1990 except between Hispanic and white populations in Monroe County.

Overall, the Dissimilarity Index indicates low levels of segregation throughout the city of La Crosse, La Crosse County, and Monroe County.

NATIONAL ORIGIN AND LIMITED ENGLISH PROFICIENCY POPULATION

Settlement patterns of immigrants significantly impact the composition and landscape of communities across the United States. Large central cities have the largest population of foreign-born residents, but suburban areas are experiencing rapid growth of foreign-born populations recently.⁷ Clusters of immigrants of the same ethnicity form for a variety of reasons. Social capital in the form of kinship ties, social network connections, and shared cultural experiences often draw new immigrants to existing communities. Settling in neighborhoods with an abundance of social capital is less financially burdensome for immigrants and provides opportunities to accumulate financial capital through employment and other resources that would otherwise be unattainable.⁸

Populations with limited English proficiency (LEP) are typically composed of foreign-born residents that originate from countries where English is not the primary language, however, a substantial portion (19%) of the national LEP population is born in the United States. Nationally, the LEP population has lower levels of education and is more likely to live in poverty compared to the English proficient population.⁹ Recent studies have also found that areas with high concentrations of LEP residents have lower rates of homeownership.¹⁰

Communities of people sharing the same ethnicity and informal networks are able to provide some resources and opportunities, but numerous barriers and limited financial capital influence residential patterns of foreign-born and LEP populations.

Foreign-born populations are evenly distributed throughout the city of La Crosse with loose concentrations based on country of origin. Residents from Laos, the largest foreign-born population, have a presence in most neighborhoods in the city of La Crosse with no discernible pattern of concentration. There is a concentration of residents from Thailand in the northern tip of the city on the fringes or east of the Logan Northside Neighborhood.

Almost the entire foreign-born population in La Crosse and Monroe Counties reside within or near the city of La Crosse. There are small concentrations of Laotian residents in northwest corner of La Crosse

⁷ James, F., Romine, J., & Zwanzig, P. (1998). The Effects of Immigration on Urban Communities. *Cityscape*, 3(3), 171-192.

⁸ Massey, D. (1999). Why Does Immigration Occur?: A Theoretical Synthesis. In Hirschman C., Kasinitz P., & DeWind J. (Eds.), *Handbook of International Migration, The: The American Experience* (pp. 34-52). Russell Sage Foundation.

⁹ Zong, J. & Batalova, J. (2015). "The Limited English Proficient Population in the United States" *Migration Information Source*. Retrieved: <http://www.migrationpolicy.org/article/limited-english-proficient-population-united-states>

¹⁰ Golding, E., Goodman, L., & Strohack, S. (2018). "Is Limited English Proficiency a Barrier to Homeownership." Urban Institute. Retrieved: <https://www.urban.org/research/publication/limited-english-proficiency-barrier-homeownership>

County. Residents originating from Thailand, Korea, and China reside in the northern half of La Crosse County. Although there is a small population of foreign-born residents in Monroe County, Figure 9 does not indicate any significant clusters of foreign-born residents.

The geographic distribution of residents with limited English proficiency (LEP) are practically identical to the locations of the foreign-born population. Most of the LEP population resides in the city of La Crosse. The Hmong-speaking LEP population is the largest and mirrors the residential patterns of immigrants from Laos and Thailand. Spanish-speaking populations are scattered throughout the city of La Crosse and nearby regions outside the city. Figure 10 indicates there are not concentrations of LEP populations in Monroe County.

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FIGURE 7 – FOREIGN-BORN POPULATION BY NATIONALITY IN THE CITY OF LA CROSSE

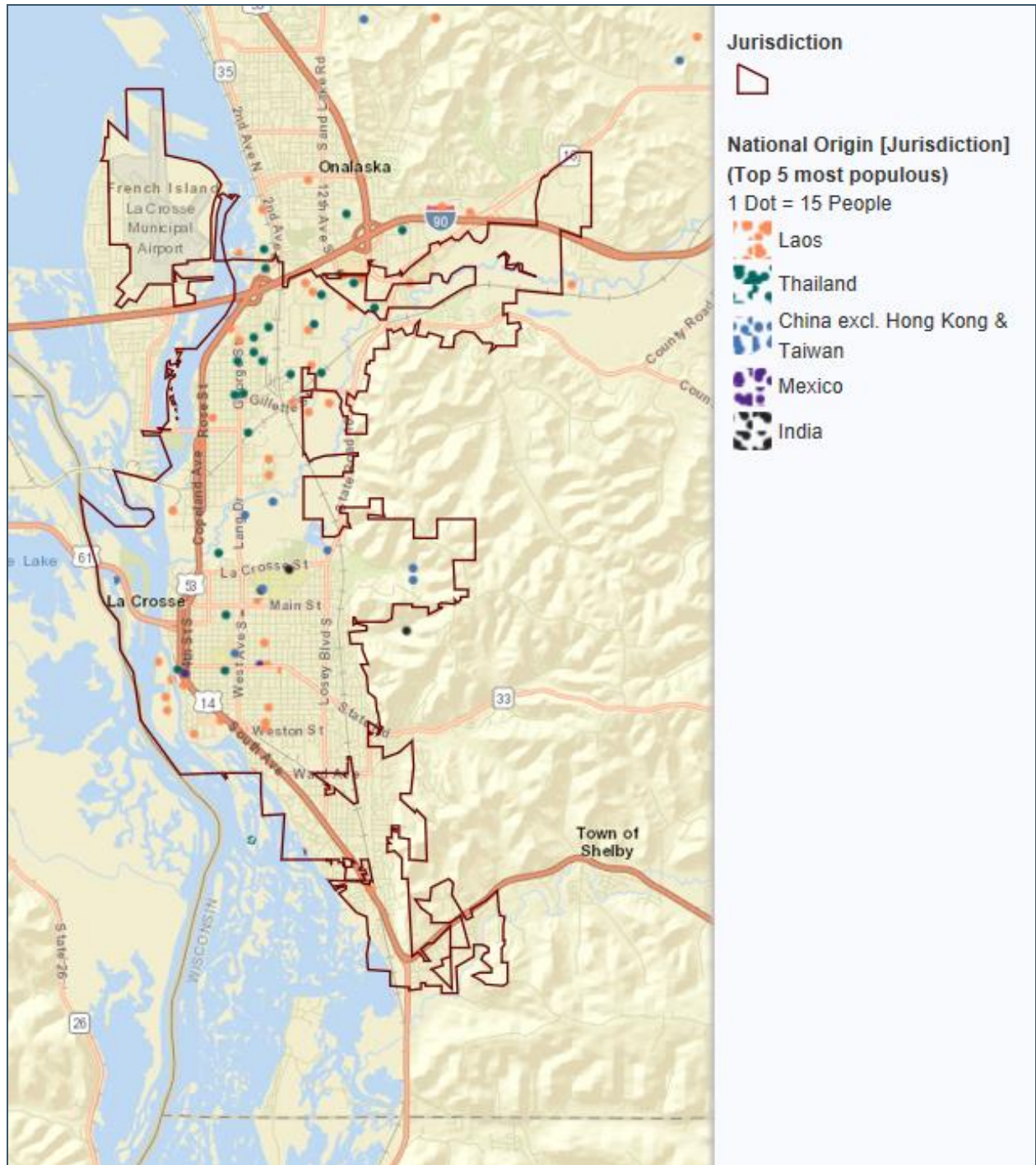


FIGURE 8 – POPULATION WITH LIMITED ENGLISH PROFICIENCY IN THE CITY OF LA CROSSE



FIGURE 9 – FOREIGN-BORN POPULATION BY NATIONALITY IN LA CROSSE AND MONROE COUNTIES

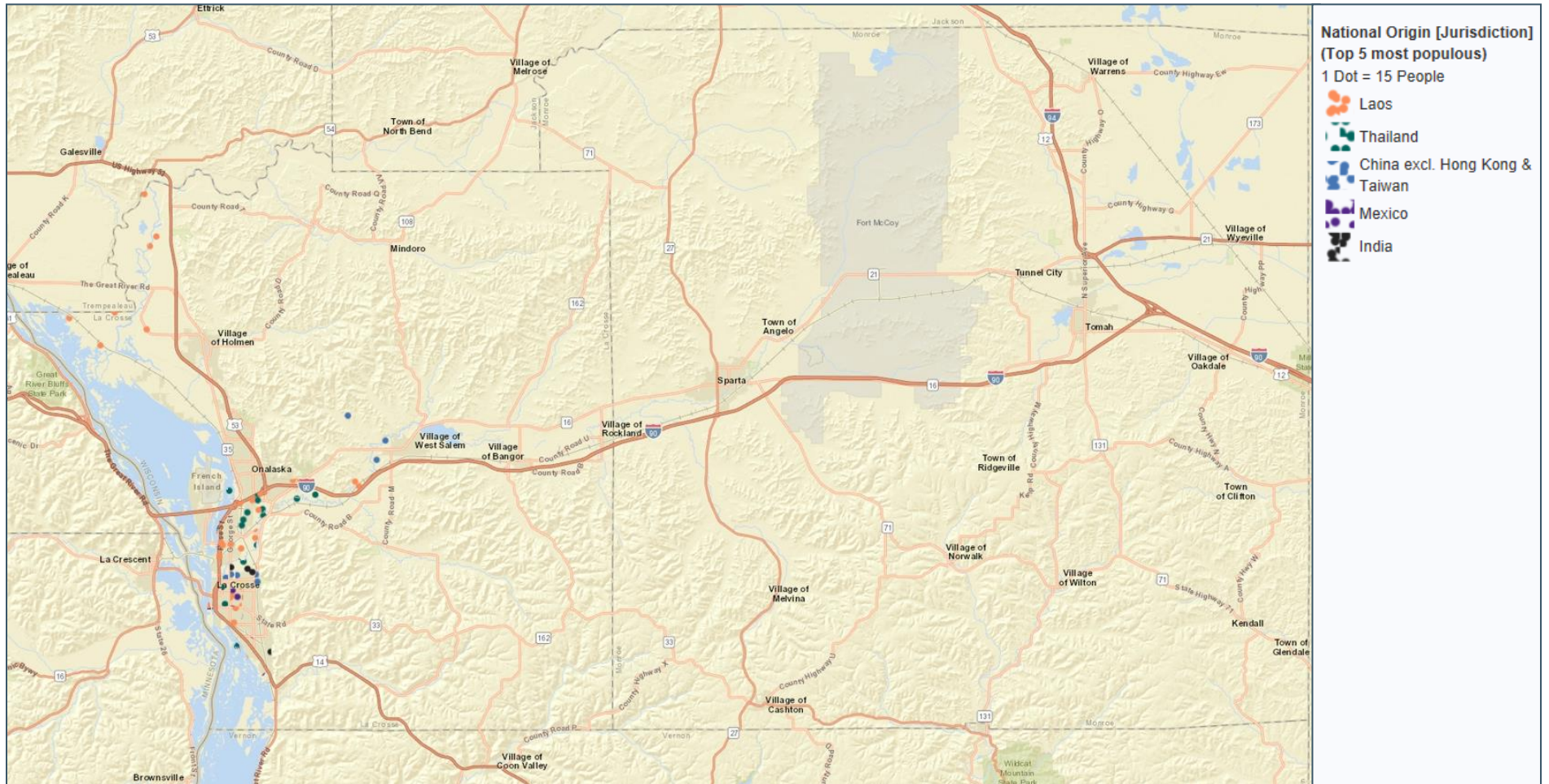
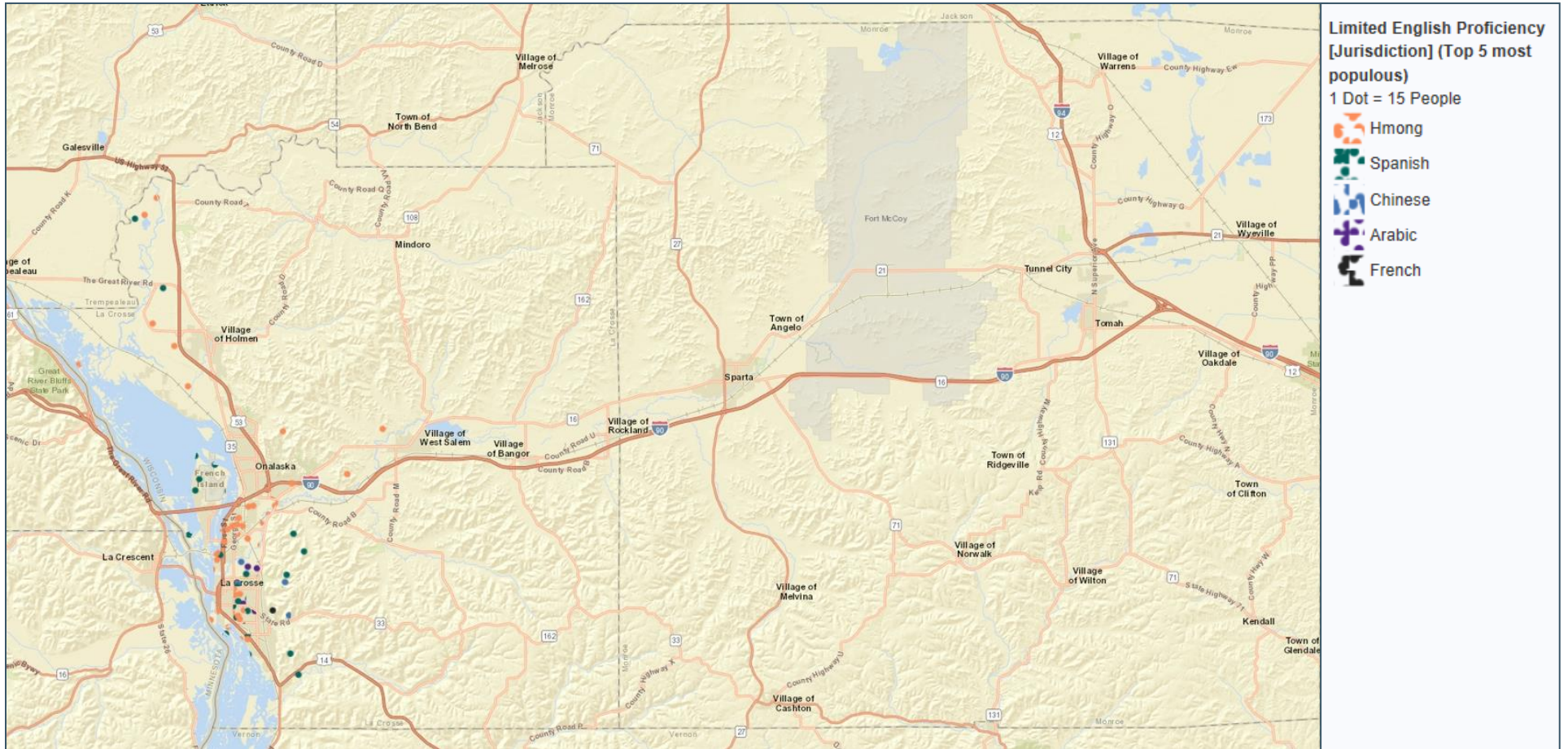


FIGURE 10 – POPULATION WITH LIMITED ENGLISH PROFICIENCY IN LA CROSSE AND MONROE COUNTIES



CHAPTER 5.

HOUSING PROFILE

The availability of quality affordable housing plays a vital role in ensuring housing opportunities are fairly accessible to all residents. On the surface, high housing costs in certain areas are exclusionary based solely on income. But the disproportionate representation of several protected class groups in low and middle income levels can lead to unequal access to housing options and neighborhood opportunity in high-cost housing markets. Black and Hispanic residents, immigrants, people with disabilities, and seniors often experience additional fair housing barriers when affordable housing is scarce.

Beyond providing fair housing options, the social, economic, and health benefits of providing quality affordable housing are well-documented. National studies have shown affordable housing encourages diverse, mixed-income communities, which result in many social benefits. Affordable housing also increases job accessibility for low and middle income populations and attracts a diverse labor force critical for industries that provide basic services for the community. Affordable housing is also linked to improvements in mental health, reduction of stress, and decreased cases of illnesses caused by poor-quality housing.¹¹ Developing affordable housing is also a strategy used to prevent displacement of existing residents when housing costs increase due to economic or migratory shifts.

Conversely, a lack of affordable housing eliminates many of these benefits and increases socioeconomic segregation. High housing costs are linked to displacement of low-income households and an increased risk of homelessness.¹² Often lacking the capital to relocate to better neighborhoods, displaced residents tend to move to socioeconomically disadvantaged neighborhoods where housing costs are most affordable.¹³

This section discusses the existing supply of housing in the city of La Crosse and La Crosse and Monroe Counties. It also reviews housing costs, including affordability and other housing needs by householder income. Homeownership rates and access to lending for home purchases and mortgage refinancing are also assessed.

HOUSING SUPPLY SUMMARY

According to the 2012-2016 American Community Survey, there are 22,325 housing units in the city of La Crosse, a number that is roughly unchanged from since 2000. Development activity has been stronger in the counties over the last decade and a half, with the number of housing units increasing by rates in the mid teens in both areas. La Crosse County added 5,700 to reach 49,247 as of the 2012-2016 ACS. Much of

¹¹ Maqbool, Nabihah, et al. "The Impacts of Affordable Housing on Health: A Research Summary." *Insights from Housing Policy Research*, Center for Housing Policy, www.rupco.org/wp-content/uploads/pdfs/The-Impacts-of-Affordable-Housing-on-Health-CenterforHousingPolicy-Maqbool.etal.pdf.

¹² "State of the Nation's Housing 2015." Joint Center for Housing Studies of Harvard University, <http://www.jchs.harvard.edu/sites/default/files/jchs-sonhr-2015-full.pdf>

¹³ Deirdre Oakley & Keri Burchfield (2009) Out of the Projects, Still in the Hood: The Spatial Constraints on Public-Housing Residents' Relocation in Chicago." *Journal of Urban Affairs*, 31:5, 589-614.

COMMUNITY MEMBERS EMPHASIZED THAT HOUSING AVAILABILITY IS CONSTRICTED, AND HOUSING CHOICES ARE OFTEN DICTATED BY WHERE A UNIT IS AVAILABLE FOR SALE OR RENT.

La Crosse County’s housing growth occurred in Onalaska and Holmen; together they added 3,410 units over that period, or about 60% of the county’s total new units.

Monroe County has fewer units (19,518) but developed at a faster rate since 2000. Of the 2,846 units added there, 865 were in Sparta and 414 were in Tomah. Overall, housing growth rates in

the region reflect population growth rates – moderate expansion in the city of La Crosse with more rapid growth in the counties.

Through the public engagement process, community members and other stakeholders emphasized that housing availability is severely constricted in the region, with housing choices often dictated by where a unit is available for rent or sale. Vacancy rates also indicate a tight housing market. In the city of La Crosse, 6.5% of units are vacant, more than the share throughout La Crosse County (5.3%) but less than the rate in Monroe County (8.7%). Vacancy rates in all three areas are well below the national average of 12.2%. These rates, all calculated from ACS data, include housing that is available for sale or rent, housing that has been rented or sold but not yet occupied, seasonal housing, and other vacant units. Thus, the actual share of rental and for-sale units that are available for occupancy are likely lower than these figures indicate, further supporting stakeholders’ descriptions of limited housing availability.

TABLE 4 – HOUSING UNITS BY OCCUPANCY STATUS

	2000	2010	2012-2016	2000-2016 Change
City of La Crosse				
Total Housing Units	22,233	22,628	22,325	0.4%
Occupied Housing Units	21,110	21,428	20,882	-1.1%
Vacant Housing Units	1,123	1,200	1,443	28.5%
Vacancy Rate	5.1%	5.3%	6.5%	+1.4% points
La Crosse County				
Total Housing Units	43,479	48,402	49,247	13.3%
Occupied Housing Units	41,599	46,137	46,657	12.2%
Vacant Housing Units	1,880	2,265	2,590	37.8%
Vacancy Rate	4.3%	4.7%	5.3%	+1.0% points
Monroe County				
Total Housing Units	16,672	19,204	19,518	17.1%
Occupied Housing Units	15,399	17,376	17,813	15.7%
Vacant Housing Units	1,273	1,828	1,705	33.9%
Vacancy Rate	7.6%	9.5%	8.7%	+1.1% points

Data Source: U.S. Census 2000 SF1 Table H003 and 2010 SF1 Table H3 and 2012-2016 5-Year American Community Survey Table B25002

Variety in terms of housing structure type is important in providing housing options suitable to meet the needs of all residents, including different members of protected classes. Multifamily housing, including rental apartments, are often more affordable than single-family homes for low- and moderate-income households, who are disproportionately likely to be households of color. Multifamily units may also be the preference of some elderly and disabled householders who are unable or do not desire to maintain a single-family home.

The table that follows shows housing units by structure type in each geography. As shown, the city of La Crosse offers the most diverse housing stock – about 50% of units are detached single-family homes, about 26% are in small multifamily properties (2 to 19 units) and about 16% are in larger multifamily properties (20 or more units per structure). Single-family homes are more common in both of the counties. Sixty-one percent (61.4%) of homes in La Crosse County and 71.4% in Monroe County are detached single-family units.

THE CITY OF LA CROSSE HAS THE MOST DIVERSE HOUSING STOCK, WITH A MIX OF SINGLE-FAMILY UNITS AND SMALL AND LARGE MULTIFAMILY PROPERTIES.

Multifamily housing is less common in the counties. In La Crosse County, small multifamily units make up 18.1% of the housing stock and large multifamily units constitute 9.5%. These shares are even lower in Monroe County at 14.7% and 2.2%, respectively, not surprising given the rural nature of much of the county. While development regulations and consumer preferences impact multifamily development, it can also be limited in rural areas due to the lack of sufficient infrastructure – specifically, water and sewer – to support higher density development.

In both counties, mobile home units make up larger shares of housing units than in the city. Nearly 5% of units in La Crosse County are mobile homes, as are almost 10% of units in Monroe County.

TABLE 5 – HOUSING UNITS BY STRUCTURE TYPE

Units in Structure	City of La Crosse		La Crosse County		Monroe County	
	Number	Percent	Number	Percent	Number	Percent
1, detached	11,289	50.6%	30,218	61.4%	13,933	71.4%
1, attached	1,136	5.1%	3,171	6.4%	490	2.5%
2-4	3,264	14.6%	4,718	9.6%	1,566	8.0%
5-19	2,666	11.9%	4,199	8.5%	1,299	6.7%
20-49	2,010	9.0%	2,696	5.5%	362	1.9%
50 or more	1,619	7.3%	1,983	4.0%	56	0.3%
Mobile home	341	1.5%	2,262	4.6%	1,810	9.3%
Other (RV, boat, van, etc.)	0	0.0%	0	0.0%	2	0.0%
Total	22,325	100.0%	49,247	100.0%	19,518	100.0%

Data Source: 2012-2016 5-Year American Community Survey Table B25024

Availability of housing in a variety of sizes is important to meet the needs of different demographic groups. Neighborhoods with multi-bedroom detached, single-family homes will typically attract larger families, whereas dense residential developments with smaller unit sizes and fewer bedrooms often accommodate single-person households or small families. But market forces and affordability impact housing choice and the ability to obtain housing of a suitable size, and markets that do not offer a variety of housing sizes at different price points can lead to barriers for some groups. Rising housing costs can, for example, lead to overcrowding as large households with lower incomes are unable to afford pricier, larger homes and are forced to reside in smaller units. On the other hand, people with disabilities or seniors with fixed incomes may not require large units but can be limited by higher housing costs in densely populated areas where most studio or one-bedroom units are located.

As the table below shows, owner-occupied housing is typically larger than renter-occupied units. Units with two or fewer bedrooms make up about 30% of owned housing in the city of La Crosse and 20% in La Crosse and Monroe Counties. In contrast, about 70% of rental housing in the city of La Crosse and La Crosse County and 60% in Monroe County has two or fewer bedrooms.

TABLE 6 – HOUSING UNITS BY SIZE AND TENURE

Number of Bedrooms	City of La Crosse		La Crosse County		Monroe County	
	Number	Percent	Number	Percent	Number	Percent
Owner-Occupied Housing Units						
Zero or one	168	1.7%	316	1.1%	270	2.2%
Two	2,856	28.5%	5,837	19.4%	2,478	20.3%
Three	4,510	45.0%	14,288	47.6%	6,008	49.3%
Four or more	2,478	24.8%	9,607	32.0%	3,421	28.1%
Total	10,012	100.0%	30,048	100.0%	12,177	100.0%
Renter-Occupied Housing Units						
Zero or one	4,047	37.2%	5,216	31.4%	1,376	24.4%
Two	3,924	36.1%	6,733	40.5%	1,914	34.0%
Three	1,810	16.7%	3,159	19.0%	1,627	28.9%
Four or more	1,089	10.0%	1,510	9.0%	719	12.8%
Total	10,870	100.0%	16,609	100.0%	5,636	100.0%

Note: Total add to the total number of occupied housing units in each geography. Unoccupied units are not included in this table because tenure data is not available for these units.

Data Source: 2012-2016 5-Year American Community Survey Table

Table 7 provides information for households living in publicly supported housing, including unit size and presence of children by housing program type. Assuming households with children would need two-bedroom or larger units, comparing the number of two- and three-plus bedroom units with the number of households with children does not immediately indicate overcrowding in assisted housing. In the city of La Crosse, for example, the 150 households with children who live in public housing properties could theoretically be housed in the 175 units with two or more bedrooms. Likewise, there appear to be

adequate units with two or more bedrooms for the 26 households with children living in project-based Section 8 units and the 44 that participate in the housing choice voucher program.

However, because data about households with children by household size is not available, precise conclusions regarding the suitability of the existing publicly supported housing stock cannot be drawn. There may be a mismatch between large family households and the availability of three bedroom or larger units, but such a situation is not discernible without information about household size. Additionally, smaller households may reside in units with more bedrooms (a 2-person household without children living in a 2-bedroom unit, for example), reducing the availability of larger units for households with children.

TABLE 7 – PUBLICLY SUPPORTED HOUSING BY PROGRAM CATEGORY: UNITS BY NUMBER OF BEDROOMS AND NUMBER OF CHILDREN

Housing Type	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Unit Bedrooms		Households with Children	
	#	%	#	%	#	%	#	%
City of La Crosse								
Public Housing	400	70%	101	18%	74	13%	150	26%
Project-Based Section 8	212	83%	37	15%	5	2%	26	10%
HCV Program	34	30%	37	33%	24	21%	44	39%
La Crosse County								
Public Housing	490	68%	130	18%	101	14%	195	27%
Project-Based Section 8	368	76%	82	17%	34	7%	77	16%
Other Multifamily	22	100%	0	0%	0	0%	0	0%
HCV Program	65	41%	49	31%	45	28%	67	42%
Monroe County								
Public Housing	56	66%	12	14%	16	19%	26	31%
Project-Based Section 8	136	80%	26	15%	7	4%	27	16%
HCV Program	138	56%	69	28%	38	15%	42	17%

Data Source: APSH

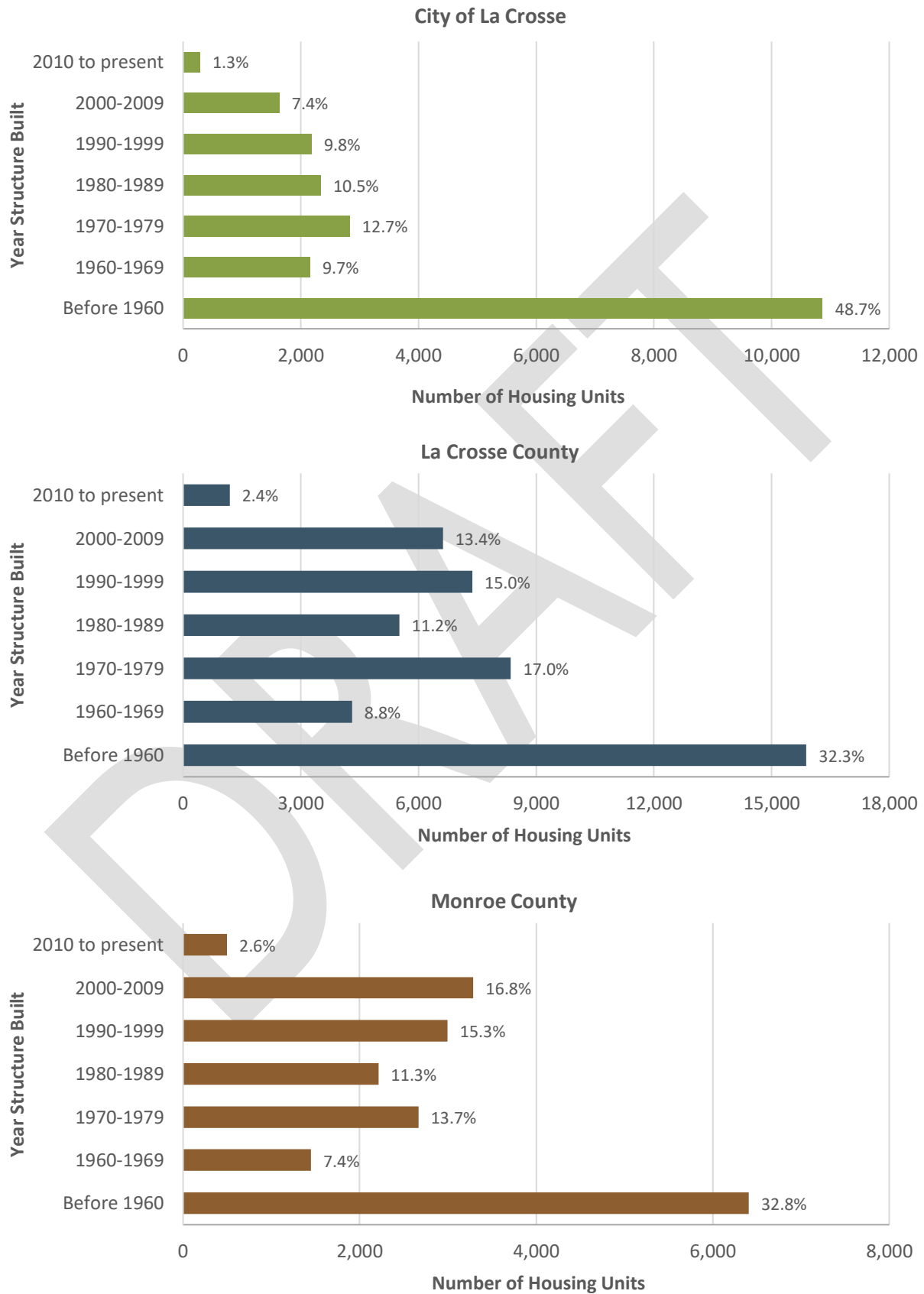
Assessing housing conditions in an area can provide a basis for developing policies and programs to maintain and preserve the quality of the housing stock. The age of an area’s housing can have substantial impact on housing conditions and costs. As housing ages, maintenance costs rise, which can present significant affordability issues for low- and moderate-income homeowners. Aging rental stock can lead to rental rate increases to address physical issues, or deteriorating conditions if building owners defer or ignore maintenance needs. Deteriorating housing can also depress neighboring property values, discourage reinvestment, and eventually impact the quality of life in a neighborhood. Additionally, homes built prior to 1978 present the potential for lead exposure risk due to lead-based paint or lead pipes carrying drinking water.

Age of housing in the city of La Crosse and La Crosse and Monroe Counties is shown on the following page. Regardless of geography, the largest share of homes were built over 50 years ago, prior to 1960. Housing is oldest in the city of La Crosse, where nearly one-half of units were built before 1960 and another 22.4% were built in the 1960s and 70s. Less than one-fifth of the city's housing was built since 1990.

In contrast, about one-third of units in La Crosse and Monroe Counties were built before 1960. Construction in the 1960s and 70s makes up 25.8% of units in La Crosse county and 21.1% in Monroe County.

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FIGURE 11 – AGE OF HOUSING IN THE CITY OF LA CROSSE, LA CROSSE COUNTY, AND MONROE COUNTY




Newer construction is considerably more common in La Crosse and Monroe Counties, where units built since 1990 comprise 30.8% and 34.7% of the housing stock, respectively. These shares are on par with the national average of 31.0%.

Looking at the median year units were built shows that the city of La Crosse is home to the region's oldest housing, with a median construction year of 1961. In contrast, Holmen and Onalaska have significantly newer housing, with median construction years of 1995 and 1983, respectively. Medians in Tomah, Sparta, La Crosse County and Monroe County are very close, ranging from 1972 to 1977, which is also the national median.

Stakeholder input reflects issues related to aging housing. Residents, housing professionals, and social service providers all indicated that housing quality, particularly lack of maintenance and repair, is a critical impediment to access to suitable rental housing. Several low- and moderate-income renters that participated in focus groups noted that they often report maintenance needs to landlords only to be ignored or to have an inadequate repair made. While not all older housing is physically substandard, age contributes heavily to poor conditions, particularly for relatively lower-cost rental units.

HOUSING COSTS AND AFFORDABILITY

The most common housing need identified by stakeholders related to affordability, particularly for low- and moderate-income households. The National Low Income Housing Coalition's annual *Out of Reach* report examines rental housing rates relative to income levels for counties throughout the U.S. The figure on the next page shows annual household income and hourly wages needed to afford Fair Market Rents (FMRs) in La Crosse and Monroe Counties for one, two, and three bedroom rental units.



TO AFFORD A 2-BEDROOM RENTAL UNIT AT LA CROSSE COUNTY'S FAIR MARKET RENT OF \$800 WOULD REQUIRE A 40-HOUR WORK WEEK AT A WAGE OF \$15 AN HOUR.

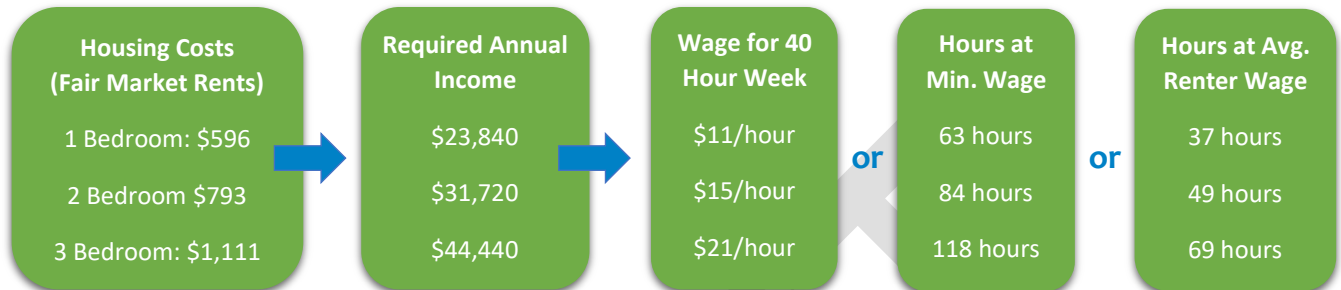
To afford a one-bedroom rental unit at the La Crosse County Fair Market Rent (FMR) of \$596 without being cost burdened (i.e., spending more than 30% of income on housing) would require an annual income of at least \$23,840. This amount translates to a 40-hour work week at an hourly wage of \$11, or a 63-hour work week at the minimum wage of \$7.25. For people with incomes equal to La Crosse County's average renter wage of \$12.37 an hour, a one-bedroom unit would be affordable given at least a 37-hour work week. La Crosse County's two-bedroom FMR of \$793 translates to an hourly wage of \$15, an 84-hour work week at minimum wage, or a 49-hour work week at the average renter wage.

Data is similar for Monroe County, where the one-bedroom FMR of \$601 would be affordable to households with an annual income of at least \$24,040, which translates to a 40-hour work week at an hourly wage of \$12, a 64-hour work week at minimum wage, or a 38-hour work week at the average renter wage of \$12.06. These figures indicate that while housing in La Crosse and Monroe Counties may be relatively affordable for small households earning at or below the average renter wage, minimum wage

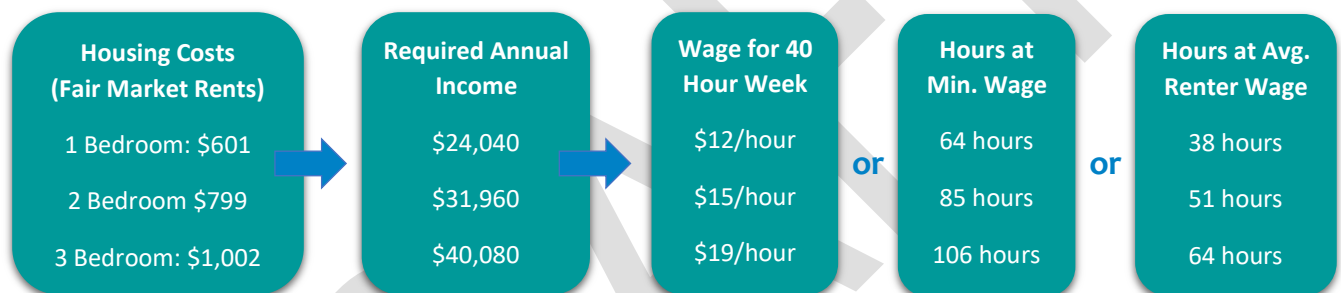
workers, other low-income households, and larger families needing more bedrooms face greater difficulty affording housing. The next section looks in more detail at affordability in the city and counties.

FIGURE 12 – REQUIRED INCOME, WAGES, AND HOURS TO AFFORD FAIR MARKET RENTS BY COUNTY, 2018

La Crosse County



Monroe County



Note: Required income is the annual income needed to afford Fair Market Rents without spending more than 30% of household income on rent. Minimum wage in La Crosse and Monroe Counties is \$7.25. Average renter wages are \$12.37 in La Crosse County and \$12.06 in Monroe County.

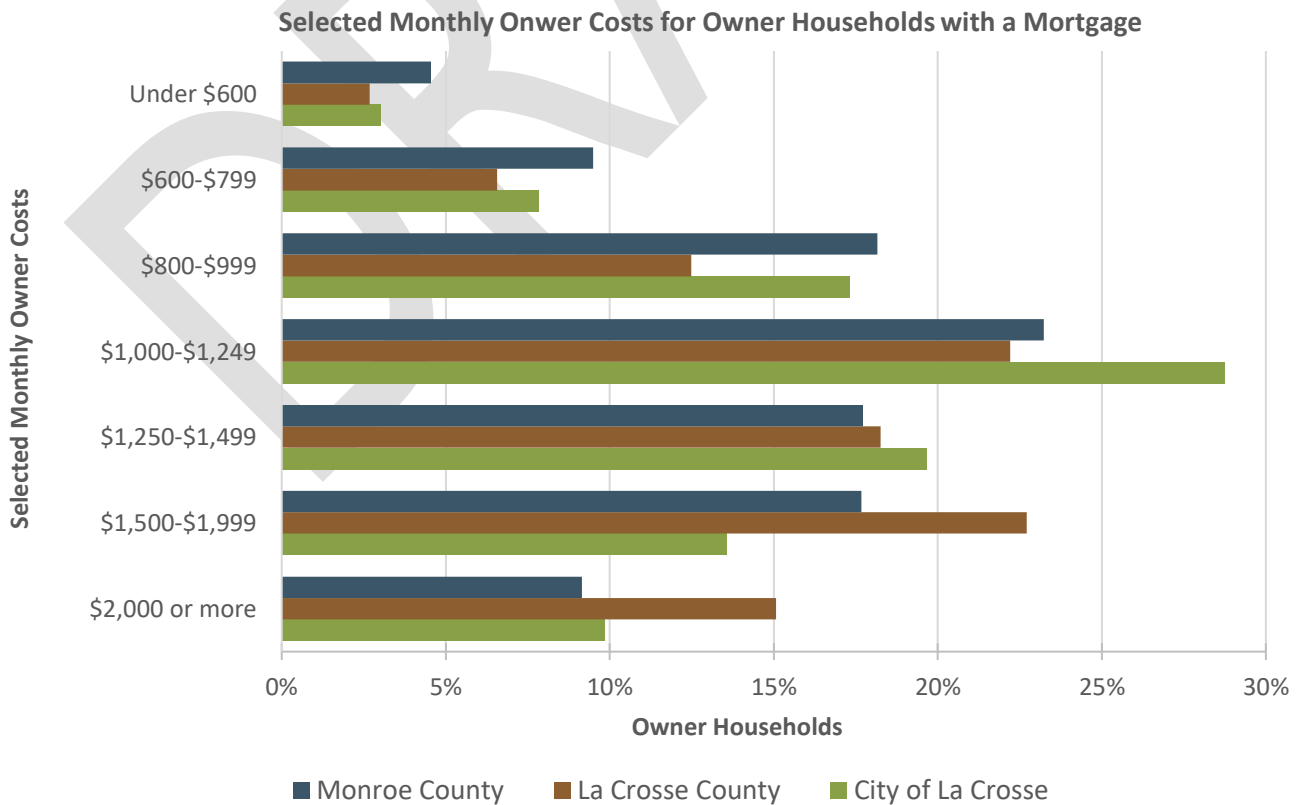
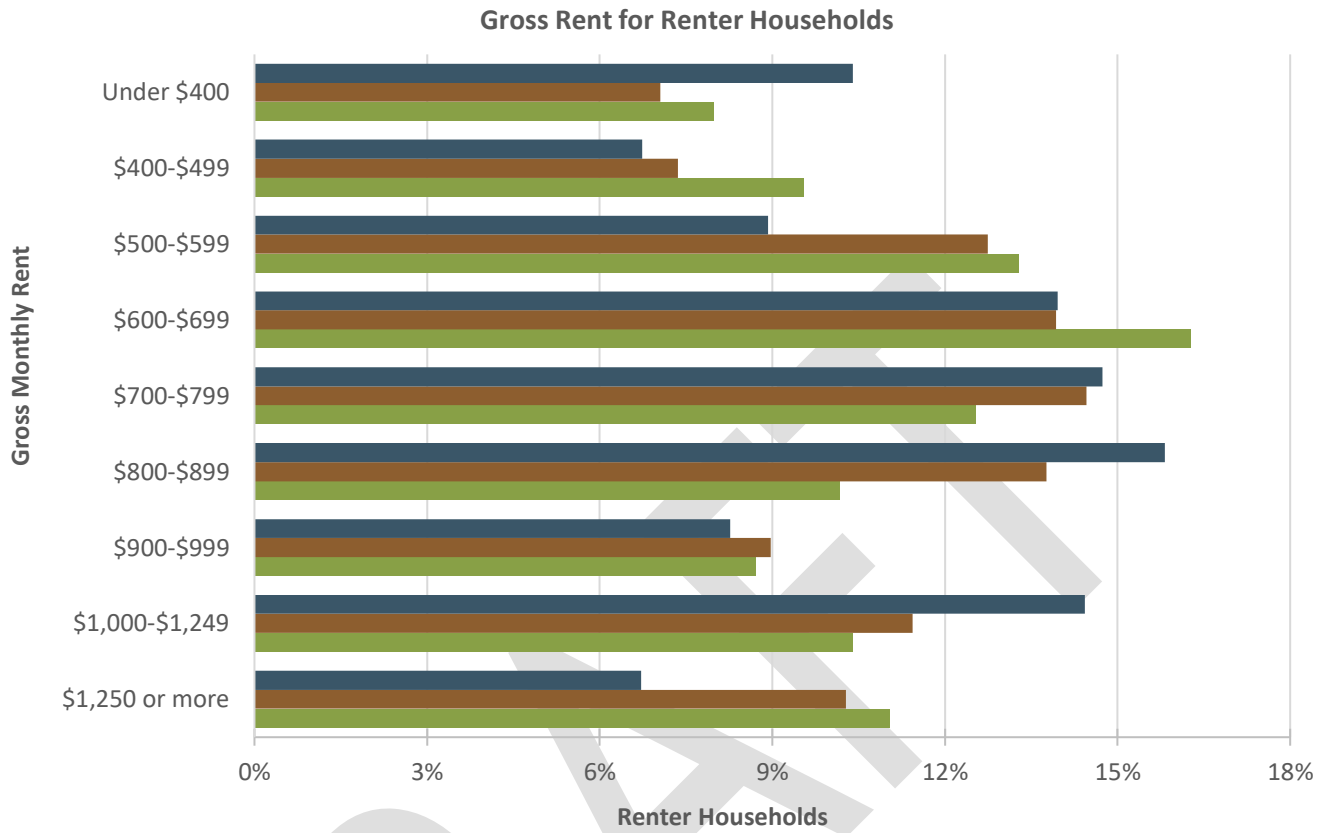
Source: National Low Income Housing Coalition *Out of Reach* 2018, Accessed from <http://nlihc.org/oor/wisconsin>

Gross rent (contract rent plus utilities) for the city of La Crosse and La Crosse and Monroe Counties is shown in Figure 13, as of the 2012-2016 American Community Survey. In the city of La Crosse, the largest share of renters spend between \$500 and \$700 a month on rent (42.1% of renters). A little over one-fifth of city of La Crosse renters (21.5%) spend more than \$1,000 a month on rent. These shares are relatively similar in both La Crosse and Monroe Counties, where 42-44% of renters pay between \$500 and \$700 a month and 21-22% pay over \$1,000.

Figure 13 also shows the distribution of monthly owner costs (mortgages, real estate taxes, insurance, and utilities) for owner households with a mortgage. In each geography, the most common range of monthly owner housing costs is between \$1,000 and \$1,249, which includes 28.7% of owners in the city of La Crosse and 22-23% of owners in La Crosse and Monroe Counties.

Overall, these housing cost figures show that there is some lower-priced housing in the city of La Crosse, La Crosse County, and Monroe County. However, they do not take into account rental housing quality, age of housing, or changes in home values (i.e., lower-cost owned housing may have been purchased when home values were lower and not reflective of current sales costs). Additionally, wages that have failed to keep up with increases in housing costs present a challenge to affordability.

FIGURE 13 – GROSS RENT FOR RENTER HOUSEHOLDS IN CITY OF LA CROSSE, LA CROSSE COUNTY, AND MONROE COUNTY



HOUSING NEEDS

Housing cost and condition are key components to housing choice. Housing barriers may exist in a jurisdiction when some protected class groups have greater difficulty accessing housing in good condition and that they can afford. To assess affordability and other types of housing needs, HUD defines four housing problems:

1. A household is *cost burdened* if monthly housing costs (including mortgage payments, property taxes, insurance, and utilities for owners and rent and utilities for renters) exceed 30% of monthly income.
2. A household is *overcrowded* if there is more than 1.0 people per room, not including kitchen or bathrooms.
3. A housing unit *lacks complete kitchen facilities* if it lacks one or more of the following: cooking facilities, a refrigerator, or a sink with piped water.
4. A housing unit *lacks complete plumbing facilities* if it lacks one or more of the following: hot and cold piped water, a flush toilet, or a bathtub or shower.

HUD also defines four severe housing problems, including a severe cost burden (more than 50% of monthly housing income is spent on housing costs), severe overcrowding (more than 1.5 people per room, not including kitchens or bathrooms), lack of complete kitchen facilities (as described above), and lack of complete plumbing facilities (also as described above).

To assess housing need, HUD receives a special tabulation of data from the U. S. Census Bureau's American Community Survey that is largely not available through standard Census products. This data, known as Comprehensive Housing Affordability Strategy (CHAS) data, counts the number of households that fit certain combination of HUD-specified criteria, such as housing needs by race and ethnicity. CHAS data for the city of La Crosse and La Cross and Monroe Counties is provided in the tables that follow.

In the city, there are 7,595 households with at least one housing problem, making up about 37% of households citywide. Nearly one-in-five city of La Crosse households have a severe need (3,930 or 18.9%). Levels of need in the counties are slightly lower; about 30% of households in both La Crosse and Monroe Counties have a housing problem and 14% have a severe housing problem.

Looking at need by householder race and ethnicity in the city of La Crosse shows that 35.4% of non-Latino white households have a housing problem and 18.2% have a severe housing problem. HUD defines a group as having a disproportionate need if its members experience housing needs at a rate that is ten percentage points or more above that of white households. In the city, three groups experience substantially disproportionate rates of housing need. More than three-quarters of Black households have a housing problem (76.3%), as do more than two-thirds of Latinos (67.1%) and 59% of households of other or multiple races. Looking at severe housing needs, Black and Latino households again face considerably

HOUSEHOLDS OF COLOR ARE MORE LIKELY TO HAVE A HOUSING NEED THAN WHITE HOUSEHOLDS IN THE CITY OF LA CROSSE AND LA CROSSE COUNTY.

IN THE CITY OF LA CROSSE, AFRICAN AMERICAN HOUSEHOLDS ARE TWICE AS LIKELY AS WHITE HOUSEHOLDS TO HAVE A HOUSING NEED.

higher rates of need at 39.8% and 38.3%, respectively, versus 18.2% for whites. These figures indicate that African-American households are more than twice as likely to have a housing or severe housing need than white households. Latinos are more than twice as likely to have a severe housing need than white households.

Black and Latino households, as well as households of other races, also have disproportionate rates of housing needs in La Crosse County. More than half of Black and Latino households have one or more housing problems (53.9% and 51.3%, respectively), compared to 28.3% of white households. About 40% of other race households have a need. In Monroe County, other race households are the only group that face housing needs at a disproportionate rate. Forty-one percent (41.1%) have a housing problem, compared to 30.2% of white households.

Table 8 also compares housing need rates for households by size and familial status. In the city of La Crosse, over one-fifth (22.5%) of small family households (1 to 4 people) have a housing problem, as do more than one-third (35.9%) of large family households (5 or more people). Non-family households have the highest rate of housing problems at 47.7%.

A similar pattern exists in La Crosse County. The share of households with housing problems is lowest for small families at 18.6% and highest for non-family households at 42.6%. In Monroe County, large family households are most likely to have a housing need (42.6%), followed by non-family households.

Table 9 examines only one dimension of housing need – severe cost burdens. In the city of La Crosse, 3,530 households (17.0%) spend more than half of their income on housing. Looking at severe cost burdens by householder race and ethnicity, two groups are disproportionately likely to have needs relative to whites. About one-third of Black households have a severe cost burden (32.1%) and 27.0% of Latinos, compared to 16.8% of white households. This is also true in La Crosse County, where 12.1% of white households have a severe cost burden compared to 23.1% of African Americans and 26.4% of Hispanics. No group in Monroe County faces a disproportionate rate of severe cost burdens relative to white households.

Non-family households are most likely to spend more than 50% of their income on housing in all three geographies. About one-quarter of non-family households in the city of La Crosse have a severe cost burden, as do 21.7% in La Crosse County and 14.8% in Monroe County. Fewer than 10% of small and large family households in each geography have a severe cost burden.

Table 9 also shows severe cost burdens by tenure. In the city of La Crosse, more than one-quarter of renter households (26.7%) spend more than 50% of their income on housing. In La Crosse County (including the city of La Crosse), 22.9% of renters have a severe cost burden. Looking at La Crosse County minus the city of La Crosse, however, a much lower share of renters spend more than 50% of income on housing (16.3%). This figure is comparable to the share of renters in Monroe County with a severe cost burden (15.5%).

Figure 14 shows cost burdens for owner households for several jurisdictions in the region. Medary has the highest rate of owner cost burdens, with 25.5% of owners spending more than 30% of their income on housing. Rates of cost burdens are also high both the town and city of Onalaska. In contrast, Shelby, Hamilton, and Holland all have less than 12% of owner households with a cost burden. The city of La Crosse falls in the middle, with 13.3% of owners spending more than 30% of income on housing. In

addition to impacting a household's ability to locate their, areas with high housing costs relative to income also face elevated risks of foreclosures in the face of another potential housing bubble.

Figures 15 through 18 map the prevalence of housing cost burdens in the city of La Crosse and La Crosse and Monroe Counties, along with population by race, ethnicity, and national origin. In the city, the highest rates of housing needs are in Grandview Emerson, where 65.8% of households have a cost burden, and Washburn and Downtown, where about half of households are cost burdened. Census tracts south of these neighborhoods also have relatively elevated incidence of housing needs, with cost burden rates in the mid 40s. These areas are also some of the more diverse neighborhoods in the city of La Crosse and La Crosse County.

Outside of the city of La Crosse, no census tracts in La Crosse County have high rates of housing cost burdens. In Monroe County, several areas have housing need rates in the mid 30s. These include the tracts covering western Sparta, eastern Tomah, the northeast corner of Monroe County, and one tract in the south central portion of the county. These areas are home to many of the County's Hispanic residents.

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TABLE 8 – DEMOGRAPHICS OF HOUSEHOLDS WITH DISPROPORTIONATE HOUSING NEEDS

Disproportionate Housing Needs	City of La Crosse			La Crosse County			Monroe County		
Households Experiencing any of the Four Housing Problems	# with problems	# of households	% with problems	# with problems	# of households	% with problems	# with problems	# of households	% with problems
Race and Ethnicity									
White, Non-Hispanic	6,915	19,510	35.4%	12,320	43,540	28.3%	5,050	16,715	30.2%
Black, Non-Hispanic	190	249	76.3%	210	390	53.9%	34	193	17.6%
Hispanic	149	222	67.1%	253	493	51.3%	72	291	24.7%
Asian or Pacific Islander, Non-Hispanic	249	574	43.4%	420	1,130	37.2%	12	55	21.8%
Native American, Non-Hispanic	29	129	22.5%	55	168	32.7%	62	157	39.5%
Other, Non-Hispanic	49	83	59.0%	93	223	41.7%	58	141	41.1%
Total	7,595	20,785	36.5%	13,350	45,950	29.1%	5,280	17,545	30.1%
Household Type and Size									
Family households, <5 People	1,950	8,655	22.5%	4,540	24,389	18.6%	2,430	10,260	23.7%
Family households, 5+ People	420	1,170	35.9%	1,095	3,435	31.9%	690	1,619	42.6%
Non-family households	5,230	10,965	47.7%	7,705	18,105	42.6%	2,165	5,675	38.2%
Households Experiencing any of the Four Severe Housing Problems	# with problems	# of households	% with problems	# with problems	# of households	% with problems	# with problems	# of Households	% with problems
Race and Ethnicity									
White, Non-Hispanic	3,555	19,510	18.2%	5,805	43,540	13.3%	2,430	16,715	14.5%
Black, Non-Hispanic	99	249	39.8%	109	390	28.0%	24	193	12.4%
Hispanic	85	222	38.3%	169	493	25.7%	61	291	14.6%
Asian or Pacific Islander, Non-Hispanic	148	574	25.8%	290	1,130	34.3%	8	55	21.0%
Native American, Non-Hispanic	15	129	11.6%	19	168	11.3%	34	157	21.7%
Other, Non-Hispanic	20	83	24.1%	39	223	17.5%	19	141	13.5%
Total	3,930	20,785	18.9%	6,425	45,950	14.0%	2,550	17,545	14.5%

Note: All % represent a share of the total population, except household type and size, which is out of total households. All La Crosse County figures include the city of La Crosse.

Source: CHAS

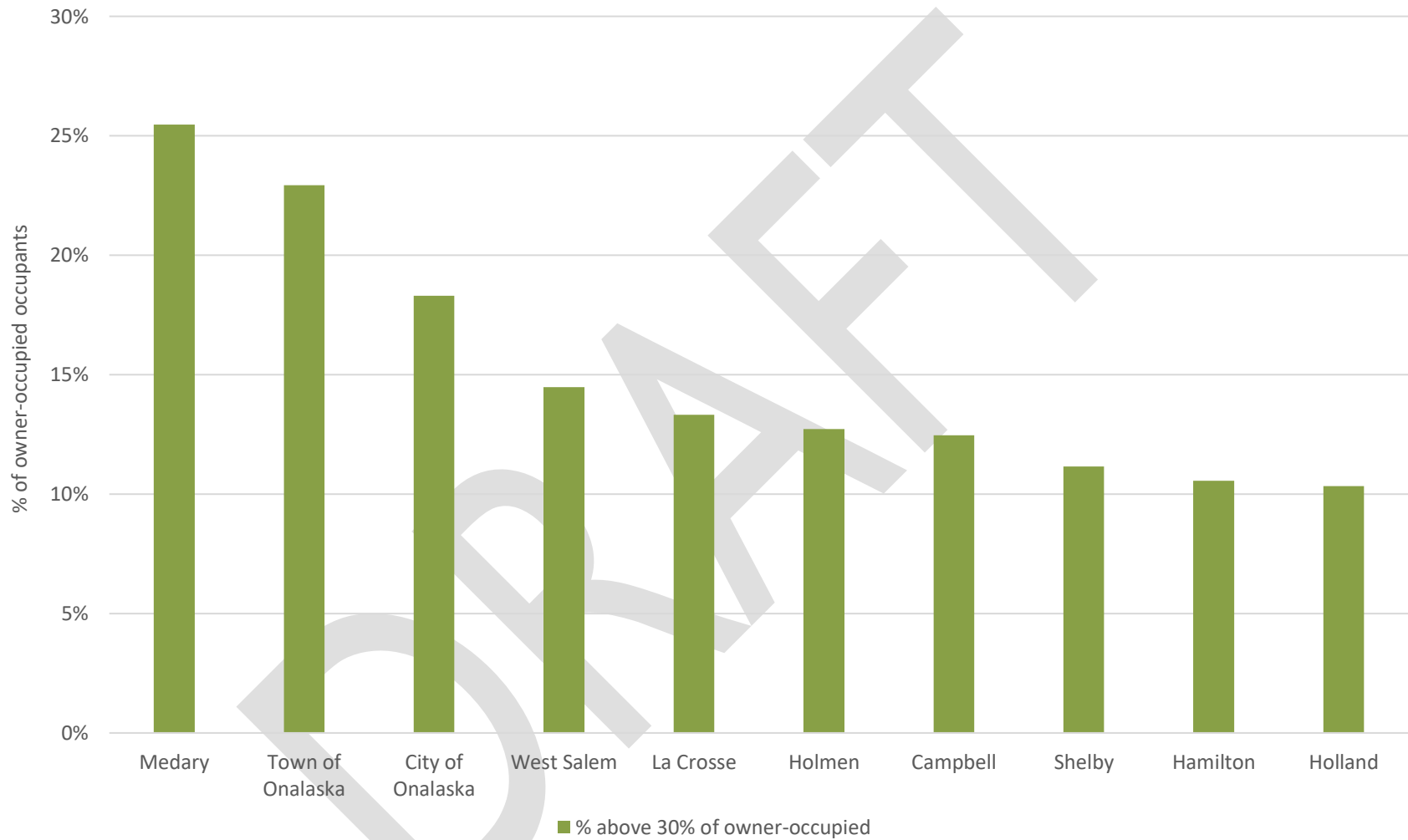
TABLE 9 – DEMOGRAPHICS OF HOUSEHOLDS WITH SEVERE HOUSING COST BURDENS

Households with Severe Cost Burdens	City of La Crosse			La Crosse County			Monroe County		
	# with problems	# of households	% with problems	# with problems	# of households	% with problems	# with problems	# of households	% with problems
Race and Ethnicity									
White, Non-Hispanic	3,280	19,510	16.8%	5,275	43,540	12.1%	1,745	16,715	10.4%
Black, Non-Hispanic	80	249	32.1%	90	390	23.1%	20	193	10.4%
Hispanic	60	222	27.0%	130	493	26.4%	35	291	12.0%
Asian or Pacific Islander, Non-Hispanic	75	574	13.1%	120	1,130	10.6%	8	55	14.6%
Native American, Non-Hispanic	15	129	11.6%	19	168	11.3%	30	157	19.1%
Other, Non-Hispanic	20	83	24.1%	24	223	10.8%	8	141	5.7%
Total	3,530	20,785	17.0%	5,658	45,950	12.3%	1,846	17,545	10.5%
Household Type and Size									
Family households, <5 People	804	8,655	9.3%	1,514	24,389	6.2%	868	10,260	8.5%
Family households, 5+ People	79	1,170	6.8%	215	3,435	6.3%	135	1,619	8.3%
Non-family households	2,645	10,965	24.1%	3,935	18,105	21.7%	840	5,675	14.8%
Tenure									
Renter households	2,730	10,220	26.7%	3,680	16,060	22.9%	864	5,580	15.5%
Owner households	795	10,565	7.5%	1,965	29,890	6.6%	980	11,965	8.2%
Total	3,525	20,785	17.0%	5,645	45,950	12.3%	1,844	17,545	10.5%

Note: Severe housing cost burden is defined as greater than 50% of income. All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households. The # households is the denominator for the % with problems, and may differ from the # households for the table on severe housing problems.

Source: CHAS

FIGURE 14 – SHARE OF OWNER OCCUPANTS PAYING 30% OR MORE OF INCOME ON HOUSING COSTS BY JURISDICTION



Source: American Community Survey

FIGURE 15 – HOUSING BURDEN AND RACE AND ETHNICITY IN THE CITY OF LA CROSSE

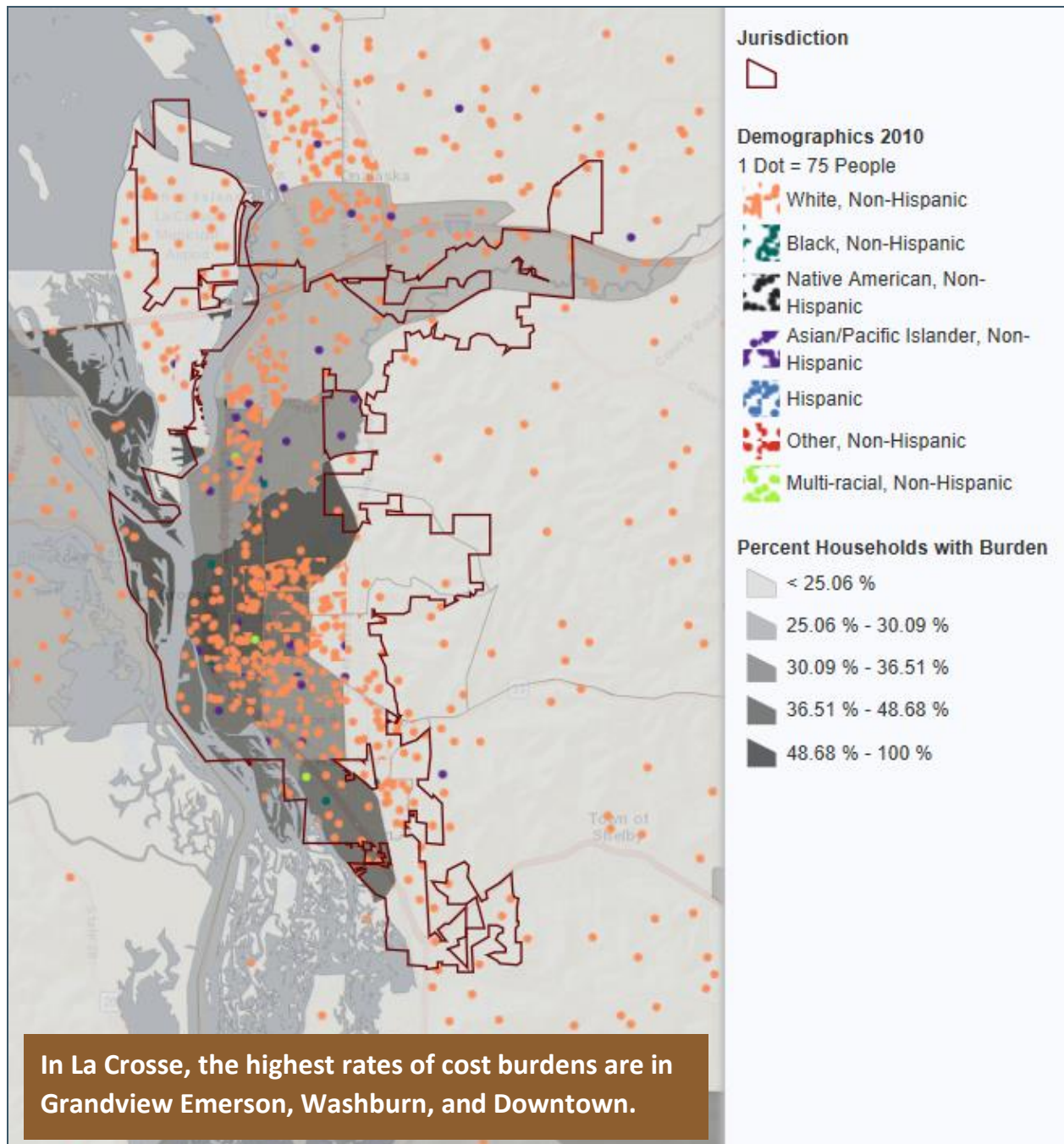


FIGURE 16 – HOUSING BURDENS AND NATIONAL ORIGIN IN THE CITY OF LA CROSSE

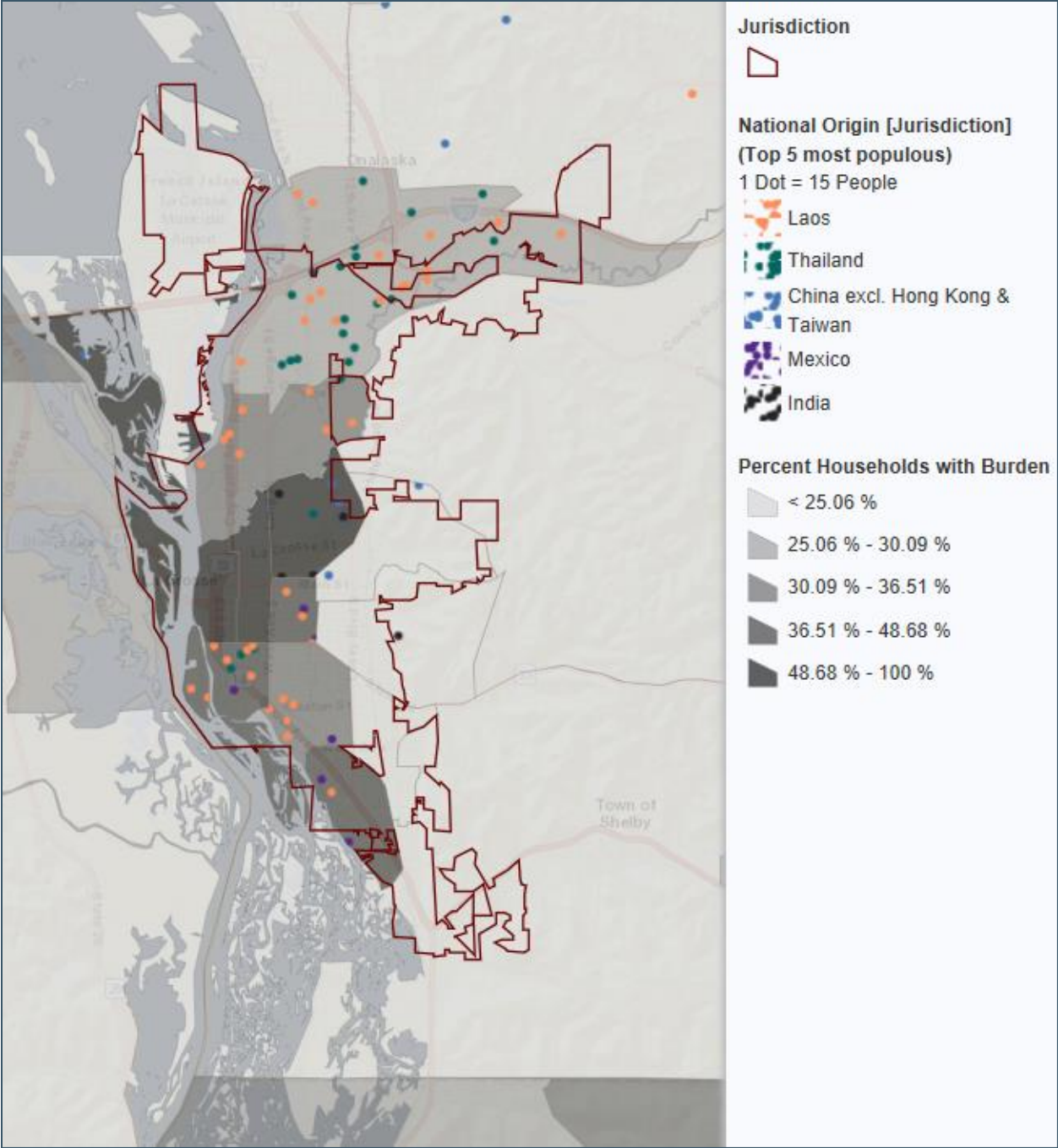


FIGURE 17 – HOUSING BURDEN AND RACE AND ETHNICITY IN LA CROSSE AND MONROE COUNTIES

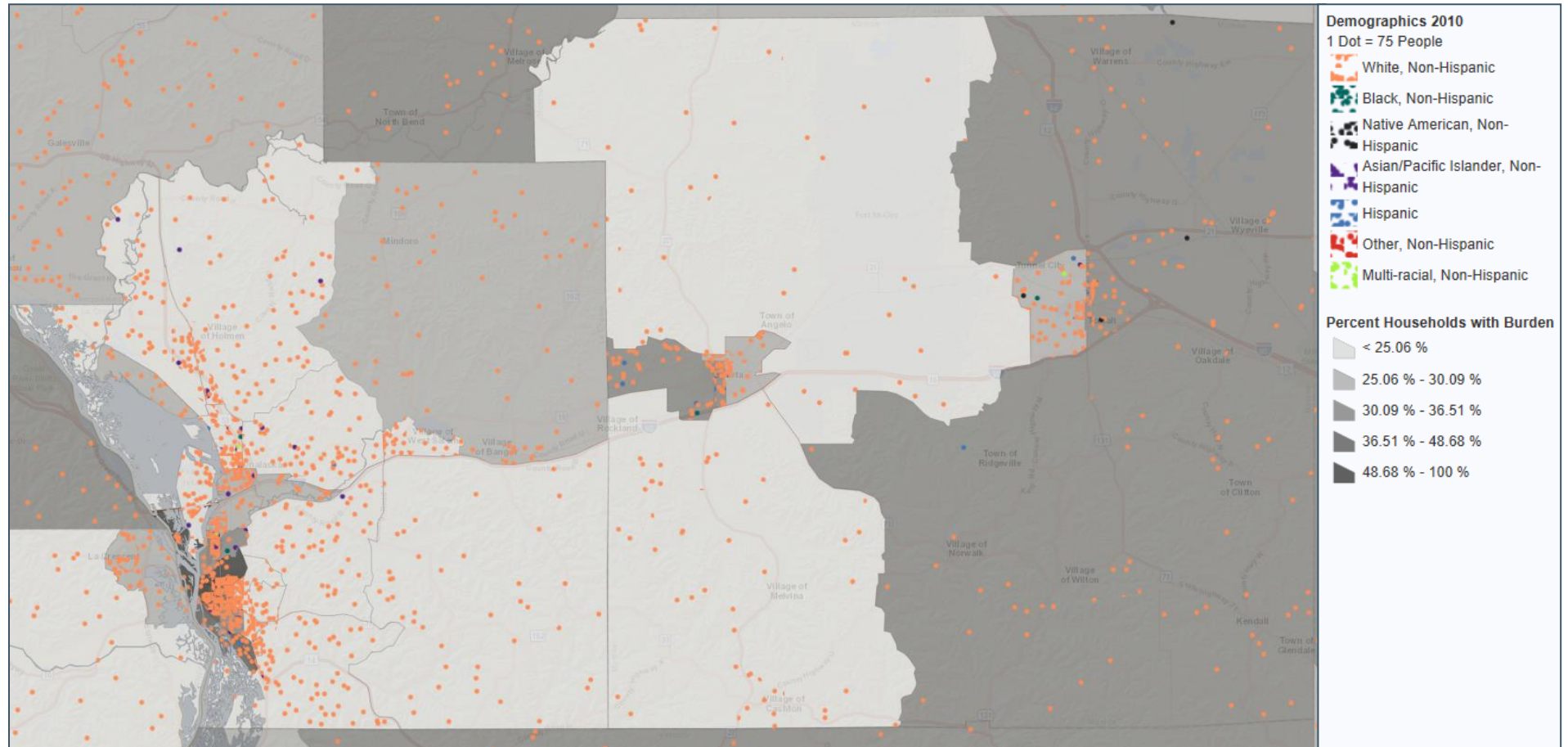
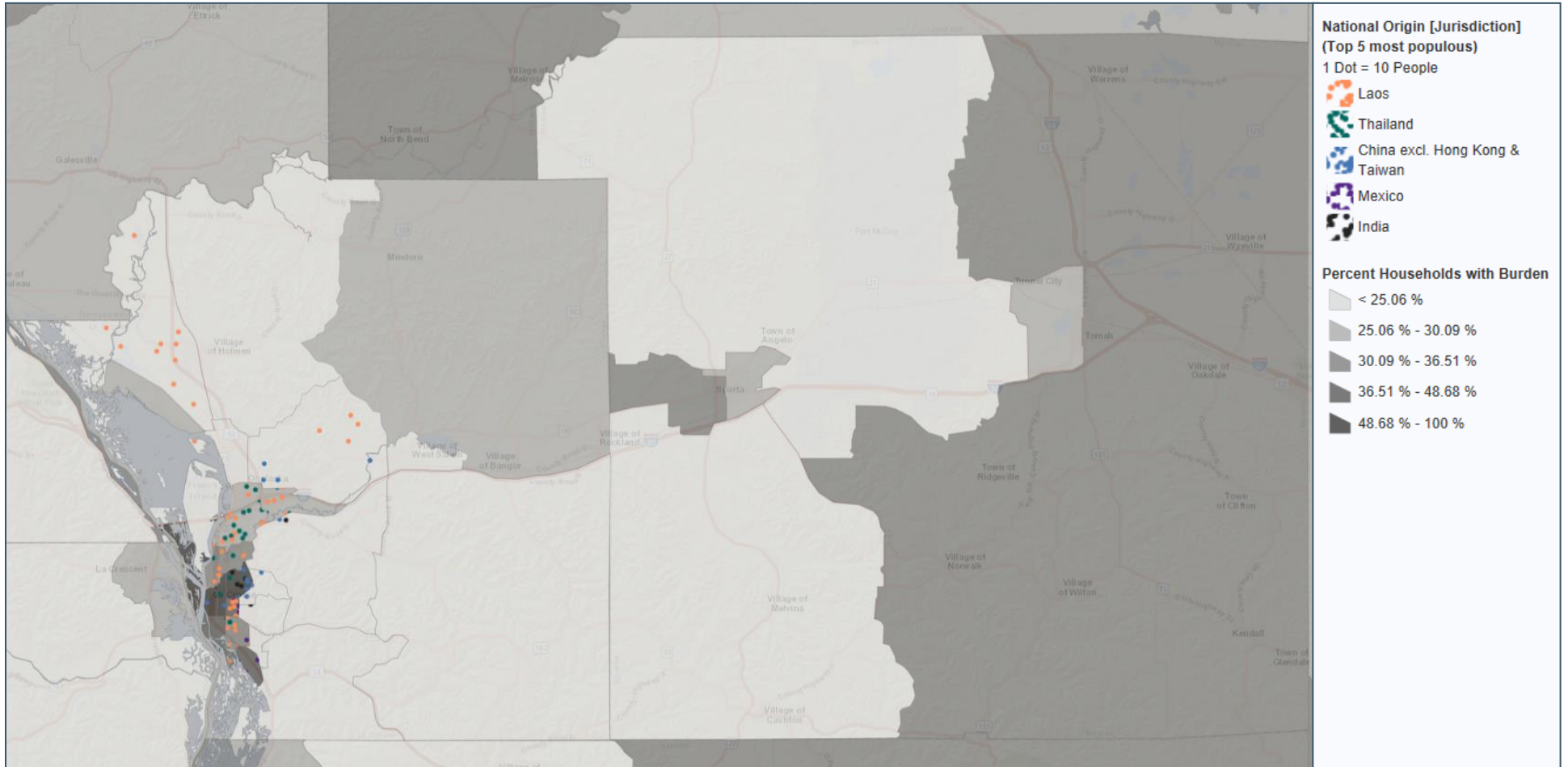


FIGURE 18 – HOUSING BURDENS AND NATIONAL ORIGIN IN LA CROSSE AND MONROE COUNTIES



HOMEOWNERSHIP AND LENDING

Homeownership is vital to a community's economic well-being. It allows the opportunity to build wealth, is generally associated with higher levels of civic engagement,¹⁴ and is correlated with positive cognitive and behavioral outcomes among children.¹⁵

Federal housing policies and discriminatory mortgage lending practices prior to the Fair Housing Act of 1968, along with continuing impediments to access, have had significant impacts on the homeownership rates of racial and ethnic minorities, particularly Black and Hispanic populations. The gap between the white and Black homeownership rate is the largest among racial and ethnic groups. In 2017, the U.S. Census Bureau reported a 21.6 percentage point gap in homeownership rate between white and Black households; just a 2.9 percentage point decrease since 1997.¹⁶

Homeownership trends have changed in recent years because of significant events in the housing market and labor force. The homeownership rate for Millennials (the generation born between 1981 and 1997) is 8 percentage points lower than the two previous generations, controlling for age. This discrepancy can be attributed to a multitude of factors ranging from preference to urban areas, cost of education and associated debt, changes in marriage and childbearing patterns, rising housing costs, and the current supply of affordable houses.¹⁷

The table that follows shows the number of owner and renter households, as well as the homeownership rate, by race and ethnicity for the city of La Crosse and La Crosse and Monroe Counties. In the city, about one-half of households own their homes (50.8%). For three groups, the rate is relatively close: 52.2% of white households own their homes, as do 45.7% of Latinos and 45.3% of Asians. The remaining three racial groups have remarkably lower homeownership rates. Less than 5% of Black, Native American and multiple or other race households own their homes, indicating a gap of at least 46 percentage points in comparison to the white homeownership rate.

In La Crosse and Monroe Counties, there is more variation in homeownership rates between racial and ethnic groups than in the city. Overall, about two-thirds of households in both counties own their homes (64.9% in La Crosse County and 67.5% in Monroe County). In La Crosse County, white households have the highest homeownership rate 66.2%. About one-half of Asian households (51.1%) and Hispanic households (48.6%) own their homes, a gap of about 15-18 percentage points from the white homeownership rate. Native Americans and households of other races own their homes at nearly half the rate of whites (33.1% and 35.0%, respectively), and African Americans have a homeownership rate of just 12.3%, a gap of 53.9 percentage points from white households.

¹⁴ Manturuk K, Lindblad M, Quercia R. "Homeownership and civic engagement in low-income urban neighborhoods: a longitudinal analysis." *Urban Affairs Review*. 2012;48(5):731–60.

¹⁵ Haurin, Donald R. et al. "The Impact of Homeownership on Child Outcomes." *Low-Income Homeownership Working Paper Series*. Joint Center for Housing Studies of Harvard University. October 2001, <http://www.jchs.harvard.edu/sites/default/files/liho01-14.pdf>.

¹⁶ U.S. Census Bureau. Homeownership Rates by Race and Ethnicity of Householder: 1994 to 2017.

¹⁷ Choi, Jung et al. "Millennial Homeownership: Why Is It So Low, and How Can We Increase It?" The Urban Institute. February 2000. https://www.urban.org/sites/default/files/publication/98729/millennial_homeownership_0.pdf

In Monroe Counties, white households again have the highest homeownership rate at 68.8%, followed by households of other races (at 58.5%) and Asian households (at 57.3%). Latinos and Native Americans show more significant gaps in homeownership of 18.5 and 26.9 percentage points, respectively, relative to whites. Finally, estimates show that none of the 130 African American households in Monroe County own their homes.

Overall, tenure data indicates that households of color are less likely than white households to own their homes. While homeownership gaps depend on race, ethnicity, and geography, African American households have the lowest homeownership rates in all three areas, and Native American households have the second lowest. Generally, Asian and Latino households have the lowest homeownership gaps relative to white households, with rates ranging from the mid 40s to mid 50s.

The maps that follow show the share of owners and renters by census tract in the city of La Crosse and La Crosse and Monroe Counties. In the city, renting is most common in the central city. More than three-quarters of households are renters in four city of La Crosse neighborhoods: Washburn (87.7%), Downtown (87.9%), Grandview-Emerson (82.6%), and Powell-Poage-Hamilton (78.8%). Homeownership predominates in Bluffside, Weigent-Hogan, Holy Trinity-Longfellow, and the residential area immediately south of Holy Trinity-Longfellow. More than 85% of households in these areas own their homes.

In La Crosse County outside of the city of La Crosse, the large majority of households are owners. Homeownership is most common in the tract surrounding the village of Holmen and the three tracts south of I-90; more than 80% of households in these areas own their homes. In Monroe County, three tracts that cover large portions of the county have homeownership rates over 80%. They include the northwestern tract surrounding the village of Angelo and Fort McCoy, the southwestern tract surrounding the villages of Melvina and Cashton, and the southeastern tract that covers Kendall, Clifton, and Oakdale. Renting is more common in the cities of Sparta and Tomah – in the two tracts covering Sparta, 53.6 and 58.6% of households rent their homes. In the two tracts around Tomah, 46.6 and 57.6% of households are renters. Generally, in the region, more urban and higher-density areas have higher shares of rental housing, while homeownership is most common in the rural parts of the counties.

TABLE 10 – HOMEOWNERSHIP AND RENTAL RATES BY RACE AND ETHNICITY

Race/Ethnicity	City of La Crosse			La Crosse County			Monroe County		
	Owner Households	Renter Households	Home-ownership Rate	Owner Households	Renter Households	Home-ownership Rate	Owner Households	Renter Households	Home-ownership Rate
Non-Hispanic									
White	10,185	9,330	52.2%	28,970	14,795	66.2%	11,640	5,285	68.8%
Black	0	245	0.0%	40	284	12.3%	0	130	0.0%
Asian	265	320	45.3%	674	645	51.1%	43	32	57.3%
Native American	4	120	3.2%	52	105	33.1%	62	86	41.9%
Other	4	80	4.8%	78	145	35.0%	103	73	58.5%
Hispanic	105	125	45.7%	269	285	48.6%	169	167	50.3%
Total	10,565	10,220	50.8%	30,083	16,259	64.9%	12,017	5,773	67.5%

Note: Data presented are number of households, not individuals.

Source: CHAS

FIGURE 19 – SHARE OF HOUSEHOLDS THAT ARE RENTERS IN THE CITY OF LA CROSSE

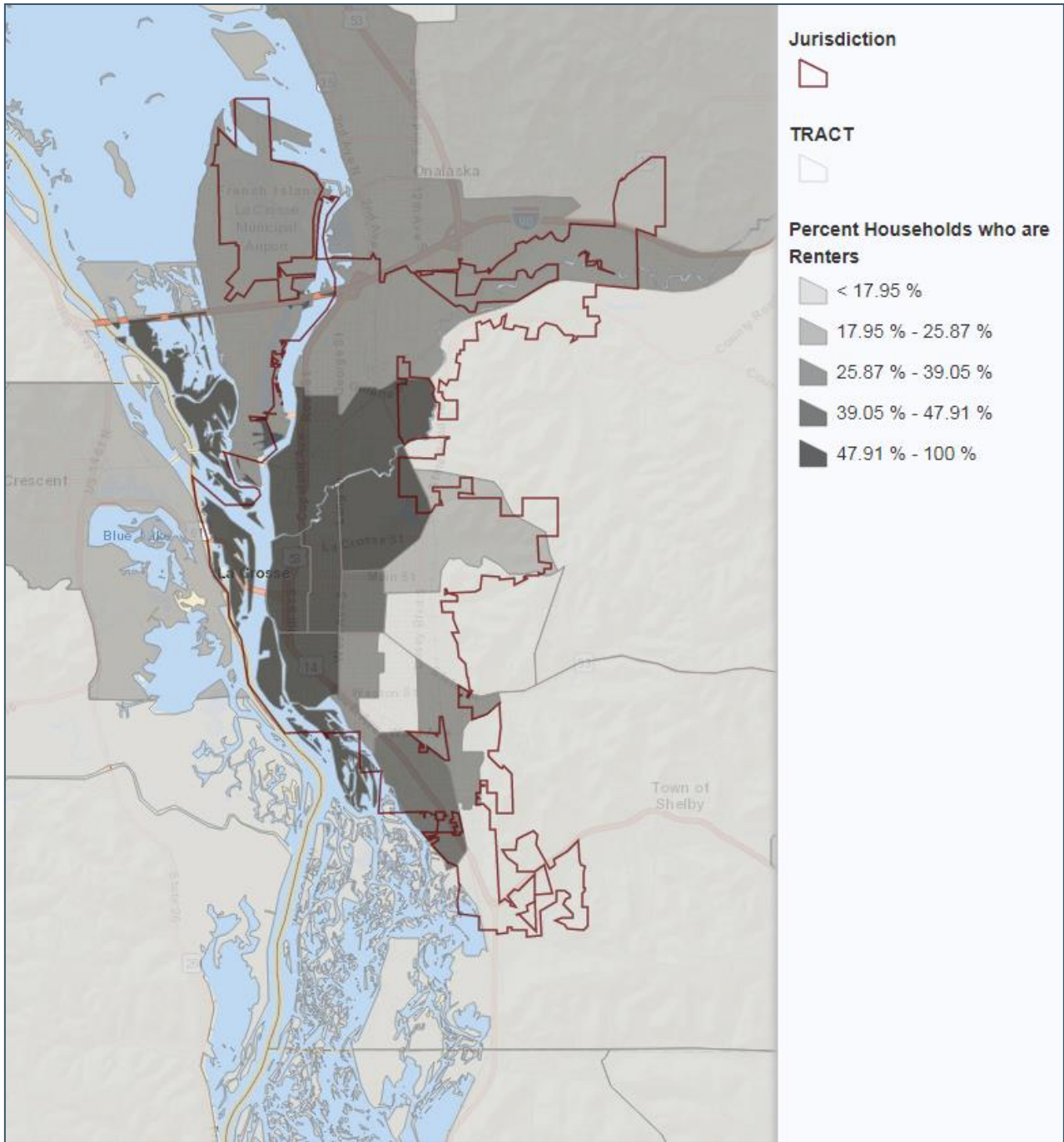


FIGURE 20 – SHARE OF HOUSEHOLDS THAT ARE OWNERS IN THE CITY OF LA CROSSE

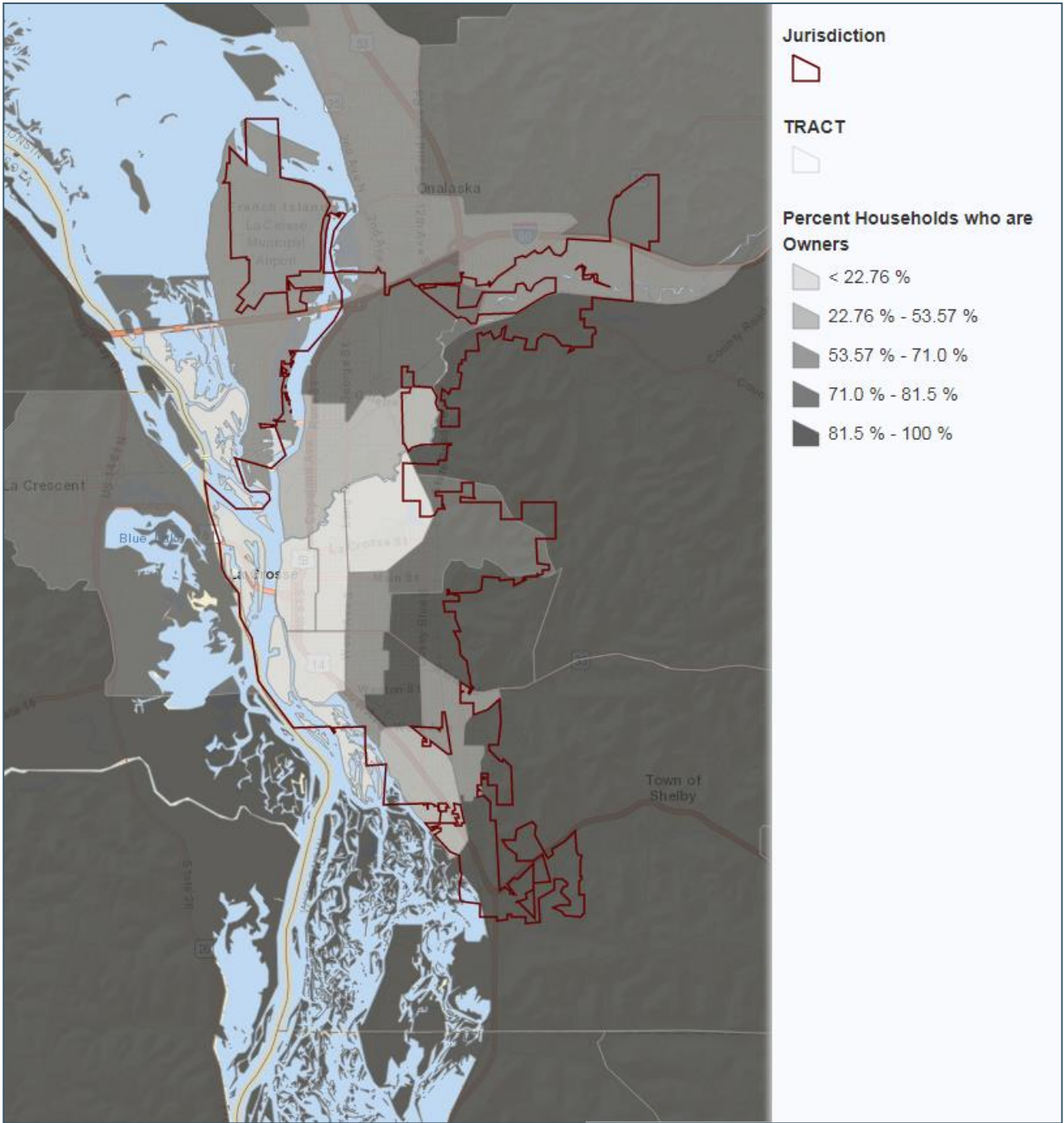


FIGURE 21 – SHARE OF HOUSEHOLDS THAT ARE RENTERS IN LA CROSSE AND MONROE COUNTIES

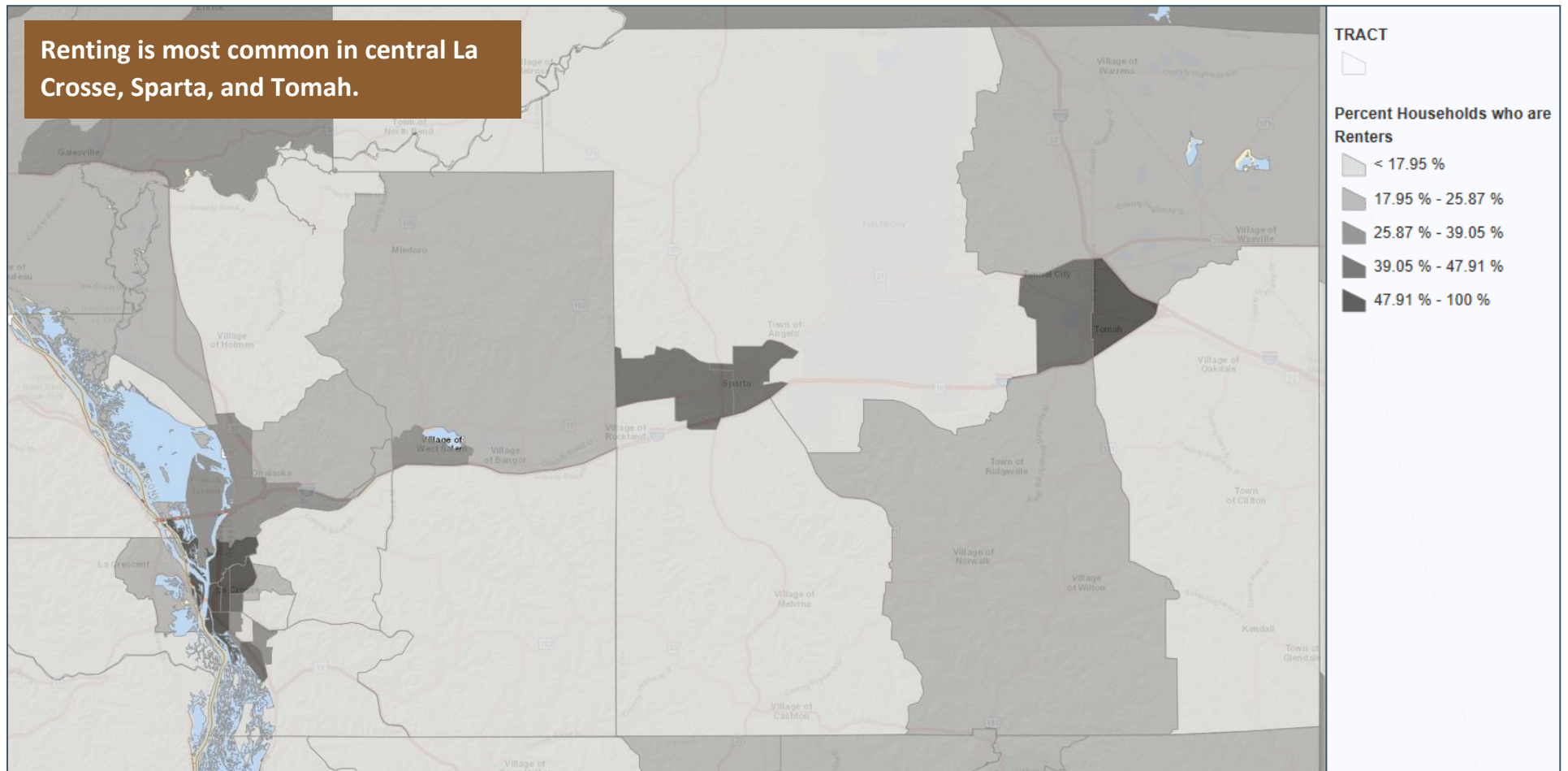
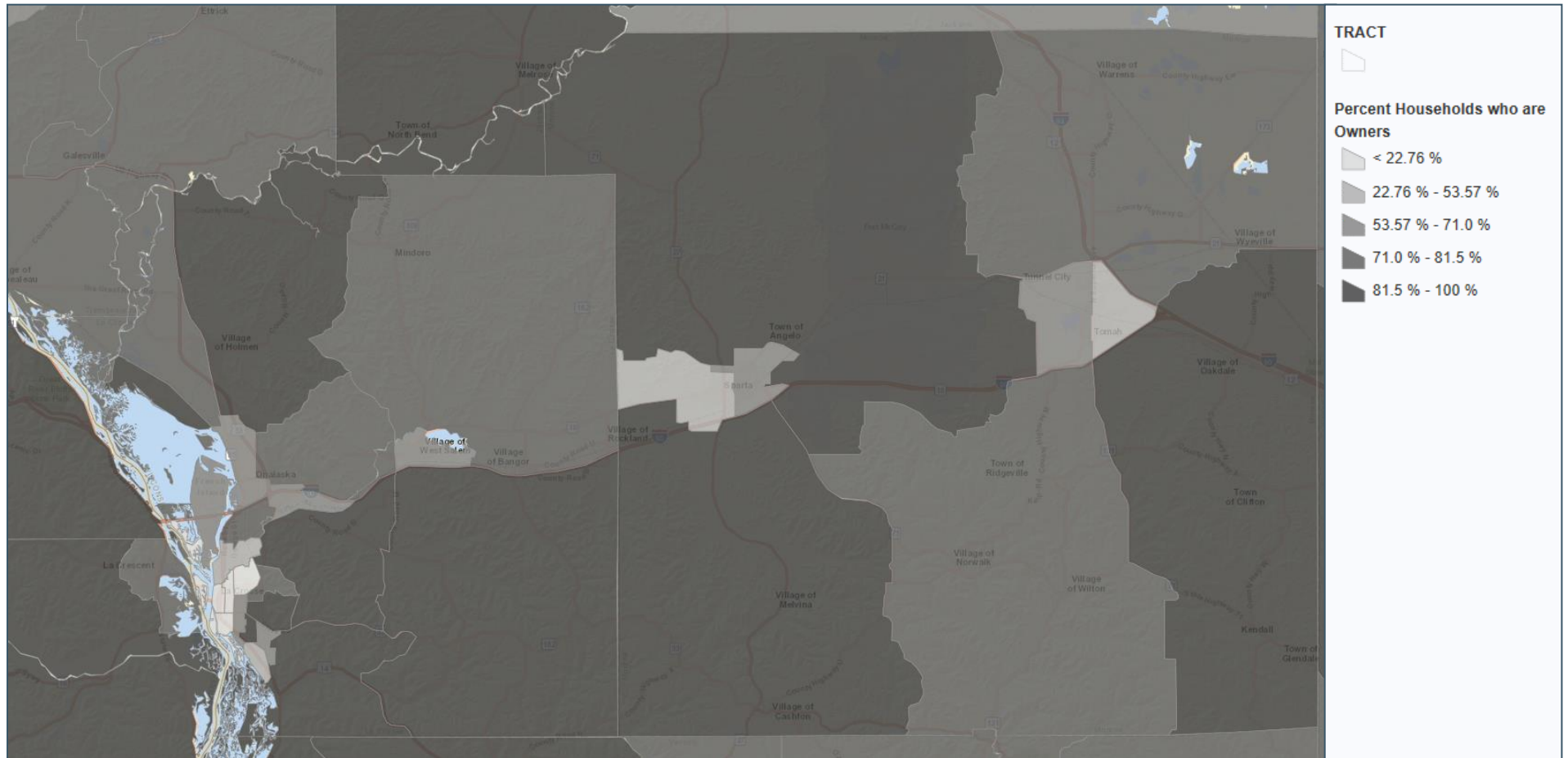


FIGURE 22 – SHARE OF HOUSEHOLDS THAT ARE OWNERS IN LA CROSSE AND MONROE COUNTIES



Mortgage Lending

Prospective homebuyers need access to mortgage credit, and programs that offer homeownership should be available without discrimination. The proceeding data and analysis assesses the degree to which the housing needs of local residents are being met by home loan lenders.

The Home Mortgage Disclosure Act of 1975 (HMDA) requires most mortgage lending institutions to disclose detailed information about their home-lending activities annually. The objectives of the HMDA include ensuring that borrowers and loan applicants are receiving fair treatment in the home loan market.

The national 2017 HMDA data consists of information for 12.1 million home loan applications reported by 5,852 home lenders, including banks, savings associations, credit unions, and mortgage companies.¹⁸ HMDA data, which is provided by the Federal Financial Institutions Examination Council (FFIEC), includes the type, purpose, and characteristics of each home mortgage application that lenders receive during the calendar year. It also includes additional data related to those applications including loan pricing information, action taken, property location (by census tract), and information about loan applicants such as sex, race, ethnicity, and income.

The source for this analysis is tract-level HMDA data for census tracts in La Crosse and Monroe Counties (including the city of La Crosse) for the years 2013 through 2017, which includes a total of 9,897 home purchase loan application records and 12,512 mortgage refinance application records.¹⁹ Within each record, some data variables are 100% reported: “Loan Type,” “Loan Amount,” and “Action Taken,” for example, but other data fields are less complete. According to the HMDA data, these records represent applications taken entirely by mail, Internet, or phone in which the applicant declined to identify their sex, race and/or ethnicity. Missing race, ethnicity, and sex data are potentially problematic for an assessment of discrimination. If the missing data are non-random there may be adverse impacts on the accuracy of the analysis. Ideally, any missing data for a specific data variable would affect a small proportion of the total number of loan records and therefore would have only a minimal effect on the results.

There is no requirement for reporting reasons for a loan denial, and this information was not provided for about 21% of home purchase loan denials and 30% of refinance loan denials. Further, the HMDA data does not include a borrower’s total financial qualifications such as an actual credit score, property type and value, loan-to-value ratio, or loan product choices. Research has shown that differences in denial rates among racial or ethnic groups can arise from these credit-related factors not available in the HMDA data.²⁰ Despite these limitations, the HMDA data play an important role in fair lending enforcement. Bank examiners frequently use HMDA data in conjunction with information from loan files to assess an institution’s compliance with fair lending laws.

¹⁸ Consumer Financial Protection Bureau. “FFIEC Announces Availability of 2017 Data on Mortgage Lending.” May 7, 2018. <https://www.consumerfinance.gov/about-us/newsroom/ffiec-announces-availability-2017-data-mortgage-lending/>

¹⁹ Includes applications for the purchase or refinance of one-to-four family dwellings in which the property is or will be occupied as the owner’s principal dwelling and in which the mortgage will be secured as first lien. Includes applications for conventional, FHA-insured, VA-guaranteed, and FSA/RHS-guaranteed loans.

²⁰ R. B. Avery, Bhutta N., Brevoort K.P., and Canne, G.B. 2012. “The Mortgage Market in 2011: Highlights from the Data Reported Under the Home Mortgage Disclosure Act.” Board of Governors of the Federal Reserve System. Federal Reserve Bulletin, Vol. 98, No. 6.

Complete information regarding applicant race, ethnicity, and income is available for 9,334 home purchase loan applications in La Crosse and Monroe Counties (94.3% of the total loan records). Most applicants were white (94.4%); Asian households made up 2.8% of the applicant pool, Latino households made up 1.3%, and Black households comprised 0.5%. These shares are roughly in line with the breakdown of households by race and ethnicity in the region overall, where 94.6% of householders are white, 2.2% are Asian, 1.4% are Latino, and 0.7% are Black. The table below shows loan approval rates for completed loan applications by race and ethnicity at various income levels.²¹ Not included in these figures are applications that were withdrawn or closed due to incompleteness such that no decision was made regarding approval or denial.

At low incomes, loan denial rates differed by race and ethnicity, ranging from 15.0% for white applicants to a rate more than twice that – 34.8% – for Black applicants. At middle incomes, disparities were less pronounced. About one-tenth of both white, Black, and Latino households were denied a home loan, while denial rates for Asian and other race applicants were somewhat higher (11.8% and 15.4%, respectively). At the highest income level, denial rates were close for white, Asian, and Latino applicants (5-6%), while applicants of other races and Black applicants were considerably more likely to be denied a loan (13.6% and 22.2%, respectively). The low number of applications from some racial groups at various income levels, however, means that each loan decision has a more marked impact on that group's denial rate. Overall, disregarding income, about one-tenth of white applicants were denied a home loan (10.6%) compared to 16.4% of applicants of color. African American and other race applicants had the greatest disparity in lending access, with overall home purchase loan denial rates of 25.6% and 19.0%, respectively.

The table also provides data for home refinance loan applications. Information regarding race, ethnicity, and income is available for 10,716 refinance applications, or 85.6% of the total refinance applications in La Crosse and Monroe Counties. This data also shows some disparity in denial rates by race and ethnicity. Denial rates for white applicants range from about 15 to 28%, depending on income. At each income level, households of color overall have higher refinance loan denial rates than white applicants, however, this is not true for each group individually. At the low income level, the four African American loan applicants had a denial rate of 25.0%, relatively on par with that of white applicants. At middle incomes, denial rates are close for white and Latino applicants (19.5% and 16.1%, respectively) and, at high incomes, Asian applicants have a lower denial rate than whites (9.3% and 14.8%, respectively). Overall, applicants of color were denied refinance loans at a rate that was 1.5 times that of white applicants (31.7% versus 20.9%). Black and other race applicants had the highest overall denial rates, both in the 40s, although these are based on a relatively small number of observations – fewer than 50 – in each group.

²¹ The low-income category includes applicants with a household income at or below 80% of area median family income (MFI). The middle income range includes applicants with household incomes from 81% to 120% MFI, and the upper income category consists of applicants with a household income above 120% MFI.

TABLE 11 – LOAN APPROVAL RATES BY RACE AND ETHNICITY IN LA CROSSE AND MONROE COUNTIES, 2013 – 2017

Applicant Income		Applicant Race and Ethnicity					All Applicants
		Non-Latino				Latino	
		White	Black	Asian	Other		
Home Purchase Loans							
Low Income	Completed Applications	3,107	23	104	31	40	3,305
	Denial Rate	15.0%	34.8%	22.1%	25.8%	22.5%	15.5%
Middle Income	Completed Applications	2,239	11	68	26	29	2,373
	Denial Rate	9.2%	9.1%	11.8%	15.4%	10.3%	9.4%
High Income	Completed Applications	2,642	9	56	22	32	2,761
	Denial Rate	5.6%	22.2%	5.4%	13.6%	6.3%	5.7%
All Applicants	Completed Applications	7,988	43	228	79	101	8,439
	Denial Rate	10.3%	25.6%	14.9%	19.0%	13.9%	10.6%
Home Refinance Loans							
Low Income	Completed Applications	3,110	4	72	19	37	3,242
	Denial Rate	28.3%	25.0%	37.5%	57.9%	37.8%	28.8%
Middle Income	Completed Applications	2,398	6	40	13	31	2,488
	Denial Rate	19.5%	50.0%	32.5%	38.5%	16.1%	19.9%
High Income	Completed Applications	3,206	16	43	14	30	3,309
	Denial Rate	14.8%	50.0%	9.3%	21.4%	30.0%	15.0%
All Applicants	Completed Applications	8,714	26	155	46	98	9,039
	Denial Rate	20.9%	46.2%	28.4%	41.3%	28.6%	21.3%

Note: “Completed applications” includes applications that were approved but not accepted, denied, and approved with a loan originated. It does not include applications withdrawn by the applicant or closed for incompleteness.

Data Source: FFIEC 2013-2017 Home Mortgage Disclosure Act Data, Accessed via www.consumerfinance.gov/data-research/hmda

The table on the following page identifies reasons for denials by applicant race and ethnicity. A reason was provided in about 80% of home purchase loan denials and 70% of refinance loan denials. For purchase loans, credit history, which speaks to a household’s overall long-term ability to repay loans, was the most common denial reason for white, Black, Asian, and Latino applicants (triggering between 31% and 55% of denials). Debt to income ratio and collateral were also common denial reasons regardless of race and ethnicity. For refinance loans, credit history, debt to income ratio, and collateral were also common reasons for denials regardless of applicant race and ethnicity.

While data regarding reasons for loan denials may provide relevant data to help financial counseling agencies better serve first time homebuyers, it does not show strong differences by race and ethnicity.

TABLE 12 – REASONS FOR LOAN DENIAL BY APPLICANT RACE AND ETHNICITY IN LA CROSSE AND MONROE COUNTIES, 2013-2017

Reason for Denial	Applicant Race and Ethnicity					All Applicants
	Non-Latino				Latino	
	White	Black	Asian	Other		
Home Purchase Loans						
Denial reason provided	79.0%	81.8%	88.2%	80.0%	78.6%	79.4%
Collateral	14.3%	0.0%	20.6%	13.3%	7.1%	14.2%
Credit application incomplete	4.4%	0.0%	0.0%	6.7%	0.0%	4.1%
Credit history	31.4%	45.5%	55.9%	26.7%	42.9%	32.6%
Debt to income ratio	25.2%	36.4%	26.5%	33.3%	14.3%	25.3%
Employment history	5.0%	0.0%	5.9%	6.7%	0.0%	4.9%
Insufficient cash	6.8%	9.1%	0.0%	6.7%	0.0%	6.5%
Mortgage insurance denied	0.1%	0.0%	0.0%	0.0%	0.0%	0.1%
Other	7.3%	9.1%	2.9%	6.7%	21.4%	7.4%
Unverifiable information	3.9%	9.1%	0.0%	6.7%	0.0%	3.8%
Reason not provided	21.0%	18.2%	11.8%	20.0%	21.4%	20.6%
Total denials	819	11	34	15	14	893
Home Refinance Loans						
Denial reason provided	69.6%	75.0%	84.1%	52.6%	64.3%	70.0%
Collateral	14.4%	25.0%	18.2%	0.0%	10.7%	14.3%
Credit application incomplete	6.5%	8.3%	4.5%	0.0%	10.7%	6.4%
Credit history	28.0%	41.7%	36.4%	31.6%	25.0%	28.3%
Debt to income ratio	22.3%	8.3%	36.4%	10.5%	21.4%	22.4%
Employment history	1.0%	0.0%	2.3%	0.0%	0.0%	1.0%
Insufficient cash	1.8%	0.0%	2.3%	5.3%	3.6%	1.9%
Mortgage insurance denied	0.2%	0.0%	0.0%	0.0%	0.0%	0.2%
Other	6.9%	0.0%	2.3%	5.3%	7.1%	6.8%
Unverifiable information	2.7%	0.0%	2.3%	5.3%	0.0%	2.7%
Reason not provided	30.1%	25.0%	15.9%	47.4%	35.7%	30.0%
Total denials	1,822	12	44	19	28	1,925

Note: Some applications were denied for multiple reasons; thus, the total number of denial reasons reported are greater than the total number of loans denied.

Data Source: FFIEC 2013-2017 Home Mortgage Disclosure Act Data, Accessed via www.consumerfinance.gov/data-research/hmda

The final analysis of HMDA data looks at loan outcomes by census tract. The two maps that follow show number of applications and denial rates by census tract for home purchase loans and mortgage refinance loans. For home purchase loans, most applications were made in western La Crosse County, including the tracts that cover the cities of La Crosse and Onalaska, and the village of Holmen. In Monroe County, the highest concentration of home purchase loan applications were in and around Sparta and Tomah.

FIGURE 23 – HOME PURCHASE LOAN APPLICATIONS AND DENIAL RATES IN LA CROSSE AND MONROE COUNTIES, 2013-2017

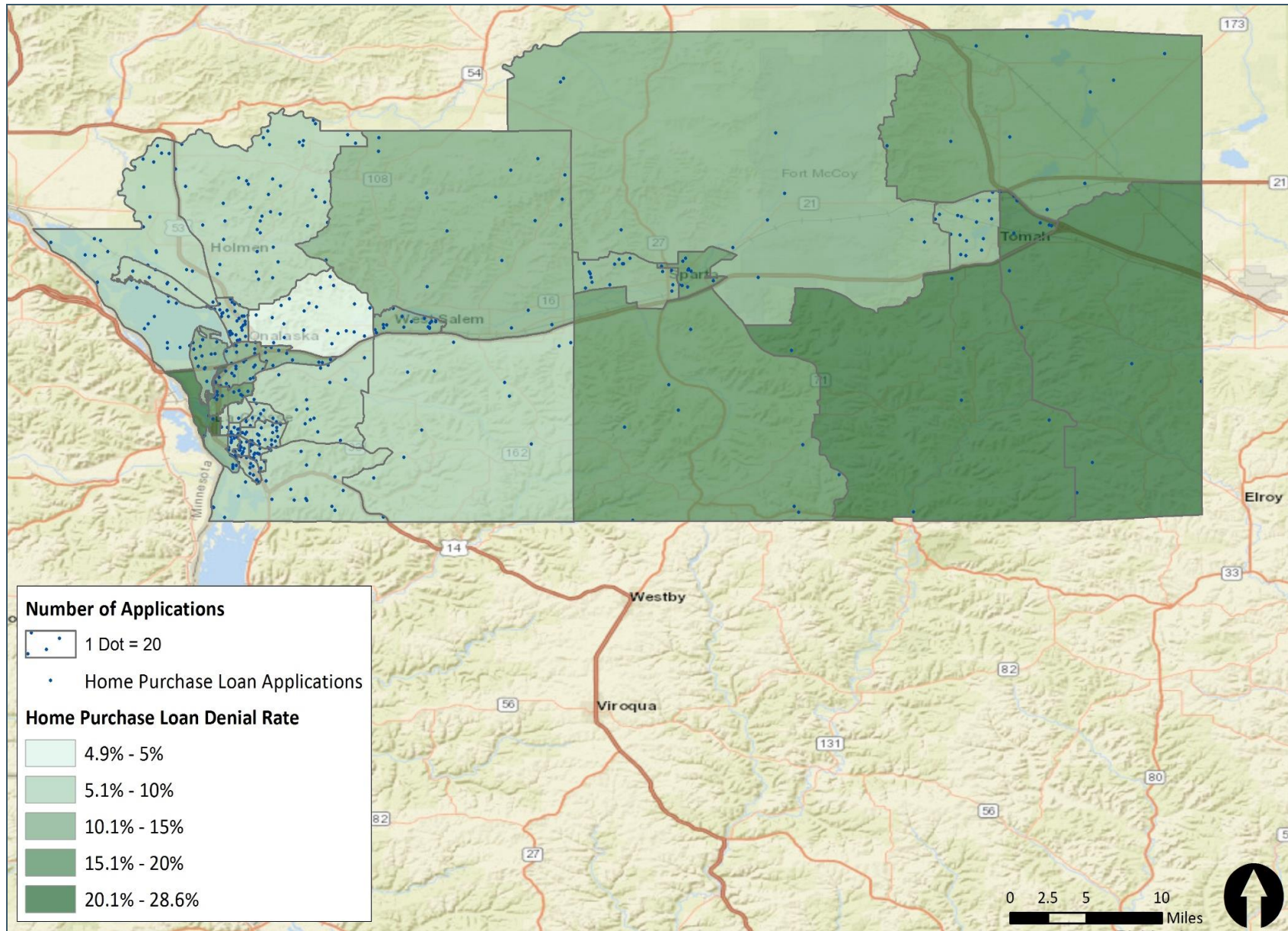
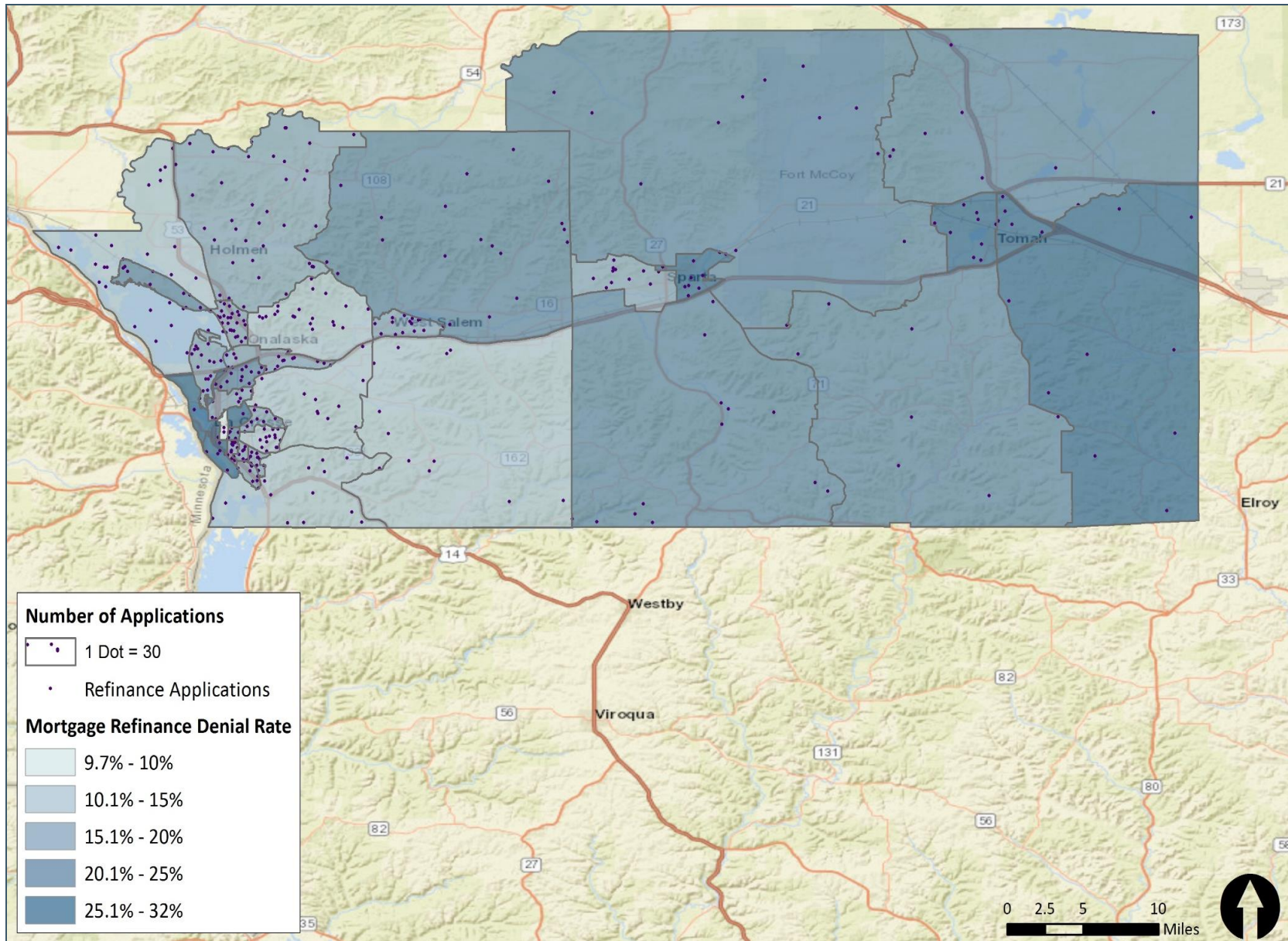


FIGURE 24 – MORTGAGE REFINANCE LOAN APPLICATIONS AND DENIAL RATES IN LA CROSSE AND MONROE COUNTIES, 2013-2017



For home purchase loans, denial rates were highest in downtown La Crosse (census tract 3) and in the southeastern quadrant of Monroe County, including Tomah (census tracts 9506, 9507, and 9508). In each of these areas, more than 20% of applications for home purchase loans were denied.

Looking at mortgage refinance applications, western La Crosse County was again where most activity occurred. The greatest concentrations of applications were in the city of La Crosse, followed by tracts that cover Holmen, Onalaska, and West Salem. In Monroe County, the largest shares of refinance applications were in the tracts covering Sparta and Tomah.

In seven tracts, the refinance application rate was over 25%. These areas include downtown La Crosse (tract 3), Washburn and Powell-Poage-Hamilton (tract 9) and the northern part of Grandview-Emerson (tract 5). In Monroe County, the eastern part of Sparta (tract 9504), Tomah (tracts 9505 and 9506) and the area southeast of Tomah (tract 9507) all had denial rates above 25%.

Overall, the maps indicate greater difficulty in obtaining loans for home purchase or mortgage refinances in downtown La Crosse, Tomah, and unincorporated southeast Monroe County.

ZONING, AFFORDABILITY, AND HOUSING CHOICE

Comprehensive land use planning is a critical process by which communities address a myriad of public policy issues such as housing, transportation, health, recreation, environmental protection, commercial and retail services, and land values, and address how the interconnection and complexity of these issues can ultimately impact the entire municipality. “The land use decisions made by a community shape its very character – what it’s like to walk through, what it’s like to drive through, who lives in it, what kinds of jobs and businesses exist in it, how well the natural environment survives, and whether the community is an attractive one or an ugly one.”²² Likewise, decisions regarding land use and zoning have a direct and profound impact on affordable housing and fair housing choice, shaping a community or region’s potential diversity, growth, and opportunity for all. Zoning determines where housing can be built, the type of housing that is allowed, and the amount and density of housing that can be provided. Zoning also can directly or indirectly affect the cost of developing housing, making it harder or easier to accommodate affordable housing.

Local government in Wisconsin is administered at the city, town, village, and county levels, which has a tendency to result in the centering of parochial interests rather than a regional mindset. While housing, employment, and transportation infrastructure must necessarily be interconnected throughout a region, small units of local government each advocating their own individual needs has led to phenomena such as sprawling land development patterns and disconnected transportation policy that weaken the region’s overall sustainability and impact housing and transportation costs. The following sections will explore (I) how Wisconsin state law impacts local land use and zoning authority and decision-making and (II) how the zoning and land use codes of the City of La Crosse, La Crosse County, and Monroe County impact housing affordability and fair housing choice within those borders.

²² John M. Levy. *Contemporary Urban Planning, Eighth Edition*. Upper Saddle River, NJ: Pearson Prentice Hall, 2009.

Intersection of Local Zoning with Federal and State Fair Housing Laws

One goal of zoning is to balance individual property rights with the power of government to promote and protect the health, safety, and general welfare of the overall community. Zoning codes regulate how a parcel of land in a community may be used and the density of development. Local governments may divide their jurisdiction into zoning districts by adopting a zoning map consistent with the comprehensive plan; define categories of permitted and special/conditional uses for those districts; and establish design or performance standards for those uses. Zoning may regulate the height, shape, and placement of structures and lot sizes or shapes. Jurisdictions also can expressly prohibit certain types of uses within zoning districts.²³ In this way, local ordinances may define the type and density of housing resources available to residents, developers, and other organizations within certain areas, and as a result influence the availability and affordability of housing.

While local governments have the power to enact zoning and land use regulations, that power is limited by state and federal fair housing laws (e.g., the Wisconsin Open Housing Law (WOHL), the federal FHAA, the Americans with Disabilities Act, constitutional due process and equal protection), which apply not only to private individuals but also to government actions. See H.R. Rep. No. 100–711, at 24 (1988), reprinted in 1988 U.S.C. C.A.N. 2173, 2185 (showing that Congress' intent was that the amendments "would also apply to state or local land use and health and safety laws, regulations, practices or decisions which discriminate against individuals with handicaps"). In a recent landmark disparate impact case under the FHA, the Supreme Court affirmed that part of the FHA's central purpose is to eradicate discriminatory housing practices, including specifically unlawful zoning laws and other housing restrictions. *Tex. Dep't of Hous. & Cmty. Affairs v. Inclusive Cmty. Project, Inc.*, 135 S.Ct. 2507, 2521-2522 (2015) (citing multiple published court opinions involving challenges to local zoning and land use decisions and stating: "Suits targeting such practices reside at the heartland of disparate-impact liability.") Besides intentional discrimination and disparate treatment, discrimination under the FHA also includes

[A] refusal to make reasonable accommodations in rules, policies, practices, or services, when such accommodations may be necessary to afford such person equal opportunity to use and enjoy a dwelling. FHA § 804(f)(3)(b).

This provision has been held to apply to zoning and land use decisions by local governments. See, e.g., *Howard v. City of Beavercreek*, 276 F.3d 802 (6th Cir. 2001) (finding Section 804(f)(3)(b) "creates an affirmative duty on municipalities . . . to afford its disabled citizens reasonable accommodations in its municipal zoning practices if necessary to afford such persons equal opportunity in the use and enjoyment of their property"); *Smith & Lee Assocs., Inc. v. City of Taylor*, 102 F.3d 781, 794-795 (6th Cir. 1996) (holding that city had violated the FHAA by failing to allow adult foster care homes to operate in areas zoned only for single-family neighborhoods).

²³ Local government power to regulate land use derives from the state's expressly delegated police power. The Local Government Comprehensive Planning Enabling Act of 1994 replaced the 1967 Act and repealed prior statutes and required all local comprehensive plans, zoning and land development ordinances conform to the 1994 Act by December 31, 1994. The 1994 Act, with subsequent amendments, is codified at S.C. Code Title 6, Chapter 29.

Wisconsin has adopted a parallel version of Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988, 42 U.S.C. §§ 3601 et seq. (the “Fair Housing Act”), known as the Wisconsin Open Housing Law (WIS. STAT. § 106.50). Both the FHA and Wisconsin Open Housing Law (“WOHL”) prohibit discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on sex, race, color, disability, religion, national origin, or familial status. Additionally, the WOHL extends anti-discrimination protection based on six additional characteristics: sexual orientation; marital status; lawful source of income; age; ancestry; and status as a victim of domestic abuse, sexual assault, or stalking. Wisconsin’s statutory definition of “family status” also is broader than the federal “familial status” counterpart, applying to households with one or more minor or adult relatives so that households that are intergenerational or include extended families are protected (e.g. a household with a grandparent, adult child, and minor child). Unlike FHA, the WOHL expressly covers single-family residences which are owner-occupied because the state has recognized that the sale and rental of single-family dwellings make up a significant portion of the housing stock within the state. The WOHL generally prohibits discrimination in single-family and multi-family housing not covered by the FHA, in addition to housing covered by the FHA.

An individual who believes he or she has been the victim of an illegal housing practice under the FHA may file a complaint with the Department of Housing and Urban Development (“HUD”) or file a lawsuit in federal or state court. The Department of Justice may bring suit on behalf of individuals based on referrals from HUD. The WOHL also allows aggrieved persons alleging a violation of fair housing rights to seek redress in state or federal court, or by filing an administrative complaint with the Department of Workforce Development’s Equal Rights Division or a local Fair Housing Council. Unlike HUD, which need only find reasonable cause to proceed with a discrimination complaint, the Equal Rights Division must find probable cause before it can issue a charge on behalf of the complainant. The parties may then choose to have the complaint decided by an administrative law judge of the Equal Rights Division or in a civil action in circuit court.

The City of La Crosse has adopted its own anti-discrimination ordinance, known as the Equal Opportunities Ordinance, which includes protection in housing. (CITY OF LA CROSSE CODE OF ORDINANCES, § 22-19 et seq.) In addition to the protected classes under the FHA and state OHL, the ordinance also includes as a basis for antidiscrimination protection (1) one’s physical appearance, (2) domestic partner relationships, (3) political activities, and (4) status as a student. (CODE OF ORDINANCES, § 22-22).

La Crosse County also has adopted a local fair housing ordinance which prohibits discrimination in housing based on the same 12 protected classes as the state’s Open Housing Law: sex, race, color, sexual orientation, disability, religion, national origin, marital status, family status, lawful source of income, age, or ancestry. Monroe County’s fair housing ordinance states that the municipal clerk shall maintain forms for complaints to be filed under Wis. Stats. § 106.50, as amended, and shall assist any person alleging a violation thereof in the County of Monroe to file a complaint thereunder with the Wisconsin Department of Work Force Development, Equal Rights Division, for enforcement of Wis. Stats. § 106.50, as amended.

Fair housing laws do not preempt local zoning laws but do apply to municipalities and local government units, and prohibit them from making zoning or land use decisions or implementing land use policies that exclude or otherwise discriminate against protected persons. And even where a specific zoning decision

does not violate a fair housing law, HUD entitlement communities must certify annually that they will set and implement standards and policies that protect and advance fair housing choice for all.

City of La Crosse, La Crosse County, and Monroe County Zoning Ordinance Review

Although comprehensive plans and zoning and land use codes play an important role in regulating the health and safety of the structural environment, overly restrictive codes can negatively impact housing affordability and fair housing choice within a jurisdiction. Examples of zoning provisions that most commonly result in barriers to fair housing choice include:

- Restrictive forms of land use that exclude any specific form of housing, particularly multi-family housing, or that require large lot sizes or low-density that deter affordable housing development by limiting its economic feasibility;
- Restrictive definitions of family that impede unrelated individuals from sharing a dwelling unit;
- Placing administrative and siting constraints on group homes for persons with disabilities;
- Restrictions making it difficult for residents with disabilities to locate housing in certain neighborhoods or to modify their housing;
- Restrictions on occupancy of alternative sources of affordable housing such as accessory dwellings, mobile homes, and mixed-use structures.

The City's and Counties' treatment of these types of issues are explored and evaluated in the tables and narrative below.

Because zoning codes present a crucial area of analysis for a study of impediments to fair housing choice, the latest available zoning ordinance of the City of La Crosse, La Crosse County, and Monroe County (which govern unincorporated areas outside city limits) were reviewed and evaluated against a list of ten common fair housing issues. Taken together, these issues give a picture of (1) the degree to which exclusionary zoning provisions may impact affordable housing opportunities within those jurisdictions and (2) the degree to which the zoning code may impact housing opportunities for persons with disabilities. The zoning ordinance was assigned a risk score of either 1, 2, or 3 for each of the ten issues and was then given an aggregate score calculated by averaging the individual scores, with the possible scores defined as follows:

1 = low risk – the provision poses little risk for discrimination or limitation of fair housing choice, or is an affirmative action that intentionally promotes and/or protects affordable housing and fair housing choice;

2 = medium risk – the provision is neither among the most permissive nor most restrictive; while it could complicate fair housing choice, its effect is not likely to be widespread;

3 = high risk – the provision causes or has potential to result in systematic and widespread housing discrimination or the limitation of fair housing choice, or is an issue where the jurisdiction could take affirmative action to further affordable housing or fair housing choice but has not.

The following chart lists the ten issues reviewed and the City’s and County’s scores for each issue. A complete report for each jurisdiction, including citations to relevant statutes, code sections, and explanatory comments, is included as an appendix to this document.

TABLE 13 – ZONING CODE RISK SCORES

Issue	Risk Scores		
	City of La Crosse	La Crosse County	Monroe County
1a. Does the jurisdiction’s definition of “family” have the effect of preventing unrelated individuals from sharing the same residence? Is the definition unreasonably restrictive?	2	2	2
1b. Does the definition of “family” discriminate against or treat differently unrelated individuals with disabilities (or members of any other protected class)?			
2a. Does the zoning code treat housing for individuals with disabilities (e.g. group homes, congregate living homes, supportive services housing, personal care homes, etc.) differently from other single family residential and multifamily residential uses? For example, is such housing only allowed in certain residential districts, must a special or conditional use permit be granted before siting such housing in certain residential districts, etc.?	2	2	3
2b. Does the zoning ordinance unreasonably restrict housing opportunities for individuals with disabilities who require onsite supportive services? Or is housing for individuals with disabilities allowed in the same manner as other housing in residential districts?			
3a. Do the jurisdiction’s policies, regulations, and/or zoning ordinances provide a process for persons with disabilities to seek reasonable modifications or reasonable accommodations to zoning, land use, or other regulatory requirements?	2	2	1
3b. Does the jurisdiction require a public hearing to obtain public input for specific exceptions to zoning and land-use rules for applicants with disabilities? If so, is the public hearing process only required for applicants seeking housing for persons with disabilities or required for all applicants?			
4. Does the ordinance impose spacing or dispersion requirements on certain protected housing types?	2	2	1
5. Does the jurisdiction restrict any inherently residential uses protected by fair housing laws (such as residential substance abuse treatment facilities) only to non-residential zones?	1	2	2
6. Does the jurisdiction’s zoning and land use rules constitute exclusionary zoning that precludes development of affordable or low-income housing by imposing unreasonable residential design regulations (such as high minimum lot sizes, wide street frontages, large setbacks, low FARs, large minimum building square footage or large livable floor areas, restrictions on number of bedrooms per unit, and/or low maximum building heights)?	2	2	2

TABLE 13 – ZONING CODE RISK SCORES (CONTINUED)

Issue	Risk Scores		
	City of La Crosse	La Crosse County	Monroe County
7. Does the zoning ordinance fail to provide residential districts where multi-family housing is permitted as of right? Are multifamily dwellings excluded from all single family dwelling districts?	1	2	3
7b. Do multi-family districts restrict development only to low-density housing types?			
8. Are unreasonable restrictions placed on the construction, rental, or occupancy of alternative types of affordable or low-income housing (for example, accessory dwellings or mobile/manufactured homes)?	1	2	2
9a. Are the jurisdiction’s design and construction requirements (as contained in the zoning ordinance or building code) congruent with the Fair Housing Amendments Act’s accessibility standards for design and construction?	1	2	2
9b. Is there any provision for monitoring compliance?			
10. Does the zoning ordinance include an inclusionary zoning provision or provide any incentives for the development of affordable housing or housing for protected classes?	2	2	2
Average Risk Score	1.6	2.0	2.0

The City’s total average risk score (calculated by taking the average of the 10 individual issue scores) is 1.6, indicating that overall there is moderate risk of the zoning regulations contributing to discriminatory housing treatment or impeding fair housing choice. In most cases, the zoning and other land use code sections are reasonably permissive and allow for flexibility as to the most common fair housing issues. The City received no “3” (high risk) scores and received several “2” (medium risk) score on certain issues where the zoning regulations have the potential to negatively impact fair and affordable housing.

La Crosse County’s cumulative scores averaged to 2.0 or moderate risk. It received “2” (medium risk) scores on all categories. These medium scores indicate that although the County is not at a high risk for any one particular issue, it may be vulnerable to fair housing complaints in a number of areas where the ordinance is applied in a way that impacts a protected class of persons. In such cases, improvements to the rules and policies could be made to more fully protect the fair housing rights of all the area’s residents and to better fulfill the mandate to affirmatively further fair housing.

Monroe County’s scores average to 2.0, or moderate risk. Although the average score is the same as La Crosse County, there is much greater variety of scores in Monroe County. On two issues, housing for people with disabilities and multifamily housing, Monroe County received a “3” (high risk) score. On the other hand, Monroe County received a “1” (low risk) score on two issues. It is the only jurisdiction among the three to offer a provision for reasonable accommodation for people with disabilities and not to impose spacing requirements on protected housing types.

Our research has shown that restricting housing choice for certain historically/socio-economically disadvantaged groups and protected classes can happen in any number of ways and should be viewed on a continuum. The zoning analysis matrix developed for this report and the narrative below are not designed to assert whether the City's and Counties' codes create a per se violation of the FHA or HUD regulations, but are meant as a tool to highlight significant areas where zoning and land use ordinances may otherwise jeopardize the spirit and intent of fair housing protections and HUD's AFFH standards for its entitlement communities.

The issues chosen for discussion show where zoning ordinances and policies could go further to protect fair housing choice for protected and disadvantaged classes, and yet still fulfill the zoning objective of protecting the public's health, safety, and general welfare. Specifically, the issues highlighted by the matrix inform, first, the degree to which the zoning ordinance may be overly restrictive and exclusionary to the point of artificially limiting the affordable housing inventory and directly contributing to higher housing and rental costs. And secondly, the matrix helps inform the impact the local regulations may have on housing opportunities for persons with disabilities, a protected class under state and federal fair housing law.

Impact of Zoning Provisions on Affordable Housing

Academic and market research have proven what also is intuitive: land use regulations can directly limit the supply of housing units within a given jurisdiction, and thus contribute to making housing more expensive, i.e. less affordable.²⁴ Zoning policies that impose barriers to housing development and artificially limit the supply of housing units in a given area by making developable land and construction costlier than they are inherently can take different forms and may include: high minimum lot sizes, low density allowances, wide street frontages, large setbacks, low floor area ratios, large minimum building square footage or large livable floor areas, restrictions on number of bedrooms per unit, low maximum building heights, restrictions against infill development, restrictions on the types of housing that may be constructed in certain residential zones, arbitrary or antiquated historic preservation standards, minimum off-street parking requirements, restrictions against residential conversions to multi-unit buildings, lengthy permitting processes, development impact fees, and/or restrictions on accessory dwelling units. Where these zoning regulations are not congruent with the actual standards necessary to protect the health and safety of residents and prevent overcrowding, they may not be in express violation of fair housing laws but may nonetheless contribute to exclusionary zoning and have the effect of disproportionately reducing housing choice for moderate to low-income families, minorities, persons with disabilities on fixed incomes, families with children, and other protected classes by making the development of affordable housing cost prohibitive.

²⁴ See Gyourko, Joseph, Albert Saiz, and Anita A. Summers, *A New Measure of the Local Regulatory Environment for Housing Markets: The Wharton Residential Land Use Regulatory Index (2007)*, available at real.wharton.upenn.edu; Randal O'Toole, *The Planning Penalty: How Smart Growth Makes Housing Unaffordable (2006)*, available at independent.org/pdf/policy_reports/2006-04-03-housing.pdf; Edward L. Glaeser and Joseph Gyourko, *The Impact of Zoning on Housing Affordability (2002)*, available at law.yale.edu/system/files/documents/pdf/hier1948.pdf; The White House's *Housing Development Toolkit, 2016*, available at whitehouse.gov/sites/whitehouse.gov/files/images/Housing_Development_Toolkit%20f.2.pdf.

In all three jurisdictions, design standards, density allowances, and housing-type diversity do not appear facially exclusionary, but large minimum lot size and dimensional standards could result in challenges in providing affordable single-family housing. For lots in the city of La Crosse and in La Crosse County on public sewer, the minimum lot size is 7,200 square feet, which is large from an affordable housing standpoint. Monroe County requires 10,000 square feet for lots on public sewer. In many communities, 5,000 square foot lots are common, with townhouses or other housing types allowed on even smaller lots. Each received a “2” (medium risk) score for Issue 6. The City of La Crosse allows for multifamily housing in multiple zoning districts, and the standards do not preclude accommodating affordable housing, so the City received a “1” (low risk) score for Issue 7. La Crosse County allows multifamily only in one zoning district with limited locations throughout the County. This, along with height restriction limiting multifamily to 2.5 stories, limits opportunity for affordable multifamily development, and La Crosse County received a “2” (medium risk) score. In Monroe County, there are no districts where multifamily is allowed by right, requiring a discretionary approval process in a limited number of zoning districts for any proposed multifamily. This has the potential to exclude multifamily throughout the unincorporated areas of the county, resulting in a “3” (high risk) score.

In addition to the complete reviews above, an abbreviated review of Holmen and Onalaska was conducted, focusing on development, design, and multifamily restrictions (items 6 and 7 in the matrix). In Holmen, large lot sizes and a 900-square-foot minimum livable floor area present the biggest challenges to affordable single-family development. For multifamily development, height limits and green space requirements in the R-5 district are the biggest challenges, along with living area and lot size minimums in other residential districts. In Onalaska, minimum single-family lot sizes are also large, and multifamily housing development is limited by minimum lot area, green space, and height requirements.

In all cases, even where multifamily is permitted by right, there are recommendations for how the jurisdictions could use more flexible zoning and land use policy to support investment in the affordable housing stock. For example, to encourage more infill development in the traditionally low-density neighborhoods, minimum lot sizes could be reduced, accessory apartments permitted, minimum setbacks reduced, conversion of established dwellings to multifamily dwellings permitted, parking minimums could be reduced in areas served by transit, and height restrictions relaxed to allow for more density on the same footprint. This would potentially allow for more supply of housing, which helps put downward pressure on rental prices, so that moderate and low-income families have access to those neighborhoods and all the congruent benefits that come with higher opportunity areas such as access to jobs, better schools, access to transportation, and access to cultural amenities and public accommodations.

Each jurisdiction’s land use regulations could go beyond just meeting the minimum FHA standards and affirmatively further and incentivize the development of affordable housing with inclusionary zoning policies (Issue 10). The City has adopted policy documents, such as the USH 53 Corridor Study, that support multifamily development and recommend tools such as a density bonus, but currently, the ordinances do not expressly provide density bonuses or other incentives for the development and protection of affordable or low-income housing units or housing for protected classes. Discussion of the Zoning Code Risk Scores with regard to housing for people with disabilities continues in the Zoning and Accessibility section of Chapter 8.

CHAPTER 6.

ACCESS TO OPPORTUNITY

Housing discrimination and residential segregation have limited access to opportunity for specific population groups and communities. It is important to understand opportunity, as used in this context, as a subjective quality. Typically, it refers to access to resources like employment, quality education, healthcare, childcare, and other services that allow individuals and communities to achieve a high quality of life. However, researchers who interviewed residents of Baltimore, Maryland on this subject found perceptions of opportunity follow similar themes but are prioritized differently by different groups. Racial and ethnic minorities, low-income groups, and residents of distressed neighborhoods identified job access, employment, and training as important opportunities while whites, higher income groups, and residents of wealthier neighborhoods more often identified sense of community, social connections among neighbors, freedom of choice, education, and retirement savings.²⁵

Proximity is often used to indicate levels of access to opportunity, however, it would be remiss to consider proximity as the only factor in determining level of access. Access to opportunity is also influenced by social, economic, and cultural factors, thus making it difficult to accurately identify and measure. HUD conducted research regarding Moving to Opportunity for Fair Housing (MTO) to understand the impact of increased access to opportunity. Researchers found residents who moved to lower-poverty neighborhoods experienced safer neighborhoods and better health outcomes, but there was no significant change in educational outcomes, employment, or income.²⁶ However, recent studies show the long-term effects of MTO on the educational attainment of children who were under the age of 13 are overwhelmingly positive with improved college attendance rates and higher incomes. On the other hand, children who were over the age of 13 show negative long-term impacts from MTO.²⁷

The strategy to improve access to opportunities has been two-pronged with different housing and community development programs. Tenant-based housing vouchers allow mobility of recipients to locate in lower-poverty areas while programs like the Community Development Block Grant and Choice Neighborhoods Initiative provide funds to increase opportunities in disadvantaged neighborhoods.

²⁵ Lung-Amam, Willow S., et al. "Opportunity for Whom? The Diverse Definitions of Neighborhood Opportunity in Baltimore." *City and Community*, vol. 17, no. 3, 27 Sept. 2018, pp. 636-657, doi:10.1111/cico.12318.

²⁶ *Moving to Opportunity for Fair Housing Demonstration Program: Final Impacts Evaluation*. U.S. Department of Housing and Urban Development, Office of Policy Development and Research, www.huduser.gov/portal/publications/pdf/MTOFHD_fullreport_v2.pdf.

²⁷ Chetty, Raj, Nathaniel Hendren, and Lawrence F. Katz. 2016. "The Effects of Exposure to Better Neighborhoods on Children: New Evidence from the Moving to Opportunity Experiment." *American Economic Review*, 106 (4): 855-902. https://scholar.harvard.edu/files/hendren/files/mto_paper.pdf

OVERVIEW OF HUD-DEFINED OPPORTUNITY FACTORS

Among the many factors that drive housing choice for individuals and families are neighborhood factors including access to quality schools, jobs, and transit. To measure economic and educational conditions at a neighborhood level, HUD developed a methodology to quantify the degree to which a neighborhood provides such opportunities. For each block group in the U.S., HUD provides a score on several “opportunity dimensions,” including school proficiency, poverty, labor market engagement, jobs proximity, transportation costs, transit trips, and environmental health. For each block group, a value is calculated for each index and results are then standardized on a scale of 0 to 100 based on relative ranking within the metro area. For each opportunity dimension, a higher index score indicates more favorable neighborhood characteristics.

THERE ARE GENERALLY NOT STRONG DISPARITIES IN ACCESS TO HUD-DEFINED OPPORTUNITY FACTORS IN THE THREE GEOGRAPHIES.

THE BIGGEST GAPS IN THE CITY OF LA CROSSE ARE RELATED TO LABOR MARKET ENGAGEMENT AND POVERTY. IN LA CROSSE COUNTY, GAPS EXIST RELATED TO LABOR MARKET ENGAGEMENT AND SCHOOL PROFICIENCY.

Average index values by race and ethnicity for the city and region are provided in Table 14 for the total population and the population living below the federal poverty line. These values can be used to assess whether some population subgroups tend to live in higher opportunity areas than others, and will be discussed in more detail by opportunity dimension throughout the remainder of this chapter. The Opportunity Index Disparity measures the difference between the scores for the white non-Hispanic group and other groups. A negative score indicates that the particular subgroup has a lower score on that dimension than the white non-Hispanic group. A positive score indicates that the subgroup has a higher score than the white non-Hispanic Group.

TABLE 14 – DISPARITY IN ACCESS TO NEIGHBORHOOD OPPORTUNITY

Opportunity Dimension	Race / Ethnicity					Opportunity Index Disparity between White Non-Hispanic Residents and Other Groups			
	Non-Hispanic				Hispanic	Black	Asian	Native American	Hispanic
	White	Black	Asian or Pacific Islander	Native American					
City of La Crosse – Total Population									
School Proficiency Index	42	40	39	39	41	-1	-3	-2	-1
Jobs Proximity Index	55	62	53	55	59	7	-2	0	3
Labor Market Engagement Index	68	57	60	60	62	-11	-9	-8	-6
Transit Index	56	57	57	56	56	2	1	0	1
Low Transportation Cost Index	66	69	68	67	67	3	2	2	1
Low Poverty Index	58	47	49	51	53	-11	-9	-7	-5
Environmental Health Index	58	58	60	59	58	0	2	1	0
City of La Crosse – Population Below Federal Poverty Line									
School Proficiency Index	43	41	40	42	40	-2	-3	-1	-3
Jobs Proximity Index	62	49	45	50	41	-13	-17	-12	-21
Labor Market Engagement Index	64	64	64	59	63	1	0	-5	0
Transit Index	59	56	59	57	57	-3	0	-2	-2
Low Transportation Cost Index	70	67	70	68	67	-3	0	-2	-3
Low Poverty Index	51	50	47	54	51	-1	-4	3	-1
Environmental Health Index	53	61	55	63	61	8	2	10	7

TABLE 14 – DISPARITY IN ACCESS TO NEIGHBORHOOD OPPORTUNITY (CONTINUED)

Opportunity Dimension	Race / Ethnicity					Opportunity Index Disparity between White Non-Hispanic Residents and Other Groups			
	Non-Hispanic				Hispanic	Black	Asian	Native American	Hispanic
	White	Black	Asian or Pacific Islander	Native American					
La Crosse County – Total Population									
School Proficiency Index	53	46	51	48	50	-7	-2	-5	-3
Jobs Proximity Index	52	60	52	53	56	8	-1	1	4
Labor Market Engagement Index	73	63	68	67	69	-10	-5	-6	-4
Transit Index	42	50	46	46	46	9	4	4	4
Low Transportation Cost Index	53	63	57	58	58	10	4	5	5
Low Poverty Index	57	58	57	57	62	1	1	1	6
Environmental Health Index	60	65	61	66	71	5	2	6	11
La Crosse County– Population Below Federal Poverty Line									
School Proficiency Index	48	41	51	45	53	-6	3	-3	5
Jobs Proximity Index	59	51	48	52	42	-8	-12	-7	-17
Labor Market Engagement Index	67	70	70	65	65	3	3	-2	-2
Transit Index	52	48	50	53	46	-4	-2	1	-6
Low Transportation Cost Index	63	61	61	63	56	-2	-2	-1	-7
Low Poverty Index	57	58	57	57	62	1	1	1	6
Environmental Health Index	60	65	61	66	71	5	2	6	11

TABLE 14 – DISPARITY IN ACCESS TO NEIGHBORHOOD OPPORTUNITY (CONTINUED)

Opportunity Dimension	Race / Ethnicity					Opportunity Index Disparity between White Non-Hispanic Residents and Other Groups			
	Non-Hispanic				Hispanic	Black	Asian	Native American	Hispanic
	White	Black	Asian or Pacific Islander	Native American					
Monroe County – Total Population									
School Proficiency Index	29	28	28	28	28	-1	-1	0	-1
Jobs Proximity Index	56	66	60	64	68	10	4	7	12
Labor Market Index	53	53	54	52	50	0	1	-1	-3
Transit Trips Index	0	0	0	0	0	0	0	0	0
Low Transportation Cost Index	28	36	31	28	33	8	3	0	5
Low Poverty Index	44	45	44	47	41	0	0	3	-3
Environmental Health Index	87	83	86	87	85	-4	-1	0	-2
Monroe County – Population Below Federal Poverty Line									
School Proficiency Index	28	25	26	36	27	-3	-2	9	-1
Jobs Proximity Index	57	76	65	69	66	19	8	12	9
Labor Market Index	52	47	49	56	51	-4	-2	4	0
Transit Trips Index	0	0	0	0	0	0	0	0	0
Low Transportation Cost Index	30	42	42	22	33	12	12	-8	3
Low Poverty Index	39	44	31	59	46	6	-8	21	7
Environmental Health Index	85	81	74	92	87	-4	-12	7	1

Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA

EDUCATION

School proficiency is an indication of the quality of education that is available to residents of an area. High quality education is a vital community resource that can lead to more opportunities and improve quality of life. HUD's school proficiency index is calculated based on performance of 4th grade students on state reading and math exams. For each block group, the index is calculated using test results in up to the three closest schools within 1.5 miles.

The map on the following page shows HUD-provided opportunity scores related to education for the city of La Crosse, La Crosse County, and Monroe County's block groups, along with the demographic indicators of race/ethnicity. In each map, lighter shading indicates areas of lower opportunity and darker shading indicates higher opportunity.

The variation in levels of access to proficient schools among most block groups is low in the city of La Crosse. School proficiency index scores of most block groups within city boundaries fall within the range of 40 to 60. Several block groups in the northern half of the city have school proficiency index scores in between 20 and 30. School proficiency index scores in block groups in the Powell-Poage-Hamilton and Holy Trinity Longfellow neighborhoods are slightly lower and in the 30's.

The spatial distribution of racial and ethnic groups and school proficiency index scores in the city of La Crosse shown in Figure 25 does not indicate correlation between race, ethnicity, and access to proficient schools. All population groups are dispersed relatively evenly throughout the city and there are no significant concentrations of specific populations that would indicate disproportionate access to proficient schools by race or ethnicity.

The opportunity dimension scores in Table 14 underscore the relatively even access to school proficiency, indicating virtually equal access to proficient schools among racial and ethnic groups in the city of La Crosse. Asian and Native American populations have slightly less access to proficient schools with a score of 39, only three points less than whites, the highest scoring group. Populations below the federal poverty line have the same level of access to proficient schools with a range of scores between 40 and 43.

Compared to the city of La Crosse, school proficiency index scores of block groups in La Crosse County vary greatly with a range between 9 and 75. Both the highest and lowest scoring block groups in the region are located in the southeast corner of La Crosse County. South of State Highway 33 is a block group with the region's lowest levels of access to proficient schools, while the area of greatest access to school proficiency lies immediately north, stretching from Highway 33 up to Interstate 90. Accordingly, levels of disparity in access to proficient schools among racial and ethnic groups are greater when considering the whole of La Crosse County compared to just the city of La Crosse. Whites and the Hispanic population below the poverty line have the best access to proficient schools in La Crosse County. Black residents, both above and below the poverty line, experience the greatest disparity of -7 and -6 points, respectively. School proficiency index scores among racial and ethnic groups in Monroe County are overall lower than both the city of La Crosse and La Crosse County, however, there is only a one-point difference between groups above the poverty line. Native American populations below the poverty line have the best access to proficient schools in Monroe County with a score of 36.

Stakeholders and members of the public consulted in development of this AI generally felt that public resources, including resources related to education, were fairly distributed throughout the community. In the city of La Crosse, the Hamilton school district was said to be one of the more diverse, and also appeared to be a desirable choice for many families. In Monroe County, residents cited the quality of their “top-notch” schools as a draw for families looking to enhance their access to educational opportunities. However, some residents took a more negative view, saying that children have had difficult times at schools in the city of La Crosse having faced racism from a principal. These residents further speculated that issues like these would probably be worse in Holmen and Onalaska.

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FIGURE 25 – SCHOOL PROFICIENCY INDEX IN THE CITY OF LA CROSSE

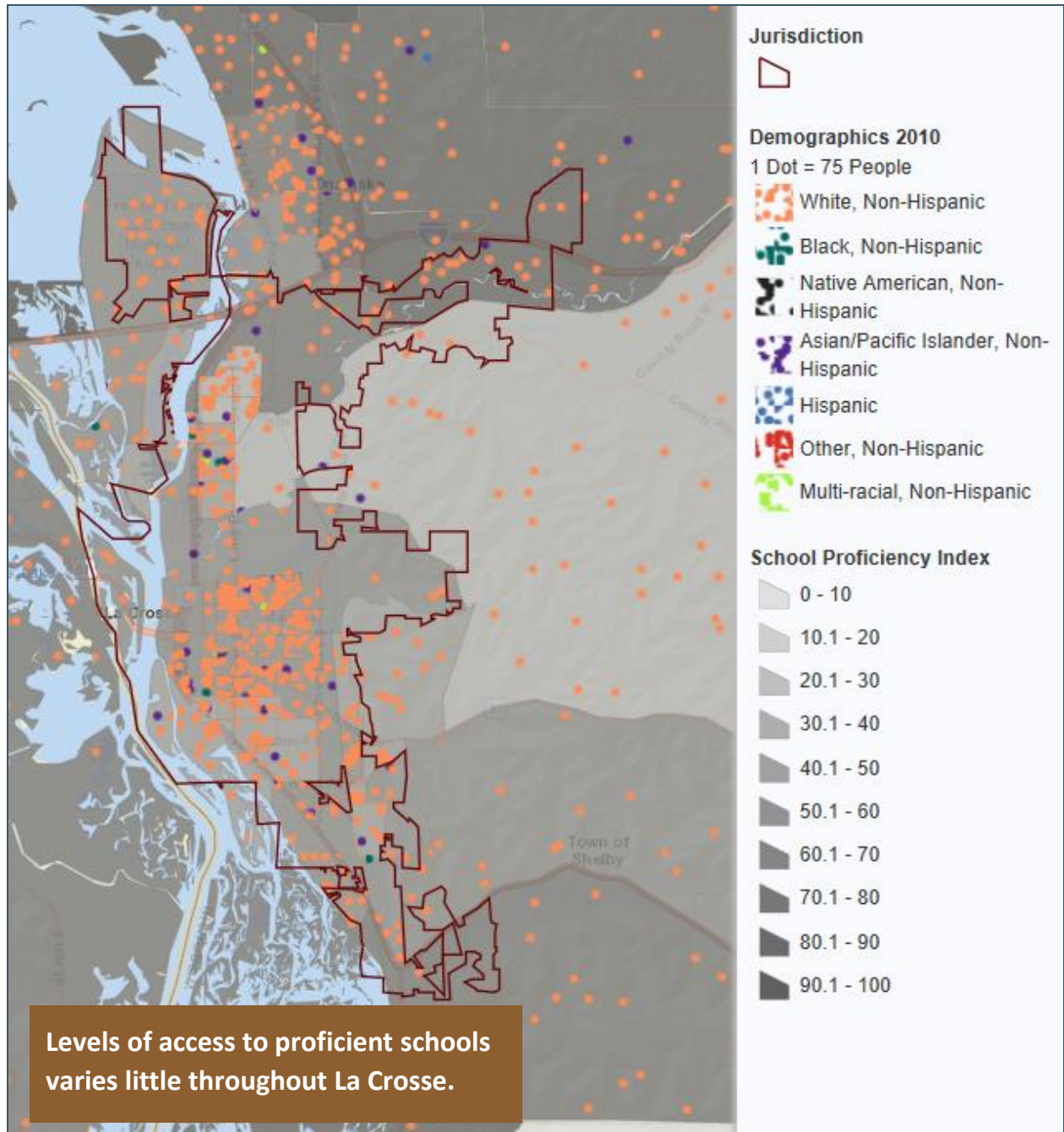
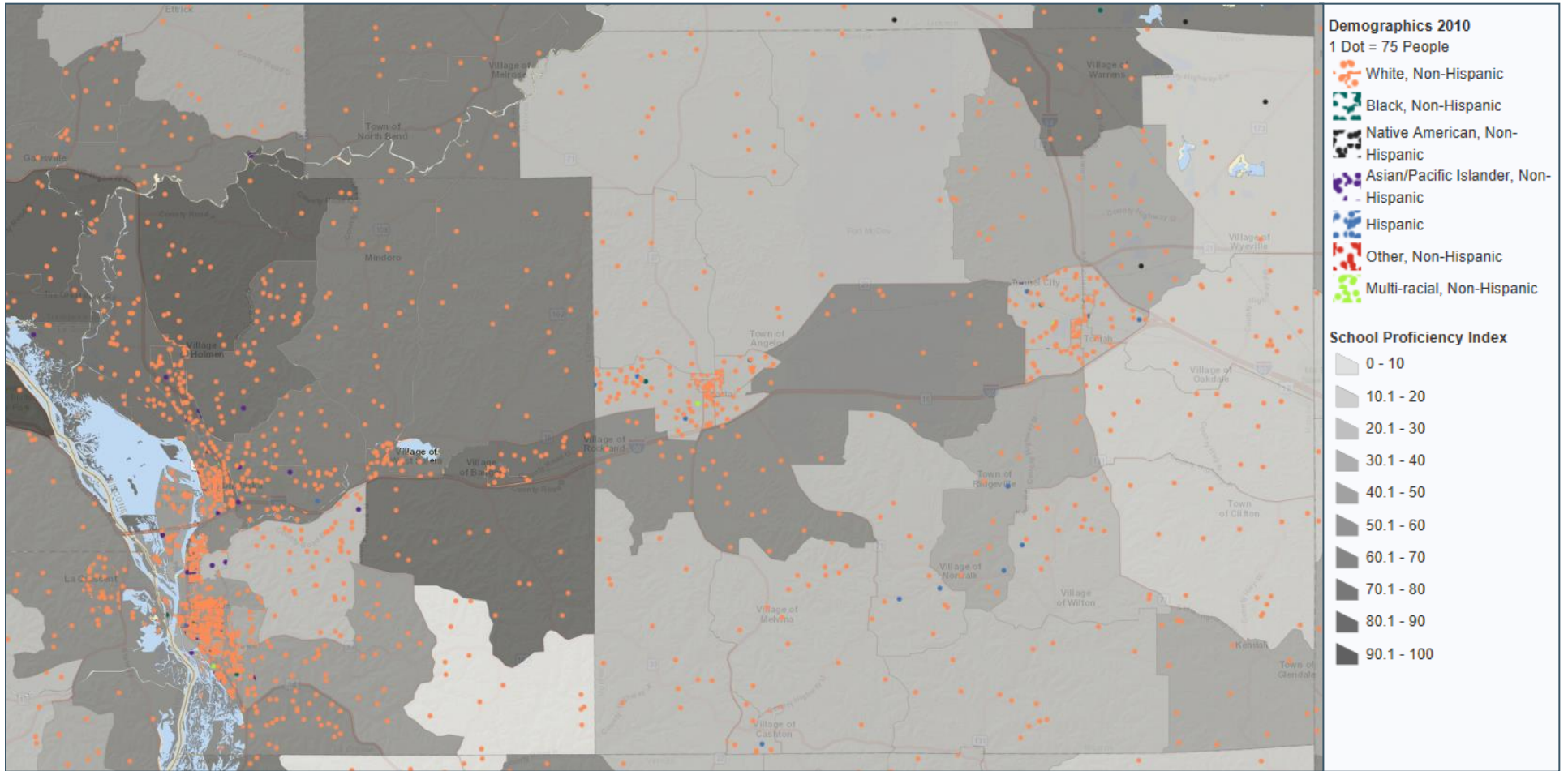


FIGURE 26 – SCHOOL PROFICIENCY INDEX IN LA CROSSE AND MONROE COUNTY



EMPLOYMENT

Neighborhoods with jobs in close proximity are often assumed to have good access to jobs. However, distance alone does not capture any other factor such as transportation options, the type of jobs available in the area, or the education and training necessary to obtain them. There may be concentrations of jobs and low-income neighborhoods in urban centers, but many of the jobs are unattainable for residents of low-income neighborhoods. Conversely, some areas appear to have good access to jobs that are reasonably attainable but pay low wages. Therefore, this section analyzes both the labor market engagement and jobs proximity indices which, when considered together, offer a better indication of how accessible jobs are for residents of a specific area.

The Jobs Proximity Index measures the physical distance between place of residence and job locations, without any weight ascribed to the type of job or level of pay. The Labor Market Engagement Index is based on unemployment rate, labor force participation rate, and the percent of the population age 25 and over with a bachelor's degree or higher. Again, lighter shading indicates areas of lower opportunity and darker shading indicates higher opportunity.

The Jobs Proximity Index scores of block groups in the city of La Crosse are mapped in Figure 27 along with the population distribution by race and ethnicity. The block groups with the best access to jobs are primarily located along the boundaries of the city. The block groups with the lowest access to jobs are located in the neighborhoods of Logan Northside, Powell-Poage-Hamilton, Holy Trinity Longfellow, and Weigent Hogan. Although not a strong correlation, Figure 27 indicates a slight overrepresentation of Asian populations in block groups with the lowest access to jobs. This correlation is supported by the disparities in Jobs Proximity Index scores.

The Jobs Proximity Index scores by race and ethnicity listed in Table 14 show small disparities between groups in the city of La Crosse. Black populations have the best access to jobs while Asian populations have the lowest levels of access. However, there are large disparities in the levels of access to jobs among populations below the poverty line. The white population below the poverty line have the best access to jobs and the Hispanic population below the poverty line live the furthest from job locations by a significant margin of 21 points. The Asian population below the poverty line has the second lowest access to jobs followed by Blacks and Native Americans below the poverty line.

Jobs Proximity Index scores of racial and ethnic groups in La Crosse County are nearly identical to city of La Crosse with Black populations having the best access and Asian populations having the least access. The disparities among groups below the poverty line also reflect the same patterns of job accessibility seen in the city. The Hispanic population below the poverty line again have the lowest access to jobs with a score 17 points below the white population below the poverty line.

Job accessibility disparities in Monroe County deviate from the patterns found in La Crosse County. The overall Jobs Proximity scores are also slightly higher compared to the city of La Crosse and La Crosse County. In Monroe County among populations above the poverty line, the Hispanic population has the best access to jobs. The white population has the lowest levels of access to jobs both above and below

the poverty line. The Black population below the poverty line has the highest Jobs Proximity Index score of all groups followed by Native Americans below the poverty line.

Labor market engagement is higher along the eastern border of the city of La Crosse. Accordingly, labor market engagement in La Crosse County is highest in block groups near the eastern border of the city. Labor market engagement decreases as the distance from the city of La Crosse increases, therefore, block groups in Monroe County have lower levels of labor market engagement compared to La Crosse County.

Labor Market Index scores in Table 14 indicate larger disparities among racial and ethnic groups above the poverty line in the city of La Crosse. The white population has the highest level of engagement with the labor market among all groups, both above and below the poverty line. The Black population above the poverty line has the lowest labor market engagement among all populations followed by Asian and Native American populations. The labor market engagement scores among racial and ethnic groups in La Crosse County are slightly higher overall, but closely resemble the patterns found in the city. Conversely, labor market engagement scores are slightly lower in Monroe County, but disparities among racial and ethnic groups are smaller.

Employment in the region is generally strong and residents seemed to agree that there are ample jobs available in the area. Proximity to job locations was an important consideration among many residents when asked what they would value or look for in choosing a new place to live elsewhere in the region. Despite there being jobs available, the quality of employment opportunities was frequently named as a concern. One resident pointed out that there are plenty of jobs, and even jobs that pay \$10 an hour, but there is also a severe lack of housing that is affordable at that income.

FIGURE 27 – JOBS PROXIMITY INDEX IN THE CITY OF LA CROSSE

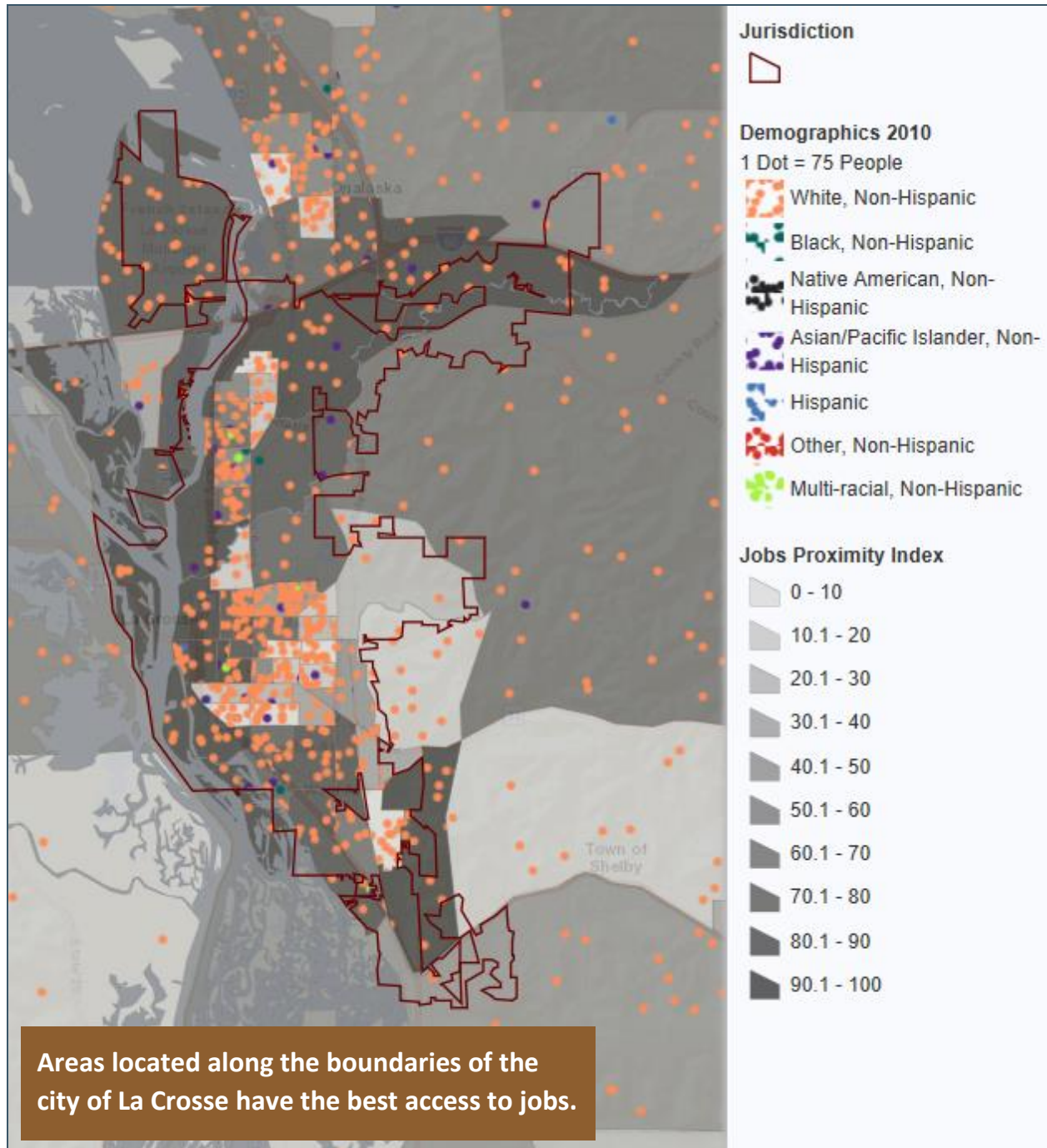


FIGURE 28 – JOBS PROXIMITY INDEX IN LA CROSSE AND MONROE COUNTIES

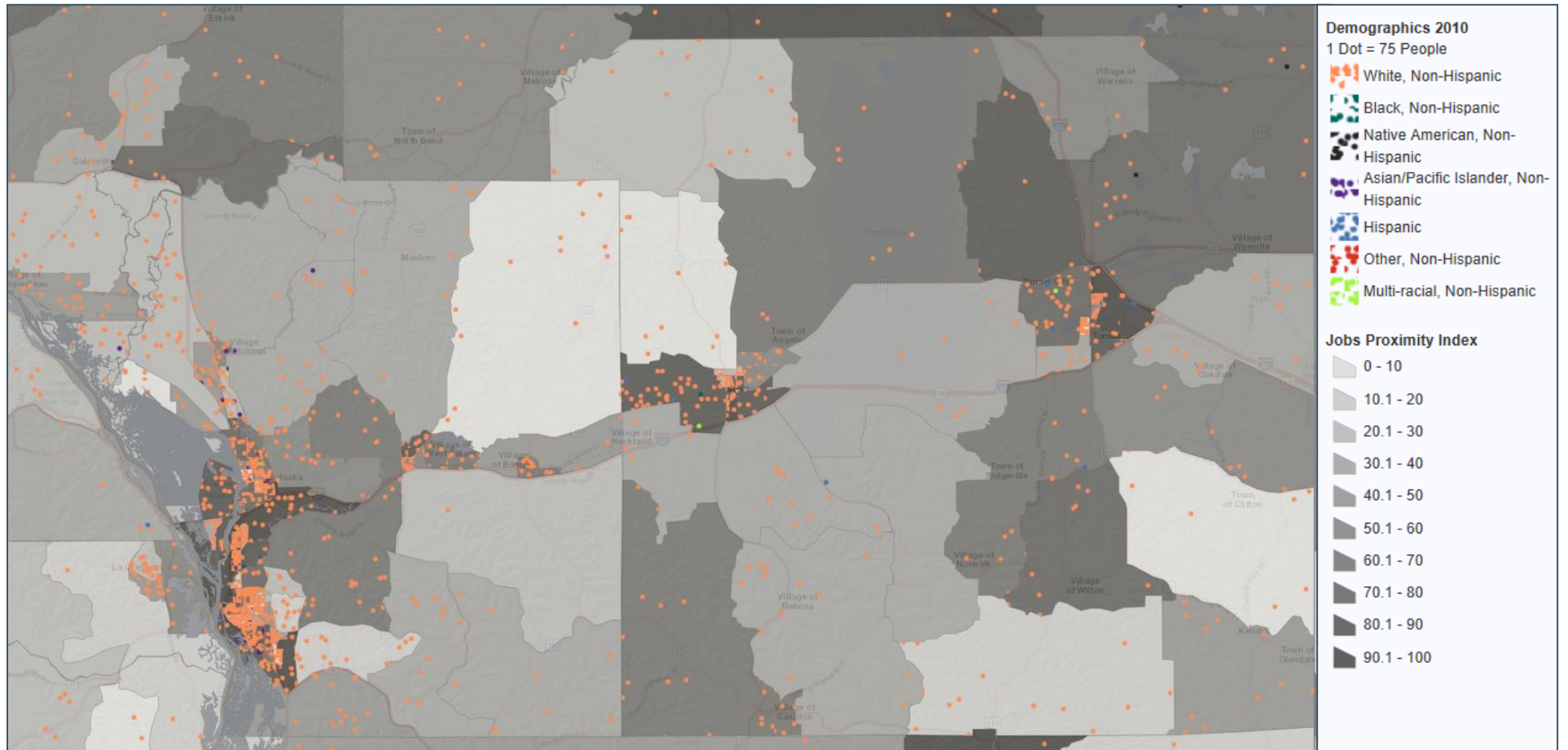


FIGURE 29 – LABOR MARKET INDEX IN THE CITY OF LA CROSSE

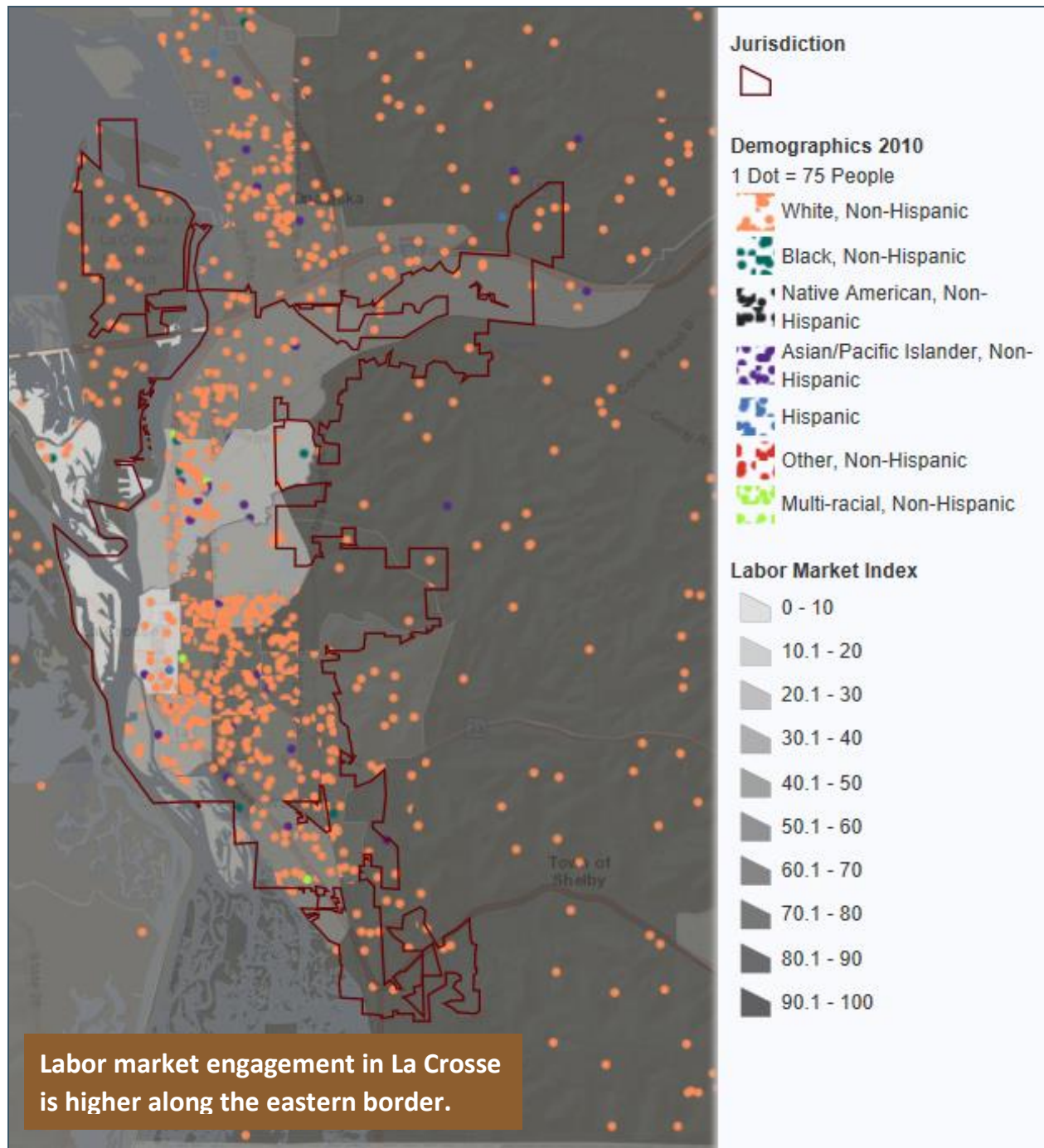
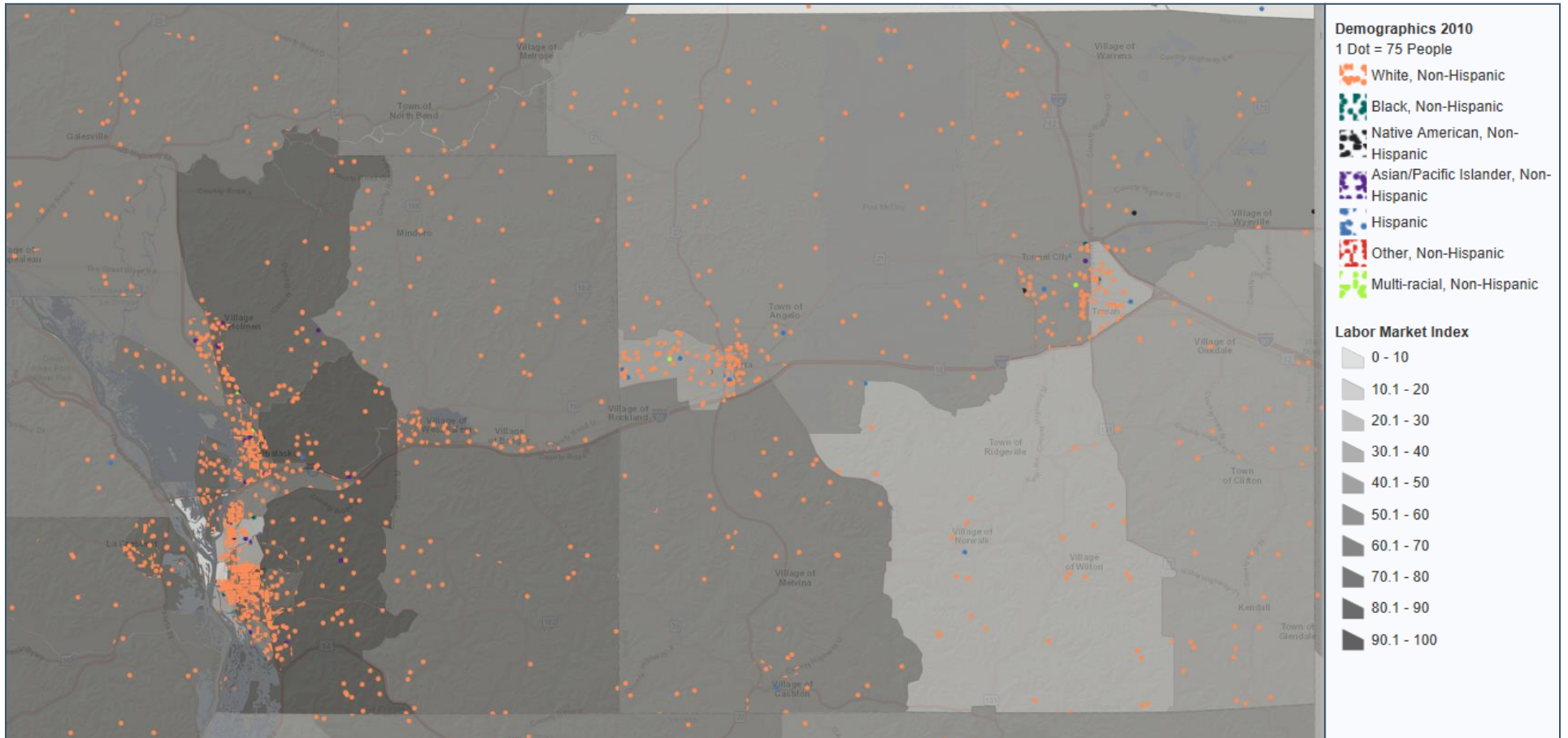


FIGURE 30 – LABOR MARKET INDEX IN LA CROSSE AND MONROE COUNTIES



TRANSPORTATION

The Transit Trip Index measures how often low-income families in a neighborhood use public transportation, while the Low Transportation Cost Index measures the cost of transport and proximity to public transportation by neighborhood. The higher the Low Transportation Cost Index, the lower the cost of transportation in that block group. Again, lighter shading indicates areas of lower opportunity and darker shading indicates higher opportunity.

Figure 31 shows transit usage is uniform throughout the city of La Crosse with the highest usage in neighborhoods in or around Downtown. Transit Trip Index scores indicate nearly the same levels of transit usage by racial and ethnic groups in the city of La Crosse. Populations below the poverty line have slightly higher Transit Trip Index scores indicating higher usage.

Outside of Holmen and West Salem, there is less overall transit usage in La Crosse County compared to the city. The difference in transit usage among racial and ethnic groups is small, but slightly greater than transit usage scores of groups in the city. Native American and white populations below the poverty line have the highest levels of usage in the county. The white population above the poverty line has the lowest transit usage scores in the county.

Similar to the spatial pattern of transit usage, Low Transportation Cost scores are highest in the city of La Crosse and decrease as the distance from the city increases. Transportation costs are also lower in densely populated areas like West Salem, Sparta, and Tomah. Low Transportation Cost scores are similar for all racial and ethnic groups in the city of La Crosse. Transit usage and low transportation cost by racial and ethnic group are closely related and share similar patterns.

Low Transportation Cost scores are lower overall in La Crosse County indicating higher costs and larger proximity to public transportation compared to the city of La Crosse. Disparities among racial and ethnic groups are also greater in La Crosse County, but still reflect patterns similar to transit usage scores.

Monroe County has the highest transportation costs and the largest disparities among racial and ethnic groups. Native Americans below the poverty line experience the highest transportation costs and greatest distances to public transportation among all racial and ethnic groups. Black and Asian populations below the poverty line score 20 points higher, but still have lower scores compared to population groups in La Crosse County.

Many residents and stakeholders named transportation as a particular challenge in the region. Within the city of La Crosse, public transportation options are available and this availability of transit is an important factor in keeping some residents within the city of La Crosse. One stakeholder pointed out that some households seek suburban communities with lower taxes, but housing there is more expensive and transportation costs increase as well. Said another: "You can't save money by moving out of La Crosse." In Monroe County, stakeholders reported that there is no public bus or vanpool, meaning one would need a car or bike to get to a job. Households that are pushed out to rural areas beyond La Crosse's suburbs have trouble accessing resources and jobs available in the cities.

FIGURE 31 – TRANSIT TRIPS INDEX IN THE CITY OF LA CROSSE

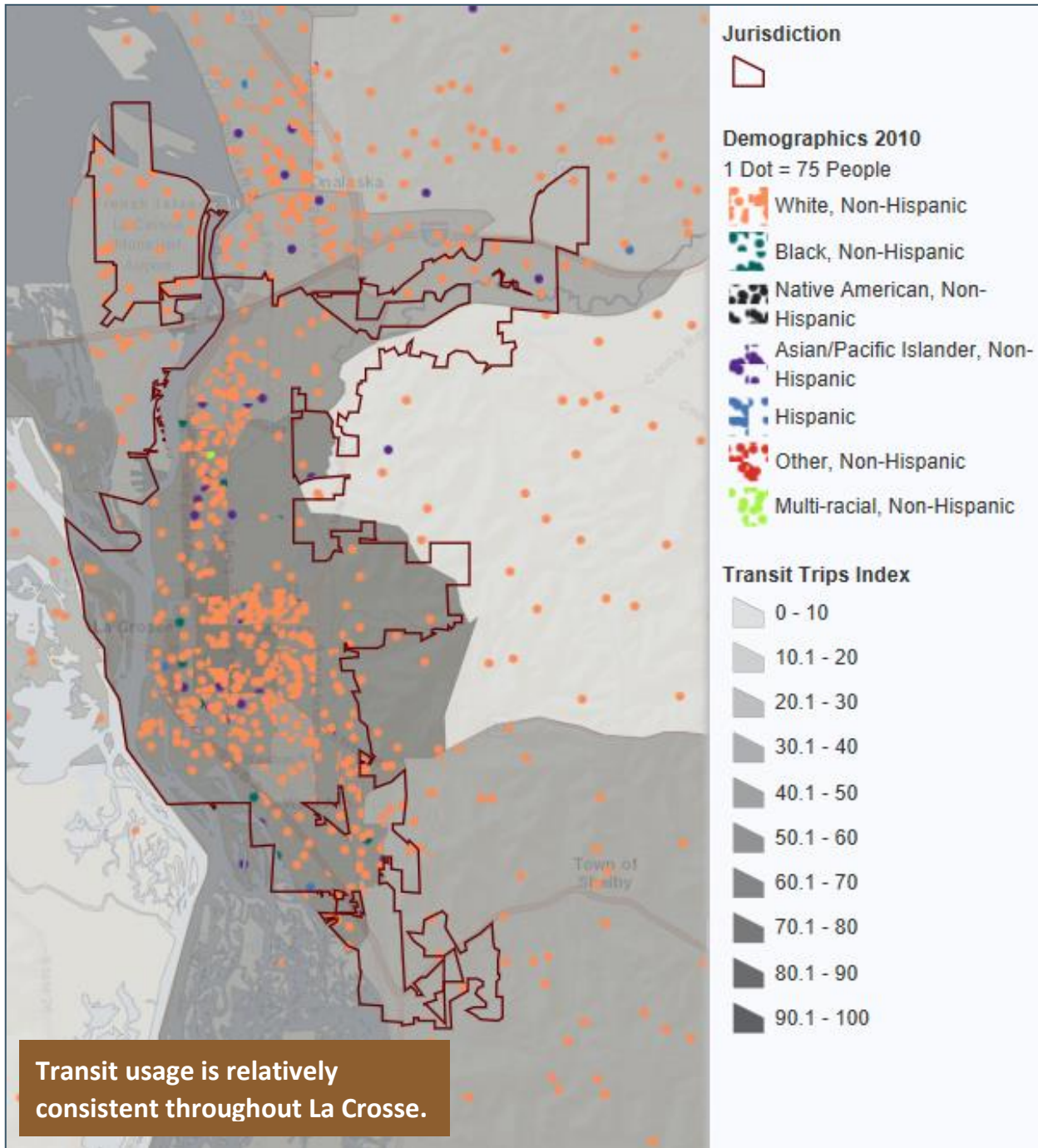


FIGURE 32 – TRANSIT TRIPS INDEX IN LA CROSSE AND MONROE COUNTIES

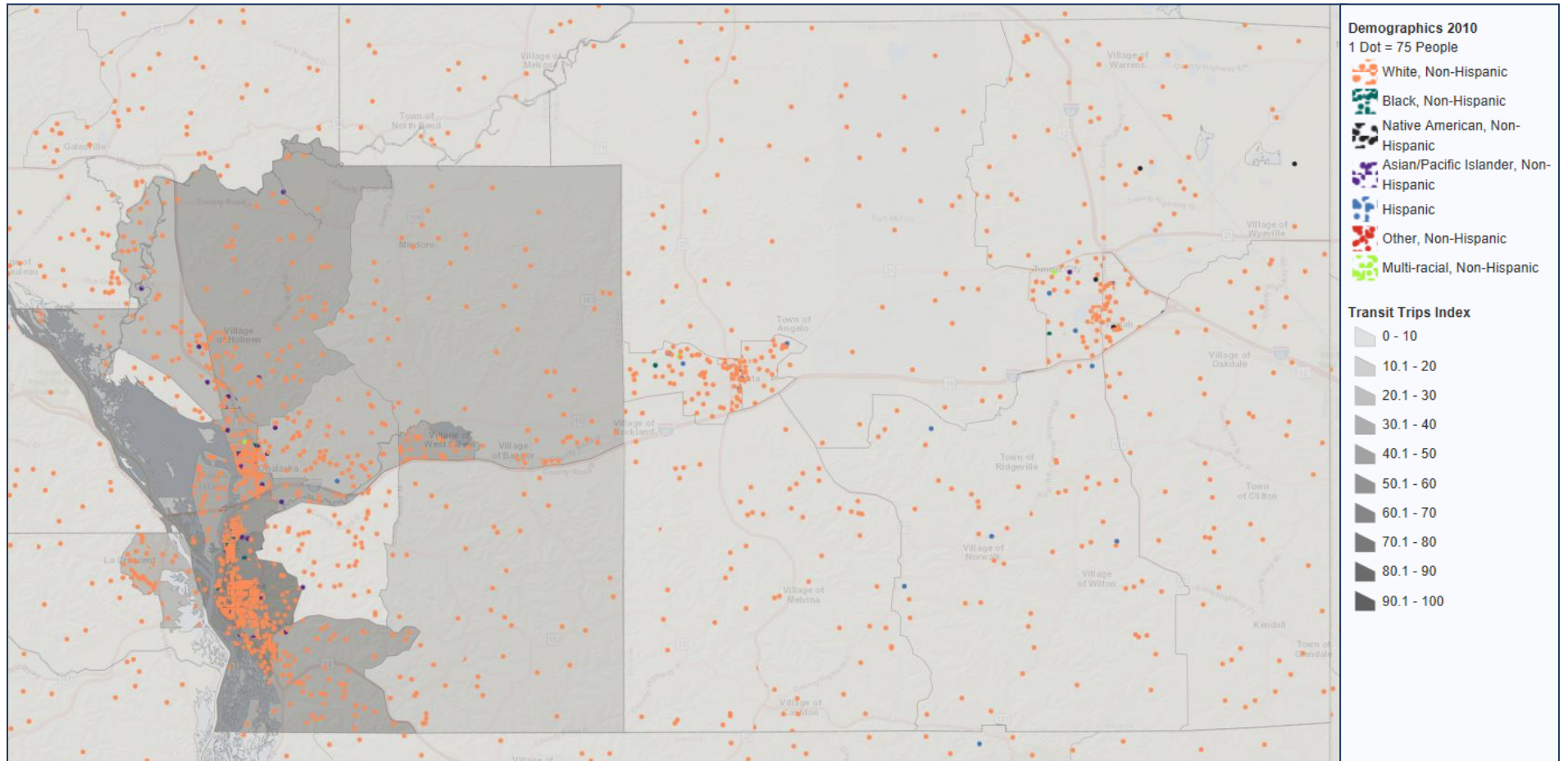


FIGURE 33 – LOW TRANSPORTATION COST INDEX IN THE CITY OF LA CROSSE

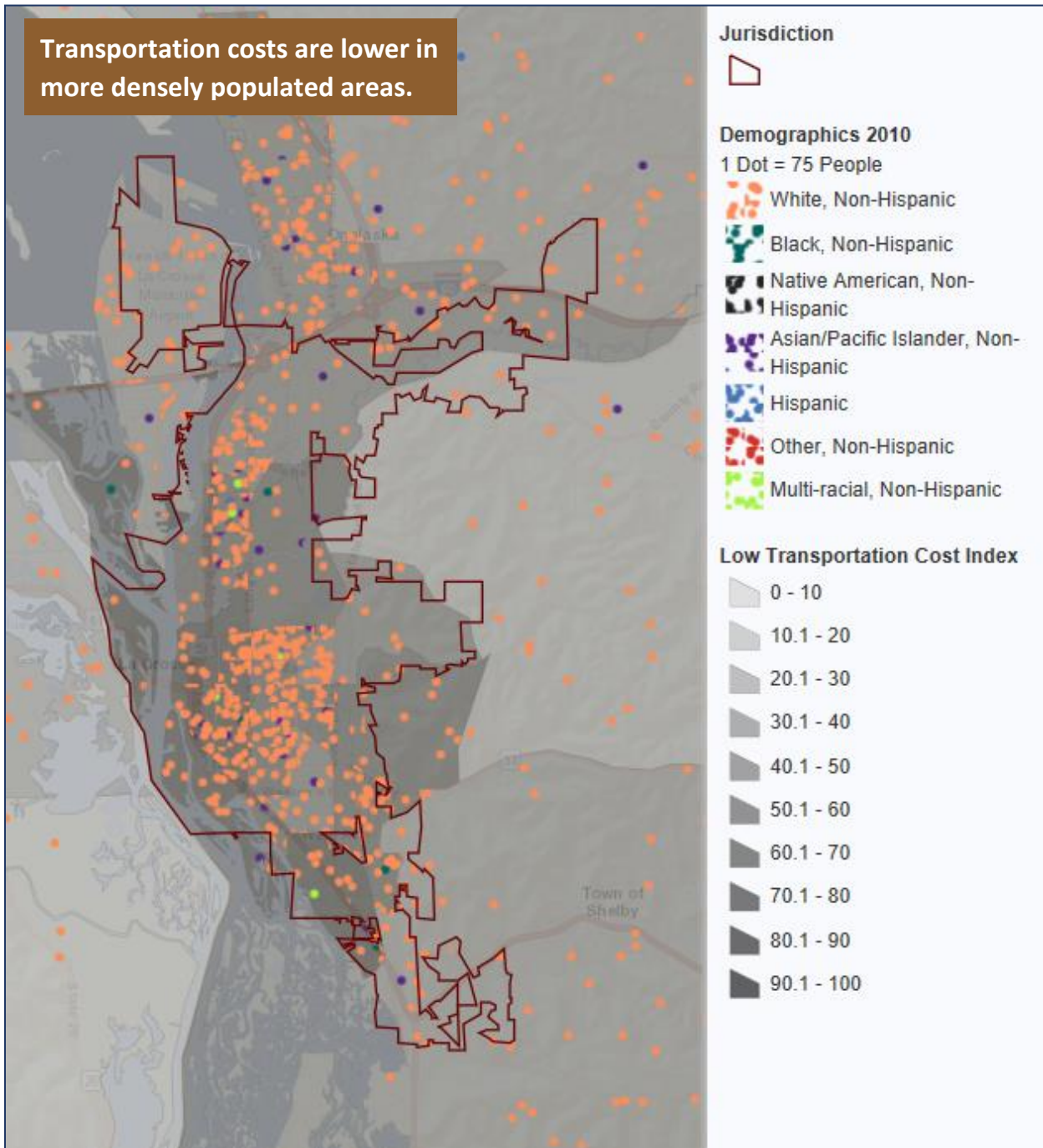
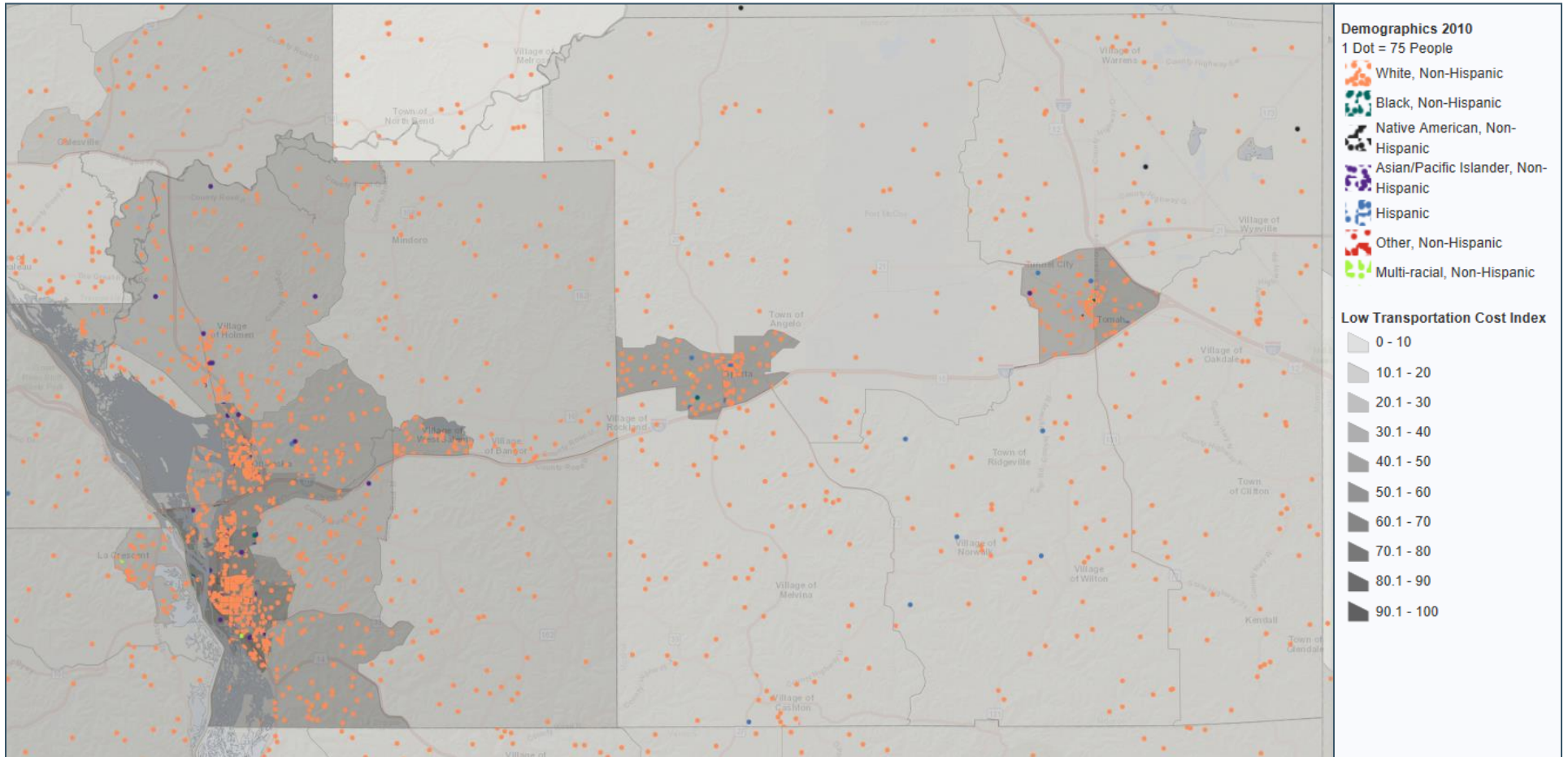


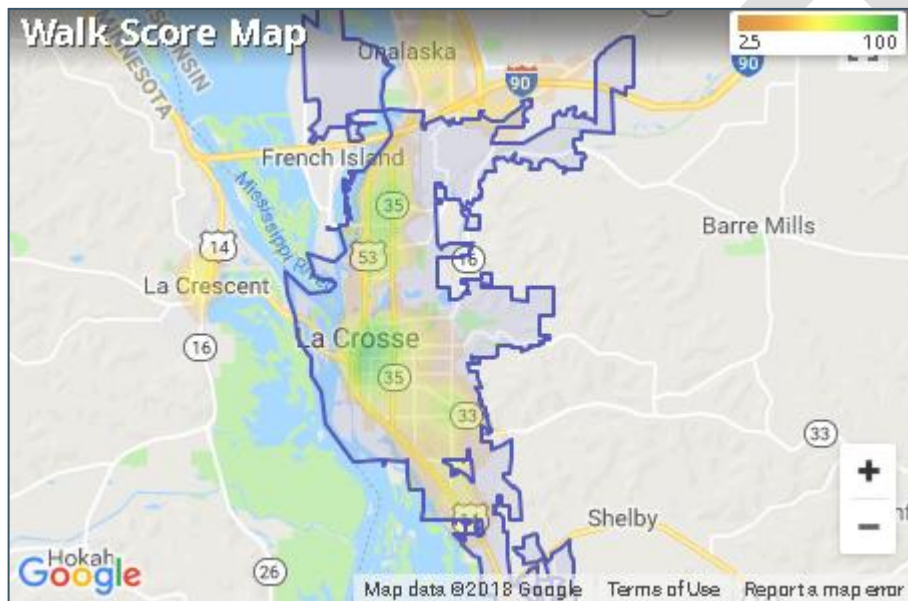
FIGURE 34 – LOW TRANSPORTATION COST INDEX IN THE LA CROSSE AND MONROE COUNTIES



Walk Score measures the walkability of any address by analyzing hundreds of walking routes to nearby amenities using population density and road metrics such as block length and intersection density. Data sources include Google, Education.com, Open Street Map, the U.S. Census, Localeze, and places added by the Walk Score user community.

Points are awarded based on the distance to amenities in several categories including grocery stores, parks, restaurants, schools, and shopping. Not only is the measure useful for showing walkability but also access in general to critical facilities. The most walkable neighborhoods in the city of La Crosse are in or around Downtown. In the northern half of the city, Logan Northside and Lower Northside and Depot neighborhoods are also conducive to walking. The block groups in the most walkable areas are also the most densely populated.

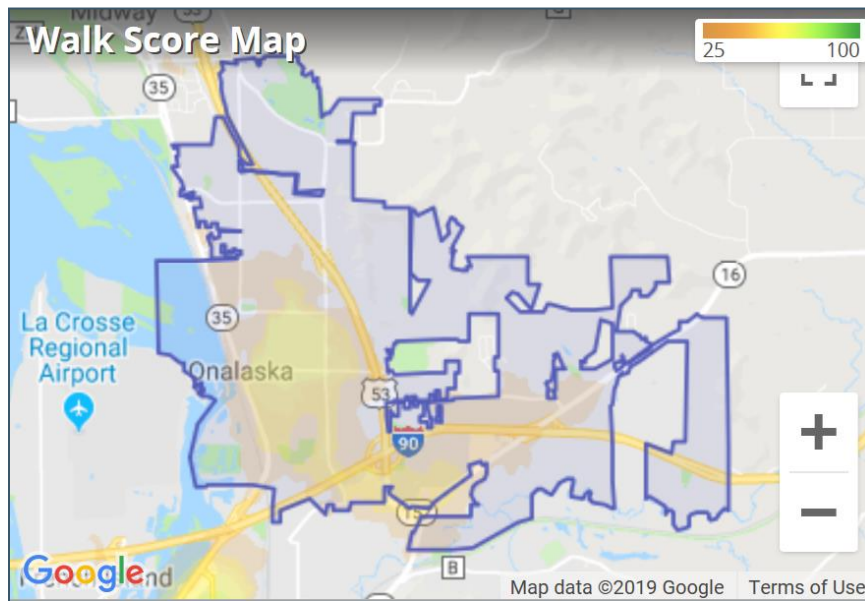
FIGURE 35 – WALKABILITY IN THE CITY OF LA CROSSE



Data Source: Walkscore, Retrieved from https://www.walkscore.com/WI/La_Crosse

Walkability in Onalaska is generally lower than in the city of La Crosse. The most walkable areas are in the city center, specifically the neighborhood bordered by Quincy Street on the north, Sand Lake Road on the east, Main Street on the south, and Oak Avenue / 6th Avenue on the west.

FIGURE 36 – WALKABILITY IN THE CITY OF ONALASKA



Data Source: Walkscore, Retrieved from <https://www.walkscore.com/WI/Onalaska>

POVERTY

Residents in high poverty areas tend to have lower levels of access to opportunity due to the absence of critical resources and disinvestment in their communities. As poverty increases, disparities in access to opportunities often increase among population groups and disadvantaged communities become even more isolated. HUD’s Low Poverty Index uses family poverty rates (based on the federal poverty line) to measure exposure to poverty by neighborhood. Lighter shading indicates areas of higher levels of poverty and darker shading indicates lower levels of poverty.

Figure 37 shows the concentrations of poverty by block group in the city of La Crosse. The block groups immediately north of the La Crosse River containing the Lower Northside and Depot neighborhood have more exposure to poverty compared to other parts of the city. According to Figure 37, the block groups that are exposed to more poverty seem to have a diverse population. Block groups in the northern tip of the city and along the eastern border have the lowest exposure to poverty.

Low Poverty Index scores in Table 14 show relatively significant disparities among racial and ethnic groups. Black and Asian populations experience the greatest exposure to poverty in the city of La Crosse. The white population above the poverty line is the least exposed to poverty in the city. The Native American population below the poverty line is the only group that is exposed to less poverty compared to the same population above the poverty line. Populations below the poverty line experience less disparity, but similar levels of exposure to poverty.

Low Poverty Index scores in La Crosse County are slightly higher and there is less disparity among all racial and ethnic groups. Block groups with the highest scores are located close to the eastern border of the city of La Crosse. The Hispanic population is the least exposed to poverty in La Crosse County while all other

groups are virtually even in score. Residents of Monroe County experience the highest levels of exposure to poverty compared to the city of La Crosse and La Crosse County. The northern half of Monroe County has higher scores compared to the southern half. All population groups above the poverty line experience similar levels of exposure, however, there are large disparities among groups below the poverty line. Asians below the poverty line experience the highest levels of poverty in Monroe County by a significant margin. The Native American population below the poverty line has the highest Low Poverty Index by 29 points.

FIGURE 37 – LOW POVERTY INDEX IN THE CITY OF LA CROSSE

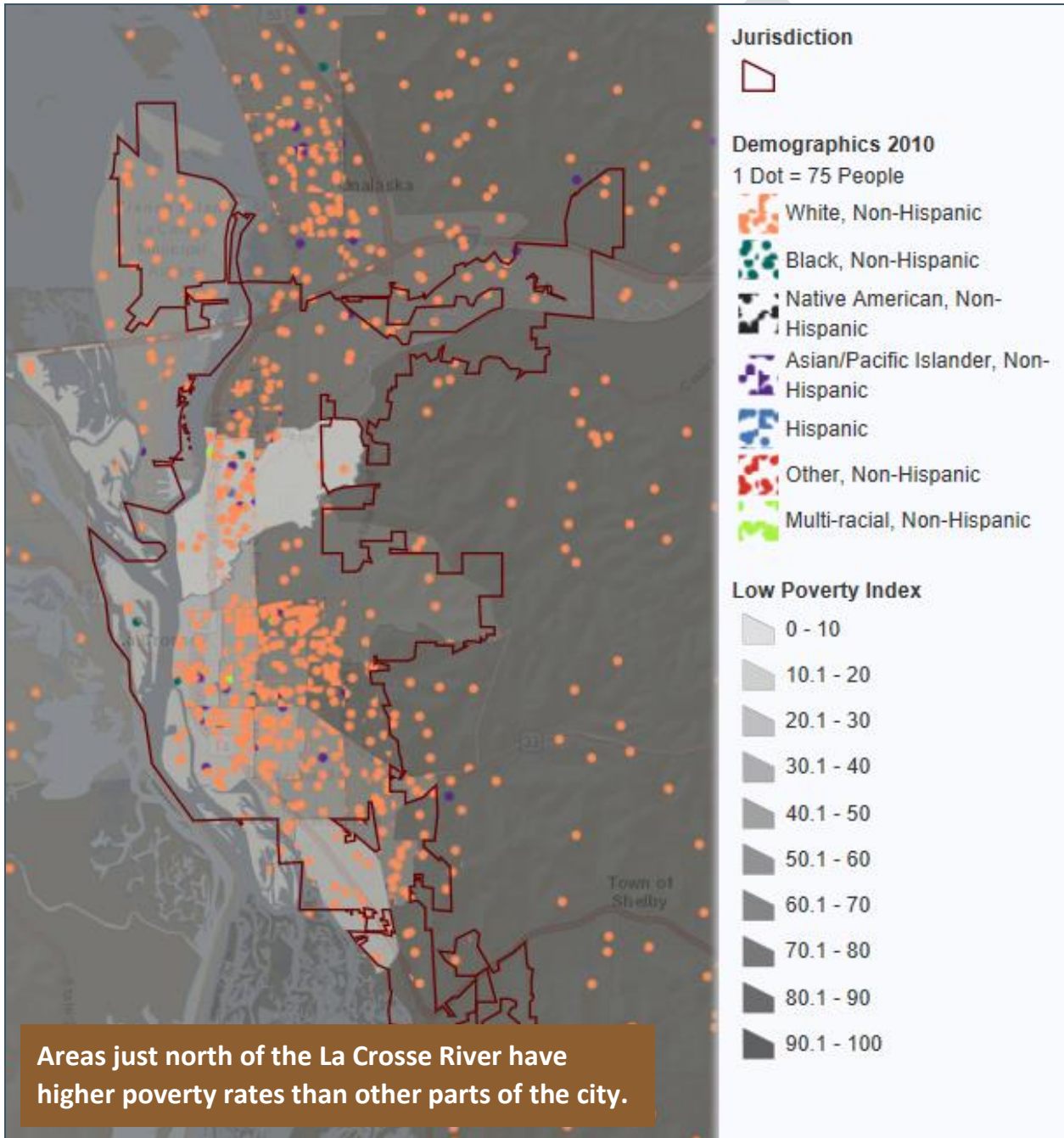
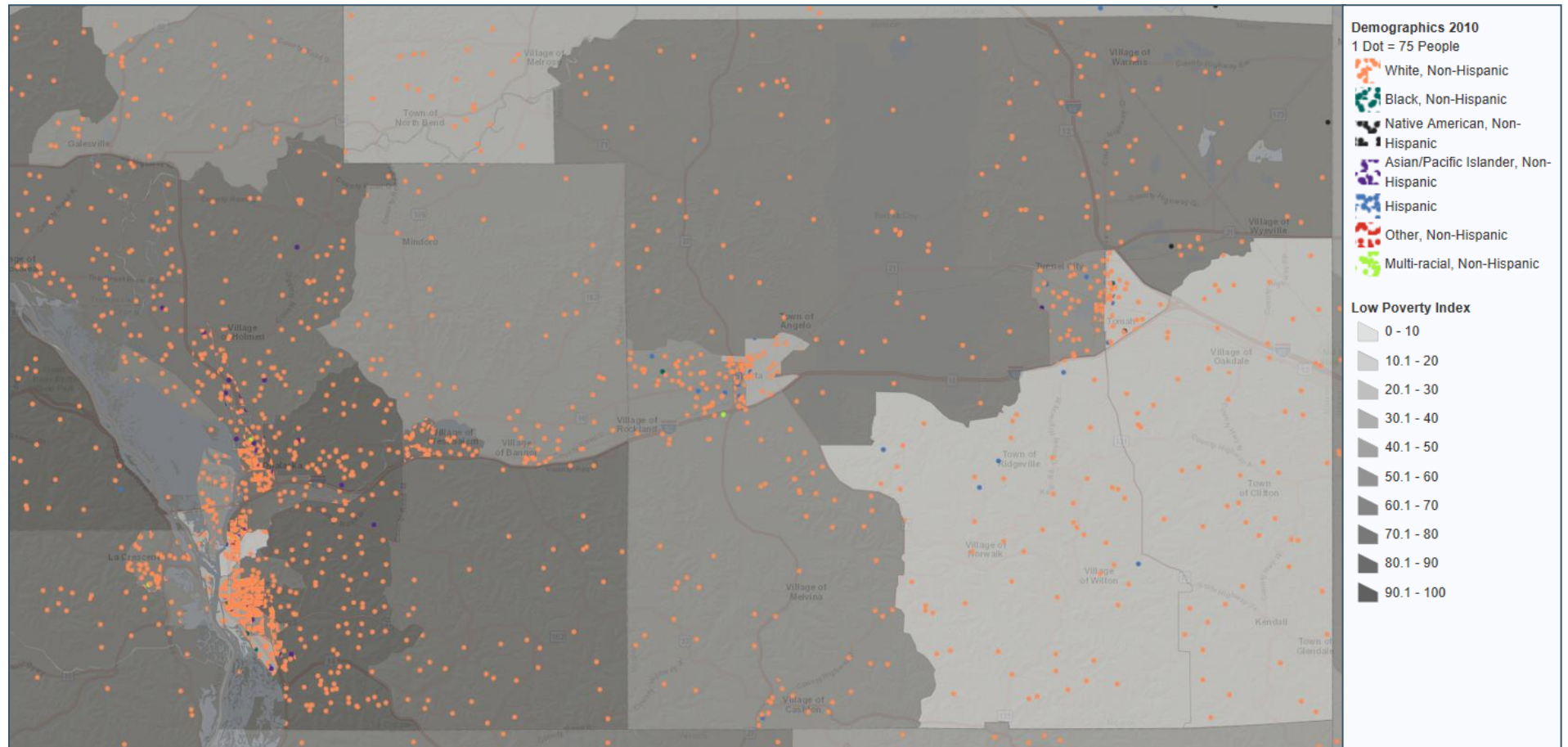


FIGURE 38 – LOW POVERTY INDEX IN LA CROSSE AND MONROE COUNTIES



ENVIRONMENTAL HEALTH

HUD's Environmental Health Index measures exposure based on EPA estimates of air quality (considering carcinogenic, respiratory, and neurological toxins) by neighborhood. The index only measures issues related to air quality and not other factors impacting environmental health. Lighter shading indicates areas of lower air quality and darker shading indicates higher air quality.

The neighborhoods with the worst air quality in the city of La Crosse are located in and around Downtown. Block groups in the neighborhoods of Grandview Emerson, Washburn, and Weigent Hogan Central neighborhoods have low air quality compared to other block groups in the city and county. There are no extreme disparities in air quality among block groups in the city of La Crosse. Figure 39 shows the spatial distribution of the population, but it is difficult to discern any patterns between racial composition of block groups and air quality.

The Environmental Health Index scores in the city of La Crosse suggest the similar levels of exposure to medium air quality among all racial and ethnic groups. The Native American population below the poverty line in the city is exposed to slightly higher air quality compared to others. The Black population, both above and below the poverty line, has the greatest exposure to low air quality in the city. The air quality in La Crosse County is slightly better as evidenced by the higher scores, but there are also slightly larger disparities among population groups. The scores suggest racial and ethnic minority populations reside in areas with better air quality compared to white populations.

The Environmental Health Index scores in Monroe County are significantly higher than the city of La Crosse and La Crosse County. All population groups are exposed to good air quality. Native Americans below the poverty line have the highest score of 92 while Asians below the poverty line scored the lowest with 74. Although the difference in scores is greater than what is found in the city of La Crosse and La Crosse County, residents experience significantly better air quality in Monroe County.

A Superfund site is any land in the United States that has been contaminated by hazardous waste and identified by the EPA as a candidate for cleanup because it poses a risk to human health and/or the environment. These sites are placed on the National Priorities List (NPL). There is one Superfund site in La Crosse County located near the western border. Two Superfund sites are also found near Tomah in Monroe County.

FIGURE 39 – ENVIRONMENTAL HEALTH INDEX IN THE CITY OF LA CROSSE

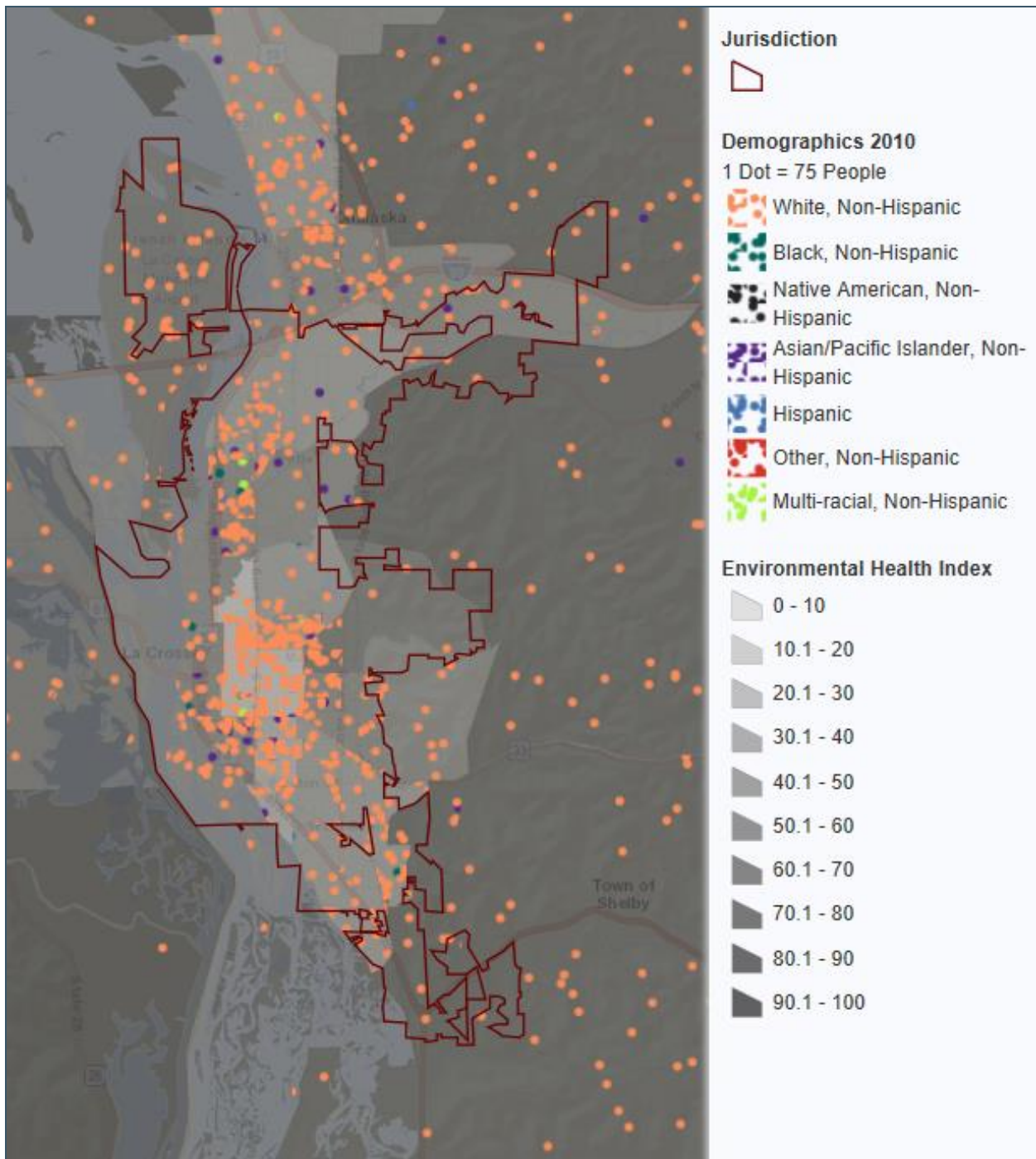


FIGURE 40 – ENVIRONMENTAL HEALTH INDEX IN LA CROSSE AND MONROE COUNTIES

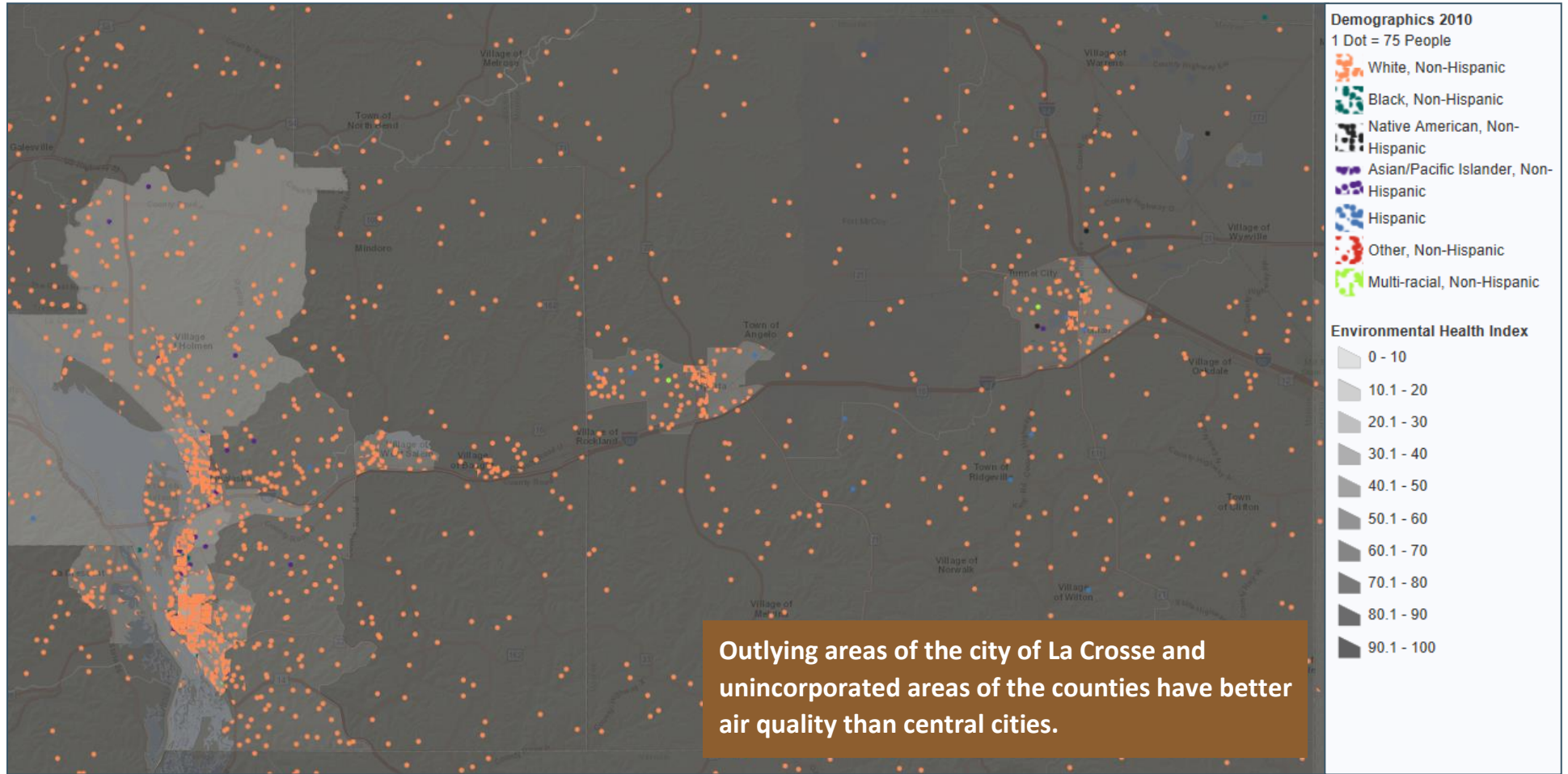
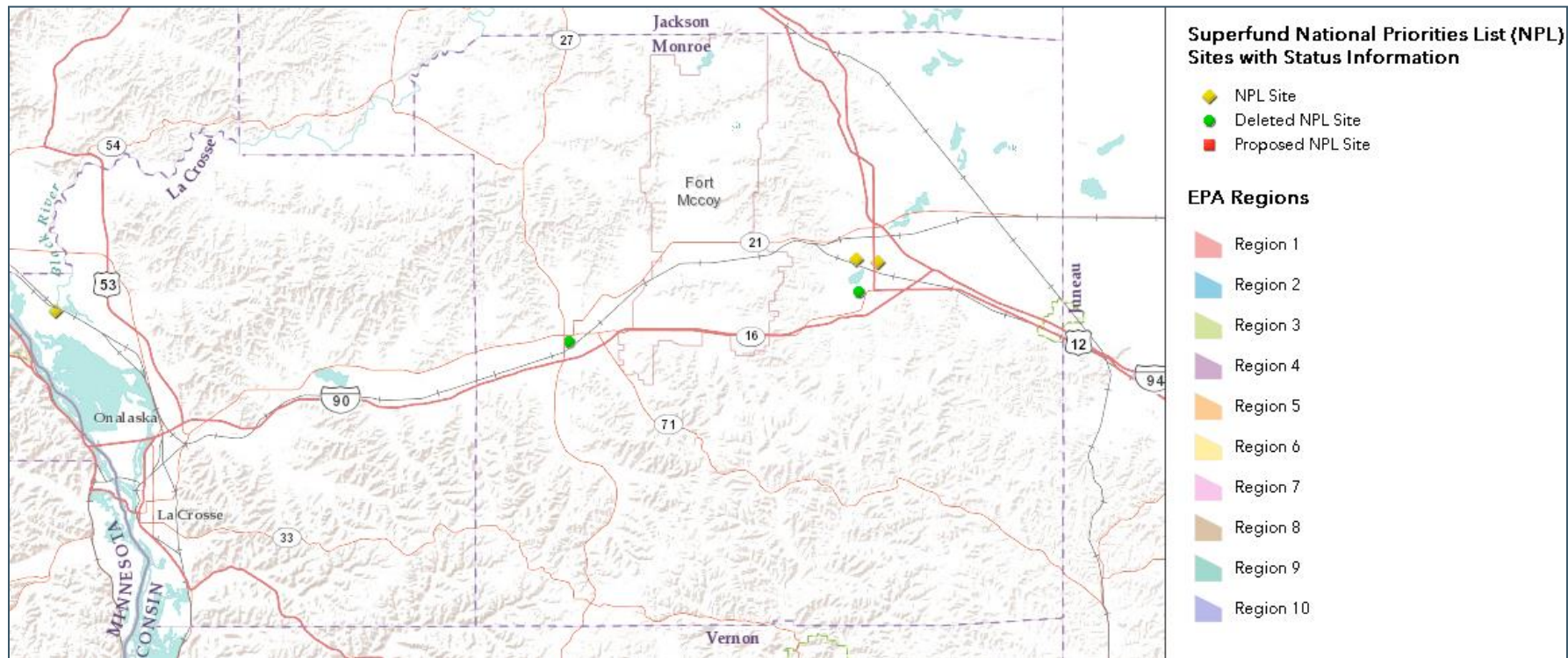


FIGURE 41 – SUPERFUND NATIONAL PRIORITIES LIST (NPL) SITES IN THE LA CROSSE REGION

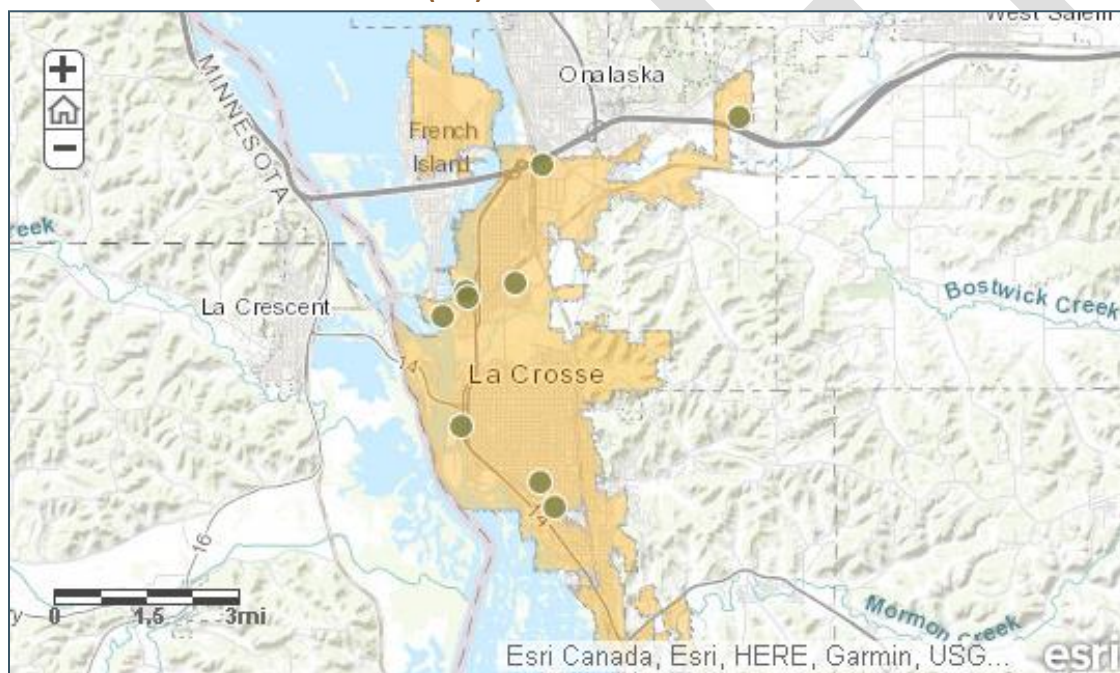


Source: Environmental Protection Agency GIS Data, Retrieved from: <https://www.epa.gov/superfund/search-superfund-sites-where-you-live>

A Superfund site is any land in the United States that has been contaminated by hazardous waste and identified by the EPA as a candidate for cleanup because it poses a risk to human health and/or the environment. These sites are placed on the National Priorities List (NPL). There is one Superfund site in La Crosse County located near the western border. Two Superfund sites are also found near Tomah in Monroe County.

The Toxics Release Inventory (TRI) tracks the management of certain toxic chemicals that may pose a threat to human health and the environment. Certain industrial facilities in the U.S. must report annually how much of each chemical is recycled, combusted for energy recovery, treated for destruction, and disposed of or otherwise released on- and off-site. This information is collectively referred to as production-related waste managed. There are nine sites located within the city of La Crosse. Sites are located along the Mississippi River and major expressways. La Crosse County houses a total of 11 sites (inclusive of the 9 sites in the city of La Crosse) with one in Onalaska and one in Bangor. There are 8 total sites in Monroe County with four near Sparta, one at Fort McCoy, and three close to Tomah.

FIGURE 42 – TOXIC RELEASE INVENTORY (TRI) IN THE CITY OF LA CROSSE



Note: TRI sites in the city of La Crosse include: Chart Energy and Chemical, Inc., 2191 Ward Avenue; Trane – S. La Crosse Operations, 2213 South 20th Street; City Brewing Company, 925 South 3rd Street; French Island Plant, 200 South Bainbridge Street; Midwest Industrial Asphalt, 615 Sumner Street; Hydrite Chemical Company, 701 Sumner Street; Crown Beverage Packaging, 1501 St. James Street; Great Lakes Cheese of La Crosse, 2200 Enterprise Avenue; and Torrance Casting, Inc., 3131 Commerce Street.

Data Source: Environmental Protection Agency GIS Data, Retrieved from:
https://iaspub.epa.gov/triexplorer/tri_factsheet.factsheet?pzip=&pstate=WI&pcity=La%20Crosse&pcounty=&pyear=2017&pParent=TRI&pDataSet=TRIQ1

FIGURE 43 – TOXIC RELEASE INVENTORY (TRI) IN LA CROSSE COUNTY



Note: In addition to the TRI sites in La Crosse identified in Figure 42, other TRI sites in La Crosse County include Metallics, Inc., W7274 County Road Z, Onalaska; and Stella Jones Corporation, W1038 County Road U, Bangor.

Data Source: Environmental Protection Agency GIS Data, Retrieved from: https://iaspub.epa.gov/triexplorer/tri_factsheet.factsheet?pzip=&pstate=WI&pcity=&pcounty=La%20Crosse&pyear=2017&pParent=TRI&pDataSet=TRIQ1

FIGURE 44 – TOXIC RELEASE INVENTORY (TRI) IN MONROE COUNTY



Note: TRI sites in Monroe County include: Hartland Lubricants and Chemicals, 2455 Commercial Drive, Sparta; Foremost Farms, 427 East Wise Street, Sparta; Necal Corporation, 1326 South Waters Street, Sparta; Northern Engraving Corporation, 803 South Black River Street, Sparta; U.S. Army Fort Mccoy Range Facility, 2171 South 8th Avenue, Fort Mccoy; Mars Petcare, 411 Martin Avenue, Tomah; Toro Company, 200 Sime Avenue, Tomah; and Coveris, 501 Williams Street, Tomah.

Data Source: Environmental Protection Agency GIS Data, Retrieved from: https://iaspub.epa.gov/triexplorer/tri_factsheet.factsheet?pzip=&pstate=WI&pcity=&pcounty=Monroe&pyear=2017&pParent=TRI&pDataSet=TRIQ1

SUMMARY

Spatial distribution patterns of racial composition and index scores indicate relatively equal access to opportunities among population groups in the city of La Crosse. With the exception of some significant differences in a few index categories, similar patterns of low disparity appear in La Crosse and Monroe Counties when examining the level of access to schools, employment, jobs, transit, and environmental health of racial and ethnic groups.

Spatial distribution patterns and index scores indicate virtually equal access to proficient schools among racial and ethnic groups in the city of La Crosse. Disparities in access to proficient schools among racial and ethnic groups in La Crosse County as a whole are slightly greater when compared to the city of La Crosse alone. School proficiency index scores among racial and ethnic groups in Monroe County are overall lower than both the city of La Crosse and La Crosse County, however, there is only a one-point difference between groups above the poverty line.

The block groups with the best access to jobs are primarily located along the eastern boundary of the city of La Crosse. Significant disparities exist among populations below the poverty line in the city of La Crosse and La Crosse County. The Hispanic population below the poverty line lives the furthest from job locations by a significant margin of 21 and 17 points, respectively. Although Jobs Proximity Index scores in Monroe County deviate from the patterns found in La Crosse County, the disparities are just as significant. There is a 20-point differential between the lowest and highest scoring populations.

Labor market engagement in the city of La Crosse and La Crosse County is highest in block groups near the eastern border of the city. Labor Market Index scores indicate larger disparities among racial and ethnic groups above the poverty line in both the city of La Crosse and La Crosse County. Labor market engagement scores are slightly lower in Monroe County, but there are fewer disparities among racial and ethnic groups.

Transit usage is uniform throughout the city of La Crosse with the highest usage in neighborhoods in or around Downtown. Transit Trip Index scores indicate nearly the same levels of transit usage by racial and ethnic groups in the city of La Crosse. There is less overall transit usage in La Crosse County compared to the city, but disparities in transit usage are slightly greater in La Crosse County.

Low Transportation Cost scores are highest in the city of La Crosse and decrease as the distance from the city increases. Compared to the city of La Crosse, disparities among racial and ethnic groups are slightly greater in La Crosse County. Monroe County has the highest transportation costs and the largest disparities among racial and ethnic groups. Native Americans below the poverty line experience the highest transportation costs and greatest distances to public transportation among all racial and ethnic groups.

Low Poverty Index scores indicate relatively significant disparities among racial and ethnic groups in the city of La Crosse. La Crosse County residents experience similar levels of exposure to poverty, however, there is less disparity among all racial and ethnic groups. Residents of Monroe County experience the highest levels of exposure to poverty compared to the city of La Crosse and La Crosse County.

Neighborhoods with the worst air quality are located in and around Downtown La Crosse. The Environmental Health Index scores in the city of La Crosse suggest the similar levels of exposure to medium air quality among all racial and ethnic groups. The air quality in La Crosse County is slightly better as evidenced by the higher scores, but there are also slightly larger disparities among population groups. The disparities in air quality among racial and ethnic groups is greater in Monroe, but all residents experience significantly better air quality compared to the city of La Crosse and La Crosse County.

DRAFT

CHAPTER 7.

PUBLICLY SUPPORTED HOUSING

Publicly supported housing encompasses several strategies and programs developed since the 1930s by the federal government to ameliorate housing hardships that exist in neighborhoods throughout the country. The introduction and mass implementation of slum clearance to construct public housing projects during the mid-1900s signified the beginning of publicly supported housing programs. Government-owned and managed public housing was an attempt to alleviate problems found in low-income neighborhoods such as overcrowding, substandard housing, and unsanitary conditions. Once thought of as a solution, the intense concentration of poverty in public housing projects often exacerbated negative conditions that would have lasting and profound impact on their communities.

Improving on public housing's model of high-density, fixed-site dwellings for very low-income households, publicly supported housing programs have since evolved into a more multi-faceted approach overseen by local housing agencies. The Housing and Community Development Act of 1974 created Section 8 rental assistance programs. Section 8, also referred to as the Housing Choice Voucher (HCV) program, provides two types of housing vouchers to subsidize rent for low-income households: project-based and tenant-based. Project-based vouchers can be applied to fixed housing units in scattered site locations while tenant-based vouchers allow recipients the opportunity to find and help pay for available rental housing on the private market.

The Tax Reform Act of 1986 created the Low-Income Housing Tax Credit (LIHTC) program to incentivize development of affordable, rental-housing development. Funds are distributed to state housing finance agencies that award tax credits to qualified projects to subsidize development costs. Other HUD Programs including Section 811 and Section 202 also provide funding to develop multifamily rental housing specifically for disabled and elderly populations.

The now-defunct HOPE VI program was introduced in the early 1990s to revitalize and rebuild dilapidated public housing projects and create mixed-income communities. Although HOPE VI achieved some important successes, the Choice Neighborhoods Initiative program was developed to improve on the

THERE ARE ABOUT 2,660 SUBSIDIZED AFFORDABLE HOUSING UNITS IN LA CROSSE AND MONROE COUNTIES, INCLUDING THE CITY OF LA CROSSE. MOST OF THESE ARE PUBLIC HOUSING AND LOW INCOME HOUSING TAX CREDIT UNITS.

HOUSEHOLDS OF COLOR ARE OVERREPRESENTED IN PUBLIC HOUSING AND HOUSING CHOICE VOUCHER RESIDENTS RELATIVE TO THEIR OVERALL POPULATION SHARES IN THE CITY OF LA CROSSE AND LA CROSSE COUNTY.

lessons learned from HOPE VI. The scope of Choice Neighborhoods spans beyond housing and addresses employment access, education quality, public safety, health, and recreation.²⁸

Current publicly supported housing programs signify a general shift in ideology toward more comprehensive community investment and de-concentration of poverty. However, studies have shown a tendency for subsidized low-income housing developments and residents utilizing housing vouchers to continue to cluster in disadvantaged, low-income neighborhoods. Programmatic rules and the point allocation systems for LIHTC are thought to play a role in this clustering and recent years have seen many states revising their allocation formulas to discourage this pattern in new developments.²⁹ The reasons for clustering of HCVs is more complicated since factors in decision-making vary greatly by individual household. However, there are indications that proximity to social networks, difficulties searching for housing, and perceived or actual discrimination contribute to clustering.³⁰ This section will review the current supply and occupancy characteristics of publicly supported housing types and its geographic distribution within the study area.

SUPPLY AND OCCUPANCY

Four different public housing authorities in the La Crosse region provide approximately 1,141 affordable housing units throughout the region, housing families, the elderly, and people with disabilities. The region's four public housing authorities (and the acronyms used to abbreviate their names) are shown below and are discussed at length throughout this chapter. In addition to their public housing units and HCVs, there are Project-Based Section 8 units offered by some of these housing authorities and some multifamily units subsidized by other HUD programs in La Crosse County that may or may not be owned by a housing authority. These tend to be Low-Income Housing Tax Credit units and units within other programs specifically for the elderly or disabled. Comparing Tables 15 and 16, it is evident that not all of the publicly supported housing units in a jurisdiction are owned or managed by the housing authority serving that jurisdiction. Due to voucher portability and other intricacies of these housing systems, there may be more units in an area than are provided by its respective housing authority.

²⁸ Department of Housing and Urban Development. *Evidence Matters: Transforming Knowledge Into Housing and Community Development Policy*. 2011. www.huduser.gov/portal/periodicals/em/EM-newsletter_FNL_web.pdf.

²⁹ Dawkins, Casey J. *Exploring the Spatial Distribution of Low Income Housing Tax Credit Properties*. US Department of Housing and Urban Development, www.huduser.gov/publications/pdf/dawkins_exploringliht_assistedhousingrcr04.pdf.

³⁰ Galvez, Martha M. *What Do We Know About Housing Choice Voucher Program Location Outcomes? A Review of Recent Literature*. What Works Collaborative, 2010. www.urban.org/sites/default/files/publication/29176/412218-What-Do-We-Know-About-Housing-Choice-Voucher-Program-Location-Outcomes-.PDF.

TABLE 15 – UNITS BY PUBLIC HOUSING AUTHORITY

Housing Authority	Public Housing Units	Housing Choice Vouchers
La Crosse Housing Authority (LHA)	593	144
La Crosse County Housing Authority (LCHA)	128	0
Monroe County Housing Authority (MCHA)	0	132
Tomah Public Housing Authority (TPHA)	28	116

Source: PHA 5-Year Plans

Taken together, these publicly supported housing programs account for 6.6% of the housing units in the city of La Crosse, 4.3% of La Crosse County’s housing units, and 3.0% of all housing units in Monroe County. However, because the programs are all rent-based, the share of rental units in the region supported in some form by a public subsidy is considerably higher. In the city of La Crosse and La Crosse County, the share of units subsidized by housing choice vouchers is rather small compared with some other communities. It is not clear why these jurisdictions do not have more funding available for the HCV program, but the lack of available vouchers is a constraint on the availability of affordable housing opportunities in locations of choice across the region.

TABLE 16 – PUBLICLY SUPPORTED HOUSING UNITS BY PROGRAM CATEGORY

Housing Units	City of La Crosse		La Crosse County		Monroe County	
	#	%	#	%	#	%
Total housing units	22,556	-	48,402	-	19,204	-
Public housing	593	2.6%	721	1.5%	84	0.4%
Project-based Section 8	285	1.3%	423	0.9%	145	0.8%
Other multifamily	0	0.0%	24	0.1%	0	0.0%
HCV program	114	0.5%	146	0.3%	214	1.1%
LIHTC program	496	2.2%	770	1.6%	136	0.7%

Source: Decennial Census; APSH; HUD User LIHTC Database

In the city of La Crosse, 93.9% of households identify as white, yet white households make up only 86.3% of public housing units and 77.4% of voucher holders in the city. The representation of white families in project-based Section 8 units (94.0%) is approximately even with their general population share. People of color from all racial and ethnic groups are overrepresented in public housing units compared with their shares of the city’s population. Latino and Asian households are underrepresented in the HCV program, but Black households (1.2% of the city’s households) comprise 20.6% of the city’s voucher holders. While the disparity is significant, it is also noteworthy that there are just 126 HCVs in use in the city of La Crosse, so the sample size for analysis is small.

In La Crosse County, as in the city, people of color are overrepresented in public housing in every racial and ethnic group. Further, the disparity in high rates of HCV use for Black households persists in the county and to an even greater degree: making up just 0.9% of the county's households, Black families comprise 22.5% of its voucher holders. In Monroe County, the white population in public housing, project-based Section 8 and holding vouchers is reasonably proportional to the white population as a whole. Some minority racial and ethnic groups display slight over- or under-representations in some types of housing, but these are very small minority populations and numbers of units/vouchers, so the differences are generally matters of fewer than 10 households.

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TABLE 17 – PUBLICLY SUPPORTED HOUSING RESIDENTS BY RACE/ETHNICITY

Housing Type	Race/Ethnicity							
	White		Black		Hispanic		Asian or Pacific Islander	
	#	%	#	%	#	%	#	%
City of La Crosse								
Public Housing	493	86.3%	40	7.0%	13	2.3%	23	4.0%
Project-Based Section 8	236	94.0%	10	4.0%	4	1.6%	1	0.4%
HCV Program	79	77.4%	21	20.6%	1	1.0%	1	1.0%
0-30% AMI	19,510	93.9%	249	1.2%	222	1.1%	574	2.8%
0-50% AMI	3,115	94.0%	75	2.3%	4	0.1%	60	1.8%
0-80% AMI	5,770	86.1%	115	1.7%	89	1.3%	109	1.6%
Total Households	19,510	93.9%	249	1.2%	222	1.1%	574	2.8%
La Crosse County								
Public Housing	601	86.8%	43	6.2%	15	4.3%	30	4.3%
Project-Based Section 8	347	94.3%	12	3.3%	4	1.1%	4	1.1%
Other Family	22	100.0%	-	0.0%	-	0.0%	-	0.0%
HCV Program	104	75.4%	31	22.5%	1	1.5%	2	1.5%
0-30% AMI	4,940	93.3%	85	1.6%	59	1.1%	130	2.5%
0-50% AMI	8,930	82.6%	125	1.2%	144	1.3%	250	2.3%
0-80% AMI	16,120	86.5%	235	1.3%	269	1.4%	550	3.0%
Total Households	43,540	94.8%	390	0.9%	493	1.1%	1,130	2.5%
Monroe County								
Public Housing	71	94.7%	2	2.7%	2	2.7%	-	0.0%
Project-Based Section 8	130	97.0%	1	0.8%	2	1.5%	-	0.0%
HCV Program	150	92.6%	9	5.6%	3	1.9%	-	0.0%
0-30% AMI	1,625	92.3%	4	0.2%	24	1.4%	4	0.2%
0-50% AMI	3,045	78.4%	18	0.5%	42	1.1%	8	0.2%
0-80% AMI	6,110	86.6%	38	0.5%	87	1.2%	37	0.5%
Total Households	16,715	95.3%	193	1.1%	291	1.7%	55	0.3%

Note: Data presented are number of households, not individuals.

Source: Decennial Census; CHAS; APSH

TABLE 18 – DEMOGRAPHICS OF PUBLICLY SUPPORTED HOUSING DEVELOPMENTS BY PROGRAM CATEGORY

Development Name	City of La Crosse					
	# Units	% White	% Black	% Hispanic	% Asian	% Households with Children
Public Housing						
Schuh Homes	210	73%	13%	3%	10%	75%
Stokke Tower	383	93%	4%	2%	1%	N/A
Project-Based Section 8						
Sagen/Christopherson Apartment	30	95%	5%	0%	N/A	5%
Forest Park	111	90%	8%	3%	N/A	N/A
Ping Manor	60	N/A	N/A	N/A	N/A	N/A
River Oaks Apartments	48	89%	5%	5%	N/A	68%
Schumann Apartments	16	100%	N/A	0%	N/A	N/A
St. Vallerie Apartments	20	100%	N/A	0%	N/A	N/A

Note: Schuh Homes and Stokke Tower are Asset Management Projects (AMPs) which each include multiple La Crosse Housing Authority properties. Schuh Homes includes Grover Estates (30 units), Huber Homes (40 units), Mullen Homes (56 units), and Schuh Homes (84 units). Stokke Tower includes Sauber Manor (82 units), Solberg Heights (78 units), Stoffel Court (75 units), Becker Plaza (75 units), and Stokke Tower (73 units).

Percentages may not add to 100 due to rounding error.

Data Sources: APSH

Data on the occupancy of specific public housing and project-based Section 8 properties was not available for La Crosse and Monroe Counties, but the information available for developments within the city of La Crosse indicates that most properties have populations of white residents approximately proportional to the overall white population share for the city. The exception is Schuh Homes, an LHA family project which includes 210 units in four properties throughout the city (Grover Estates, Huber Homes, Mullen Homes, and Schuh Homes). Households of color reside at these properties at rates disproportionate to their share of the general population of the city. The other subsidized housing developments, including other family developments such as River Oaks Apartments, exhibit a more proportional population distribution. Two project-based Section 8 properties, Schumann Apartments and St. Vallerie Apartments, both have populations that are 100% white, however, given their small number of units (16 and 20, respectively) and the city’s population being nearly 94% white, these demographics are not necessarily due to anything other than chance.

GEOGRAPHY OF SUPPORTED HOUSING

In the first map that follows, the locations of publicly supported housing developments are represented along with levels of Housing Choice Voucher use in the city of La Crosse. The map is overlaid with dots representing racial/ethnic demographics. The second map contains the same elements but displays the entire two-county study area.

The blue markers on the maps indicate the locations of public housing. In the city, there are three public housing properties clustered near one another in the Lower Northside and Depot Neighbors community and the area immediately to the east on Winneshiek Road. This area is one of the city of La Crosse's more diverse neighborhoods, with generally higher than average populations of racial and ethnic minorities, particularly Asians. Another four public housing communities are located together in the Downtown and Washburn neighborhoods. In the regional map, two additional areas with public housing properties are observed. These are the TPHA's units in Tomah and the Brookside Apartments in Sparta. The Tomah location is somewhat more diverse than Monroe County as a whole, with that diversity attributed to slightly higher shares of racial and ethnic minorities of all types. In Sparta, the community surrounding Brookside owes its diversity primarily to a larger than average Latino population.

The orange markers on the maps indicate that the locations of Project Based Section 8 units in the city of La Crosse tend to be in the southern half of the city, generally west of South Avenue and south of the Gunderson campus. Two of these properties are immediately adjacent to the south edge of Gunderson, and two more are located about two miles further south. This southernmost cluster is located in a neighborhood with a demographic composition similar to that of the city as a whole. The cluster nearest Gunderson is in a slightly more diverse neighborhood with a larger than average Asian population. Project-based Section 8 units are more likely than public housing to be distributed beyond the city into suburban locations, with additional properties sited in Holmen, Onalaska, and West Salem. In Monroe County, project-based Section 8 developments are located in Sparta and Tomah.

Finally, the maps also depict the locations of Low Income Housing Tax Credit developments. The Low Income Housing Tax Credit (LIHTC) program is the primary source of subsidy for development of affordable housing by the private market. Created by the Federal Tax Reform Act of 1986, the LIHTC program makes available an indirect federal subsidy for investors in affordable rental housing. The value of the tax credits awarded to a project may be syndicated by the recipient to generate equity investment, offsetting a portion of the development cost. As a condition of the LIHTC subsidy received, the resulting housing must meet certain affordability conditions. The largest cluster of LIHTC developments is found near the convergence of La Crosse's downtown, Washburn, and Powell-Poage-Hamilton neighborhoods. This portion of the city is significantly more diverse than the city as a whole. A second, linear concentration of LIHTC development is found along the US-53 and State Road 35 corridor extending from Holmen south to Onalaska. Five LIHTC developments are found along this corridor, plus another in West Salem. Two LIHTC developments are located in Tomah.

The rates at which Housing Choice Vouchers (HCVs) are used are represented by the shading on the maps. HCVs are issued to households and may be used at a rental unit of the tenant's choosing to reduce the tenant's share of rent payments to an affordable level. Therefore, unlike the publicly supported developments marked on the map, HCVs are portable and their distribution throughout the city is subject to fluctuate over time. The current maps show that, in the city of La Crosse, vouchers are relatively evenly distributed throughout the city. It bears repeating here that the allotment of vouchers in use in the city of La Crosse is a very small percentage (114 total vouchers, or 0.5%) of the city's housing stock, so it is not surprising to find low rates of voucher usage throughout the city. The highest concentration of HCVs in the city of La Crosse can be found in the Holy Trinity Longfellow neighborhood, where 1.9% of the housing units are rented using a voucher. In Monroe County, more intensive use of vouchers can be found in

Tomah and Sparta. The two darkest-shaded areas near Tomah on the regional map indicate tracts where voucher usage ranges from about 5.5% to nearly 7% of all housing units. The shading in the vicinity of Sparta indicates voucher use rates between 2% and 3%.

When the map of publicly supported housing locations is compared with the maps of opportunity index scores in Chapter 5 of this report, it is clear that different housing locations all carry with them different positive and negative opportunity attributes.

Public housing in the city of La Crosse is located in an area with somewhat low access to proficient schools, low levels of labor market engagement and high rates of poverty, however this area also has good access to transit, low transportation costs, and good levels of walkability. The public housing in Sparta and Tomah similarly has lower access to proficient schools than other areas of Monroe County but, in Sparta, has good proximity to jobs and high environmental quality. In Tomah, there is also good environmental quality high rates of labor market engagement in addition. Project-based Section 8 and LIHTC developments, being more widely distributed across the region allow residents to access different combinations of opportunity factors. In the LIHTC units between Holmen and Onalaska, residents have good access to transit, proficient schools, walkable neighborhoods (in Onalaska), and low-poverty areas. However, transportation costs, environmental quality, and proximity to jobs are lower than in some other areas. The Project-based Section 8 units in West Salem offer enhanced access to neighborhoods with proficient schools and access to jobs, which are features some other neighborhoods with clusters of Project-based Section 8 housing lack.

Evaluating tradeoffs in access to opportunity is an important exercise because it demonstrates that no one neighborhood has all the markers of high opportunity – and neither are high scores on all the opportunity indices likely to be imperative for any one person or household. A family with children may opt for an affordable housing option in a neighborhood with access to better schools, even if it offers lower proximity to jobs and a longer, costlier commute. Conversely, a retiree who is no longer employed and does not have school-aged children may choose a neighborhood with many services nearby over one with good schools or jobs proximity. The relative dispersion of publicly supported housing types across La Crosse and Monroe Counties means that, to the degree housing units in those developments have vacancies and are available for rent, residents have the opportunity to access opportunity factors of particular importance to them. Larger numbers of vouchers and wider acceptance by landlords in locations throughout the study area would further enhance the mobility of renters seeking to relocate in order to access areas of greater opportunity.

FIGURE 45 – PUBLICLY SUPPORTED HOUSING AND RACE / ETHNICITY IN THE CITY OF LA CROSSE

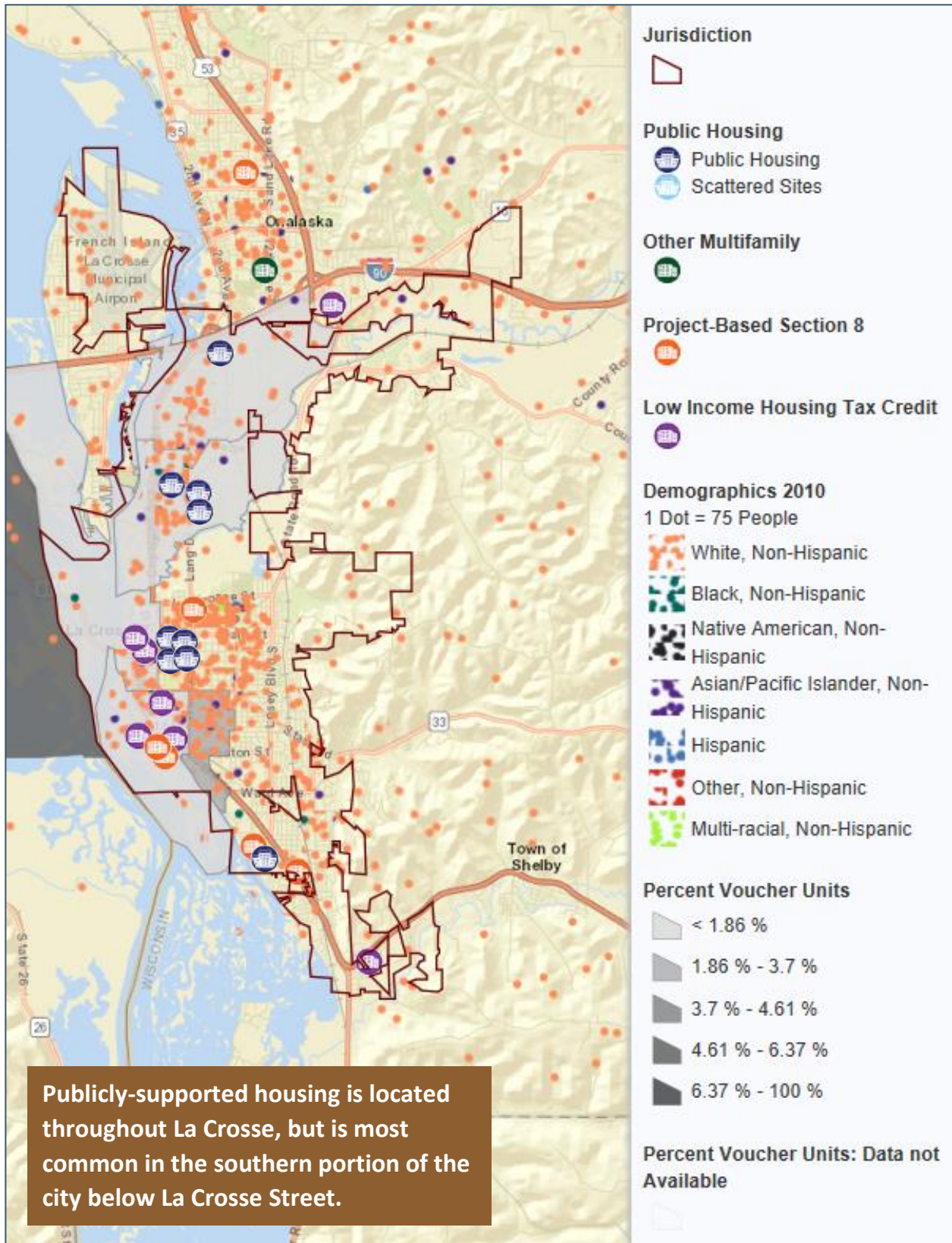
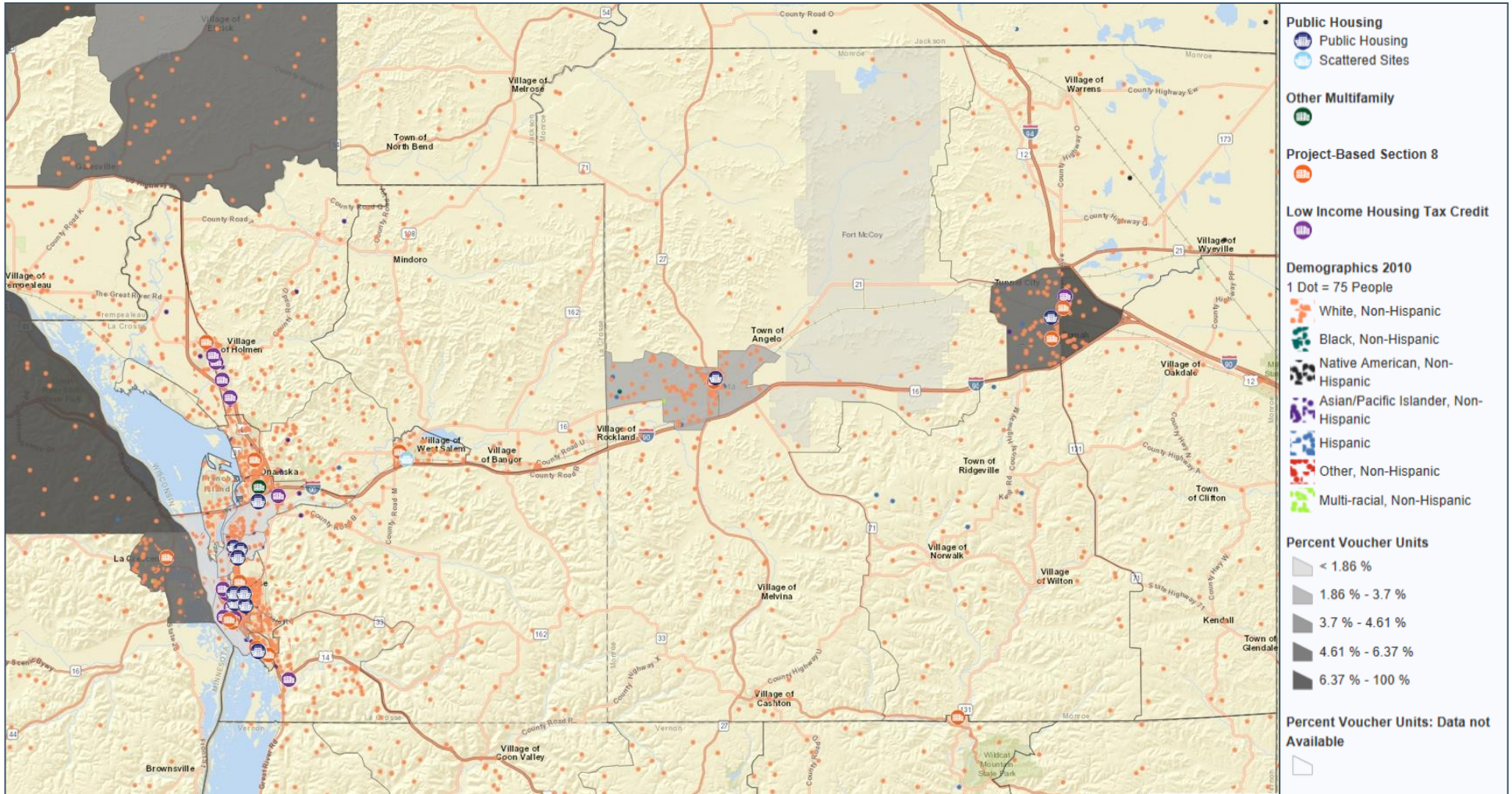


FIGURE 46 – PUBLICLY SUPPORTED HOUSING AND RACE / ETHNICITY IN LA CROSSE AND MONROE COUNTIES



POLICY REVIEW

The four local public housing authorities serving the greater La Crosse region collectively administer approximately 1,141 total units of subsidized housing between their public housing and voucher programs. As required by HUD, each of the authorities maintains a comprehensive Five-Year PHA Plan with annual plan updates, as well as other program-specific policies, namely an “Admissions and Continued Occupancy Policy” (ACOP) and/or an Administrative Plan for voucher-based programs. These documents set policy for who may be housed by the agencies and how those tenant households are selected. Four different aspects of the ACOPs and/or Administrative Plans are examined here: tenant selection, local preference, tenant screening, and subsidy standards. These four policy types all allow some degree of local determination by public housing authority and are among the most central to matters of fair housing choice.

Public housing and HCV assistance are typically competitive programs and housing authorities often maintain lengthy waiting lists of potential tenants. When a waiting list becomes so long that the prospective tenants on the list are not likely to rise to the top and be considered for housing within a 12-month timeframe (LCHA) or within two years (MCHA and TPHA), the waiting list may be closed to new applicants until the list is diminished. In many cases, an application is made in a two-phase process, with an initial application filed and screened for basic eligibility criteria and a full application subject to a final eligibility determination once a wait-listed household reaches the top of the waiting list. Access to applications when the waiting lists are open varies considerably among the four housing authorities. The LHA has applications available to be completed and filed in-person at the LHA office during standard business hours. LHA also works with the La Crosse Collaborative to End Homelessness to make applications available through 21 other local organizations, and sends applications by mail to families that request one. The MCHA makes applications available in its office, but also in various community-based social service locations around the county. Completed applications can be filed both at the MCHA’s office or in one of the alternative community locations. While the LCHA requires completed applications to be filed in its office, the applications themselves are available online and can be printed out and completed at an applicant’s convenience. TPHA applications are available at its office, printable from its website, and are sent via e-mail in response to applicant or support agency requests. These conveniences matter to applicant households according to input received from members of the public who were consulted in the process of developing this AI. Having to physically make a trip or multiple trips to a particular office just to make application for a housing program can be a barrier for working households and those with transportation or childcare limitations.

The process by which applicants are ranked on and selected from a waiting list is guided by a tenant selection policy. Selection of tenants from the LHA, LCHA, and MCHA waiting lists is determined first by special preference criteria for which the household may qualify, followed by the date and time of the tenant’s application. The TPHA’s policy establishes application rank solely by submission date and time. Ordinarily, a “date and time” standard for waiting list selection can be somewhat problematic for disadvantaging applicants who have inflexible, hourly work schedules or transportation and childcare challenges. In the case of the LHA, LCHA, and MCHA, however, application date and time is more akin to a tie-breaker given the preference criteria that are applied first. Although TPHA’s rankings are based on

date and time, its multiple submission options provide flexible access and convenience to applicants, negating any advantage to an applicant with greater ability to physically complete and submit the application more quickly than another.

As mentioned in the discussion of tenant selection policies, HUD allows public housing authorities to, within narrow boundaries, set local preferences for the applicants who will be selected from their waiting lists. Local preferences must be constructed carefully to avoid discrimination against protected classes, but can be helpful tools to strategically adapt public housing programs to local housing needs and priorities as determined through data-driven planning processes. For example, the LHA provides greatest preference to households involuntarily displaced due to some type of governmental action or natural disaster. Households meeting this criterion automatically rise to the top of the waiting list, followed by disabled, then veteran households. MCHA has a residency preference which presumably extends to residents of the whole county rather than a specific city, town, or village; MCHA's subsequent preferences include elderly or disabled households, followed by employed households. Although MCHA's residency preference includes the county, in a regional market like La Crosse, such preferences can still have the effect of limiting residents' housing choices and reducing mobility. The LCHA expresses preference for elderly and disabled households, but has established no other local preferences; TPHA refers to applicable preferences in its ACOP, of which there are currently none.

Tenant screening, specifically policies regarding criminal background checks, is another aspect of this review. Housing authorities are required to consider an applicant's criminal background as part of their screening process for public housing occupancy but must conduct the screening so as not to violate the prospective tenant's fair housing rights. For Housing Choice Voucher (HCV) programs, tenant screening is optional for the housing authority. Recognizing that people of color are disproportionately more likely to have experienced an encounter with the criminal justice system and to have arrest records or criminal convictions, HUD issued guidance in 2016 warning that blanket policies of refusal to rent to people with criminal records could be discriminatory. Although criminal history is not a protected class, under the Fair Housing Act, restricting housing access on the basis of criminal history could be unlawful if it results in a disparate impact on people of a specific race or ethnicity. Rather than blanket policies, exclusions of persons with criminal histories must be tailored to the housing provider's legitimate interests, be applied consistently to all applicants, and take into account the type of crime, time since conviction, and other factors.

All of the four local public housing authorities have in some way made efforts to moderate the influence of criminal background on tenant eligibility, while also supporting the safety of their residents and communities. All four conduct criminal background checks as a matter of course in the application process and may deny housing to a family because of drug-related criminal activity, violent criminal activity by family members, and/or registration on the National Sex Offender Registry. Federal regulations require the barring of public housing admission in some of these cases, but the housing authorities each reserve for themselves some amount of discretion in denying applicants for reasons related to a criminal background where permitted to do so by HUD regulations. The LHA's Administrative Plan says the Authority will consider the seriousness of the offense committed and the effect of an eligibility denial on other household members not associated with the criminal record. MCHA provides a waiver process wherein an applicant with a criminal background is in full compliance with the terms of his or her

probation or parole, admission may be considered. The LCHA conditions its denials for certain drug-related offenses on whether the applicant has completed or is enrolled in a supervised drug or alcohol treatment program. The TPHA's ACOP lists 16 criteria including criminal history that "may result" in ineligibility. This provides TPHA with the latitude and discretion to deem an applicant eligible upon review of the overall application.

Finally, individual housing authorities are required to include in their policies the criteria by which they determine the number of bedrooms needed to house families of various sizes and compositions; these are known as subsidy standards. HCV families are not required to actually seek or rent dwellings with the number of bedrooms determined by the subsidy standard, but rather the standards determine the amount of the subsidy the family qualifies for based on its size. While the LHA and TPHA factor in gender, age, and relatedness in determining the number of bedrooms, the LCHA's policy is more neutral in that regard, simply stating that each bedroom should not accommodate more than two persons. Similarly, the MCHA does not consider the factors of gender or age but prescribes slightly higher occupancy than the others. For example, the MCHA's standard for a three-bedroom unit is between 4 and 7 occupants whereas the others would house between 3 and 6 occupants in the same sized unit. The MCHA does outline a process by which an applicant can petition for a larger unit size for intergenerational households, disabled households with a live-in aide, or where separate sleeping arrangements are necessary for health or medical reasons. Generally, these are all rather neutral and objective methods for determining subsidy standards and they do not appear to raise any fair housing issues.

CHAPTER 8.

HOUSING FOR PEOPLE WITH DISABILITIES

According to the U.S. Census Bureau, 19% of the population reported having a disability in 2010. Research has found an inadequate supply of housing that meets the needs of people with disabilities and allows for independent living. The U.S. Department of Housing and Urban Development identified that approximately one third of the nation's housing stock can be modified to accommodate people with disabilities, but less than 1% is currently accessible by wheelchair users.³¹

ADOPTING A REASONABLE ACCOMMODATION ORDINANCE IS ONE WAY TO ADDRESS LAND USE REGULATIONS' IMPACT ON HOUSING FOR PERSONS WITH DISABILITIES.

THE CITY OF LA CROSSE AND LA CROSSE COUNTY DO NOT CURRENTLY HAVE A REASONABLE ACCOMMODATION ORDINANCE. INSTEAD, THEY RELY ON THE VARIANCE PROCESS TO PROVIDE ACCOMMODATIONS. MONROE COUNTY HAD ADOPTED A PROCESS FOR MAKING ACCOMMODATIONS ADMINISTRATIVELY.

Identifying and quantifying existing accessible housing for all disabilities is a difficult task because of varying needs associated with each disability type. People with hearing difficulty require modifications to auditory notifications like fire alarms and telecommunication systems while visually impaired individuals require tactile components in design and elimination of trip hazards. Housing for people that have difficulty with cognitive functions, self-care, and independent living often require assisted living facilities, services, and staff to be accessible.

Modifications and assisted living arrangements tend to pose significant costs for the disabled population, which already experiences higher poverty rates compared to populations with no disability. Studies have found that 55% of renter households that have a member with a disability have housing cost burdens, compared with 45% of those with no disabilities.³²

RESIDENTIAL PATTERNS

In the city of La Crosse, an estimated 5,421 persons 5-years-old or older have a disability, representing 10.5% of the total population. People aged 18-64 have the highest disability rate (6.1%), and the rate for those over 65 is 4.5%. In contrast, less than 1% of children between the ages of 5 and 17 are disabled.

³¹ Chan, S., Boshier, L., Ellen, I., Karfunkel, B., & Liao, H. . L. (2015). Accessibility of America's Housing Stock: Analysis of the 2011 American Housing Survey. U.S. Department of Housing and Urban Development: Office of Policy Development and Research.

³² America's Rental Housing 2017. (2017). Joint Center for Housing Studies of Harvard University.

These rates of disability all track relatively closely with those of La Crosse County and Monroe County, although the rates are slightly higher across all age groups in Monroe County.

Ambulatory disabilities are the most common type in all three jurisdictions affecting 6.0% of the city of La Crosse, 5.5% of La Crosse County, and 6.6% of Monroe County. Cognitive disabilities are the next most common across all jurisdictions, followed by independent living, hearing, and self-care. Vision difficulty is the least common disability in all jurisdictions. The map that follows shows the geographic distribution of persons with disabilities throughout the city and counties. Although the population with disabilities is relatively dispersed throughout the city of La Crosse, and even La Crosse and Monroe Counties, areas where people with disabilities are most clustered include significant numbers of all types and ages of disabilities within the city of La Crosse, those aged 65+ with a disability in northern La Crosse County. Within the City, the central neighborhoods including downtown, the Lower Northside, Grandview Emerson, and Washburn contain significant numbers of residents with disabilities. A significant number of residents with ambulatory and independent living difficulties and those over 65 can be found in Onalaska.

The central areas of the city of La Crosse where people with disabilities are most clustered have high rates of transit usage, low transportation costs, and are the city’s most walkable areas. People with many different types of disabilities are limited in their ability to drive, so transit access and walkability are highly attractive opportunity features. Relatively low levels of labor market engagement and high rates of poverty in these areas may make them less attractive for some, but for others, the tradeoffs in opportunity features are worthwhile. In Onalaska, where there is some clustering of residents with ambulatory and independent living difficulties, neighborhoods tend to offer less robust transit options, and less proximity to jobs, but a moderate level of walkability, low rates of poverty, and access to good schools. The northern half of La Crosse County, which has a concentration of people aged 65+ who have a disability, offers yet another mix of opportunity features: job proximity is limited, transportation is costlier, and (except for the communities of Holmen and Onalaska along the western edge of the county) transit availability is poor, but residents in this part of the region have access to some of the best schools and environmental quality.

TABLE 19 – DISABILITY BY TYPE

Disability Type	City of La Crosse		La Crosse County		Monroe County	
	#	%	#	%	#	%
Hearing difficulty	1,735	3.6%	3,980	3.7%	1,738	4.3%
Vision difficulty	800	1.7%	1,694	1.6%	664	1.6%
Cognitive difficulty	2,183	4.5%	4,270	4.0%	1,921	4.7%
Ambulatory difficulty	2,879	6.0%	5,911	5.5%	2,704	6.6%
Self-care difficulty	1,153	2.4%	2,338	2.2%	1,041	2.6%
Independent living difficulty	1,975	4.1%	4,153	3.9%	1,775	4.4%

Note: All % represent a share of the total population within the jurisdiction or region.

Source: ACS

TABLE 20 – DISABILITY BY AGE GROUP

Age of People with Disabilities	City of La Crosse		La Crosse County		Monroe County	
	#	%	#	%	#	%
Age 5-17 with disabilities	302	0.6%	777	0.7%	369	0.9%
Age 18-64 with disabilities	2,951	6.1%	5,836	5.4%	2,749	6.7%
Age 65+ with disabilities	2,168	4.5%	4,824	4.5%	2,078	5.1%

Note: All % represent a share of the total population within the jurisdiction or region.

Source: ACS

DRAFT

FIGURE 47 – PEOPLE WITH A DISABILITY BY AGE IN THE CITY OF LA CROSSE

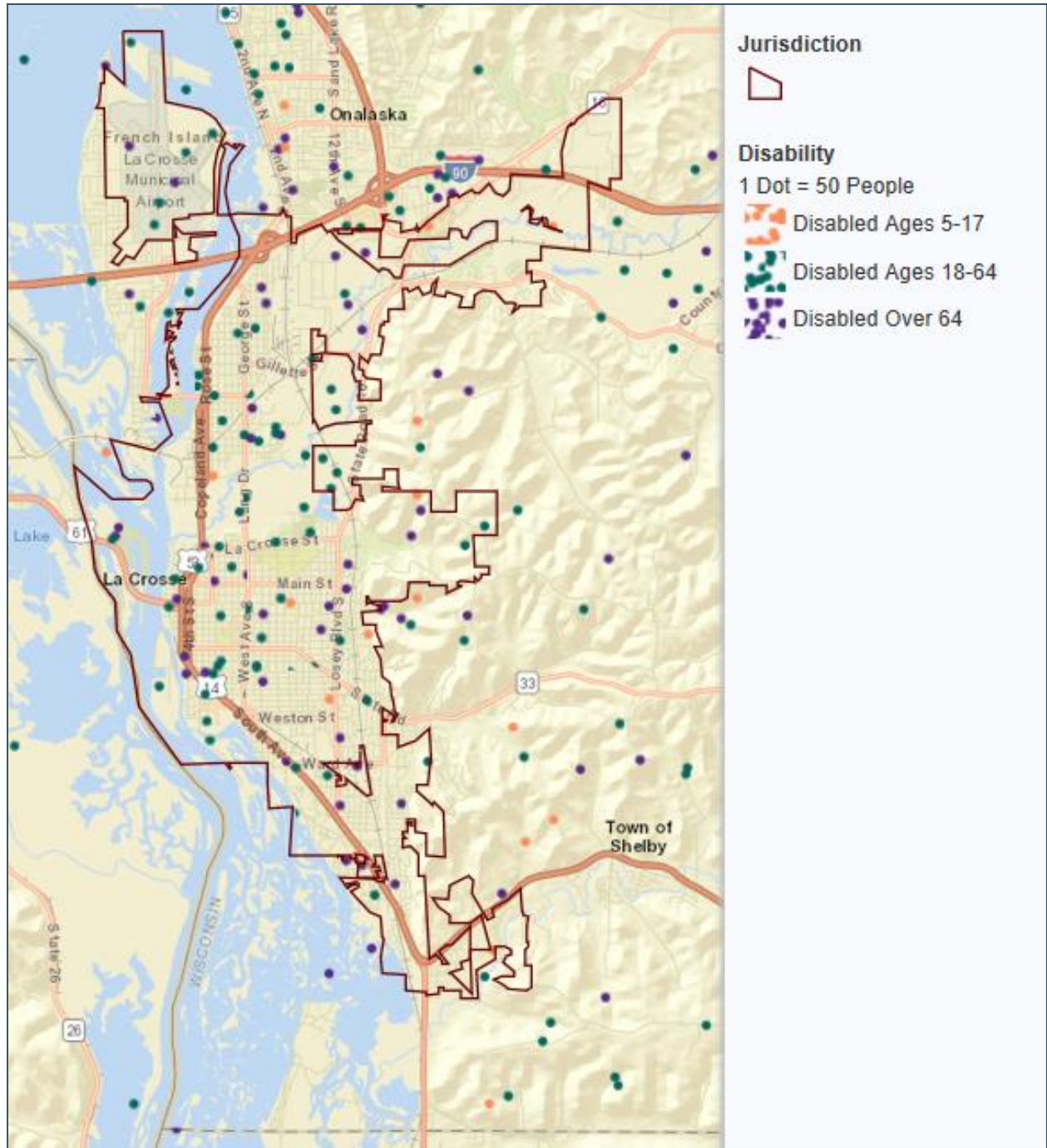
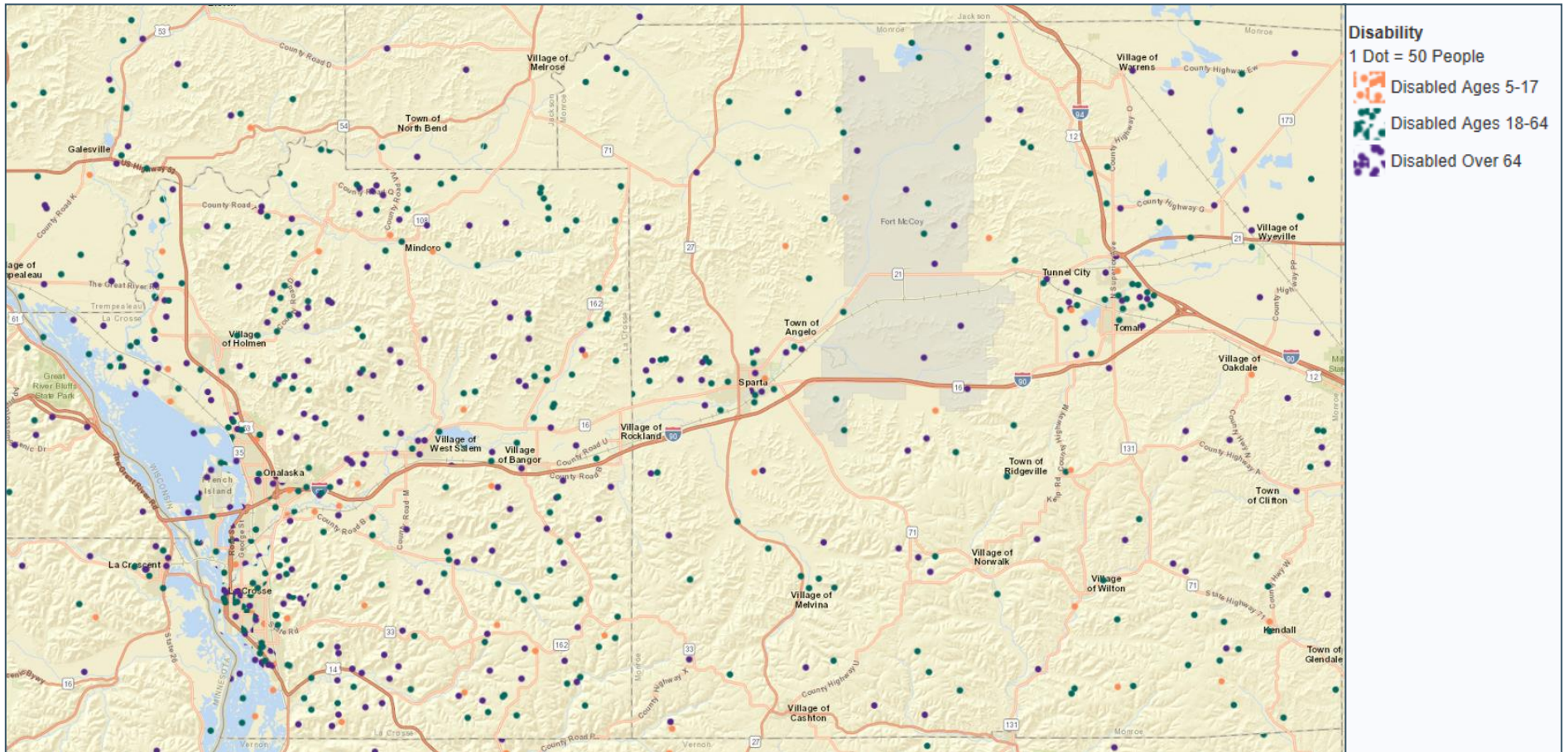


FIGURE 48 – PEOPLE WITH A DISABILITY BY AGE IN LA CROSSE AND MONROE COUNTIES



ACCESSIBLE HOUSING SUPPLY AND AFFORDABILITY

A search using HUD’s Affordable Apartment Search Tool was conducted to identify affordable rental properties in the city of La Crosse designed to serve people with disabilities. The search returned six results; three properties specifically designated for people with disabilities, two listed as being for elderly households, and one serving family households.

A search of La Crosse County found 10 total results, including the six in the city of La Crosse and four additional listings. Among the four listings in the county but outside La Crosse, one designated for the elderly is located in Holmen, and another for families is located in West Salem. Onalaska contains two; one for disabled households and another for families. A search of Monroe County returned three results. Two were designated for families and the other for the elderly.

A similar point-in-time search on socialserve.com for affordable apartments currently for rent in the city of La Crosse returned 30 results, 29 of which had some accessible features. Of the 30, 12 had waiting lists. In La Crosse County, 54 properties were found, including 53 with accessible features. The properties outside the city of La Crosse were located in Onalaska, West Salem, Mindoro, Holmen, and Bangor. In Monroe County, 14 properties were found, all of which contained accessible features.

Based on a standard Supplemental Security Income (SSI) payment of \$733 per month (equating to an affordable rent of \$220 or less), it is highly likely that people with disabilities who are unable to work and rely on SSI as their sole source of income, face substantial cost burdens and difficulty locating affordable housing. Publicly supported housing is often a key source of accessible and affordable housing for people with disabilities, and in the study area, these subsidized housing options are much more likely to contain households with at least one member with a disability than the housing stock in general. The table below shows that persons with disabilities are able to access all types of publicly-supported housing, except for other multifamily in the city of La Crosse and Monroe County. La Crosse County contains other multifamily housing that is entirely rented by households containing at least one member with a disability.

TABLE 21 – DISABILITY BY PUBLICLY SUPPORTED HOUSING PROGRAM CATEGORY

Housing Type	People with a Disability					
	City of La Crosse		La Crosse County		Monroe County	
	#	%	#	%	#	%
Public Housing	235	40.9%	264	37.9%	42	55.3%
Project-Based Section 8	129	50.6%	160	42.8%	25	18.4%
Other Multifamily Housing	N/A	N/A	24	100%	N/A	N/A
HCV Program	29	25.4%	36	24.7%	63	37.5%

Note: The definition of “disability” used by the Census Bureau may not be comparable to reporting requirements under HUD programs.

Source: ACS

Supportive housing, a typically subsidized long-term housing option combined with a program of wrap-around services designed to support the needs of people with disabilities, is another important source of housing for this population. Unique housing requirements for people with an ambulatory difficulty may include accessibility improvements such as ramps, widened hallways and doorways, and installation of grab bars, along with access to community services such as transit. For low- and moderate-income households, the costs of these types of home modifications can be prohibitive, and renters may face particular hardships as they could be required to pay the costs not just of the modifications, but also the costs of removing or reversing the modifications if they later choose to move.

ZONING AND ACCESSIBILITY

From a regulatory standpoint, local government measures to control land use typically rely upon zoning codes, subdivision codes, and housing and building codes, in concurrence with comprehensive plans. Local zoning authority is directed by the state enabling laws as part of the local government's police power but limited by superseding state laws related to specific land use, for example the regulation of public property, flood plains, utilities, natural resources, airports, housing regulated by a state licensing authority for persons with disabilities, higher education institutions, and others. Conditions of the City of La Crosse, La Crosse County, and Monroe County zoning codes affecting accessibility are assessed in the following section. Several elements of the following analysis refer back to the scored zoning code review presented in Chapter 6.

Definition of “Family” and Group Housing for People with Disabilities

Often one of the most scrutinized provisions of a municipality's zoning code is its definition of “family.” Local governments use this provision to limit the number of unrelated persons who may live together in a single dwelling. Unreasonably restrictive definitions may have the unintended or intended (depending on the motivations behind the drafting of the jurisdiction's definition) consequence of limiting housing for nontraditional families and for persons with disabilities who reside together in congregate living situations.

In its zoning ordinance, the City of La Crosse defines “family” differently by zoning district. In the R-1 and WR district, family is defined as any number of individuals related by blood, marriage, adoption, or legal guardianship living as a single housekeeping unit, plus up to two additional unrelated persons. In the R-2 district, family is defined as any number of individuals related by blood, marriage, adoption, or legal guardianship living as a single housekeeping unit, plus up to three additional unrelated persons. However, for duplexes, the maximum number of additional unrelated persons is limited to two. In the R-3, R-4, and R-5 districts, family is defined as any number of individuals related by blood, marriage, adoption, or legal guardianship living as a single housekeeping unit or not to exceed five unrelated persons. In all zoning districts, foster families are included in the definition of “family” but may not exceed ten total residents. Limiting a family to no more than two or three unrelated persons in the R-1/WR and R-2 districts, respectively, is somewhat restrictive. Allowing up to five unrelated individuals in the R-3, R-4, and R-5 districts is neither the most permissive nor most restrictive. The City reports that, as in other university cities, the limit on unrelated individuals is in response to student overcrowding and associated issues.

La Crosse County's zoning defines "family" as "a group of people related by blood, marriage or adoption or a maximum of 4 unrelated people living together in a single dwelling unit which is used as a principal residence." Allowing up to four unrelated individuals is neither the most permissive nor most restrictive use of such a definition.

Limiting single family to a number of unrelated individuals may fail to treat nontraditional, but functionally equivalent, household relationships equal with those related by blood or marriage, and may violate fair housing, privacy, and due process protections. More permissive and neutral definitions of family do not distinguish between related and unrelated occupants as long as the residents live together as a functionally or factually equivalent family or common household sharing common space, meals, and household responsibilities, and/or leaves maximum occupancy per dwelling as a matter of safety under occupancy standards rather than the zoning regulations. While the Supreme Court has recognized a local government's right to limit the number of unrelated individuals who may live together as constitutionally permissible, the restriction must be reasonable and not exclude a household which in every sense but a biological one is a single family. An unreasonably, or arbitrarily, restrictive definition could violate state Due Process and/or the federal FHAA as it may have a disproportionate impact on people with disabilities, minorities, and families with children. Another option is to amend the ordinance to add an administrative process for rebutting the presumption that a group exceeding the permitted maximum number of unrelated persons is not otherwise residing together as a single housekeeping unit and functional family. Accordingly, the City of La Crosse and La Crosse County received a "2" moderate risk score on Issue 1 of the matrix.

Monroe County's zoning ordinance does not define "family." A dwelling unit is defined as "one or more rooms designed as a unit for occupancy by not more than one family for living and sleeping purposes." The county's interpretation of the meaning of "family" as it relates to dwelling units determines whether it has the effect of preventing unrelated individuals from sharing the same residence. The reasonable accommodation provision (see issue #3 on the zoning code review in Chapter 6) provides a means of mitigating negative impacts of this ambiguity, but in order to maintain consistency of interpretation and to limit fair housing issues, the County should consider including a permissive definition of "family" in its ordinance. Accordingly, Monroe County received a "2" moderate risk score on Issue 1 of the matrix.

None of the three jurisdictions' "Family" or "Dwelling Unit" definitions distinguishes between or treats persons with disabilities differently *because of* their disability. However, each code contains obstacles or uncertainties regarding supportive housing services for persons with disabilities in residential districts. In the city of La Crosse, the zoning ordinance regulates these and other housing types under the term Community Living Arrangements (CLAs), which are defined by Wisconsin Statutes. CLAs are subject to spacing requirements from other CLAs and total capacity restrictions. When these requirements are met, a CLA with capacity for eight or fewer persons is entitled to locate in any residential zone without any further zoning permission. A facility with nine to 15 persons may locate in any residential area except those zoned exclusively for single-family or two-family residences. Special zoning permission is required to locate in those areas or to locate a facility with more than 16 persons in any residentially zoned area. Presumably this permission would be in the form of a Conditional Use Permit. Collectively, the spacing and capacity requirements and Conditional Use Permit standards comprise more restrictive regulations for CLAs than other residential uses. The spacing and capacity restrictions are permitted under state law

but are not mandatory. The City could lessen the restrictions by removing them and by revising the requirements and criteria for Conditional Use Permits. The City of La Crosse received a score of “2” (moderate risk) for Issue 2.

La Crosse County’s zoning Code restricts “group homes” to a conditional use in the Residential Districts “A,” “B,” “C,” and Rural. “Group home” is not listed in the definitions or otherwise defined, so it is unclear what type or size of facility would be included in this use. Community Based Residential Facilities (CBRF) are defined with a reference to 50.01(1g) of Wisconsin state law, which states that the term “means a place where 5 or more adults who are not related to the operator or administrator and who do not require care above intermediate level nursing care reside and receive care, treatment or services that are above the level of room and board but that include no more than 3 hours of nursing care per week per resident.” The definition excludes a number of types of facilities such as adult family homes, homeless shelters, residential care apartment complexes, group homes or residential care centers for children and youths, and more. In Residential Districts “A,” “B,” “C,” and Rural, a CBRF with eight or fewer residents is allowed by right and one with more than eight residents is conditional. In the Rural zoning district, an additional requirement is that a CBRF with more than eight residents must meet “60.63(5).” This appears to reference a section of Wisconsin state law regulating Community Living Arrangement (CLA). CLAs include CBRFs along with a number of other types of facilities. The section referenced includes spacing requirements and capacity restrictions for CLAs.

Since the zoning ordinance allows up to four unrelated persons to live as a family and five or more adults to live in a CBRF, housing people with disabilities is given somewhat wider latitude with regard to the family definition. However, there is ambiguity in the definitions and allowable uses in the zoning ordinance. CBRFs are a subset of housing for people with disabilities, and they are allowed by right if the number of residents is eight or less. Other types of housing are excluded from the definition of CBRFs, such as adult family homes and homeless shelters, and their placement under the code is unclear. They may be included and regulated as group homes, but since that term is not defined it is unclear if this is the case. The code should be amended to clarify and ensure fair treatment of housing for people with disabilities. La Crosse County could lessen the restrictions by removing or revising the requirements and criteria for Conditional Use Permits. La Crosse County received a score of “2” (moderate risk) for Issue 2.

Monroe County’s zoning ordinance includes the three following terms in the definitions section:

- Adult Family Home “means a place where less than five unrelated adults reside, in which care, treatment or services above the level of room and board, but not including nursing care, are provided to persons residing in the facility as a primary function of the facility.”
- Community-based Residential Facility (CBRF) “means a place where five or more unrelated adults reside, in which care, treatment or services above the level of room and board, but not including nursing care, are provided to persons residing in the facility as a primary function of the facility.”
- Group Home “means any facility operated by a person required to be licensed under Wis. Stats. § 48.625, for the care and maintenance of five to eight children. This applies only to facilities where children reside.”

These terms are defined, but it is not clear where they are allowed. They are not explicitly allowed by right in any zoning district. The only mention of any of these facilities outside the definitions section is in the

GA and R-2 districts, where CBRFs are conditional uses. As with the definition of “family,” much is left to interpretation. Allowable uses are defined for each zoning district. One could interpret that housing for disabilities is substantially similar to the listed residential uses and therefore allowed in the same zoning districts. On the other hand, an alternative reading of the same ordinance could find that Section 47-15 prohibits “uses not specifically permitted.” Since the terms are listed in definitions but not explicitly mentioned in any zoning district except for R-2 and GA, one could interpret that CBRFs are not allowed in any other zoning district, while Adult Family Homes and Group Homes are not allowed at all. This would be an example of an unreasonable restriction. There are numerous ways to revise the code to clarify this. For example, the allowed housing types could be listed as allowed in residential zoning districts along with comparable residential uses. Monroe County received a score of “3” (high risk) for Issue 2.

Reasonable Accommodations

Adopting a reasonable accommodation ordinance is one specific way to address land use regulations’ impact on housing for persons with disabilities. Federal and state fair housing laws require that municipalities provide individuals with disabilities or developers of housing for people with disabilities flexibility in the application of land use and zoning and building regulations, practices, and procedures or even waive certain requirements, when it is reasonable and necessary to eliminate barriers to housing opportunities, or “to afford persons with a disability the equal opportunity to use and enjoy a dwelling.” (The requirements for reasonable accommodation under the Americans with Disabilities Act (ADA) are the same as those under the FHA. 42 U.S.C. 12131(2).) However, the FHA does not set forth a specific process that must be used to request, review, and decide a reasonable accommodation.

Neither the City of La Crosse nor La Crosse County have adopted a clear and objective process by which persons with disabilities may request a reasonable accommodation to zoning, land use, and other regulatory requirements. Rather, both jurisdictions appear to rely on the variance process for such matters. In the City, the Board of Zoning Appeals holds power to hear and decide applications for variances following the public notice and hearing process. The La Crosse County Board of Adjustment has authority to decide variance requests within unincorporated La Crosse County. This is required for any applicant seeking a variance and is not limited to housing for persons with disabilities. The purpose of a variance is not congruent with the purpose of requesting a reasonable accommodation, as a variance requires a showing of special circumstances or conditions applying to the land. In contrast, a reasonable accommodation is to allow individuals with disabilities to have equal access to use and enjoy housing. Whereas simple administrative procedures may be adequate for the granting of a reasonable accommodation, the variance procedures subject the applicant to the public hearing process where there is the potential that community opposition based on stereotypical assumptions about people with disabilities and unfounded speculations about the impact on neighborhoods or threats to safety may impact the outcome. Although the FHA does not require a specific process for receiving and deciding requests for reasonable accommodation, as a matter of equity, transparency, and uniformity, it is advisable that local jurisdictions adopt a standardized administrative process.

Model ordinances are available that have been approved by HUD or the DOJ as part of fair housing settlement or conciliation agreements. These model ordinances include a standardized process so that there is transparency and equality in how requests are treated, and gives the director of planning or zoning administrator, or her designee, the authority to grant or deny reasonable accommodation requests

without the applicant having to submit to a public hearing process. A jurisdiction may not comply with its duty to provide reasonable accommodation if it applies a standard based on the physical characteristics of a property rather than considering the need for modification based on the disabilities of the residents, and accordingly, both jurisdictions received a “2” on Issue #3.

Monroe County has adopted a process by which persons with disabilities may request a reasonable accommodation to zoning, land use, and other regulatory requirements. The zoning administrator has the authority to relax a requirement so long as a person with a disability requires reasonable use of the facility. No public hearing is required. Monroe County received a “1” on Issue #3.

Supportive Housing for People Recovering from Alcohol or Substance Addiction

Under federal law (e.g. FHA, ADA, Rehabilitation Act), it is discriminatory to deny an individual or entity the right to site a residential treatment program in a residential zone because it will serve individuals with alcohol or other drug problems or mental health disabilities.

In the city of La Crosse, these types of facilities are defined as CLAs, which though subject to spacing and capacity requirements, are allowed in residential zones, and consequently the City received a “1” low risk score on Issue #5.

La Crosse and Monroe Counties do not address the location or siting of residential substance abuse treatment facilities. Therefore, presumably as long as the facility otherwise met the definition of single-family dwelling, such housing should be permitted equally with single-family dwellings. But because the regulations are not clear on this issue there is potential for ambiguity and unequal treatment, and both counties received a “2” medium risk score on this issue.

CHAPTER 9.

FAIR HOUSING ACTIVITIES

FAIR HOUSING RESOURCES

Wisconsin's state fair housing law is found in Chapter 106, Subchapter II of the Wisconsin State Statutes, the Open Housing Law ("OHL") (WIS. STAT. § 106.50 *et seq.*), and is administered and enforced by the Equal Rights Division of the Department of Workforce Development (WIS. ADMIN. CODE, DWD 220.01 *et seq.*). In many ways, the state's law and administrative regulations track the federal Fair Housing Act (FHA) in terms of prohibitions against discrimination in the sale, rental, financing, and availability of dwellings based on sex, race, color, disability, religion, familial status, or national origin.

When comparing the OHL to the FHA, Wisconsin's protections are even broader than federal standards and cover more classes of persons and housing types in some significant ways. First, Wisconsin's fair housing laws also prohibit discrimination based on six additional protected classes: (1) sexual orientation; (2) marital status; (3) status as a victim of domestic abuse, sexual assault, or stalking; (4) lawful source of income; (5) age; and (6) ancestry. Wisconsin's law also covers more single-family residences that are owner-occupied than the FHA, because according to the legislative purpose statement of the statute, "the sale and rental of single-family residences constitute a significant portion of the housing business in this state and should be regulated." (WIS. STAT. § 106.50(1)). The FHA largely exempts single-family housing sold or rented by its owner and owner-occupied housing of four or less units, whereas the OHL expressly includes most single-family housing.

More multifamily housing also is covered by the OHL than the FHA. Under the FHA's design and accessibility requirements for persons with disabilities, "covered multifamily housing" means housing with four or more units; however, under the state law, covered multifamily housing is new construction containing *three* or more units and includes all units not just those on the ground floor or accessible by elevator as under the FHA. Wisconsin's regulations also more specifically address remodeling of multifamily units than does the FHA standards. For housing with three or more dwelling units, if more than 50% of the interior square footage is remodeled, the entire building must conform to the state

ALL THREE GEOGRAPHIES HAVE RESOURCES AND PROCEDURES FOR FAIR HOUSING ENFORCEMENT. THE CITY OF LA CROSSE AND LA CROSSE COUNTY ADOPTED LOCAL FAIR HOUSING ORDINANCES, AND MONROE COUNTY INCORPORATED THE STATE'S OPEN HOUSING LAW.

THE CITY OF LA CROSSE ESTABLISHED A HUMAN RIGHTS COMMISSION AND LA CROSSE COUNTY HAS A COMMISSION ON EQUALLY OPPORTUNITIES IN HOUSING TO ENFORCE FAIR HOUSING LAW. MONROE COUNTY'S CLERK ASSISTS RESIDENTS SHOULD THEY NEED TO MAKE A COMPLAINT TO THE STATE'S EQUAL RIGHTS DIVISION.

accessibility standards. If 25% to 50% of the interior square footage is remodeled, then the remodeled portions must conform to the state accessibility standards. If less than 25% of the interior square footage is remodeled, the remodeling is not subject to the standards unless the alteration involves work on doors, entrances, exits or toilet rooms, in which case the doors, entrances, exits or toilet rooms must conform to the state accessibility standards.

While in many important ways, Wisconsin's Open Housing Law provides greater equal housing protections than the FHA, it differs in other respects related to pursuing administrative or judicial remedies. These differences currently disqualify the State from meeting HUD's "substantial equivalence" standards for eligibility to receive federal funding for processing and enforcing discrimination complaints and for use with outreach, education, and training under the Fair Housing Assistance Program (FHAP). HUD provides funding annually through FHAP to state and/or local agencies that enforce fair housing laws certified by HUD as "substantially equivalent" to the substantive rights, procedures, remedies, and judicial review processes of the federal Fair Housing Act. Unfortunately, Wisconsin's OHL was decertified as "substantially equivalent" in 1993, following the 1988 amendments to the Fair Housing Act, and since then no state agency or non-governmental organization has been qualified by HUD to participate in the FHAP. Differences between the federal and state standards would have to be addressed legislatively in order to comply with HUD's "substantial equivalence" certification standards. For instance, under the FHA, aggrieved persons have up to two years after an alleged discriminatory occurrence or termination of a discriminatory housing practice to commence a civil action in court, whereas the statute of limitations under the state law is only one year. Another difference is that whereas under the federal statute, the investigatory administrative body need only find "reasonable cause" to believe that an unlawful discriminatory practice has occurred in order to proceed with administrative enforcement or government representation of the aggrieved in a civil action, under Wisconsin's Open Housing Law, the Equal Rights Division must find evidence demonstrating the higher standard of "probable cause" before it can issue a charge of discrimination on behalf of the aggrieved party.

Despite not having a certified FHAP agency, robust fair housing enforcement in Wisconsin still takes place on the federal, state, and local levels.

FAIR HOUSING LAWSUITS AND COMPLAINTS

An individual in the city of La Crosse, La Crosse County, or Monroe County who believes he or she has been the victim of an illegal housing practice under the FHA may file a complaint with the appropriate HUD Regional Office of Fair Housing and Equal Opportunity (FHEO) within one year of when the discriminatory practice occurred. The Wisconsin field office is located in Milwaukee. The aggrieved party also may file a lawsuit in federal district court within two years of the discriminatory act (or in the case of multiple, factually-related discriminatory acts, within two years of the last incident). Where an administrative action has been filed with HUD, the two-year statute of limitations is tolled during the period when HUD is evaluating the complaint.

After the FHEO receives a complaint, it will notify the alleged discriminator (respondent) and begin an investigation. During the investigation period, the FHEO will attempt through mediation to reach conciliation between the parties. If no conciliation agreement can be reached, HUD must prepare a final

“Determination” report finding either that there is “reasonable cause” to believe that a discriminatory act has occurred or that there is no reasonable cause. If the FHEO finds “reasonable cause,” HUD must issue a “Charge of Discrimination.” If the FHEO determines that there is no “reasonable cause,” the case is dismissed. The advantages of seeking redress through the administrative complaint process are that HUD takes on the duty, time, and cost of investigating the matter for the complainant and conciliation may result in a binding settlement. However, the complainant also gives up control of the investigation and ultimate findings.

If a charge is issued, a hearing/trial will be scheduled before an administrative law judge. The ALJ may award the aggrieved party injunctive relief, actual damages, and also impose civil penalties; but unlike federal district court, the ALJ may not impose punitive damages. Administrative proceedings are generally more expedited than the federal court trial process.

Housing discrimination claims may be brought against local governments and zoning authorities and against private housing providers, mortgage lenders, or real estate brokers.

Complaints Filed with HUD

Region Five of the Office of Fair Housing and Equal Opportunity (FHEO) receives complaints by households regarding alleged violations of the Fair Housing Act for cities and counties throughout Wisconsin (as well as Illinois, Indiana, Michigan, Minnesota, and Ohio). To achieve its mission of protecting individuals from discrimination, promoting economic opportunity, and achieving diverse, inclusive communities, the FHEO receives and investigates complaints of housing discrimination, and leads in the administration, development, and public education of federal fair housing laws and policies.

A request was made to the regional office for complaints received regarding housing units in the city of La Crosse, La Crosse County, and Monroe County for the previous five-year period. The Regional Office of FHEO maintains data reflecting the number of complaints of housing discrimination received by HUD, the status of all such complaints, and the basis/bases of all such complaints.

From January 1, 2013 through October 15, 2018, HUD received six formal complaints of housing discrimination occurring within the city of La Crosse, four complaints involving housing elsewhere in La Crosse County, and three complaints concerning housing in Monroe County. Of the 13 reported cases involving perceived or alleged discrimination in housing ten cases have been closed and two remain open / pending as of the date of this report. One case was withdrawn by the complainant after resolution and two cases settled after successful conciliation/mediation efforts. Of those three cases, two were settled with a small monetary reward of \$300 and \$500, respectively. Three cases were voluntarily withdrawn by the complainant without resolution; two cases were dismissed after investigation on the basis of a “no cause” determination; two cases were administratively closed due to HUD’s lack of jurisdiction; and one case was administratively closed due to the complainant’s failure to cooperate in the investigation. In the settled case, the respondent did not necessarily admit liability, but may have settled to avoid further expense, time, and the uncertainty of litigation.

TABLE 22 – FAIR HOUSING COMPLAINTS RECEIVED BY HUD FOR CITY OF LA CROSSE, LA CROSSE COUNTY AND MONROE COUNTY FOR PREVIOUS 5 YEAR PERIOD

Case No.	Filing Date	Basis	Issue	Closure Reason	Settlement Amount
City of La Crosse					
05-13-0990-8	2013	Disability	Discriminatory refusal to rent; Discriminatory refusal to rent and negotiate for rental; Discriminatory terms, conditions, privileges, or services and facilities	Complaint withdrawn by complainant without resolution	
05-15-0049-8	2014	Disability	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Withdrawn after resolution	\$300
05-14-1381-8	2014	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	
05-18-0379-8	2018	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Still open / pending	
05-18-2257-8	2018	Disability	Discrimination in terms/conditions/privileges relating to rental	Still open / pending	
05-18-1251-8	2018	Race, Sex, Familial Status	Discrimination in terms/conditions/privileges relating to rental	Complainant failed to cooperate	
Onalaska, La Crosse County					
05-13-0427-8	2013	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No Cause Determination	
05-14-0554-8	2014	Sex, Disability, Familial Status, Retaliation	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)	Dismissed for lack of jurisdiction	

TABLE 22 – FAIR HOUSING COMPLAINTS RECEIVED BY HUD FOR CITY OF LA CROSSE, LA CROSSE COUNTY AND MONROE COUNTY FOR PREVIOUS 5 YEAR PERIOD (CONTINUED)

Case No.	Filing Date	Basis	Issue	Closure Reason	Settlement Amount
Hartford, La Crosse County					
05-15-0043-8	2014	Race	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable	No Cause Determination	
Oxford, La Crosse County					
05-17-9376-8	2017	Disability	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	Dismissed for lack of jurisdiction	
Tomah, Monroe County					
05-13-1016-8	2013	Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable	Conciliation/settlement successful	\$500
Kendall, Monroe County					
05-15-0525-8	2015	Race	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	Complaint withdrawn by complainant without resolution	
Sparta, Monroe County					
05-18-0325-8	2018	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Conciliation / Settlement successful	

Source: FOIA Request to HUD Region V Office of Fair Housing and Equal Opportunity

More than one basis of discrimination and more than one discriminatory act or practice, recorded as the discriminatory *issue*, may be cited in a single complaint. Here, disability was cited as the basis of discrimination in nine of the 13 filed case; followed by race in three cases; retaliation in three cases; sex in two cases; and familial status in two cases. Most of the cases involved rental housing, specifically cited in seven cases; and discriminatory terms, conditions, privileges, or services and facilities was cited as an issue in 10 cases; discriminatory acts under Section 818 (coercion, etc.) in seven cases; failure to make a reasonable accommodation cited as an issue in five cases; otherwise deny or make housing unavailable was cited in four cases; and discriminatory advertising, statements and notices in three cases.

Complaints Filed with the Wisconsin Equal Rights Division

The State's administrative process for investigation and enforcement is laid out in the OHL at Wisc. Stat. § 106.50(6) et seq. The Wisconsin Equal Rights Division has the power to receive and investigate complaints, hold formal hearings, award remedies, and facilitate settlement between parties if the complaint is filed not later than one year after the alleged discrimination occurred or terminated. A complaint form with instructions may be accessed through the Division's website or from one of its offices. The Division has the authority under the statute to conduct testing, subpoena witnesses, and investigate for the purpose of establishing violations.

The Division may seek to facilitate settlement possibilities before an investigation begins as many housing complaints are resolved by compromise. If after investigation, the Division makes a determination of "no probable cause" to believe unlawful discrimination has occurred, it will dismiss the case. The dismissal will become final unless the Equal Rights Division receives a written appeal letter within 20 days of the determination. If the investigation finds "probable cause" to believe that discrimination may have occurred, the Equal Rights Division will issue a CHARGE of discrimination, along with the investigator's determination. Either party then may elect to have the charge decided by an administrative law judge after a hearing on the evidence or in a civil action filed by the complainant in Circuit Court. The ALJ or circuit judge may award to the prevailing party out of pocket losses and interest, attorney fees and costs, compensatory damages for losses or injury, injunctive relief, and punitive damages if filed in court. Within 30 days after service upon all parties of an administrative order or determination, the respondent, the complainant, or the aggrieved party may appeal the order or the determination to the circuit court for the county in which the alleged discrimination took place by the filing of a petition for review.

A request was made to the Equal Rights Commission for data reflecting the number of housing discrimination related complaints received by the Commission regarding housing units in the subject jurisdictions. Over the multiyear period, the Commission received and processed 10 housing discrimination complaints originating in La Crosse and Monroe Counties, eight of those from La Crosse County and two from Monroe County.

TABLE 23 – FAIR HOUSING COMPLAINTS RECEIVED BY THE WISCONSIN EQUAL RIGHTS DIVISION FOR CITY OF LA CROSSE, LA CROSSE COUNTY AND MONROE COUNTY FOR PREVIOUS 5 YEAR PERIOD

Case No.	Filing Date	Basis	Issue	Closure Reason	Settlement Amount
La Crosse County					
CR201500382	2015	Race, Color	Rental / lease	No probable cause. Not appealed.	
CR201500749	2015	Race	Rental / lease	Probable cause found, however, complainant failed to appear for hearing so case closed.	
CR201501886	2015	Disability	Rental / lease	Probable Cause found. Parties requested mediation and it was successful. Dismissed following private settlement.	
CR201601483	2016	Family Status, Lawful Source of Income, Disability	Denial of housing	Probable Cause found. Parties requested mediation and it was successful. Dismissed following private settlement.	
CR201701594	2017	Race, color	Rental / lease	No Probable Cause. Not appealed.	
CR201703084	2017	Disability	Rental / lease	No Probable Cause. Not appealed.	
CR201800607	2018	Disability	Rental / lease	No Probable Cause finding. Appealed. Awaiting hearing on the issue of probable cause.	
CR201500382	2015	Race, Color	Rental / lease	No probable cause. Not appealed.	
Monroe County					
CR201501631	2015	Disability, Sex, Lawful Source of Income	Rental / lease	Closed. No Probable Cause Finding. Not appealed.	
CR201802637	2018	Disability, Lawful Source of Income	Rental / lease	Investigation still pending.	

Source: Wisconsin Department of Workforce Development, Equal Rights Division

As with FHA complaints, complaints under the OHL to the Equal Rights Division may cite more than one basis of discrimination. For the reported cases concerning La Crosse and Monroe Counties, six cases were on the basis of the complainant's disability; three cases cited were on the basis of race; three cases cited lawful source of income; one case cited sex; and one case cited family status. Nine of the ten cases specifically identified issues with a rental / lease for the type of housing issue and one case identified "denial of housing" as the issue. In five of the ten cases, the Division, after investigation, made a determination that no probable cause was found to believe that discriminatory conduct occurred. One of those cases has been appealed to the circuit court and the appeal is still pending awaiting judicial review. In three of the filed cases, probable cause was found, but in one case the matter had to be closed due to failure of the complainant to appear at the administrative hearing and assist in prosecuting the case. In the two other cases of probable cause, the parties requested and were assisted with mediation and conciliation efforts and the matters were closed after successful settlement.

Complaints Filed with the Metropolitan Milwaukee Fair Housing Council

Although Wisconsin lacks a HUD-certified FHAP agency, the Metropolitan Milwaukee Fair Housing Council has been awarded grant funding under HUD's Fair Housing Initiatives Program (FHIP). FHIP grants help nonprofit organizations carry out fair housing educational and advocacy programs, testing, investigations, and other enforcement activities to prevent or eliminate discriminatory housing practices. For FY 2017 and 2018, HUD awarded the MMFHC \$300,000 under FHIP's private enforcement initiatives (PEI) grant category and \$125,000 under the education and outreach (EOI) grant program.

MMFHC, founded in 1977 and headquartered in Milwaukee, also operates two satellite offices in Madison and Appleton and offers state-wide complaint intake for communities outside of its main service areas, including La Crosse and Monroe Counties on a limited basis. Under its enforcement programs, MMFHC receives and investigates fair housing complaints and offers counseling on options for administrative or judicial remedy; makes referrals to attorneys and government agencies; and conducts systemic investigations of institutional discrimination. Under its education programs, MMFHC conducts fair housing training; offers fair housing technical assistance and professional support to government agencies, civil rights organizations, social service agencies and housing providers; and develops and distributes fair housing educational materials. The organization also monitors financial institutions for potential violations of fair lending laws and provides technical assistance and education on fair lending and foreclosure prevention to lenders, policy makers, and the public.

MMFHC received 204 housing discrimination complaints in 2016 (the most current year publicly available), 43 of which were outside of its main service areas of metro Milwaukee, Dane County, and Northeast Wisconsin. However, the organization declined to identify or provide data specific to housing units in the city of La Crosse, La Crosse County, or Monroe County.

City of La Crosse Human Rights Commission

The Wisconsin Open Housing Law places an affirmative duty on its political subdivisions—cities, villages, towns, and counties—to protect fair housing rights, and grants them authority to create local community relations-social development commissions through the Wisconsin Bill of Human Rights to, among other duties, recommend to the local governing authority ordinances that ensure, encourage, or protect equal

housing opportunities. The State expressly prohibits local governments from passing local ordinances that would weaken the state law protection and authorizes local jurisdictions to pass antidiscrimination housing ordinances which may be more inclusive in their terms of protected classes or in respect to the different types of housing protected. (See WISC. STAT. § 66.0125; 66.1011(1)).

The City of La Crosse has adopted its own anti-discrimination ordinance, known as the Equal Opportunities Ordinance, which includes protection in housing. (CITY OF LA CROSSE CODE OF ORDINANCES, § 22-19 et seq.) In addition to the protected classes under the FHA and state OHL, the ordinance also includes as a basis for antidiscrimination protection (1) one’s physical appearance, (2) domestic partner relationships, (3) political activities, and (4) status as a student. (CODE OF ORDINANCES, § 22-22). The City has established an eight member Human Rights Commission, appointed by the mayor and confirmed by City Council, authorized to enforce the provisions of the Equal Opportunities Ordinance, which includes the power to receive, initiate, and investigate all complaints alleging discriminatory practices; to appoint mediators for the purpose of settlement /conciliation between the parties; to hold hearings and issue temporary restraining orders; and to refer cases which violate state housing or accommodation laws to the state’s Equal Rights Division for enforcement. (CODE OF ORDINANCES, § 22-25).

A request was made to the City’s Human Rights Commission for data regarding the bases and disposition of housing discrimination complaints it had received for the previous five-year period. Between 2013 and 2018, the Commission reported having reviewed eight complaints, four of which were lodged against the La Crosse Housing Authority. At least three of these were referred by the Commission for further investigation by HUD or another party and one reached an unknown resolution. Of the remaining four complaints, one was outside the Commission’s jurisdiction, one lacked sufficient evidence, one was successfully mediated, and one was referred to HUD.

TABLE 24 – FAIR HOUSING COMPLAINTS REVIEWED BY THE CITY OF LA CROSSE HUMAN RIGHTS COMMISSION, 2013-2018

Date	Nature of Complaint	Resolution
05/2014	La Crosse Housing Authority	Unknown
12/2016	Nature of Application and False Reporting	Mediated Resolution
11/2016	Independent Landlord Complaint on Age Discrimination	Finding of no substantial evidence
01/2018	Boys and Girls Club Discrimination	Referred to HUD
01/2018	La Crosse Housing Authority Discrimination	Referred to HUD
09/2018	La Crosse Housing Authority Discrimination	Referred to proper authority
08/2018	Landlord Complaint-Outside of Jurisdiction	Referred to HUD
06/2018	La Crosse Housing Authority Discrimination	Referred to HUD

Source: City of La Crosse Department of Planning & Development

La Crosse County Commission on Equal Opportunities in Housing

La Crosse County also has adopted a local fair housing ordinance which prohibits discrimination in housing based on the same 12 protected classes as the state's Open Housing Law-- sex, race, color, sexual orientation, disability, religion, national origin, marital status, family status, lawful source of income, age, or ancestry. The Ordinance authorizes creation of a Commission on Equal Opportunities in Housing— composed of five members appointed by the County Board Chair with approval of the County Board— with authority to receive, initiate, and investigate complaints of alleged discriminatory practices; to appoint mediators; to hold hearings if settlement efforts fail; to issue temporary restraining orders; and to refer cases to the County Attorney, among other powers and duties related to ensuring fair housing opportunities. As with the state fair housing law, liability requires a showing of probable cause and complaints must be filed with the County Clerk within one year of the alleged prohibited act.

Monroe County has not adopted a separate fair housing ordinance but has incorporated Wis. Stats. § 106.50, the Open Housing Law, and given power to the municipal clerk to provide complaint forms and assist any person alleging a violation in the County of the OHL with filing a complaint with the state's Equal Rights Division for enforcement. (MONROE COUNTY CODE, § 25-31).

Fair Housing Lawsuits and Litigation

For the recent five-year period—January 1, 2013 through October 2018—one federal district court opinion was found regarding allegations of unlawful housing discrimination in the study area, this one occurring in the Village of Holmen, La Crosse County. In *REM Wisconsin III, Inc. v. Village of Holmen*, Civil Action No. 3:17-cv-00662 (W.D. Wis.), the operator of small adult family homes serving clients with intellectual and developmental disabilities filed suit seeking injunctive relief to prevent the Village of Holmen from requiring REM to submit to a public hearing under Wis. Stat. § 62.23(7)(i)(9)&(10) for the purpose of determining whether one of REM's licensed properties in a single-family residential district should be ordered to cease operation. (REM operates five AFHs in Holmen, four in Onalaska, two in the city of La Crosse, one in West Salem, and one in the town of Holland.) The state statute at issue allows local governments to determine through a public hearing process whether the existence of a licensed adult family home or a community living arrangement poses a threat to the health, safety or welfare of the residents of the city and grants local governments power to order the adult family home or community living arrangement to cease operation unless special zoning permission is obtained. The order is subject to judicial review. Plaintiff argued that both the state statute and Holmen's decision to invoke the statute constitute intentional discrimination and disparate treatment against people with disabilities in violation of the FHA, the Americans with Disabilities Act, and Sec. 504 of the Rehabilitation Act because the public hearing review process applies only to people with disabilities and is both stigmatizing and discriminatory.

REM sought a preliminary injunction ordering the Village to suspend the hearing process. REM also sought a declaratory judgment that Wis. Stat. § 62.23(7)(i)(9)&(10) is facially invalid and preempted by the FHA, ADA, and §504 because it contains explicit classifications based on disability; imposes different terms, conditions, or privileges in the provision of services in connection with such dwellings based on disability; and does not impose the same hearing process on similarly situated housing for nondisabled residents even if one of them poses a threat to the health, safety, or welfare of others. REM also requested that the

court grant permanent injunctive relief prohibiting any present or future application or enforcement of Wis. Stat. § 62.23(7)(i)(9)&(10).

Before the district court had opportunity to rule on the merits of Plaintiff's claims, the parties reached a settlement and stipulation of dismissal of the lawsuit, which was entered on September 12, 2017. The Village agreed to cancel the hearing regarding REM's properties and agreed that it will not conduct any hearings pursuant to Wis. Stats. §62.23(7)(i)9 & 10 in the future unless and until the issuance of a final judgment by the U.S. District Courts for the Eastern or Western Districts of Wisconsin, the U.S. Seventh Circuit Court of Appeals or the U.S. Supreme Court holding that §62.23(7)(i)9 & 10 are constitutional and do not conflict with the FHA, ADA, or §504 of the Rehabilitation Act, and may be validly enforced by Wisconsin municipalities. In the meantime, the parties agreed to meet on a quarterly basis to discuss and resolve any issues regarding the operation of REM residences and the interaction of REM residents, REM staff and law enforcement. REM agreed to develop training for Holmen officials regarding disabilities, community services, and techniques and strategies for interacting with people who have disabilities.

Because the constitutional issues raised by REM's lawsuit regarding facial and disparate treatment of adult family homes and community based residential facilities remain unresolved, one should expect more litigation surrounding the validity of Wis. Stats. §62.23(7)(i), which includes both the public hearing requirement for community living arrangements for people with disabilities and the state's 2,500 foot spacing requirement between CLA's.

One other recent FHA case found relating to housing in the La Crosse region was settled and dismissed in late 2012. In *United States v Geneva Terrace Apartments, Inc.*, Civil Action No. 3:11-cv-0734 (W.D. Wis., complaint filed Oct. 26, 2011), the Department of Justice sued the owner and manager of a 96-unit apartment complex in the city of La Crosse on behalf of African Americans who were denied the opportunity to rent available units in the complex because of their race. The case stemmed from an occurrence involving an African American couple who inquired with the complex about an available unit after seeing vacancy advertising but were told by the manager that no units were available. The couple sought assistance from the Metropolitan Milwaukee Fair Housing Council who conducted testing which revealed African American testers were being told no units were available while white testers were shown available units. The couple also filed a complaint with HUD, which investigated, and, after issuing a charge of discrimination, referred the matter to the Department of Justice. The defendants denied liability, but stipulated to a settlement and consent decree, which the court entered on November 30, 2012. Under the terms of the settlement, the defendants were required to pay complainants \$47,500 in damages and also pay a civil penalty of \$10,000 to the United States. The Defendant Geneva Terrace Apartments LLC also was required to develop and maintain non-discrimination housing policies and attend fair housing training.

No other significant federal or state lawsuits or HUD ALJ decisions/settlements were found involving discriminatory housing practices in La Crosse or Monroe Counties.

PAST FAIR HOUSING GOALS AND RELATED ACTIVITIES

The City of La Crosse last completed an Analysis of Impediments to Fair Housing Choice in 2011. That AI identified impediments in six categories and recommended remedial actions to address each. The impediments and recommended activities from the 2011 are shown below, along with progress made toward addressing them over the last several years.

Administrative Impediments

- Lack of education about fair housing issues and resources
- Lack of internal capacity to meet all the diverse housing needs of city of La Crosse residents
- Lack of a clear housing plan

Recommendations provide in the 2011 AI:

- Increase knowledge and awareness of fair housing rights and procedures by disseminating fair housing information in English, Spanish, and Hmong
- Streamline the City's discrimination complaint process and train employees as to how to deal with a fair housing complaint
- Ensure the City's programs serve the needs of renters including addressing housing quality, transitional housing, and emergency services
- Use the Consolidated Planning process to convene housing service providers to increase collaborative efforts and reduce duplication of services

Progress since the 2011 AI:

- Distributed fair housing rights brochures to over 10,000 households via water bills, to 150 households door-to-door, and to local non-profit organizations for distribution to their staff and clients
- Distributed fair housing information to all UW La Crosse students through email
- Conducted fair housing training for 76 advocates, social workers, and non-profit staff with professional trainers from the Milwaukee Fair Housing Council and Legal Action Aid
- Established Human Rights Commission to replace the former Equal Opportunities Commission
- Through legislation for the Human Rights Commission, created a more user-friendly complaint process, with updates to websites and material
- Advocated and promoted fair housing through the Human Rights Commission
- Convened 20 local housing service providers to multiple stakeholder meetings as part of the City's Consolidated Planning process
- Proactively reached out to surrounding communities to encourage them to play a role in meeting the area's affordable housing need

Regulatory Impediments

- Ambiguous fair housing ordinance
- Moratorium on residential rental inspection ordinance

Recommendations provide in the 2011 AI:

- Update the City's Fair Housing Ordinances to define each protected class and add new protected classes for consistency with State of Wisconsin standards
- Reinstate and ensure enforcement of the residential rental inspection ordinance, with a focus on units that have not previously been inspected

Progress since the 2011 AI:

- Updated to City's Fair Housing Ordinance to provide clarity, better define protected classes, and add gender identity as a protected class
- Reinstated the residential rental inspection ordinance, however, lobbying efforts at the state level have inhibited the City's ability to conduct rental inspections
- Added an inclusionary or affordable housing component to all City of La Crosse RFPs for new developments to encourage developers to think about fair and affordable housing

Quality Impediment

- Lack of quality affordable housing, including older units with more maintenance and repair needs

Recommendations provide in the 2011 AI:

- Continue to implement the City's Rehabilitation and Replacement Housing Programs and, if participation declines, consider alternate programs to address housing quality

Progress since the 2011 AI:

- Under the 2015-2020 Consolidated Plan, provided housing rehabilitation assistance for 46 owner-occupied housing units and 16 affordable rental units
- Under the 2015-2020 Consolidated Plan, provided assistance for development of 27 new affordable units for homeownership and 114 new affordable rental units
- Under the 2015-2020 Consolidated Plan, provided funding for 12 new transitional housing units

Spatial Impediment

- Census Tracts 2 and 9 are particularly prone to fair housing violations given the high percentage of minority residents and high poverty rate

Recommendations provide in the 2011 AI:

- Prioritize Census Tracts 2 and 9 for investment through the Rehabilitation and Replacement Housing Programs

Progress since the 2011 AI:

- The City of La Crosse created two Neighborhood Revitalization Strategy Areas which include Census Tracts 2 and 9. The City has invested about 60-70% of its Community Development Block Grant (CDBG) funds in these areas and created incentives in its annual RFP process for projects located in these areas.

Financial/Affordability Impediments

- Lack of loans for home improvements
- Lack of loans to minorities

Recommendations provide in the 2011 AI:

- Continue to promote and implement the Rehabilitation Program to improve local housing conditions
- Provide education and information to local lenders about predatory lending practices
- Continue to provide credit and home-buying education to city of La Crosse residents, including coordinating with local organizations that provide these services

Progress since the 2011 AI:

- The City of La Crosse actively promotes its Housing Rehabilitation Program and partners with Couleecap to promote its programs. Over the past 5 years, approximately 75 homes have been rehabilitated under these programs.
- The City of La Crosse partnered with Couleecap and Consumer Credit Counseling Services to provide homebuyer counseling.

Discriminatory Impediments

- Lack of housing units available for disabled persons

Recommendations provide in the 2011 AI:

- Adopt visitability requirements for houses funded through the Rehabilitation and Replacement Housing programs and for new home buildings

Progress since the 2011 AI:

- While the City of La Crosse has increased the number of universal design homes it has built, adding visitability requirements to its programs was not financially feasible.

CHAPTER 10.

IDENTIFICATION OF IMPEDIMENTS

Described below are the fair housing impediments identified in this Analysis of Impediments, along with associated contributing factors. Contributing factors are issues leading to an impediment that are likely to limit or deny fair housing choice or access to opportunity. Recommended activities to address the contributing factors are provided in Table 25, along with implementation timeframes and responsible parties.

Impediment 1: Affordable Housing Needs Disproportionately Affect Protected Classes

The most common housing need identified by local residents and other stakeholders was affordability, particularly for low- and moderate-income households and people who are homeless. While housing prices in the city of La Crosse and La Crosse and Monroe Counties are relatively modest in comparison to national averages, these costs are often unattainable for individuals with low-wage workers, seniors, and other groups. For example, minimum wage workers in La Crosse County would need to work 84 hours a week to afford a two-bedroom apartment at the HUD Fair Market Rent of \$793. Data about housing problems – including affordability – shows that Black, Latino, and other race households are considerably more likely than whites to have a housing need in the city of La Crosse and La Crosse County. Most notably, African-American households experience housing problems and, particularly, severe cost burdens, at rates that are more than twice those of white households. While housing programs supported with City of La Crosse CDBG and HOME funds will continue to address local housing needs, a broader approach is needed to more adequately serve the range of needs in the community. Working in partnership, the City of La Crosse, La Crosse County, Monroe County, and the local PHAs should develop a regional plan for addressing affordable housing needs. Active participation by other communities in the region, including Holmen, Onalaska, West Salem, Sparta, and Tomah, would also be necessary for a meaningful study.

Impediment 2: Limited Access to Some Areas of Opportunity

When asked where in the region they would choose to live if cost were not an object, residents listed many different areas. Some chose Holmen, Onalaska, or West Salem, while others named the city of La Crosse. Some said they were happy where they are and wouldn't move if they could. While no household should be encouraged to move if it does not wish to, those that are open to relocating in order to take advantage of a different mix of opportunity features in another part of the region should be able to do so. Currently, one of the best programs supporting mobility of households is the Housing Choice Voucher program. The number of vouchers available in the region is extremely limited, but even for those families able to obtain a voucher, options are limited by landlords who refuse to accept an HCV as payment. Although Wisconsin state law includes "lawful source of income" as a protected class, courts have not interpreted the provision as including housing vouchers and thus, there is no legal requirement that landlords accept HCVs. Furthermore, the households using these vouchers are disproportionately households of color, particularly African Americans who make up 20% or more of the voucher recipients in some areas while their share of the population overall does not exceed 2% in any of the jurisdictions

studied. The Monroe County Housing Authority employs a residency preference, meaning that their waiting list is sorted such that residents of the county are boosted toward the top of the list. This creates a barrier to receiving housing assistance for low-income families who may wish to move to Monroe County from elsewhere in the area. Finally, regional transit, another key to opening up opportunities for families seeking to access opportunity by moving to a different part of the region, is limited. Transit within the vicinity of the city of La Crosse is generally good but strengthening public transportation links to La Crosse County's suburban communities and to Monroe County would further open up housing options in those areas to families seeking to move. So as not to encourage sprawl, transit improvements should consider linkages to existing nodes of housing and/or employment and prioritize smart growth concepts such as transit-oriented development.

Impediment 3: Poor Rental Housing Conditions Limit Access to Quality Housing

Concerns regarding the condition of existing rental housing stock were widespread among the stakeholders and members of the public who contributed to this AI. Many people faulted landlords for not doing enough to maintain their properties, but rather letting them fall into disrepair and refusing to make necessary improvements or making only minor, "band aid" fixes. Tenants who reside in substandard rental properties may not have any good options. Pointing problems out to their landlord could result in retaliation; reporting deficiencies to code enforcement could result in the property being condemned and the tenant becoming homeless. Other times landlords make minimal corrections to satisfy code enforcement but do not address overarching problems with housing quality. For these and many other reasons, many housing conditions go unreported and undetected. Compounding this problem, recent state legislation has rolled back local governments' ability to implement rental registration and inspection programs. Alternative tools for local enforcement should be considered while advocating for state-level changes that would permit more robust local controls. Continuing to fund rental rehabilitation and new construction should also help to address poor housing quality in the La Crosse region.

Impediment 4: Accessible Housing for People with Disabilities is in Short Supply

In the fair housing survey conducted as part of this analysis, 43.6% of respondents named lack of housing options for people with disabilities as a barrier to fair housing in the region. Two-thirds of respondents agreed that either "some more" or "a lot more" housing for people with disabilities is needed in La Crosse and Monroe Counties. Searches for accessible rental housing using various internet search tools revealed the relative scarcity of units for this population and that many properties with accessible housing had waiting lists for those units. Compounding this scarcity are provisions of state law and local zoning codes that have the effect of making the development or siting of new housing for this population more challenging. La Crosse County and Monroe County both have various ambiguities within their definitions of "family" as they may relate to group homes or "community living arrangements" and under these codes, as well as the City of La Crosse's zoning code, these uses are variously subject to spacing requirements, conditional use permitting, and capacity limitations. Where a group home or other similar housing consists of multiple unrelated people with disabilities living together as a single, functional housekeeping unit, regulations of these sorts, when not applied similarly to households of similar size composed of people who are not disabled, could be discriminatory treatment. Additionally, the City of La Crosse and La Crosse County lack a reasonable accommodation provision within their zoning ordinances.

Such a provision creates a separate administrative process for someone to request accommodation of a disability without the undue burden of following a typical variance process, which is designed for handling special conditions associated with a lot or property rather than for ensuring equal access to housing.

Impediment 5: The La Crosse Housing Authority is Rebuilding Public Trust

As the largest provider of publicly supported housing in the region, the La Crosse Housing Authority is a valuable asset and coveted partner in many different affordable housing initiatives, however, its relationship with the low-income renters who make up its customer base is strained. Some LHA procedures, such as the housing application process which is generally done on-site, in-person at LHA's office are seen by the community as unnecessarily burdensome and unfriendly toward prospective tenants. The LHA's offices are open on weekdays only from 9:00 a.m. to 4:00 p.m. and are closed for an hour at lunch. Given these hours, the application process is difficult for working families without taking unpaid time off from their jobs. Although applications are available through other local agencies and by mail, these options did not appear to be general knowledge among focus group participants who had experience applying for LHA housing. While far from universal, criticism of the LHA was common in resident focus groups and comments from survey respondents. People described having their housing applications lost after submission to the LHA, being passed over on the waiting list, having phone messages ignored, and being reluctant to complain for fear of retaliation. Of the survey respondents who reported having experienced housing discrimination while living in the region, several identified policies or actions of the LHA as the source of the reported discrimination. Further, when the City of La Crosse reconstituted its Human Rights Commission in 2017, the first two complaints it received were allegations of discrimination by the LHA.

Although these issues affect the public reputation of the LHA, the LHA has taken progressive steps that improve overall access to and availability of housing in the city of La Crosse. A key partnership between the LHA and the La Crosse Collaborative to End Homelessness has softened the in-person application requirement such that applicants working with a case manager at one of the Collaborative's 20 member organizations can complete an application off-site. In working with the Collaborative's landlord liaison program, the LHA has also agreed to lower barriers to housing for individuals with negative background factors but who are engaged in social services. As with these examples, the LHA board and staff should continue to evaluate and overhaul their policies and procedures related to customer service. Where policies cannot be changed, better communication of their rationale could be helpful to building greater public trust.

Impediment 6: Racial Disparities Exist in Access to Homeownership

Many households desire homeownership as a housing option in order to build equity and increase stability. However, homeownership rates and data regarding home mortgage applications indicate that households of color – both in the La Crosse region and nationally – face greater difficulty purchasing a home than do white households. In the city of La Crosse, about 52% of white households own their homes while the vast majority of Black, Native American, and other race households are renters. (Data examined in this report estimates no African-American owner households in the city of La Crosse. These estimates are based on samples and may not capture a small number of African-American owners.) Similar disparities exist in La Crosse and Monroe Counties, where about two-thirds of white households own their

homes compared to 12% or less of African-Americans. In La Crosse County, Native Americans and other race households also have significant gaps in homeownership rates compared to whites (30+ percentage points). While not the only factor impacting homeownership rates, difference in mortgage loan approval rates also play a big role. Home Mortgage Disclosure Act data shows that Black applicants are more than twice as likely to be denied as white applicants for home mortgage loan and mortgage refinance applications. The City of La Crosse should ensure that the homeownership programs it supports through CDBG and HOME funding are affirmatively marketed to communities of color in the La Crosse region. The City could also consider funding homeownership counseling, downpayment assistance, or other resources for first-time homebuyers.

Impediment 7: The Human Rights Commission Continues to Clarify Its Fair Housing Role

The City of La Crosse's Human Rights Commission is charged with receiving, initiating, and investigating complaints alleging discrimination with respect to practices prohibited by the City's Equal Opportunities Ordinance, which includes protections against housing discrimination. While the Commission has authority to investigate complaints, appoint mediators, hold hearings, and issue findings, the Commission's role in fair housing has generally lacked definition and clarity, both internally and to the public. Over the last year, there has been high turnover among commissioners, including the resignation of four members regarding the handling of a complaint against the La Crosse Housing Authority.

In early 2019, the City of La Crosse passed an ordinance that more clearly defines the HRC's role and complaint handling processes. To the extent that the Commission will be hearing and directing the investigation of complaints, appropriate legal and procedural training should be provided to members so as to ensure that both complainants and defendants receive proper treatment as provided by law and that complaint investigations are appropriately rigorous. Significant improvements have recently been instituted to make the HRC a stronger advocate for fair housing, but progress should be monitored closely over time to ensure the Commission's members and the public continue to gain awareness of the HRC's role and responsibilities.

Impediment 8: Need for Coordinated Fair Housing Education and Enforcement

A need for ongoing outreach, education, and enforcement regarding fair housing is evident from public input and the results of the fair housing survey. Meeting, focus group, and interview participants, when asked to name organizations that provide fair housing education or that could be turned to for help with a housing discrimination complaint, struggled at times to think of appropriate service providers. Survey data revealed that nearly half of respondents (47.4%) report not knowing where to file a complaint of housing discrimination. Even so, respondents' self-reported knowledge of their fair housing rights was relatively high, with 42% knowing and another 38% "somewhat" knowing their rights under the law. In addition to a need for general public education about fair housing rights and complaint filings, stakeholder input suggests a need for training and education focused on overcoming racism. Meeting participants cited several examples of prejudicial attitudes among people in positions of local leadership as well as among some members of the public at large. A broad-based and respected local convening organization could consider a periodic anti-racism training aimed at government, school, housing authority, and corporate leaders across the community. Participation would be voluntary, but by attracting high-level officials, the trainings would take on a reputation of esteem in the community. The City of La Crosse has

a Human Rights Commission that could be instrumental in this work, but the commission's membership has been subject to some turnover over the past year and the commission has just begun to clarify its role in fair housing through a strategic planning effort.

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TABLE 25 – FAIR HOUSING GOALS AND ACTIVITIES

Contributing Factors	Recommended Activities, Goals, and Timeframes	Responsible Parties and Partners
Impediment 1: Affordable Housing Needs Disproportionately Affect Protected Classes		
<p>Housing needs, particularly needs related to affordability, exist throughout the area and a require a regional approach</p>	<ul style="list-style-type: none"> • Continue efforts to work collaboratively between the City of La Crosse, La Crosse County, and Monroe County to improve housing affordability, encourage new development, and reduce barriers to accessing housing. Consider working together along with other jurisdictions including Holmen, Onalaska, West Salem, Sparta, and Tomah to develop a Regional Affordable Housing Plan that prioritizes housing needs and outlines strategies the entities plan to take to address them. <ul style="list-style-type: none"> a. Work to identify the participating communities and other partners necessary to make an affordable housing plan truly regional and successful, reaching out to secure buy-in and lay groundwork. (Q4, 2019) b. As a group, identify the goals and desired outcomes for a regional plan, including strategies (such as zoning code changes, incentives for mixed-income housing development, transit-oriented development, and barrier-free housing programs) that should be considered. (Q2, 2020) • Determine a process for developing and jointly funding the plan, to include whether the work will be completed in-house by a local organization or government or whether it may be contracted out; initiate the planning process. (Q4, 2020). 	<p>City of La Crosse La Crosse County Monroe County La Crosse Housing Authority La Crosse County Housing Authority Monroe County Housing Authority Tomah Public Housing Authority</p>
<p>Public resources for affordable housing development are limited and partnerships with private-sector entities may expand this capacity</p>	<ul style="list-style-type: none"> • Continue requiring inclusionary or affordable housing components to all City of La Crosse RFPs for new development to encourage developers to address affordable housing needs. Other cities within the region should consider adopting these requirements as well. (Ongoing, beginning Q1, 2019) 	<p>City of La Crosse La Crosse County Monroe County</p>

Contributing Factors	Recommended Activities, Goals, and Timeframes	Responsible Parties and Partners
Impediment 2: Limited Access to Some Areas of Opportunity		
<p>Although designed to encourage mobility, the local utility of Housing Choice Vouchers is constrained by their low availability and by landlords who refuse them</p>	<ul style="list-style-type: none"> Alternative sources to increase the number of available rental housing vouchers in the region (e.g. Tenant-Based Rental Assistance under the HOME program, HUD VASH, etc.) should be sought and developed where possible. (Q1, 2021) A regular, ongoing campaign to reach and recruit new landlords into the HCV program and other subsidized housing programs (such as TBRA, supportive housing) should be designed by the Housing Authorities and the La Crosse Collaborative to End Homelessness and be implemented in partnership with the City of La Crosse and La Crosse and Monroe Counties. (Ongoing, beginning Q4, 2019) 	<p>City of La Crosse La Crosse County Monroe County La Crosse Housing Authority La Crosse County Housing Authority Monroe County Housing Authority Tomah Public Housing Authority</p>
<p>Public transportation options connecting La Crosse with suburbs in La Crosse County and communities in Monroe County are limited</p>	<ul style="list-style-type: none"> Research alternative transportation programs that may provide direct transportation linkages between existing housing and employment centers (ex: vanpools, use of dial-a-ride vehicles) and potential funding sources. (Q4, 2021) As City and County comprehensive plans and other local or regional transportation plans are developed or updated, the City's Community Development and Housing staff should review the proposed plan elements for consistency with planned strategies to expand public transportation in a way that would open up housing choices within the region. (Ongoing, beginning Q4, 2019) 	<p>City of La Crosse La Crosse County Monroe County</p>
<p>The Monroe County Housing Authority includes a residency preference in its waiting list criteria</p>	<ul style="list-style-type: none"> Reconsider residency preferences in Administrative Plan in favor of an overall policy that removes barriers to mobility for residents of the region. (Q4, 2019) As appropriate, amend plans and preference criteria. (Q1, 2020) 	<p>Monroe County Housing Authority</p>

Contributing Factors	Recommended Activities, Goals, and Timeframes	Responsible Parties and Partners
Impediment 3: Poor Rental Housing Conditions Limit Access to Quality Housing		
Landlords are reluctant to maintain and improve rental properties	<ul style="list-style-type: none"> The City of La Crosse and its partners should continue efforts to advocate the state legislature to make it possible to reinstate rental registration and rental inspection programs. (Q1, 2020) Continue to consider alternative means of addressing poor housing conditions through existing programs such as Chronic Nuisance Abatement, exterior code enforcement, and continue to employ code enforcement officers. (Ongoing, beginning Q4, 2019) 	City of La Crosse La Crosse County Monroe County
Landlords lack education on responsibilities under the Fair Housing Act	<ul style="list-style-type: none"> Design and deliver annual fair housing education (either in-house or through a contracted third-party organization) to landlords. (Annually, beginning Q4 2019) 	City of La Crosse La Crosse County Monroe County La Crosse Housing Authority La Crosse County Housing Authority Monroe County Housing Authority Tomah Public Housing Authority
Limited new rental housing construction or rental rehabilitation in the region	<ul style="list-style-type: none"> Continue using CDBG funding to support the construction, acquisition, and/or rehabilitation of high-quality, affordable rental properties in the city of La Crosse. Additionally, new LIHTC projects can be located in Holmen, Onalaska, West Salem, Sparta, Tomah, and other communities in the region. (Annually, beginning Q4 2019) 	City of La Crosse La Crosse County Monroe County La Crosse Housing Authority La Crosse County Housing Authority Monroe County Housing Authority Tomah Public Housing Authority

Contributing Factors	Recommended Activities, Goals, and Timeframes	Responsible Parties and Partners
Impediment 4: Accessible Housing for People with Disabilities is in Short Supply		
Insufficient accessible housing exists to serve the needs of people with disabilities	<ul style="list-style-type: none"> • Consider opportunities to encourage or incentivize the construction of new accessible housing units for people with disabilities. <ul style="list-style-type: none"> a. When new accessible housing is proposed by a developer, organization, or agency, express support (through letters of support and/or certifications of consistency with the Consolidated Plan) wherever possible. (Ongoing, beginning Q4, 2019) b. Review local funding mechanisms and federal grant sources for opportunities to incentivize development of new accessible housing units. (Q2, 2020) c. Meet with local providers of accessible housing and permanent supportive housing to discuss resources available and potential for collaboration on future proposed housing developments. (Q1, 2021) 	City of La Crosse La Crosse County Monroe County La Crosse Housing Authority La Crosse County Housing Authority Monroe County Housing Authority Tomah Public Housing Authority
Ambiguous or inconsistent zoning code provisions raise questions about allowable siting and occupancy for housing for people with disabilities	<ul style="list-style-type: none"> • Family definitions should be reviewed to remove any ambiguities and ensure clear definitions. <ul style="list-style-type: none"> a. Review the La Crosse and Monroe County zoning codes with planning staff members and consult with community partners as needed to draft potential revisions. (Q1, 2020) b. Amend ordinances and policies as necessary to expand housing choice for people with disabilities. (Q3, 2020) • Family definitions should be aligned with group housing definitions and codes should clarify where these group housing uses are permitted by right. <ul style="list-style-type: none"> a. Review the La Crosse and Monroe County zoning codes with planning staff members and consult with community partners as needed to draft potential revisions. (Q1, 2020) b. Amend ordinances and policies as necessary to expand housing choice for people with disabilities. (Q3, 2020) • Review and clarify the permitted locations of housing serving people recovering from alcohol or substance abuse addition to include residential districts. <ul style="list-style-type: none"> a. Review the City and County zoning codes with planning staff members and consult with community partners as needed to draft potential revisions. (Q1, 2020) b. Amend ordinances and policies as necessary to expand housing choice for people with disabilities. (Q3, 2020) 	La Crosse County Monroe County

Contributing Factors	Recommended Activities, Goals, and Timeframes	Responsible Parties and Partners
Impediment 4: Accessible Housing for People with Disabilities is in Short Supply (continued)		
<p>The City of La Crosse and Lacrosse County do not have a clear and objective process by which persons with disabilities may request a reasonable accommodation</p>	<ul style="list-style-type: none"> • Consider, draft, and adopt local code amendments that would provide an administrative alternative to a variance application for people requesting accommodation or modification related to a disability. <ul style="list-style-type: none"> a. Review the City and County zoning codes with planning staff members and consult with community partners as needed to draft potential revisions. (Q4, 2019) b. Amend ordinances and policies as necessary to expand housing choice for people with disabilities. (Q3, 2020) 	<p>City of La Crosse La Crosse County</p>
Impediment 5: The La Crosse Housing Authority is Rebuilding Public Trust		
<p>LHA policies and procedures are frequently perceived as unfriendly, burdensome, and sometimes discriminatory to members of the public who are served by or who seek services from the Authority</p>	<ul style="list-style-type: none"> • Collect public input and, where possible, consider amending policies and procedures to make them more customer-focused. <ul style="list-style-type: none"> a. With the assistance of a neutral third-party facilitator, convene a series of listening sessions to hear input from both residents and non-residents about issues with LHA policies and procedures. (Q4, 2019) b. Based on the input received, develop and implement amended policies and procedures. (Q1, 2020) • With the assistance of a skilled marketing agent (and perhaps a student or student clinic from a local university), develop a campaign to describe how the LHA cares for its residents and reset the local narrative about the organization. (Q2, 2020) • With the assistance of a neutral, third-party trainer, schedule an annual in-service staff training day wherein the entire LHA staff is trained and provided a refresher on topics related to fair housing, anti-bias, and racial/ethnic/cultural sensitivity. (Ongoing, beginning Q4, 2019) 	<p>La Crosse Housing Authority</p>
<p>LHA board and staff members are perceived by some as indifferent to the needs and grievances of residents</p>	<ul style="list-style-type: none"> • In making appointments to the LHA’s Board of Commissioners, the City should be mindful of community criticisms and select board members who are reflective of the LHA’s tenant community and who have a background that helps them identify with the needs of this group. (Ongoing, beginning Q4, 2019) 	<p>City of La Crosse</p>

Contributing Factors	Recommended Activities, Goals, and Timeframes	Responsible Parties and Partners
Impediment 6: Racial Disparities Exist in Access to Homeownership		
Homeownership rates are considerably lower for Black, Native American, and other race households than they are for white households in the city of La Crosse and La Crosse County	<ul style="list-style-type: none"> • Ensure that opportunities to participate in City of La Crosse homebuyer programs, including those funded using CDBG and HOME funds, are affirmatively marketed. (Ongoing, beginning Q4, 2019) • Consider using CDBG funding for to support homebuyer education classes that connect graduates with downpayment and/or closing cost assistance. Work with local community organizations to advertise these programs to communities of color. (Q3, 2021) 	City of La Crosse La Crosse County
Home purchase and refinance loan applications by Black applicants and applicants of multiple or other races are more likely to be denied than those by white households	<ul style="list-style-type: none"> • Meet with local lenders to share Home Mortgage Disclosure Act findings and discuss the goals for furthering fair housing as it relates to homeownership. Invite lenders to participate in fair housing trainings offered by the City. (Ongoing, beginning Q2, 2020) 	City of La Crosse La Crosse County
Impediment 7: The Human Rights Commission Continues to Clarify Its Fair Housing Role		
The La Crosse Human Rights Commission's is continuing to define its role through a strategic planning process	<ul style="list-style-type: none"> • The La Crosse Human Rights Commission is in the midst of a strategic planning process to consider its proper and most effective role in fair housing enforcement and develop a plan, to include potential training for commission members, for successfully fulfilling that role. Based on the outcome of the Commission's planning process, the City of La Crosse should be prepared to allocate financial support and staffing to enable the Commission's mission. (Ongoing, beginning Q4, 2019) 	City of La Crosse
Residents and other stakeholders need a clear understanding of the Human Rights Commission and the housing discrimination complaint process	<ul style="list-style-type: none"> • Once the Human Rights Commission has established its role in fair housing enforcement and developed a process for handling fair housing complaints, information should be made available to city of La Crosse residents that outlines the complaint process. Prospective complainants should have an understanding of the complaint process, the Human Rights Commission's role, and under what conditions their complaint will be investigated locally or referred to another agency prior to filing. This information should be available online and in hard copy in places where fair housing information is disseminated. (Ongoing, beginning Q1, 2020) 	City of La Crosse

Contributing Factors	Recommended Activities, Goals, and Timeframes	Responsible Parties and Partners
Impediment 8: Need for Coordinated Fair Housing Education and Enforcement		
Stakeholder input and survey responses indicate that more fair housing education is needed for members of the general public	<ul style="list-style-type: none"> • Either using in-house staff or through a contracted provider, the City and its partners should annually design and/or update and coordinate delivery of a fair housing education program that reaches the public with information about fair housing rights and responsibilities, how to recognize discrimination, and how and where to file a complaint. (Ongoing, beginning Q4, 2019) 	City of La Crosse La Crosse County Monroe County La Crosse Housing Authority La Crosse County Housing Authority Monroe County Housing Authority Tomah Public Housing Authority

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