

ANALYSIS OF IMPEDIMENTS OVERVIEW

The City of La Crosse, La Crosse County, City of La Crosse Public Housing Authority, La Crosse County Housing Authority, Tomah Housing Authority, Monroe County, and Monroe County Housing Authority have jointly prepared a fair housing study known as an Analysis of Impediments to Fair Housing Choice. This study discusses patterns of race, housing, and poverty; access to opportunity; and housing barriers in the region. It also outlines strategies that each agency may take to improve housing choices for their residents. The study is required by the U.S. Department of Housing and Urban Development for jurisdictions that receive certain community development and affordable housing grant funds.



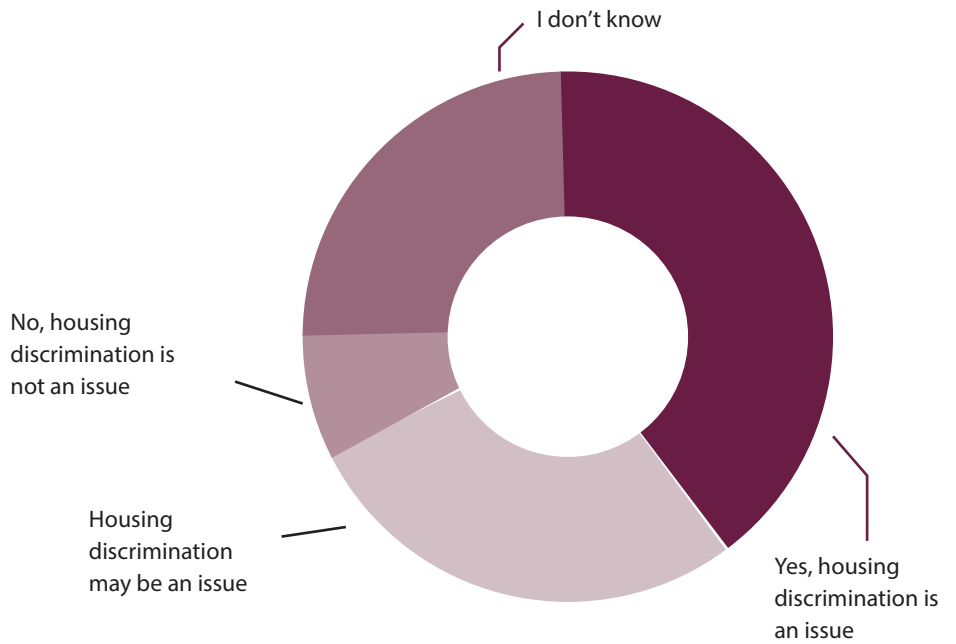
COMMUNITY PARTICIPATION PROCESS

Participants' Thoughts about Their Neighborhoods

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



Participants' responses regarding whether they think housing discrimination is an issue in La Crosse and Monroe Counties:



Other key survey findings included:

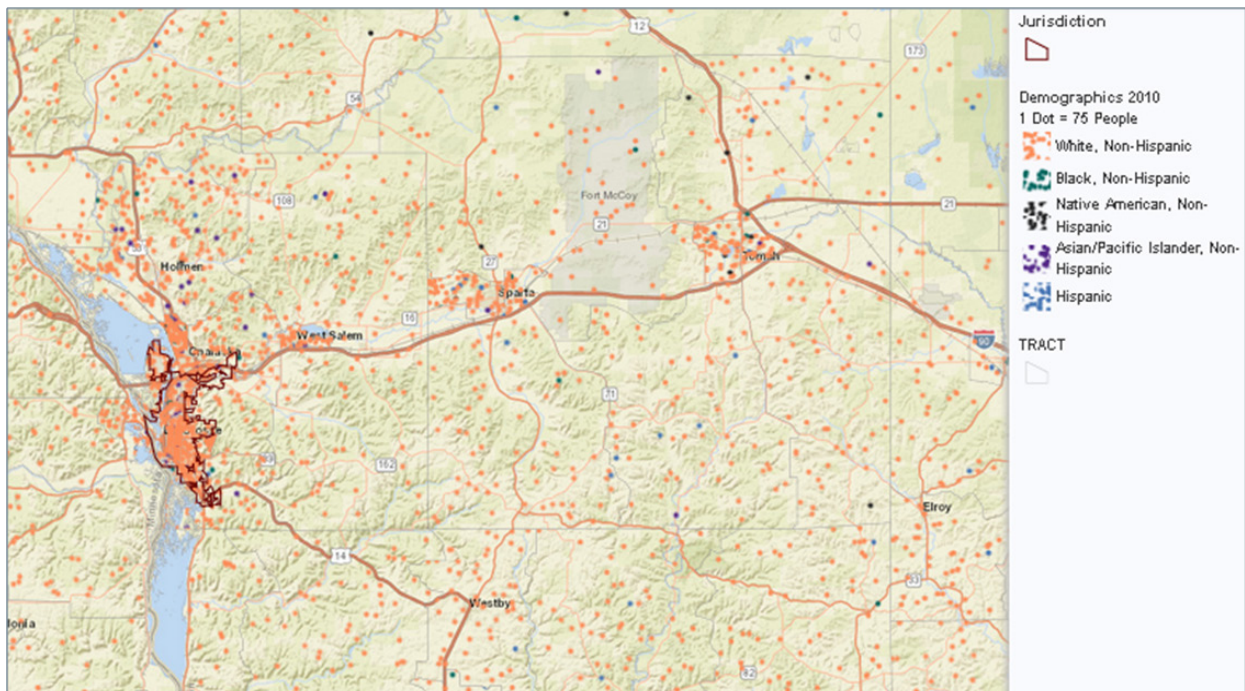
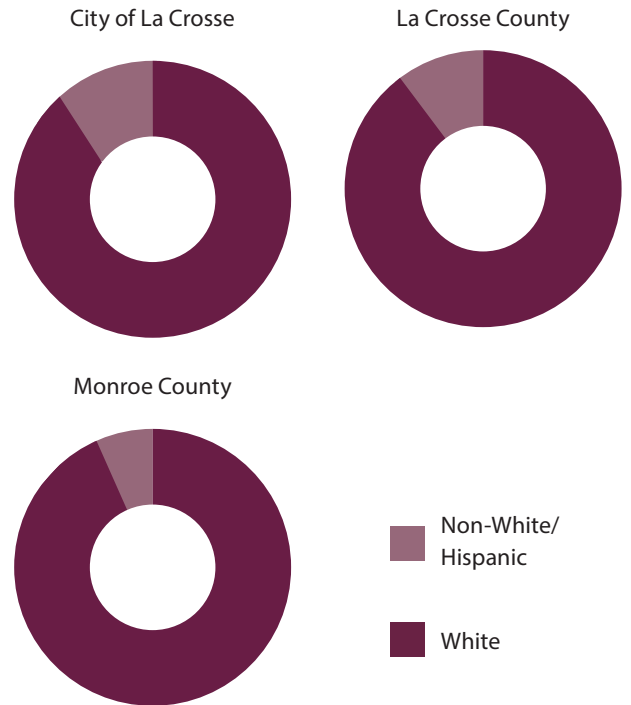
- Fewer than half (42%) of respondents reported understanding their fair housing rights.
- A large majority of respondents (89%) are either very satisfied or satisfied with their neighborhoods, and 70% said they did not want to move.
- Most respondents (64%) stated that there was not enough affordable rental housing for individuals.

SOCIOECONOMIC PROFILE

The population of La Crosse has been around the same since 1990, but the city is becoming more diverse. White residents make up the majority of the population but both their share of the population and the total white population has been decreasing since 1990. Asians are the second-largest racial group, and their share of the population has increased since 1990. 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.

Segregation/Integration

Demographic data indicates low levels of racial and ethnic segregation in the city of La Crosse, La Crosse County, and Monroe County. Segregation has decreased since 1990. To the extent that it exists, segregation is highest between whites and African-Americans.



Population by Race and Ethnicity in La Crosse and Monroe Counties, 2010

ACCESS TO OPPORTUNITY

Among the many factors that drive housing choice for individuals and families are neighborhood characteristics including access to quality schools, jobs, and transit. To measure economic and educational conditions at a neighborhood level, HUD developed a methodology to measure the degree to which a neighborhood provides such opportunities. With the exception of some significant differences in a few index categories, similar patterns of low disparity appear in La Crosse and Monroe Counties.

Spatial distribution patterns and index scores indicate virtually equal access to proficient schools among racial and ethnic groups.

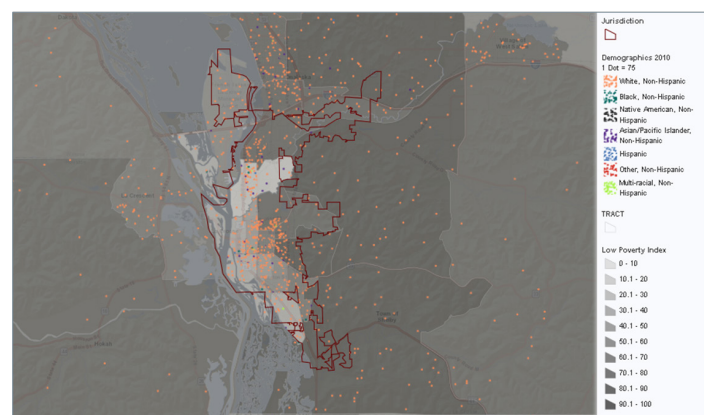
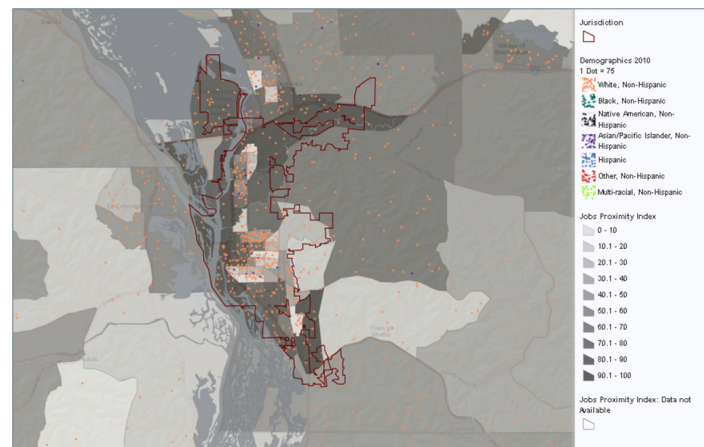
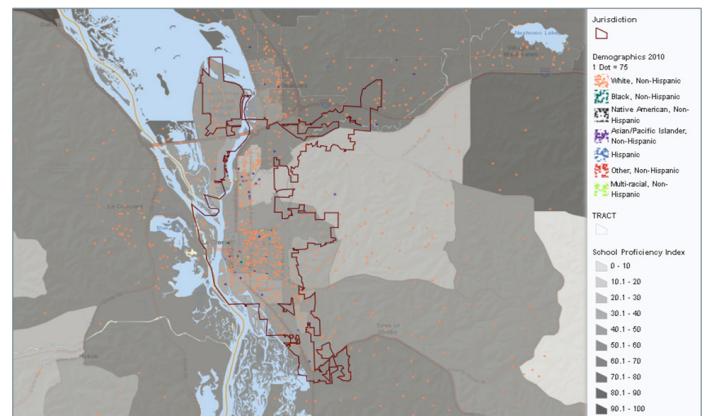
The block groups with the best access to jobs are primarily located along the eastern boundary of the city of La Crosse. Significant disparities exist among populations below the poverty line in the city of La Crosse, La Crosse County, and Monroe County.

Labor market engagement in the city of La Crosse and La Crosse County is highest near the eastern border of the city. Larger disparities exist among racial and ethnic groups above the poverty line in both the city of La Crosse and La Crosse County. Labor market engagement is 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 have the highest levels of exposure to poverty compared to the city of La Crosse and La Crosse County.



HOUSING

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 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

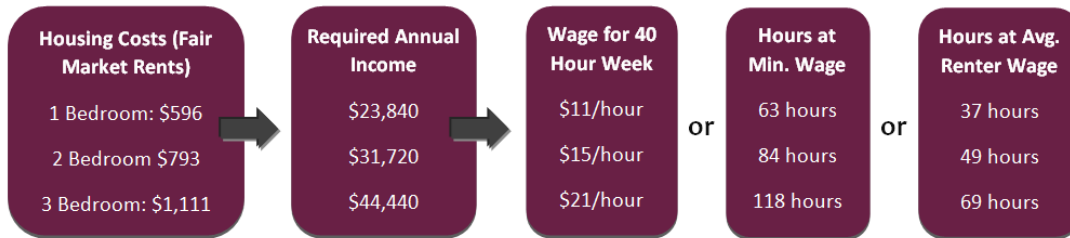
rate since 2000. Of the 2,846 units added there, 865 were in Sparta and 414 were in Tomah. Overall, housing growth rates in the region reflect population growth rates – moderate expansion in the city of La Crosse with more rapid growth in the counties.

The most common housing need identified by stakeholders related to affordability, particularly for low- and moderate-income households.

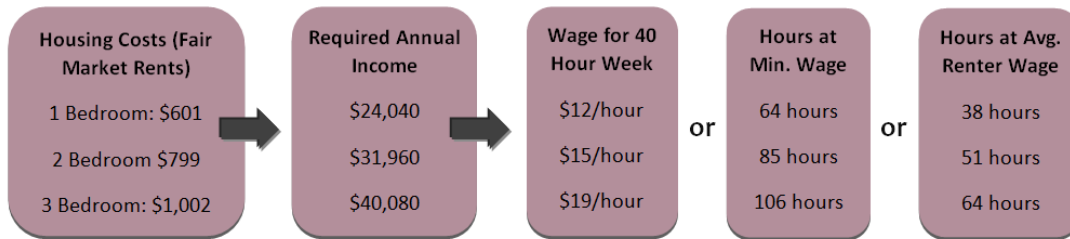
Homeownership rates are disproportionately low for certain racial/ethnic groups such as African-Americans and Native Americans.

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>

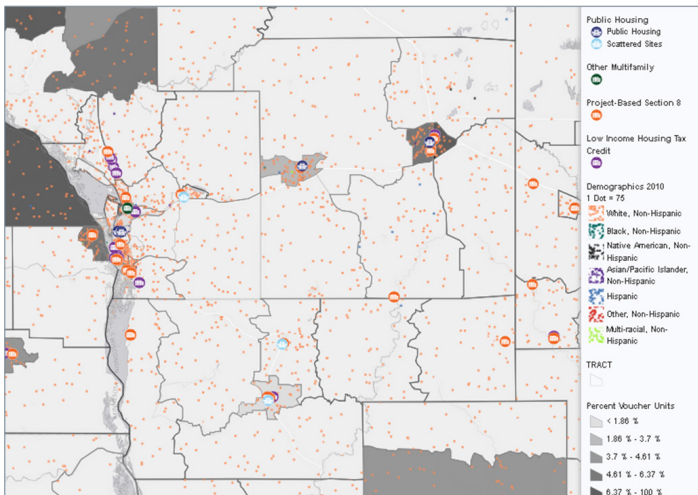
In the city of La Crosse, about 37% of households citywide reported having one of four housing problems (a cost burden, overcrowding, or lack of complete kitchen or plumbing facilities). About 19% of La Crosse households have a severe need. Levels of need in the counties are slightly lower: 29% of households have a housing problem and 14% have a severe housing problem in La Crosse County, and 30% of households have a housing problem and 15% have a severe housing problem in Monroe County.

HOUSING

Publicly Supported Housing

Publicly supported housing programs account for approximately one in 23 housing units in La Crosse, one in 37 in La Crosse County, and one in 43 in Monroe County. These units are generally disbursed throughout the area.

Four different public housing authorities in the La Crosse region provide approximately 1,100 affordable housing units throughout the region, housing families, the elderly, and people with disabilities. These units account for a significant share of public housing, but not all of the publicly supported housing units in a jurisdiction are owned or managed by the housing authority serving that jurisdiction. 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.



Housing for People with Disabilities

In the city of La Crosse, an estimated 11% of persons 5-years-old or older have a disability. In the city of La Crosse, La Crosse County, and Monroe County, people aged 18-64 have both the largest number of people with disabilities and the highest disability rate.

Searches using HUD's Affordable Apartment Search Tool and apartmentguide.com for apartments with accessibility features currently for rent in the area were conducted and returned limited results, particularly for units priced at \$900 or less per month.

Several elements within the city of La Crosse, La Crosse County, and Monroe County's respective zoning codes could be amended or clarified to expand housing choice, including for people with disabilities. Several examples include ensuring that group homes and Community Living Arrangements ensure fair treatment of people with disabilities, modifying the definition of "family, and providing a reasonable accommodation provision.

Fair Housing Activities

From January 2013 through October 2018, HUD received six formal complaints of alleged housing discrimination occurring within the jurisdiction of the City of La Crosse, four complaints elsewhere in La Crosse County, and three complaints in Monroe County.

In complaints originating from La Crosse, disability was cited as the basis of discrimination in five of the six cases, and race, sex, and familial status in the other. For La Crosse County, the numbers show disability was cited in two complaints as the basis of discrimination, followed by race in one case and sex, disability, familial status in another. In Monroe County, retaliation, race, and disability were each cited once.

Between January 2013 and October 2018, one federal district court opinion was found regarding allegations of unlawful housing discrimination in the study area, involving adult family homes in the Village of Holmen, La Crosse County. 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.

IDENTIFICATION OF IMPEDIMENTS

Based on the data and public input collected for this analysis, the following fair housing impediments have been identified. The full report contains recommendations to address these impediments, along with associated activities, goals, timelines, and responsible parties.

IMPEDIMENT #1:	<p>Affordable Housing Needs Disproportionately Affect Protected Classes</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 to develop a Regional Affordable Housing Plan. • 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. (Ongoing, beginning Q1, 2019).
IMPEDIMENT #2:	<p>Limited Access to Some Areas of Opportunity</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 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 Q1, 2019) • 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 Q1, 2019)• • 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)
IMPEDIMENT #3:	<p>Poor Rental Housing Conditions Limit Access to Quality Housing</p> <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, 2019) • 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 Q1, 2019) • Design and deliver annual fair housing education (either in-house or through a contracted third-party organization) to landlords. (Annually, beginning 2019)

IDENTIFICATION OF IMPEDIMENTS (CONTINUED)

<p>IMPEDIMENT #3 (CONTINUED):</p>	<p>Poor Rental Housing Conditions Limit Access to Quality Housing</p> <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 other communities in the region. (Annually, beginning 2019) • Design and deliver annual fair housing education (either in-house or through a contracted third-party organization) to landlords. (Annually, beginning 2019) • 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 other communities in the region. (Annually, beginning 2019)
<p>IMPEDIMENT #4:</p>	<p>Accessible Housing for People with Disabilities is in Short Supply</p> <ul style="list-style-type: none"> • Consider opportunities to encourage or incentivize the construction of new accessible housing units for people with disabilities. • Family definitions should be reviewed to remove any ambiguities and ensure clear definitions. • Family definitions should be aligned with group housing definitions and codes should clarify where these group housing uses are permitted by right. • Review and clarify the permitted locations of housing serving people recovering from alcohol or substance abuse addition to include residential districts. • 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.
<p>IMPEDIMENT #5:</p>	<p>The La Crosse Housing Authority Is Rebuilding Public Trust</p> <ul style="list-style-type: none"> • Collect public input and, where possible, consider amending policies and procedures to make them more customer-focused. • With the assistance of a skilled marketing agent, develop a campaign to describe how the LHA cares for its residents and reset the local narrative about the organization. (Q1, 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 Q1, 2019) • 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. (Ongoing, beginning Q1, 2019)

IDENTIFICATION OF IMPEDIMENTS (CONTINUED)

<p>IMPEDIMENT #6:</p>	<p>Racial Disparities Exist in Access to Homeownership</p> <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 Q1, 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, 2020) • 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 Q3, 2019)
<p>IMPEDIMENT #7:</p>	<p>The Human Rights Commission Continues To Clarify Its Fair Housing Role</p> <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 and how to best fulfill it. 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 Q2, 2019) • 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 La Crosse residents that outlines the complaint process, including 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. (Ongoing, beginning Q2, 2019)
<p>IMPEDIMENT #8:</p>	<p>Need for Coordinated Fair Housing Education and Enforcement</p> <ul style="list-style-type: none"> • 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 Q1, 2019)