

Analysis of Impediments to Fair Housing Choice

City of La Crosse, Wisconsin

March 2025



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**Developed by MSA Professional Services in partnership with the
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Executive Summary

Purpose

The purpose of this Analysis of Impediments to Fair Housing Choice (AI) is to identify practices and conditions in the City of La Crosse that are impeding housing opportunities for residents because of their race, color, national origin, religion, sex, disability, or other “protected class” status. Fair housing impediments include *direct* discriminatory actions, omissions or decisions related to membership in a protected class, or *indirect* actions, omissions or decisions that have the effect of restricting housing choices for people of all backgrounds (including protected class membership).

In tandem with the City’s Consolidated Plan (updated every five years), this AI document is required by the U.S. Department of Housing and Urban Development (HUD) as a condition for receiving federal community development funding. The barriers and mitigation strategies identified in these documents help the City outline how it will address identified discriminatory practices, improve disparate outcomes for protected classes, and ensure that federal funding is allocated towards the initiatives that will affirmatively further fair housing choice for everyone.

Overview of Study

The City of La Crosse hired MSA Professional Services to complete the Analysis of Impediments to Fair Housing (AI) and 2025-2029 Consolidated Plan. The AI combines data available from a wide variety of sources, including population, demographic, economic and housing data from the U.S. Census and American Community Survey, HUD, and existing City policy documents. This data analysis, along with thorough community engagement and conversations with numerous key stakeholders, was used to generate a list of current housing choice impediments and actionable recommendations.

Identified Impediments to Fair Housing Choice in the City of La Crosse

This study identified the following impediments to fair housing choice in La Crosse, as well as recommendations to address these barriers.* In most cases, the City of La Crosse should serve as the primary actor for the recommendations by either implementing them directly or coordinating efforts with relevant parties. For more information on each impediment, see Chapter 7.

* *Italicized* recommendations denote strategies that have been carried over from the 2019 Regional Analysis of Impediments to Fair Housing Choice.

#	Impediments, Goals & Actions
1. Housing Affordability Impediments	
1.1 Inadequate Supply of Affordable Renter- and Owner-Occupied Housing Units	
1.1.1	<i>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.</i>
1.1.2	<i>Consult the 2025-2029 Consolidated Plan to allocate CDBG and HOME funding that supports the construction, acquisition, and/or rehabilitation of high-quality, affordable rental properties in the City of La Crosse.</i>

1.1.3	Leverage Capital Improvement Project dollars to incentivize market rate and affordable housing development.
1.1.4	Continue to leverage TIF Districts to finance the improvement of blighted areas and creation of new residential and mixed-use developments.
1.1.5	The La Crosse Housing Authority should further evaluate the supply gap in extremely low-income housing and offer strategies to fill the gap in smaller rental units.
1.1.6	Continue to incentivize developers to build affordable housing within the City by utilizing the TIF 1-year extension (which allows a TID to be open for an additional year and funds to be used for affordable housing anywhere in the City) and the Affordable Housing Revolving Loan Fund.
1.2 High Ancillary Housing Costs	
1.2.1	Promote existing weatherization programs such as Couleecap, Habitat, and Salvation Army.
1.2.2	In accordance with the City's Climate Action Plan, promote high-quality and energy efficient development that lowers utility costs.
1.2.3	Research the feasibility and implementation process of codifying a cap on rental security deposits.
1.2.4	Explore funding opportunities to incentivize energy efficiency.
1.3 Inadequate Supply & Utilization of Section 8 Housing Vouchers	
1.3.1	<i>Consider alternative funding sources to increase the number of available rental housing vouchers in the City (e.g. Tenant-Based Rental Assistance under the HOME program, HUD VASH, etc.).</i>
1.3.2	<i>For existing subsidized housing programs, the City should collaborate with the La Crosse Housing Authority and Pathways Home team to strengthen relationships with cooperative landlords and continually recruit new landlords to increase available rental stock.</i>
1.3.3	Collaborate with local partners to create and promote educational programs and incentives for landlords that address Section 8 Housing Choice voucher holder stereotypes, administrative barriers, and advertising practices.
1.3.4	Produce and endorse model language that can be used by landlords in advertising or leasing documents inclusive to Section 8 Housing Choice Voucher holders and participants in other subsidized housing programs.
1.4 Inadequate Supply of Accessible Housing	
1.4.1	<i>Review local funding mechanisms and federal grant sources for opportunities to incentivize development of new accessible housing units.</i>
1.4.2	<i>Regularly meet with local providers of accessible housing and permanent supportive housing to discuss available resources and collaboration opportunities.</i>
1.4.3	<i>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.</i>
1.4.4	Continue coordinating with Habitat for Humanity and Couleecap to fund mobility retrofit projects for low-income homeowners.
1.4.5	Collaborate with the La Crosse Housing Authority to evaluate shortages in affordable accessible housing and opportunities to grow the available stock.
2. Housing Quality Impediments	
2.1 High Proportion of Aging Housing Stock	
2.1.1	Promote existing home rehabilitation programs such as the City's Housing Rehabilitation Loan Program, Couleecap, and Habitat for Humanity.
2.1.2	Continue the City's Replacement Housing program to address the community's most dangerous and dilapidated housing.

2.1.3	Support and contribute to larger-scale community projects that focus on revitalizing neighborhoods with aging homes, such as Habitat for Humanity’s ReNew the Block. This can include infrastructure improvements, beautification projects, and community events to foster a sense of pride and investment in the area.
2.1.4	Explore City-wide renovation programs targeted at specific aging infrastructure (e.g. plumbing, sewer, and electrical issues).
2.2 Commodification of Rental Housing	
2.2.1	<i>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.</i>
2.2.2	Develop or expand existing code enforcement programs.
2.2.3	Consider piloting and executing a landlord/tenant liaison program, which would provide education and mediation services for housing-related conflicts.
2.2.4	Explore the potential of City- or County-held leases.
3: Housing Development Impediments	
3.1 Physical Constraints to New Housing Development	
3.1.1	In tandem with the policies outlined in the City’s Climate Action Plan, bolster stormwater management strategies to protect properties in the floodplain.
3.1.2	Continue to promote the redevelopment and infill of underutilized sites throughout the City for residential and/or mixed-use uses, including the cleanup and reuse of brownfields.
3.1.3	Collaborate with neighboring communities to identify jointly beneficial development opportunities and plan for future regional growth.
3.2 Outdated Zoning Restrictions	
3.2.1	During the City Code revision process, consult with a variety of stakeholders, including affordable housing developers and social support organizations, to ensure that amendments adequately address housing development and acquisition barriers.
3.2.2	Consult previous planning documents and recommended policy changes to ensure that amendments align with existing City vision and goals.
3.2.3	Equitably educate members of the public on the importance of zoning and its impact on development.
3.3 Inefficient City Processes	
3.3.1	Pursue the hiring of a City Administrator or develop a more thorough framework to encourage increased communication/collaboration between City departments.
3.3.2	Continue to maintain clear communication with applicants regarding approval process steps, time commitment, and necessary submission materials.
3.4 NIMBYism & Negative Stigma Towards Housing/Assistance Solutions	
3.4.1	Provide factual information to dispel myths about affordable housing, such as its impact on property values and crime rates.
3.4.2	Engage with the community early in the planning process to build trust and address concerns before they escalate and potentially delay/impede the approval process.
3.4.3	Promote and empower neighborhood improvement efforts that foster a sense of pride in one’s community and increase consensus for holistic change.
3.4.4	Explore and implement strategies to directly address NIMBYism, such as Good Neighbor Agreements.
4: Fair Housing & Education Impediments	
4.1 Rental Discrimination Based on Non-Protected Factors	

4.1.1	Consider revising Section 22-22 of the City's Code of Ordinances to include "victims of domestic violence, sexual abuse or stalking" as a protected class, which would align with existing state and county statutes.
4.1.2	Consulting the Fair Housing Act and HUD guidance, create a criminal history rental-housing guide that summarizes best practices in leasing to persons with criminal history and provide landlords with language to use for applications and leases.
4.1.3	Coordinate with the Pathways Home Justice Response System to ensure all measures are being taken to address criminal records, when possible.
4.2 Ineffective Fair Housing Enforcement Processes	
4.2.1	Ensure all staff are well-versed in the Fair Housing Act and up-to-date policies/procedures to provide timely and accurate guidance.
4.2.2	Continue to evaluate the role and process of the City's Human Rights Commission.
4.2.3	Explore opportunities to address discrimination complaints to ensure cases are investigated fully and damages are applied appropriately.
4.3 Inadequate Renter & Homeowner Education	
4.3.1	<i>Either using in-house staff or a contracted provider, the City and its partners should annually update and coordinate delivery of a fair housing education program that reaches the public, including protected classes, with information about fair housing rights and responsibilities, how to recognize discrimination, and how and where to file a complaint.</i>
4.3.2	Collaborate with local organizations to create a clearinghouse of renter/homeowner assistance resources and educational opportunities, to be hosted on the City's website or other accessible online resource.
4.3.3	Collaborate with local high schools and colleges to educate students on financial literacy, fair housing rights, and renter/homeowner resources.
5: Homelessness Prevention & Assistance Impediments	
5.1 Limited Funding & Capacity for Wraparound Services	
5.1.1	Continue to participate in the <i>Pathways Home</i> initiative, especially to bolster housing resource navigation efforts to free up local non-profits' capacity to return to their original missions and target demographics.
5.1.2	Seek grants and donations from federal, state, and private sources to fund wraparound services and expand housing opportunities.
5.1.3	Continue to collaborate with local assistance organizations and philanthropic entities to identify service gaps and opportunities for collaboration/resource-sharing.
5.2 Insufficient Assistance for Emergency Expenses & ALICE Households	
5.2.1	Integrate with the <i>Pathways Home</i> plan to establish an emergency fund with the intention to assist ALICE households.
5.2.2	Promote existing emergency funds through Couleecap and local/state weatherization programs.
5.3 Siloing of Outreach Efforts	
5.3.1	Continue to support and promote the REACH Center (a brick-and-mortar coalition of local support organizations proving assistance across many sectors).
5.3.2	Work with local non-profit organizations to identify strategies to increase communication, share resources and knowledge, and secure additional financial resources.
6: Impediments to Housing for BIPOC and/or LEP (Limited English Proficiency) Households	
6.1 Disproportionate Loan Denial	

6.1.1	<i>Ensure that opportunities to participate in City of La Crosse homebuyer programs, including those funded using CDBG and HOME funds, are affirmatively marketed (e.g. print media, social media, and targeted outreach).</i>
6.1.2	Provide education and information for local lenders on predatory lending practices and common pitfalls for new buyers, to ensure that efforts to reduce the racial disparities in loan origination do not have the unintended consequence of increased rates of default and foreclosure among BIPOC borrowers.
6.1.3	Continue funding public services through HUD CDBG funds that assist BIPOC and/or LEP households (e.g. Cia Siab, Inc.).
6.2 Rental Discrimination	
6.2.1	See Recommendation 4.2.3.
6.2.2	See Recommendation 4.3.1.
6.3 Limited Culturally Competent Assistance Services	
6.3.1	See Recommendation 6.1.3.
6.3.2	Promote County, Regional, and State programs that provide culturally competent advocacy services (e.g. Legal Action of Wisconsin).
7: Transportation Impediments	
7.1 Limited Public Transportation	
7.1.1	<i>Research alternative transportation programs that may provide direct transportation linkages between existing housing and employment centers (e.g. vanpools, use of dial-a-ride vehicles) and potential funding sources, especially prioritizing low-income areas outside of City limits.</i>
7.1.2	<i>Review and actively participate in the development of local/regional transportation plans to ensure alignment with the City's multi-modal transportation needs and planned strategies.</i>
7.1.3	Evaluate changes to the transit routing system and schedules, including the potential for later routes that better support second and third shift employment, and more routes that serve neighboring communities.

Chapter 1: 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.

HUD maintains several Community Planning and Development (CPD) funding opportunities, including the Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) programs. These programs are critical to supporting home rehabilitation efforts, affordable housing development, public facility development and improvement, and other projects that benefit low- and moderate-income people, prevent or eliminate slums or blight, and/or address urgent threats to community welfare. As a recipient of these funds, HUD requires the City of La Crosse to work to affirmatively further fair housing – overcome patterns of segregation, promote fair housing choice, eliminate disparities in opportunities, and foster an inclusive community.

Provisions to affirmatively furthering fair housing (AFFH) are fundamental components of HUD's community development and housing programs. These provisions stem from the Fair Housing Act¹, which required HUD to administer the department's programs in a manner that fulfills their AFFH obligations. Although a grantee's AFFH obligations arise in connection to their receipt of federal funding, these obligations extend to all housing and housing-related activities in the grantee's jurisdictional area, whether publicly or privately funded.

The Federal Civil Rights Act and Fair Housing Amendments established protected classes. Protected classes are groups of people who share a characteristic that historically has been used as the reason for discrimination, such as race or sex. These characteristics have no relevance as to whether a person will make a good tenant or homeowner. As such, these groups are protected from housing discrimination under U.S., Wisconsin, and La Crosse County laws. Federal and State laws have slightly different sets of protected classes, while La Crosse County's ordinance follows the State's protected classes. The City of La Crosse also has its own housing discrimination ordinance, which is more stringent than the three higher levels of law.

¹ Title VIII of the Civil Rights Act of 1968 (also known as the Fair Housing Act) prohibits discrimination in the sale, rental, and financing of dwellings based on race, color, religion, sex, or national origin. Title VII has been amended since its original adoption in 1968 to include more protected classes. Refer to https://www.hud.gov/program_offices/fair_housing_equal_opp/fair_housing_rights_and_obligations for other laws which have fair housing components. Exceptions to the Fair Housing Act, depending on the jurisdiction can include housing for elderly or disabled persons, illegal distribution or manufacture of illegal drugs, certain convictions, student status in relation to housing needs exclusively for members of the same sex.

Table 1-1 displays the protected classes at a federal, state, county, and city level. For additional information on each of these laws, visit these sites (and if the address has changed, search for the specific title provided here):

City of La Crosse Ordinance for Discrimination in Housing, Public Accommodations, and City Facilities
https://library.municode.com/wi/la_crosse/codes/code_of_ordinances?nodid=PTIGEOR_CH22HURI_ARTIIDIHOUFAPUAC_S22-22DEPO

La Crosse County Housing Discrimination Ordinance
<https://apps.lacrossecounty.org/DisplayDocuments/Ordinances/1Home/Chapter%2009%20Public%20Peace%20and%20Good%20Order.pdf>

State of Wisconsin Housing Discrimination Law
<https://dwd.wisconsin.gov/er/civilrights/housing/complaintprocess.htm#:~:text=The%20Wisconsin%20Fair%20Housing%20Law%20protects>

United States Fair Housing Code
<http://www.law.cornell.edu/uscode/text/42/chapter-45>

Table 1-1. Summary of Protected Classes and Exceptions

Protected Class	Federal (42 U.S.C 3602)	Wisconsin (Wis. Stat. 106.50(1))	La Crosse County (Sec. 9.06)	City of La Crosse (Sec. 22-22)
Race	✓	✓	✓	✓
Color	✓	✓	✓	✓
Religion	✓	✓	✓	✓
Sex/Gender	✓	✓	✓	✓
National Origin	✓	✓	✓	✓
Handicap/Disability	✓	✓	✓	✓
Perception of disability		✓		
Familial Status	✓	✓	✓	✓
Sexual Orientation		✓	✓	✓
Marital Status		✓	✓	✓
Ancestry		✓	✓	✓
Lawful Source of Income		✓	✓	✓
Age		✓	✓	✓
Status as a victim of Domestic abuse, sexual abuse, or stalking (limited protections)		✓	✓	
Physical appearance				✓
Political beliefs				✓
Status as a student				✓
Domestic Partnership Status				✓
Gender Identity/Expression				✓

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<p>Exceptions</p>	<p>Owner-occupied buildings with 4 or fewer units</p> <p>Housing for elderly or persons with disabilities</p> <p>Single-family house if owner doesn't own more than three units at a time</p>	<p>Family size if local building codes limit the number of occupants</p> <p>Housing for elderly or persons with disabilities</p> <p>Person who poses a threat to the safety of others of who would do substantial damage to property</p>	<p>Family size if local building codes limit the number of occupants</p> <p>Housing for elderly or persons with disabilities</p> <p>Person who poses a threat to the safety of others of who would do substantial damage to property</p>	
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Protected Class Exceptions, or Legal Discrimination

There are exceptions written into the state and federal fair housing laws that allow for discrimination based on characteristics that are otherwise protected. All levels of government grant exceptions for the benefit of elderly and disabled residents, such that it is legal to offer housing designated specifically for such residents, and to discriminate against younger residents and persons without disabilities.

Most levels of government allow discrimination based on criminal convictions for certain crimes that could put other tenants or employees at risk. To a limited extent, housing occupants are allowed to discriminate in the selection of other occupants, including roommates, as long as there are five or fewer people in the same unit. Owner-occupants of buildings with four or fewer units are permitted by federal law to discriminate against their renters, but this means only that the federal government cannot pursue a discrimination case in these circumstances. This exception is not included in state or county laws, meaning that all landlords are required to comply with fair housing requirements as defined at each of those levels, including duplex owners.

What is Required to Affirmatively Further Fair Housing?

The federal mandate to affirmatively further fair housing (AFFH) has never included clear directives regarding how to fulfill this obligation. However, HUD defines it as requiring a grantee to:

- Conduct an analysis to identify impediments (AI) to fair housing choice within the jurisdiction,
- Take appropriate actions to overcome any impediments identified through the analysis, and
- Ensure maintenance of AFFH records.

Beyond these requirements, the intent is that the City will take proactive steps to overcome historic patterns of segregation, promote fair housing choice, and foster inclusive communities for all.

What are Impediments to Fair Housing Choice?

There are two types of impediments to fair housing choice, as defined by HUD and restated here for clarity:

- Direct impediments: any actions, omissions, or decisions that directly restrict housing choices or the availability of housing choices based on race, color, religion, sex, disability, familial status, national origin, or other protected class status;

- **Indirect impediments:** any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices by resulting in conditions in which members of protected classes experience disparate outcomes as compared to the general population.

Any policies, practices, or procedures that may appear neutral but operate to deny or adversely affect the availability of housing to a person may be considered an indirect impediment. To the best extent possible, this Analysis of Impediments to Fair Housing Choice defines the existence, nature, extent, and causes of fair housing choice problems within La Crosse and the resources available to mitigate them. It is the goal of this document and the process by which it was created to identify any issues within the City of La Crosse that are preventing some people from having access to housing of their choice without discrimination.

Data Sources

Decennial Census Data – Conducted once every decade, the Decennial Census data is used by the U.S. Census Bureau to create several different datasets that capture the nation’s demographic and housing conditions, including:

- 2010 and 2020 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.

American Community Survey (ACS) – The ACS 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.

- 2016-2020 ACS Estimates – More current than Census 2010 data, this dataset is one of the most frequently used to provide basic demographic information. 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. **To remain consistent with the most recent data used in the City’s Consolidated Plan, the 2016-2020 ACS 5-year estimates are used most often in this assessment** (even though data from as recent as 2023 is available). However, data sets as early as 2006-2010 ACS were used to show demographic changes over time.
- Comprehensive Housing Affordability Strategy (CHAS) – This dataset is a special tabulation of ACS data that provides a more comprehensive picture of low-income housing needs at the tract level. It documents households that have low enough incomes to qualify for HUD’s programs, as well as lead paint risks, “affordability mismatch,” and the interaction of affordability with variables like age of homes, number of bedrooms, and type of building.

U.S. Department of Housing and Urban Development (HUD) – Many of the maps and supplementary data in this document were provided by HUD itself, primarily showing the interactions of multiple demographic factors through data viewing platforms. These platforms included the Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) and Racially or Ethnically Concentrated Areas of Poverty (R/ECAP) map.

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 regional entities, including:

- City of La Crosse Housing Study (2024) – This study utilizes extensive community engagement, a thorough demographic and market analysis, and neighborhood visioning to outline a list of policies that identify and address gaps in La Crosse’s housing market. These approaches range from revising the City’s zoning code to streamlining approval processes and promoting renter education programs. While not explicitly focused on *impediments* to fair housing, this plan supplied crucial information and housing-related community input for the development of this AI.
- Regional Analysis of Impediments to Fair Housing Choice (2019) – This study is the immediate predecessor to this AI, although its study area encompassed La Crosse and Monroe Counties in addition to the City of La Crosse. It includes demographic and economic data, an overview of the region’s 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 in the identification of fair housing impediments across six categories (administrative, regulatory, quality, spatial, affordability/financial, and discriminatory) and recommendations to address each impediment.
- City of La Crosse 2020-2024 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 certain 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.
- 2040 Comprehensive Plan – Adopted in 2023, this plan outlines a strategic framework to guide the City’s growth and development over the next two decades. The plan includes policies to provide affordable and diverse housing options for all residents, initiatives to boost local businesses, attract new industries, and create job opportunities. The plan’s Growth and Land Use chapter was especially useful for this planning process, as it identified needs, opportunities, and future land use designations for each individual neighborhood within the City of La Crosse.

While data collection is a necessary part of the process to prepare an AI, it is also important to remember that the AI is meant to be a practical document that identifies impediments to fair housing choice and offers actions to help remove them. For the most part, the community is aware of these impediments, and those that are not clearly presented in the data are identified through the community engagement process described in Chapter 2.

Definitions

Affirmatively Further Fair Housing (AFFH) – Under its community development programs, HUD requires its grantees to affirmatively further fair housing through three broad activities: 1) conduct an *Analysis of Impediments to Fair Housing Choice*; 2) act to overcome identified impediments; and 3) track measurable progress in addressing impediments and the realization of fair housing choice.

Affordable Housing – Affordability of housing is relative to income generated per household. Generally, affordability is gauged using the 30% household income threshold (see “Cost Burdened” definition below).

Cost Burdened – A household is considered cost-burdened when it spends more than 30% of its income on housing costs, including rent, mortgage payments, utilities, and other housing needs. Households that spend more than 50% of their income on housing costs are considered severely cost-burdened.

Disability – The Americans with Disabilities Act (ADA) defines a person with a disability as an individual that has a physical or mental impairment that substantially limits one or more major life activities, a person who has a history or record of such an impairment, or a person who is perceived by others as having such an impairment. “Major life activities” include, but are not limited to, walking, speaking, hearing, seeing, breathing, working, learning, performing manual tasks, and caring for oneself.

Fair Housing Choice – The ability of persons, regardless of race, color, religion, national origin, disability, sex, or familial status, of similar income levels to have the same housing choices.

Low and Moderate Income – Households with 80% of the median household income for the area are considered by HUD to be “low-income”, those making 50% of the median household income are considered “very low-income”, and those making under 30% of the median household income fall below the poverty line.

NIMBYism (“Not In My Back Yard”) – The characterization of residents’ opposition to new development (e.g. affordable housing, certain businesses, etc.) over *fears* of potential negative impacts on their neighborhood. Common concerns include increased traffic, noise, strain on existing infrastructure, and reduced property values, and can often be dispelled through impact studies or mitigation plans. NIMBYism does not include objections to real threats, such as incompatible neighboring uses (e.g. hazardous waste facilities near residential areas).

Recent Fair Housing Activities

Following the City of La Crosse’s 2019 Analysis of Impediments to Fair Housing Choice, the City has worked to expand fair access to housing, enhance affordability, and improve the safety and quality of the existing stock of affordable units through the following activities:

- **Affordable Housing Revolving Loan Fund:** Two major housing developments – The Collective on Fourth and Driftless Apartments – have been funded through the Affordable Housing Revolving Loan Fund. These projects have added 182 total housing units of varying sizes, 172 of which are designated as affordable. The City anticipates continuing funding these

important projects through means including, but not limited to, HUD funding, TID/TIF Extension, and Directed Spending Requests.

- Housing Rehabilitation Assistance: Using Community Development Block Grants (CDBG), the City of La Crosse has provided housing rehabilitation assistance for 48 homes. Additionally, this funding contributed to the development of 10 new affordable owner-occupied units.
- 2024 Housing Study: In 2024, the City completed a study to determine community housing priorities and gaps, ultimately demonstrating the data-based need for affordable housing. The first goal of the Housing Study is to increase the supply of owner and rental units affordable to households making less than the area median income.
- Continued Fair Housing Training: The City has provided fair housing education opportunities to members of the public through partnerships with Couleecap, Habitat for Humanity, and the La Crosse Library. The most recent training provided a history of zoning and redlining in the City of La Crosse.
- Refining Human Rights Commission: In 2015, the Human Rights Commission was established to handle complaints alleging discriminatory practices prohibited by the City Ordinance. The Commission continues to refine its complaint intake and investigation process.
- Involvement with La Crosse Area Diversity Council: The City continues to be an active member of the Greater La Crosse Area Diversity Council, a collective of local non-profits, businesses, municipalities, school districts and universities, religious institutions, and cultural organizations that meets throughout the year for workshops and networking events.
- Zoning Code Update: In late 2024, the City began revising its zoning and subdivision ordinances to improve readability, enforceability, and alignment with the Comprehensive Plan and state statute. This also ties into a key goal of the Housing Study, to make building procedures and approvals in La Crosse a clear, predictable and flexible process.

Chapter 2: Community Input

Since this Analysis of Impediments document was produced tangentially to the 2025-2029 Consolidated Plan, feedback gathered through the community engagement process was used in both documents (as applicable). Public participation included an online community input survey, two public open houses, interviews with key local and regional stakeholders, and public hearings and comment periods.

Input Survey Results

The community input survey was created through SurveyMonkey and distributed through a variety of methods, including promotion on the City's social media accounts and La Crosse Tribune, providing physical copies in prominent public buildings, and sending to key community organizations to share with their constituents. It received 665 total responses between October and December 2024, encapsulating a wide cross section of the community in terms of age, income, housing status, and race. While the majority of the respondees of this survey indicated that they are white, have an annual household income of over \$50,000, and/or own their own home, this Analysis of Impediments document and the Consolidated Plan both draw from other community-led input opportunities that captured the housing concerns of underrepresented populations within La Crosse.

Common Concerns from Short Answer Questions:

- Discrepancies in housing affordability, availability, and quality between various neighborhoods.
- "Slumlords" and the deterioration of rental properties throughout La Crosse.
- Homeless presence and accompanying overt drug activity, loitering, and trespassing.
- Noise and air pollution, especially near the brewery and heavy rail corridor.
- Alleged housing discrimination by landlords/property managers and governmental entities.
- Lack of awareness of housing rights.

Top-Ranked CDBG Funding Priorities:

1. Homelessness services.
2. Mental health services.
3. Crime prevention and public safety.
4. Homeownership assistance.
5. Substance abuse services.

Top-Ranked Barriers to Fair Housing

1. Not enough affordable rental housing for individuals.
2. Displacement of residents due to rising housing costs.
3. Neighborhoods that need revitalization and new investment.
4. Not enough affordable rental housing for small families.
5. Not enough affordable rental housing for large families.

Stakeholder Interviews

The project team held one-on-one interviews with representatives from key community organizations and stakeholders, especially those with intimate knowledge of housing issues and social service needs in the City of La Crosse. Entities consulted in these interviews included:

School District of La Crosse	YWCA La Crosse
La Crosse County – Community Development	Cinnaire
St. Clare Health Mission	Salvation Army of La Crosse
Couleecap	Firefighters Credit Union
Habitat for Humanity – Greater La Crosse Region	New Horizons Shelter & Outreach Centers
La Crosse County – Human Services	North La Crosse Business Association
Independent Living Resources	City of La Crosse
Great Rivers United Way	Western WI Workforce Development Board
La Crosse Housing Authority	La Crosse Area Chamber of Commerce
La Crosse Area Community Foundation	WI Women’s Business Initiative Corporation
Family & Children’s Center	La Crosse Promise
B.L.A.C.K.	

The topics of these discussions are summarized below and organized by topic, including possible impediments to fair housing choice. These comments and observations serve as the foundation for many of the recommended action items to continue affirmatively furthering fair housing in the City of La Crosse.

Several recurring concerns emerged throughout these discussions, including the prevalence of aging and unaffordable housing in the City, significant siloing of City departments and/or non-profit organizations, increasing demand for housing assistance and homelessness prevention services, and the need for additional funding across all support sectors.

Administrative Comments

- *Pathways Home*, REACH’s Total Navigation Team (TNT), and other regional frameworks for addressing homelessness have been confusing and incohesive; activity data has not been reflected accurately and organizations do not appear to “cross-pollinate” between different frameworks, therefore making it difficult to track progress.
- City departments are “siloed” and suffer from lack of interdepartmental communication, negatively impacting standardization when working with residents.
- A City Administrator or Manager would be beneficial to hold departments accountable, monitor boundary agreements and other intergovernmental cooperation activities, oversee the prioritization of capital improvements, and advance housing initiatives. However, the debate over creating this position continues to stall.
- The City seems to be great at producing long-range planning documents to address housing issues, but not readily implementing the recommended strategies.
- The City/County’s available rental subsidy is often returned due to a lack of housing capacity or coordination.
- City staff and local decision-makers are overwhelmingly white and are therefore less empathetic to the needs and unique challenges of BIPOC residents.

Collaboration Comments

- There appears to be significant siloing within assistance programs, preventing people from receiving relevant and timely aid. Many non-profits only help specific demographics that qualify for their program (e.g. a residential detox shelter for unhoused individuals) and therefore exclude individuals or families that need short-term or more general assistance.
- Limited funding opportunities and resources has resulted in a “scarcity mindset” among non-profits. Organizations are reluctant to exchange strategies and knowledge in fear of losing leverage in grant applications, cultivating an individualistic mindset that further silos assistance activities.
- Local support organizations have historically struggled to access and maintain connections with diverse populations. These organizations are encouraged to collaborate with social advocacy groups to ensure equal access to resources.
- Local non-profits cannot use CDBG funds within the City of La Crosse due to the revolving loan fund, limiting assistance activities that can occur within the City. Additional coordination between these organizations and the City is needed to identify the most efficient use of human and financial capital.

Homeownership Comments

- La Crosse’s housing market post-COVID (e.g. high mortgage rates, high home prices and low supply, and high property taxes) has made homeownership inaccessible for many residents, which is consistent with nationwide trends.
- Quality contractors can be difficult to find for non-profit home rehabilitation efforts; upon hearing about a connection to a housing assistance agency, some contractors will charge the same for shoddy work or ghost potential clients.
- Modifying homes to increase accessibility can negatively impact the resale value of the home (e.g. removing space from a bedroom to make the bathroom bigger may reduce the total number of compliant bedrooms in the home).
- Elderly homeowners are passing along poorly-maintained homes with extensive maintenance issues, therefore burdening first-time and/or low-income homebuyers with significant hurdles to safe and quality housing.
- Older residents are increasingly foregoing homeowners insurance and/or floodplain insurance.
- Many households do not understand the financial implications and physicality of maintaining their home, which can often become overwhelming and put them at increased risk for deferred maintenance and/or housing instability.

Housing Development & Management Comments

- The process for getting projects through the City’s approval process has been difficult, time-intensive, and resource-intensive for non-profit organizations and developers. Many times, projects make it through the various advisory boards but are denied by City Council.
- Acquiring developable parcels can be incredibly challenging for developers looking to build affordable housing, since they often have to go up against market-rate developers that can afford optimal lots. The remaining available parcels often have significant development barriers such as floodplains and abnormal or noncompliant dimensions.
- The City’s building inspection department has been difficult to work with and provides inconsistent information, making development within the floodplain difficult.

- Building affordable housing is inherently complicated, requiring multiple funding sources and navigating red tape, which limits lenders' willingness to work with these developers.
- Wisconsin's Uniform Dwelling Code (UDC) is different from everywhere else and is a "barrier to entry" by design, limiting development competition from outside Wisconsin. While this favors local developers with UDC experience, it also hinders creative outside developers with experience in new solutions.
- While favorable to relying on third-party landlords for affordable rental units, non-profit organizations have found affordable housing management impractical due to low income streams (very low rents and limited, if any, governmental funding), high maintenance costs, and high employee turnover.
- Public housing's largest challenges at the moment include nonpayment of rent (exacerbated by the COVID pandemic and vacuum of rent moratoria), criminal activity, and uninvited/non-liable guests that destroy property.
- Efforts to address blighted properties – such as the City's Replacement Housing program, Habitat for Humanity, and various beautification/placemaking efforts – have consistently prompted the improvement of neighboring properties. By mitigating nuisance properties, residents are encouraged to take pride in their neighborhoods and invest in their own properties.
- Many stakeholders have acknowledged that the La Crosse Housing Authority is difficult to work with; public housing applicants are often denied for "arbitrary" or discriminatory reasons, the application process is complicated, and maintenance requests are often delayed or missed completely.
- The City has already made strides towards removing barriers to affordable housing development, such as eliminating conditional use permits (CUPs)/off-street parking minimums and allowing accessory dwelling units (ADUs).

Housing/Resource Supply Comments

- There is a significant need for affordable, safe, and quality housing for low-income residents within the City of La Crosse, for both individuals and families of varying sizes.
- Due to the very low turnover of affordable, accessible units, there is also a consistent need for this type of housing within the City, especially in scatter-site developments rather than high-rise buildings.
- Assistance organizations are encouraging families to move out of the City of La Crosse to find cheaper housing options in surrounding communities, which sometimes removes children from their school district and makes accessing employment/City amenities through public transit incredibly difficult.
- Many of the multi-family housing in the City of La Crosse is geared towards college students; there are limited options for young professionals and new residents that are not yet ready to commit to homeownership, which can dissuade these demographics from seeking employment in the City.
- It is hard to find landlords that accept Section 8 Vouchers or renters with problematic rental histories. Due to the increased competition for rental units within the City, landlords have little incentive to give these prospective renters a chance over those with clean records.
- Black renters have frequent experiences with landlords ghosting them/stringing them along only to disappear before finalizing lease, putting up arbitrarily high financial barriers to begin lease, arbitrary restrictions on TVs/furnishings, putting off urgent maintenance, requiring illegally short eviction proceedings, etc.

- HUD's reimbursement funds for Section 8 Vouchers are expected to continue decreasing, further limiting the number of households that can obtain subsidized market-rate housing and straining the affordable public housing stock.
- There is a lack of resources for households within the ALICE (Assets Limited, Income Constrained, Employed) threshold. In most instances, these households make too much to receive income-based assistance but do not make enough to weather emergency expenses or get to the point of "thriving" financially.
- Child-less adults are often "bottom of the totem pole," especially compared to families with young children, making it difficult to access assistance or support services.
- Many landlords are now requiring security deposits equal to 3-months' rent, which can be a major financial barrier to acquiring housing of any condition.
- Mental health issues and AODA (Alcohol and Other Drug Abuse) are not widely recognized as disabilities (i.e. protected class) and are seen as "nuisances" by many landlords, making it difficult for these populations to find housing, especially if these illnesses contributed to a criminal record or poor rental/credit history.
- There is a need for quality senior housing options throughout La Crosse; many elderly residents are opting to age in place because there is nowhere else to go, limiting housing options for young families and other first-time homebuyers.

Homelessness Prevention/Assistance Comments

- Recent City actions (e.g. banning camping on public property and failed emergency solutions) have sewn homeless population's mistrust in outreach efforts. Many unsheltered individuals have withdrawn further from public view, making it difficult for case workers to find their clients and administer aid.
- Organizations across all sectors of La Crosse have experienced a significant increase in demand for housing or homelessness services, straining their available resources and capacity to focus on their original missions.
- Wraparound services are critical to successfully transition homeless individuals into stable housing; however, funding/housing options are limited and constantly monitoring this population is incredibly resource intensive.
- There appears to be plenty of funding for activities that get people *into* housing but there is not much financial support for those that have been housed, such as wraparound services and emergency funds (e.g. catching up on missed rent payments, paying urgent healthcare/transportation costs, etc.)
- There is currently a high volume of homelessness organizations fighting for limited funding; causes may have a better shot of acquiring funding if they combine efforts or absorb into a larger, more established organization.
- In addition to existing emergency shelters, more transitional housing (and accompanying services) is needed to accommodate the homeless population and ensure that they permanently settle into stable housing. This could include communal living options (paired with live-in staff that provide wraparound services), group homes, and emergency options for those that are homeless due to sudden circumstances.
- Homeless youth have been identified as an incredibly underserved population in the region.
- Local emergency shelters have reported that their biggest challenges are currently capital limitations (e.g. volunteers, funding, etc.); overcoming residents' resistance to change; and breaking the cycle of generational homelessness, mental health issues, trauma, and hoarding tendencies.

- Mental health resources were identified as a major need in La Crosse County and the City of La Crosse. Since many housing-insecure and/or homeless individuals suffer from mental health disorders, addressing these internal factors could improve outcomes for staying in housing.
- While the City of La Crosse has numerous assistance organizations for low-income residents, there are limited resources for Hispanic, Hmong, and other populations with limited English proficiency.

Business and Non-Profit Organization Comments

- Non-profits are overwhelmingly in need of unrestricted funds that pay for “unflashy” expenses that grants do not often cover (e.g. rent, utilities, bookkeeper, staff salaries). However, it is difficult to regulate these funds and hold organizations’ leadership accountable to spend the funds on quality causes.
- There is a growing local need for skilled workers in trades, healthcare, and technology. However, many of these jobs require higher education or certifications that can be financially/temporally prohibitive to obtain, especially for low-income residents.
- Finding and retaining employees within La Crosse has been difficult due to challenges finding housing, childcare, and cost-effective transportation methods to get to work. Additionally, many prospective employees are seeking remote positions over in-person positions, lessening the need to live within or in close proximity to La Crosse.
- Vacuum created by the reduction in COVID-era funding/support resources has made it difficult to keep small businesses open.
- Artificial intelligence (AI) could impact many industries in Wisconsin, especially engineering, data analysis, and customer service. Rapidly developing AI and new technology will present unique challenges for workers to stay relevant and qualified.
- Many employers have identified “workplace readiness” as a primary need in new hires; mentorship opportunities are crucial for prospective employees to gain soft skills such as professional conduct and timeliness.
- Economic development efforts should be conscious of the difference between job creation and “upskilling” (i.e. creating additional employment opportunities versus increasing current employees’ capacity to earn more in their industry). Both can be useful in bolstering local business growth but often require different strategies and solutions.

Identified Fair Housing Barriers

- Unaffordability – Housing within the City of La Crosse is becoming increasingly unaffordable, especially when paired with stagnating wages.
- Aging housing stock – La Crosse’s housing stock is old and many homes are falling into disrepair. Consistently maintaining homes can be cost-prohibitive for low-income families, compounding the issues and leading to severe dilapidation that is difficult to fix later.
- Zoning – La Crosse’s zoning ordinance is currently not conducive to residential development, especially high-density multi-family housing.
- Negative stigma – Pervasive narrative that assistance money and activities are “handouts” and that people in need are not trying hard enough to improve their situation. NIMBY (Not In My Back Yard) sentiments often limit where social support organizations, affordable/supportive housing, emergency shelters, and other beneficial entities can be located within the City.
- City geography – Due to La Crosse’s location between the bluff and river (and the accompanying floodplain), there are limited developable areas within the City for new

housing. This significantly increases the demand for available parcels, often pricing out affordable housing developers.

- Commodification of housing – Absentee landlords and investor-owned properties have led to the deterioration of rental housing within the City and has further strained the housing market, blocking first-time homebuyers and low-income residents from buying these homes.
- Systemic racism and discrimination – Lenders, landlords and property managers, and other entities can block households of protected classes from successfully acquiring housing, with little accountability or consequences.
- High ancillary housing costs – “Affordable” housing units can still be exorbitantly expensive once ancillary housing costs are factored in, such as utilities, property taxes, and security deposits. In particular, high energy costs perpetuate “energy poverty” in the La Crosse area.
- Lack of information – Financial literacy, understanding of available financial/technical assistance resources, lack of awareness of financial and physical demands of owning a home

Public Forums

Two public forums were held during the Consolidated Plan and Analysis of Impediments development process, engaging an approximate total of 30 community members. The first meeting, held on September 4, 2024 at Black River Beach Neighborhood Center, aimed to inform the public about the process and collect basic feedback/priorities such as neighborhood improvement needs and highest-priority supportive services. The second meeting was held on January 23, 2025 at the same location and aimed to share the results of the project’s community engagement efforts, as well as clarify/expand upon priorities identified during the data-gathering process.

Public Comment

[Add results of AI public comment period here, if applicable]

2024 Housing Study Engagement Process

The results of the City of La Crosse’s 2024 Housing Study heavily informed the recommended policies in this document and the 2025-2029 Consolidated Plan. The community engagement process for the housing study consisted of the following activities:

- Community input survey, conducted in spring 2024, that collected 1,789 responses from La Crosse area residents.
- Landlord and property manager survey that collected 56 responses, representing approximately 450 residential units across the City of La Crosse.
- Listening sessions with residents, real estate agents, builders, employers, and other housing industry members.
- Stakeholder interviews and community tours to discuss and/or investigate housing conditions, downtown development, housing diversity, new construction, and quality of life.

Chapter 3: Demographic Profile

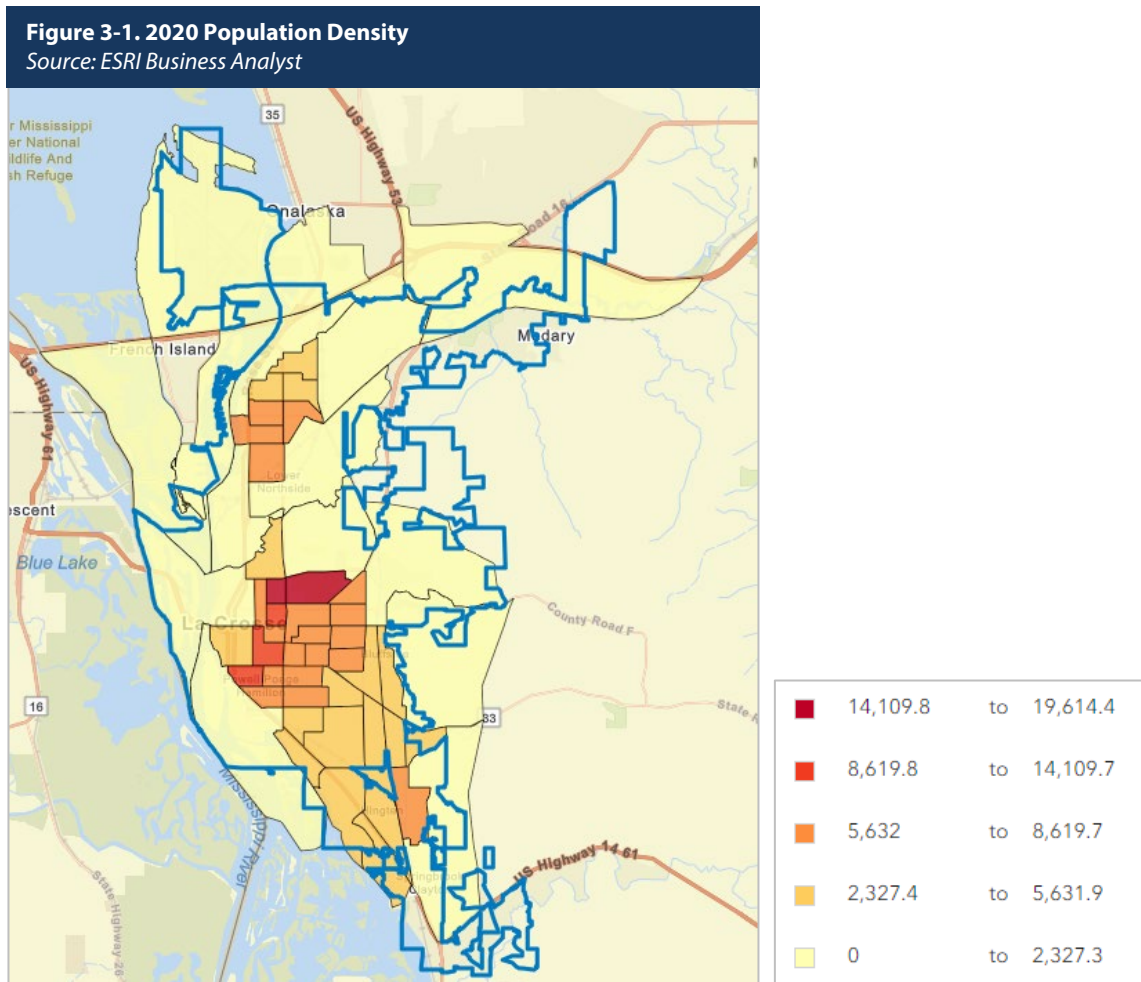
Demographics

Population & Households

According to 2020 U.S. Census data, the total population of the City of La Crosse is 52,680, which accounts for approximately 43.6% of the population of La Crosse County (120,784). While the City's population has generally grown steadily since 1860, the growth rate has slowed in the last twenty years, with increases ranging between 1% and 3% per decade.

According to 2016-2020 ACS Estimates, there are 21,239 total households in the City of La Crosse, with an average household size of 2.21. Household size in La Crosse has increased slightly since 2010 (2.16). In many other communities and nationwide, household size has been decreasing due to smaller family sizes, increases in life expectancy and increases in single-person households.

The following map, Figure 3-1, shows the population density by block group for the City of La Crosse. The densest census tracts (shown in dark orange and red) are those containing the UW-La Crosse and Western Technical College campuses, as well as those west of West Ave S (Washburn and Powell-Poage-Hamilton neighborhoods).



Race and Ethnicity

The population of the City of La Crosse is predominantly non-Hispanic white (85.6%). Residents of two or more races make up the next largest demographic group (4.94%), followed by Asian (4.87%), Black or African American (2.9%), some other race (1.2%), American Indian or Alaska Native (0.5%), and Native Hawaiian or Pacific Islander (0.03%). Figure 3-2 indicates that between 2010 and 2020, the City has become more diverse; the non-Hispanic white population fell from 89.8% to 85.56% and Black/African American, some other race, and two or more races populations saw noticeable growth. The Hispanic or Latino population also grew 1.24% in this same timeframe, adding 681 residents over the last decade.

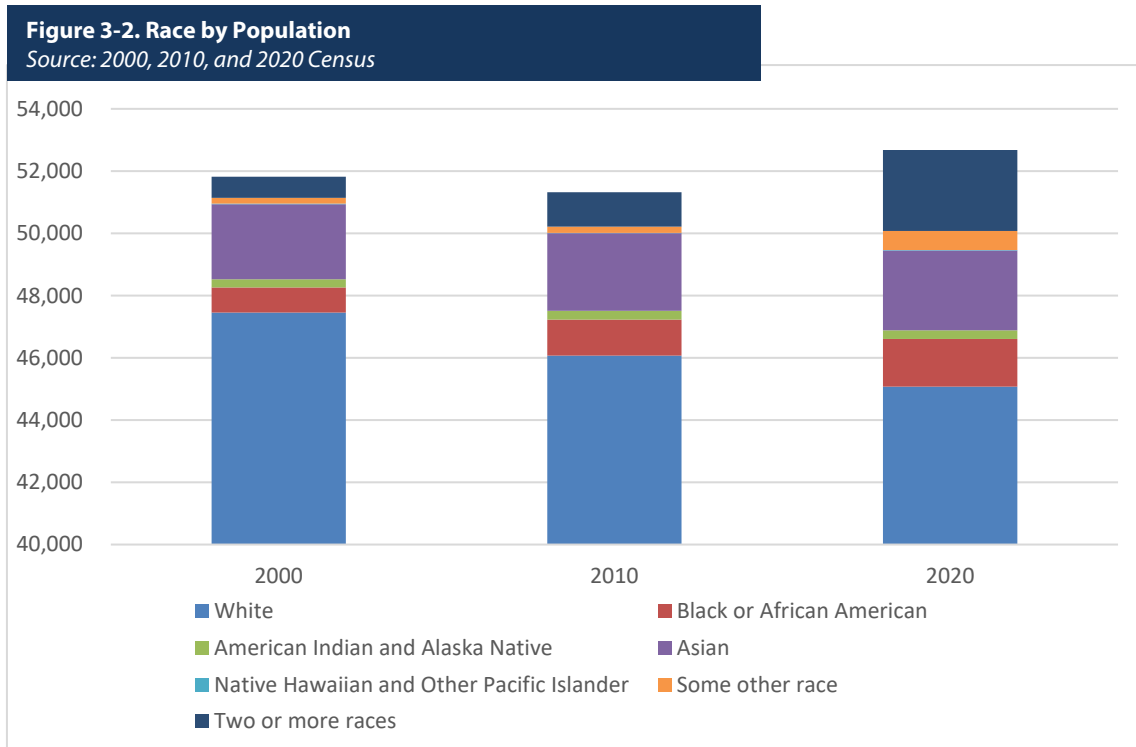
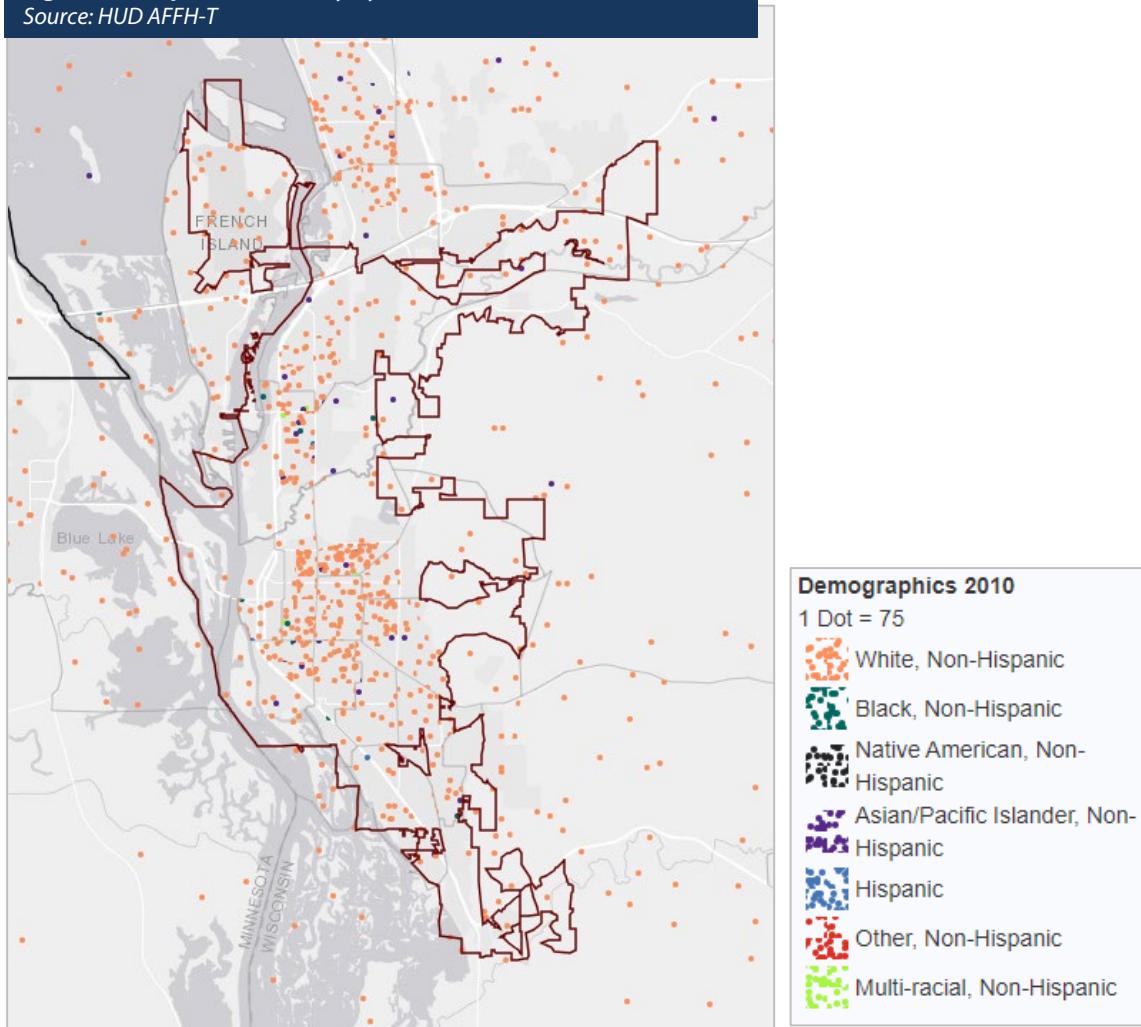


Figure 3-3 shows the spatial distribution of La Crosse’s population by race and ethnicity, where each colored dot represents 75 individuals. There do not appear to be highly-concentrated areas of specific colored dots, indicating that there are low levels of segregation within the City.

As noted in La Crosse’s 2019 Analysis of Impediments to Fair Housing Choice, the City’s overall population distribution has shifted since 1990 as density has increased in the northern neighborhoods of Logan Northside, Lower Northside, and Depot. While La Crosse has generally become more diverse between 2000 and 2020, as shown in Figure 3-2, racial and ethnic groups have remained evenly distributed throughout the City; in this same timeframe, minority populations have begun to expand outside of La Crosse to neighboring communities such as Onalaska, Holmen, West Salem, Sparta, and Tomah.

Figure 3-3. Population Density by Race

Source: HUD AFFH-T



One method to quantify racial and ethnic concentration is with the Dissimilarity Index, which measures the degree to which two groups living in a region are similarly geographically distributed. 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. This data is available from Brown University's [Spatial Structures in the Social Sciences](#). For the City's Black population, the 2020 Census dissimilarity index relative to white residents was 25.3, for Hispanics it was 17.3, and for Asians it was 22. These scores indicate low levels of segregation for these groups within La Crosse.

HUD's Racially or Ethnically Concentrated Areas of Poverty (R/ECAP) classification can also show patterns of concentration, identifying census tracts with higher rates of diversity and poverty throughout the nation. The [R/ECAP map viewer on HUD's website](#) does not display any census tracts that fit HUD's criteria at this time.

National Origin and Limited English Proficiency (LEP)

Between 2010 and 2020, the number of foreign-born residents decreased from 4.3% of the City’s population to 3%. Generally, population dynamics for people with Limited English Proficiency (LEP) often resemble those of foreign-born residents in a community. 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.

Age and Sex

The City of La Crosse’s population is normally distributed regarding age. The largest segment of the population (70.6%) is working age, between the ages of 18 and 65. The population under the age of 18 (15.4%) is slightly larger than the population that is 65 or older (13.9%). Since 2010, ACS data indicates that the distribution of these age cohorts have stayed about the same, with only a 0.93% increase in working-age individuals. The City’s gender distribution is fairly proportional between males and females; the female population is the slight majority at 52.4% of the population.

Family Type

The City of La Crosse experienced a decline in the number of families with children in both absolute numbers and as a percentage of total families between 2010 and 2020, decreasing from 4,448 (20.7%) in 2010 to 4,210 (19.8%) in 2020. This reflects the recent statewide and nationwide trend.

Disability

2016-2020 ACS data estimates that 6,273 residents (12.4% of the total population) have a disability. The age cohort with the highest number of residents with a disability is those aged 18 to 64, in which 3,275 residents are estimated to have a hearing, vision, cognitive, ambulatory, self-care, and/or independent living disability. The age cohort with the highest percentage of disabilities is those aged 65+, in which 40.75% of residents in that age group are estimated to have a disability. Of the listed disabilities, the most common are cognitive, ambulatory, and independent living difficulties. This data shows that there is a need for accessible units for both the elderly and non-elderly.

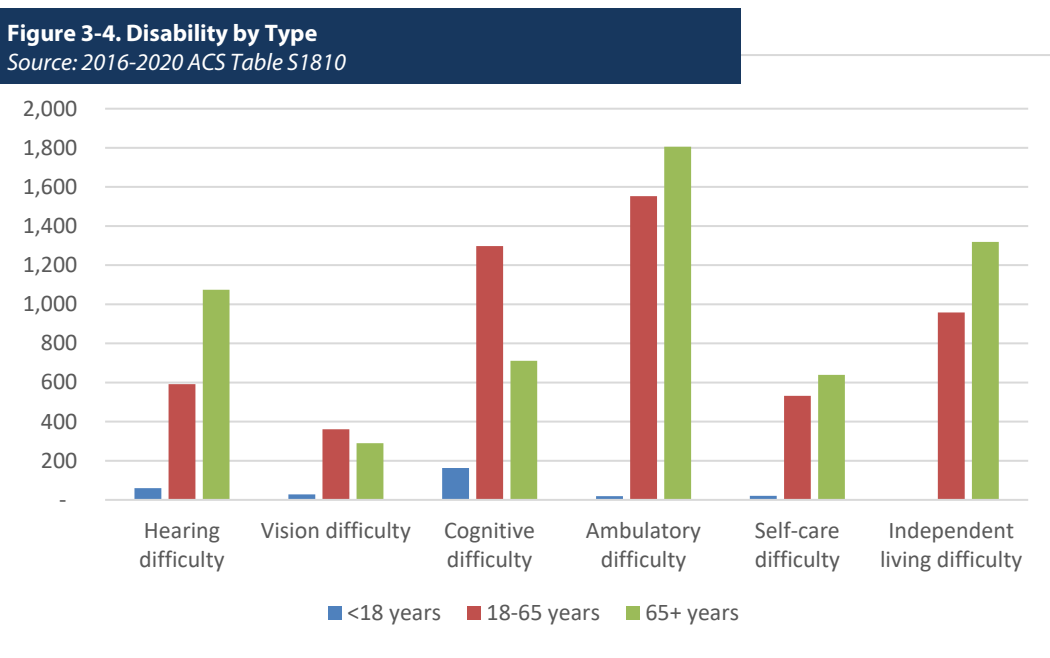
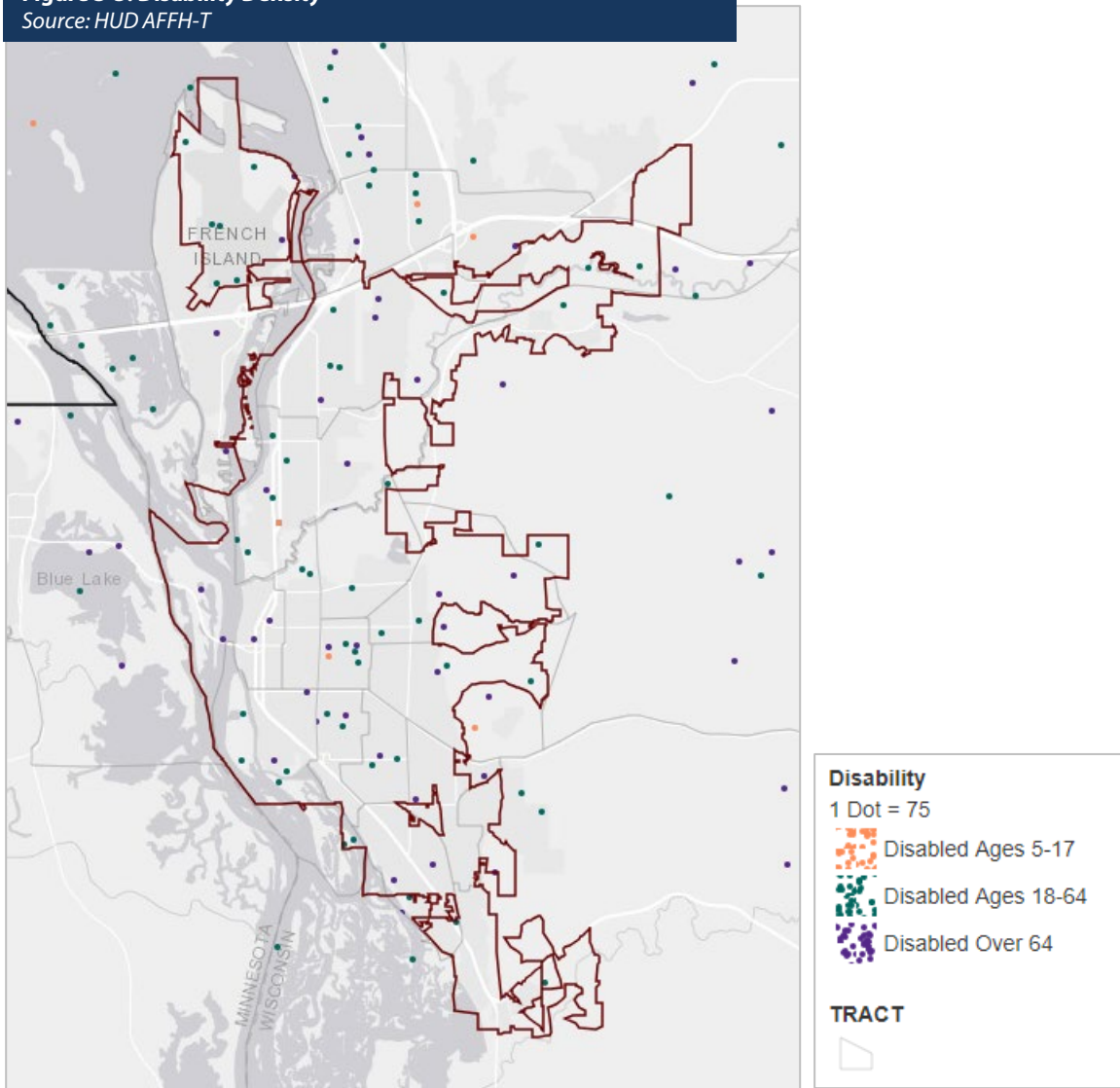


Figure 3-5. Disability Density

Source: HUD AFFH-T



Income and Poverty

According to the 2016-2020 ACS Estimates, the median household income in the City of La Crosse was \$46,438. Table 3-1 shows a 25.3% increase in median household income within the City since 2010. Despite this, the median household income in the City is approximately 29.9% lower than the median household income in La Crosse County (\$60,307).

KEY FINDING

Individuals from certain protected classes, especially Black or African American residents, residents of Hispanic or Latino origin, female-headed households, residents with disabilities, and those identifying as two or more races, are disproportionately represented among the City's low-income residents and have fewer housing options as a result.

Income is not a protected class, nor is it an "action, omission, or decision." However, the disparate impact on housing choice for these identified groups makes poverty a fair housing issue requiring the City's continued attention in its efforts to Affirmatively Further Fair Housing.

Table 3-1. Income and Poverty Trends

Source: 2006-2010, 2011-2015, 2016-2020 ACS Tables S1901, B19301, S1701, S1702

	2006-2010 ACS Estimates*	2011-2015 ACS Estimates**	2016-2020 ACS Estimates***
Per Capita Income	\$20,592	\$22,345	\$27,398
Median Family Income	\$55,881	\$57,690	\$66,928
Median Household Income	\$37,065	\$40,725	\$46,438
% Individuals Below Poverty Line	23.5%	23.9%	22.9%
% Families Below Poverty Line	12.2%	9.4%	7.9%

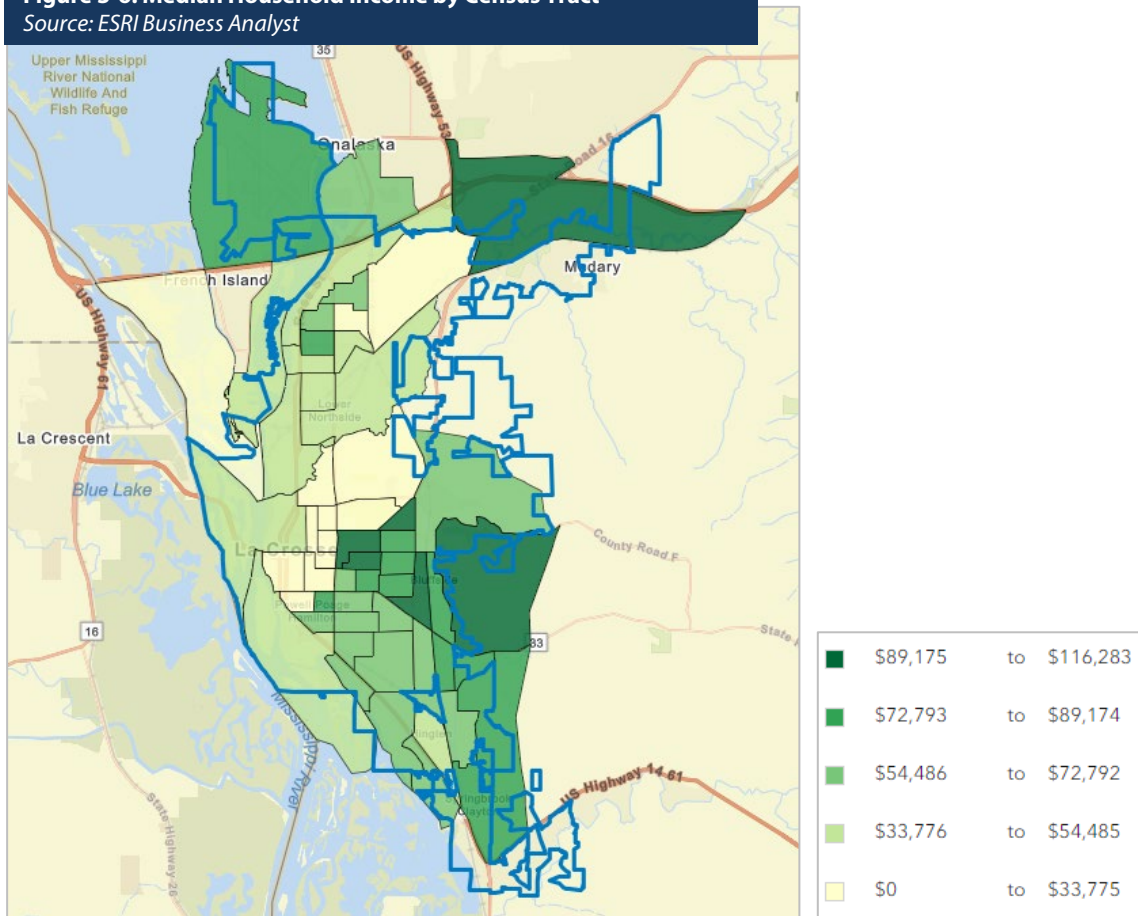
* In 2015 inflation-adjusted dollars

** In 2015 inflation-adjusted dollars

*** In 2020 inflation-adjusted dollars

Figure 3-6 shows Median Household Income by census tract; the lighter the color of the tracts, the lower the median household income. The areas with the lowest median household incomes are primarily centralized around downtown La Crosse, UW-La Crosse, and the neighborhoods of Washburn, Powell-Poage-Hamilton, and Logan Northside.

Figure 3-6. Median Household Income by Census Tract
 Source: ESRI Business Analyst

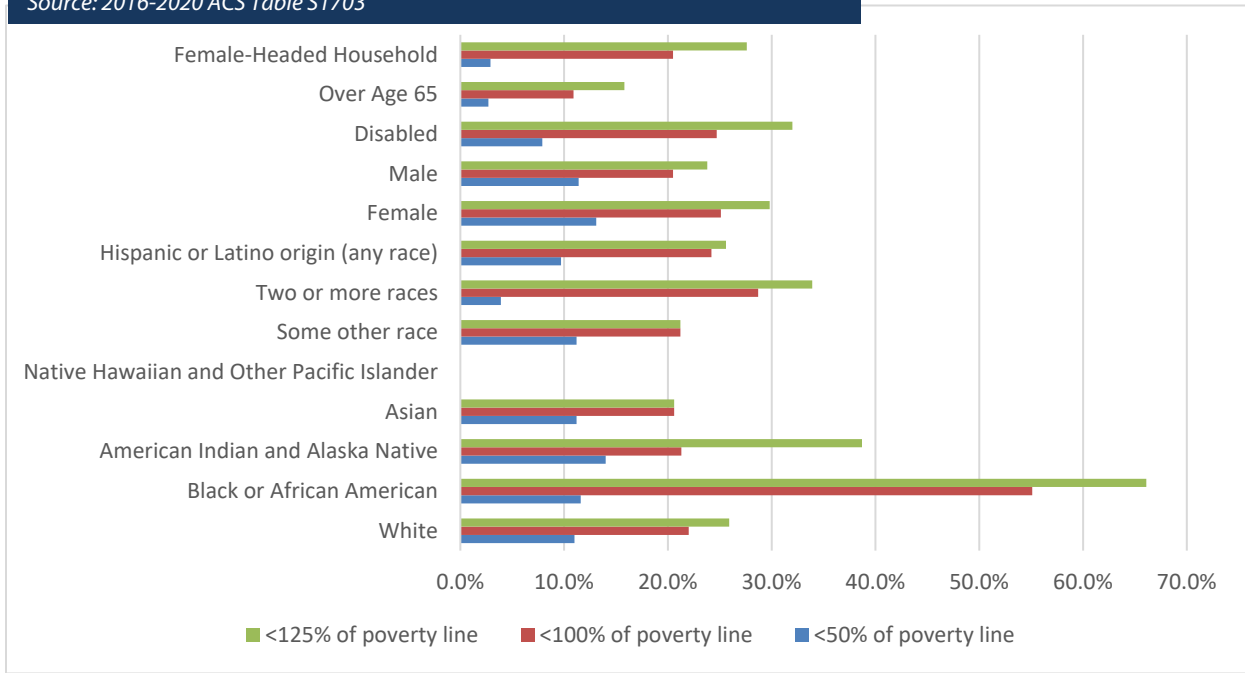


Approximately 21% of individuals in La Crosse are estimated to fall below the poverty line, compared to 12.2% of individuals in La Crosse County, 11% in Wisconsin, and 12.8% nationwide. Figure 3-7 compares the prevalence of poverty among various racial, age, ethnic and gender groups. All groups are experiencing poverty at a higher rate in La Crosse than in Wisconsin as a whole. Comparing groups within La Crosse, there are clear racial and ethnic disparities. Whereas 22% of white residents are considered to be at or below the federal poverty level, that number jumps to 55.1% for Black or African American residents, 28.7% for residents identifying as two or more races, and 24.2% of residents of Hispanic or Latino origin. More women are also at or below the federal poverty line (25.1%) than men (20.5%).

This data indicates that poverty and its associated challenges are disproportionately affecting some protected classes. Because protected class residents, especially Black or African American residents, residents of Hispanic or Latino origin, female-headed households, residents with disabilities, and those identifying as two or more races, are much more likely to be poor, they are disproportionately affected by conditions that limit housing choice for poor residents.

Figure 3-7. Selected Characteristics of People at Specific Levels of Poverty

Source: 2016-2020 ACS Table S1703



Access to Opportunity

The Opportunity Index, which measures 16 key indicators, provides valuable insights into La Crosse’s economic, educational, and community health factors that influence residents’ quality of life. To thrive, one needs living wages, good schools, affordable housing, efficient public transportation, safe streets, good services, adequate parks, and full-service grocery stores. By analyzing these indicators, La Crosse can identify and address barriers to fair housing and other life necessities, ensuring that all residents have equitable access to beneficial resources and opportunities. Each opportunity index is ranked on a 0–100 scale, with a score closer to 100 indicating a higher level of opportunity.

Overall, La Crosse County scored a B+ and beat out the United States and State of Wisconsin in every category except for “economy,” where it fell short due to having a lower median household income and percentage of households subscribed to broadband internet. Typically, counties with prominent population centers, including La Crosse County, have a higher opportunity score than rural counties due to the concentration of job and education opportunities, healthcare facilities, and community amenities.

Table 3-2. Opportunity Index (2023)

Source: www.opportunityindex.org

	Opportunity	Economy	Education	Community	Health
La Crosse County	63.5	65.0	64.5	60.0	64.5
Wisconsin	55.0	65.5	52.6	50.8	51.1
United States	51.9	59.3	53.9	51.2	43.2

K-12 Education

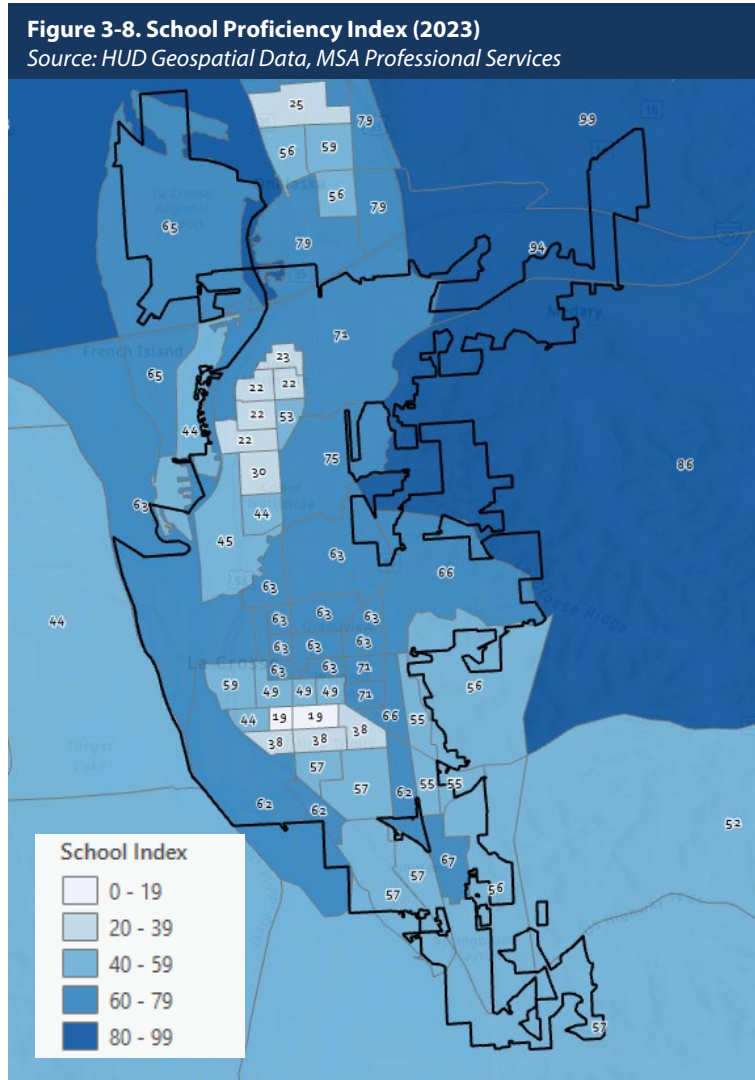
The La Crosse School District served approximately 5,700 students in 2023, representing a 29% decline in enrollment from 1995. The district includes nine elementary schools, two middle schools, two high schools (Central and Logan), and six charter schools serving various grade levels. There are also private school options within the City such as Aquinas High School.

Currently, the School District of La Crosse’s primary challenges are declining enrollment (which is a nationwide trend due to the COVID-19 pandemic and declining birth rates), lower revenue, and aging education buildings. In November 2024, voters passed a \$53.3 million elementary school referendum that will fund a new centrally located elementary school, the closure and consolidation of three other elementary schools, and various building improvements. While this referendum will help the school district balance its budget and upgrade aging facilities, many key stakeholders have expressed concern for the neighborhoods in which elementary schools are closing. These neighborhoods may become less attractive for families with young children, leaving former owner-occupied housing vulnerable to rental conversions, further lessening options for prospective homebuyers.

Proficiency Index

HUD’s School Proficiency Index illustrates the proficiency of 4th-grade students on state exams, providing insights into which areas have access to high-performing elementary schools and which do not. This index helps identify educational disparities and supports efforts to promote fair housing by ensuring that all children, regardless of their neighborhood, have access to quality education.

Based on Figure 3-8, schools located in Logan Northside, Lower Northside and Depot, Powell-Poage-Hamilton, and Holy Trinity-Longfellow have lower proficiency scores than the rest of La Crosse. This shows that while all schools across the community are providing the same type of education, the outcomes have been different in these locations.



Employment

It is important to consider the spatial characteristics of employment centers and transportation systems in the City. Concentrations of employment opportunities should be accessible via public transit from a reasonable set of affordable housing alternatives, such that housing choices are not unduly restricted within the City by someone’s place of employment. This section describes employment conditions, generally, and the location of employment centers.

Figure 3-9 identifies the City’s largest employers and Figure 3-10 illustrates the location of those employers within the City of La Crosse. While many of La Crosse’s largest employers are located around downtown, there are also employers scattered throughout the City.

KEY FINDING

La Crosse’s employment market is relatively strong, with major employers distributed throughout the City, providing more opportunities to find a job and find housing near that job.

Average commute times are low and transit routes offer access to and from most areas of the city. However, second and third shift workers are unable to use public transit due to the hours of operation. Additionally, those living outside of the City of La Crosse, such as La Crescent and Onalaska, have limited options for taking public transit into the City.

Because of the correlations between poverty, transit dependence, and race, this is a mild, indirect impediment to fair housing choice.

Figure 3-9. La Crosse’s Top Employers (500-1,000+ Employees)

Source: La Crosse Tribune

Gundersen Health System
Mayo Clinic Health System (Franciscan Skemp Medical Center)
Trane
Kwik Trip
La Crosse County
La Crosse Public Schools
University of Wisconsin – La Crosse
Century Link
Wal-Mart
Logistics Health Incorporated
City of La Crosse
Western Technical College
La Crosse Area YMCA
APAC

Figure 3-10. Location of Top Employers (500-1,000+ Employees)

Source: Google Maps, MSA Professional Services

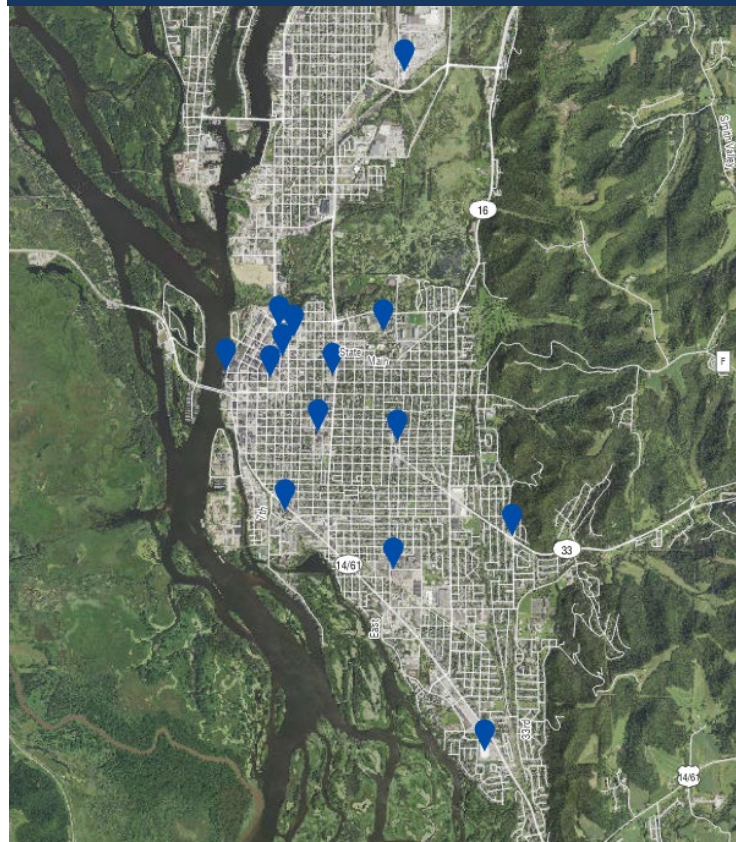


Table 3-3. Employment Status

Source: 2016-2020 ACS Table S2301

	Total	Labor Force Participation Rate	Employment/Population Ratio
Race			
White alone	40,622	63.3%	60.6%
Black or African American alone	884	56.9%	49.9%
American Indian and Alaska Native alone	161	67.1%	67.1%
Asian alone	1,651	71.8%	71.8%
Native Hawaiian and Other Pacific Islander alone	14	100.0%	100.0%
Some other race alone	302	56.0%	56.0%
Two or more races	634	79.3%	74.8%
Hispanic or Latino origin (of any race)	846	76.7%	76.7%
Poverty Status			
Below poverty level	8,260	52.4%	47.1%
At or above the poverty level	22,923	88.3%	86.0%
Disability Status			
With any disability	3,085	48.2%	43.6%

Table 3-3 indicates that Black/African American residents and residents of “some other race” experience the lowest rates of labor force participation in the City of La Crosse. Additionally, those below the poverty line and/or those with disabilities are much less likely to be employed than those above the poverty line and/or without a disability.

Figure 3-11. Unemployment Rate (2000-2023)

Source: U.S. Bureau of Labor Statistics

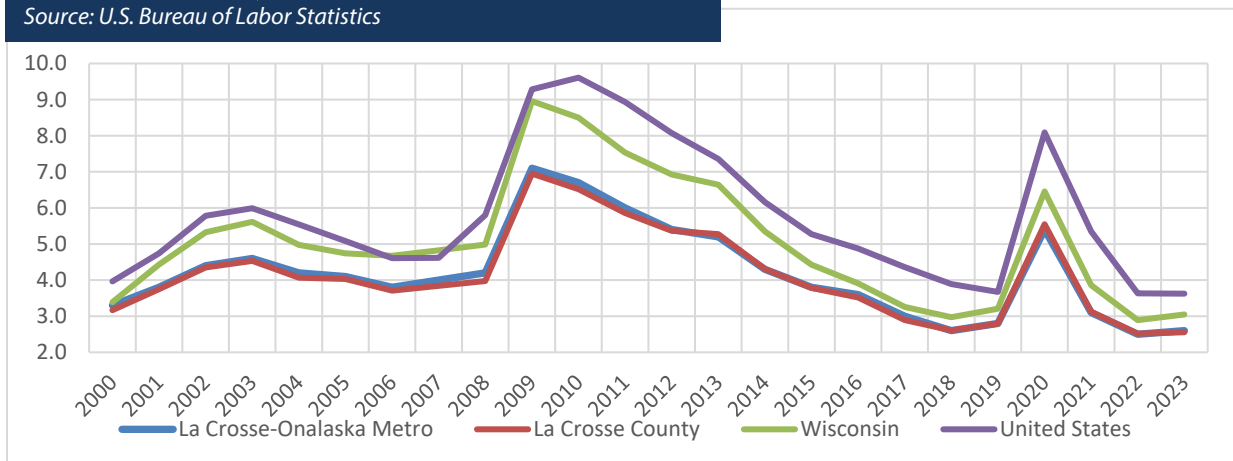
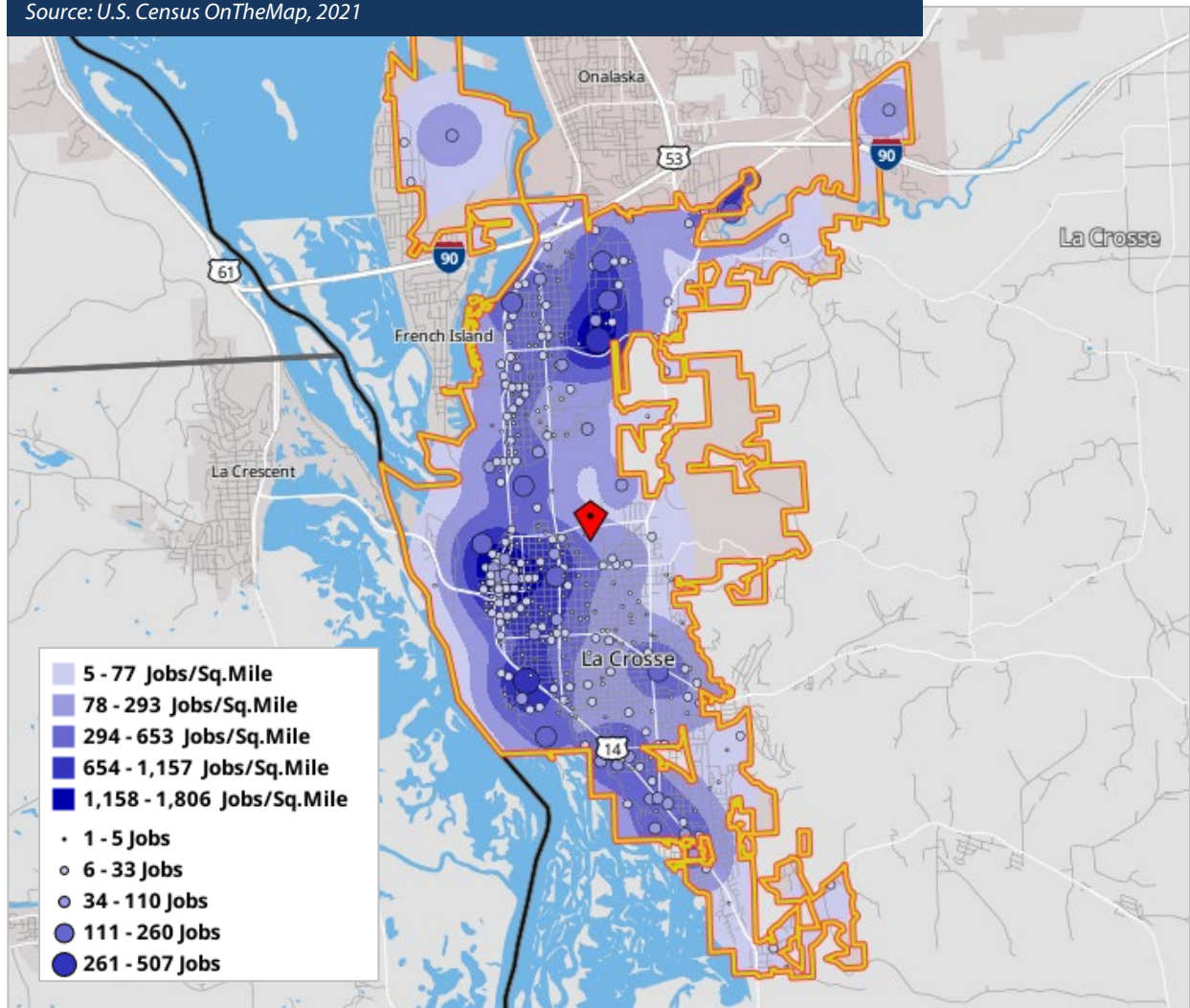


Figure 3-11 shows that the La Crosse-Onalaska Metropolitan Statistical Area has experienced a similar unemployment rate to La Crosse County over the last two decades, even through the 2007-2009 recession and COVID-19 pandemic, and fared better than Wisconsin and the U.S. as a whole during this same timeframe. As of the beginning of 2024, the unemployment rate of La Crosse-Onalaska was around 2.4% – its lowest point since at least 2000 and lower than both Wisconsin (3.2%) and the U.S. (3.7%).

Figure 3-12 below shows the location of jobs within the City where employees make \$1,250 per month or less (\$7.25 an hour for someone working 40 hours per week) in 2021. According to the U.S. Census’s OnTheMap application, over half (58.4%) of those working the jobs shown on the map are under age 30 and two-thirds of these jobs are in the manufacturing, retail trade, health care and social assistance, and accommodation and food services industries. A majority of these jobs are held by those identifying as white (90.7%) and a smaller portion for those identifying as Black or African American (3.5%), Asian (2.6%), and two or more race groups (2.6%). Three percent (3%) are held by those identifying as Hispanic or Latino.

Figure 3-12. Job Locations in La Crosse for Those Making <\$1,250 per Month

Source: U.S. Census OnTheMap, 2021



Transportation Options and Commute Outcomes

Transit

Households without a vehicle – due to economic circumstance, disability or choice – are at a disadvantage in regards to accessing jobs, services and amenities. Convenient access to public transit is essential to these households, and can impact housing and employment options. 2016-2020 ACS data indicated the following regarding household vehicle ownership in the City of La Crosse:

- 11% have no personal vehicle
- 40% have 1 household vehicle
- 35% have 2 household vehicles
- 14% have 3 or more household vehicles

KEY FINDING

While La Crosse's MTU bus routes offer decent coverage within the City, limited routes and operation hours serving surrounding communities inhibit low-income residents' ability to commute into the City for employment, healthcare, and other urban amenities.

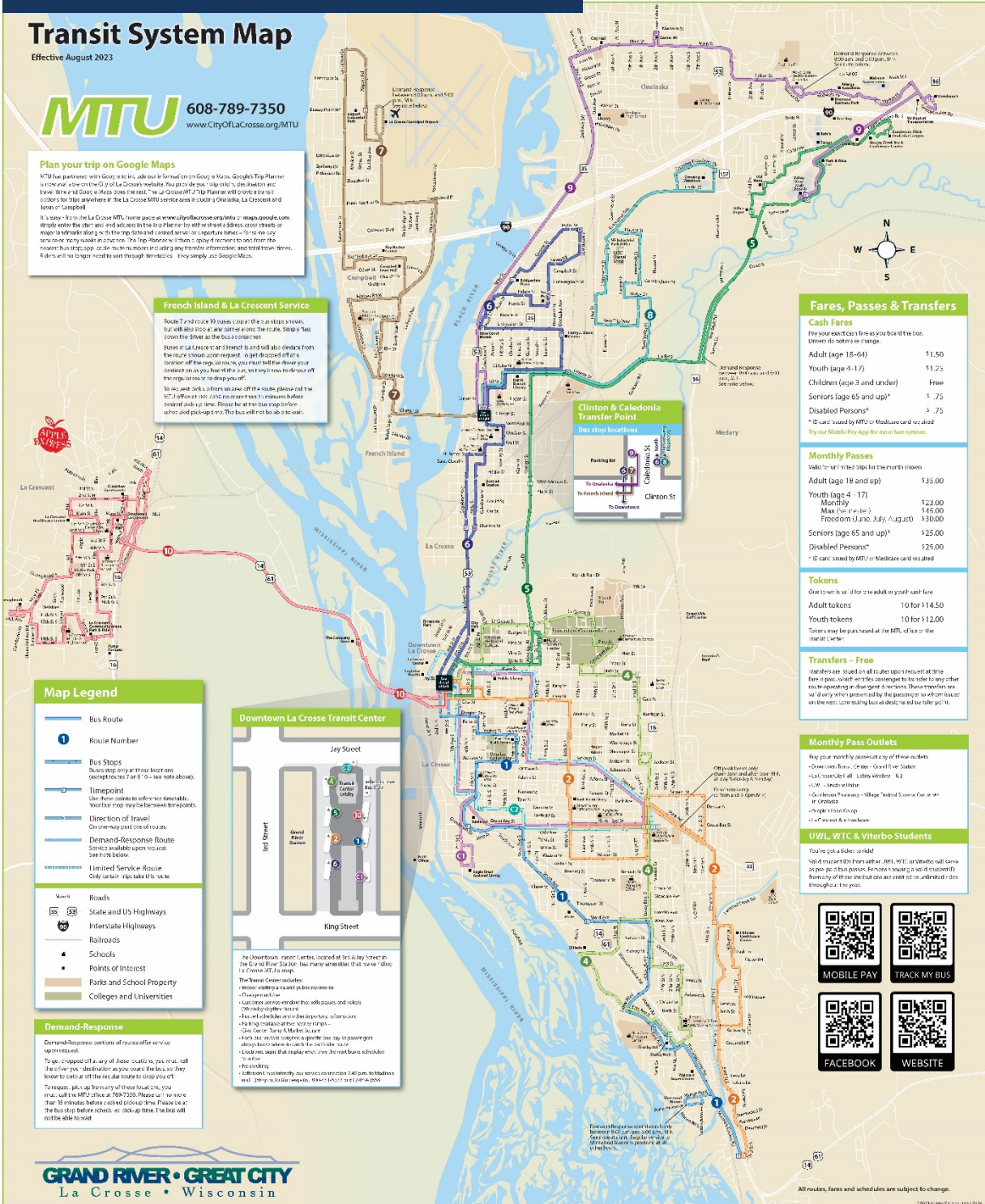
La Crosse's limited housing affordability and supply has driven many low-income households into neighboring areas for better housing opportunities. Because of the correlations between poverty, transit dependence, and race, restricted public transit service is a mild, indirect impediment to fair housing choice.

La Crosse Municipal Transit (MTU) provides bus service within the City of La Crosse, as well as connections to La Crescent (Minnesota), Onalaska, Campbell, French Island, and the La Crosse Municipal Airport. There are 12 routes that travel through the area on regular, fixed schedules, as shown in Figure 3-13. Most buses that circulate within the City operate from 5:15 AM to 10:40 PM on weekdays and 7:40 AM to 6:40 PM on weekends; buses connecting to other communities run from approximately 5:30 or 6:30 AM to 5:00 or 6:30 PM on weekdays only. There is also a Safe Ride service that connects downtown La Crosse to the University of Wisconsin-La Crosse campus on Thursday, Friday, and Saturday nights during the school year.

Other relevant transit service providers include Onalaska/Holmen/West Salem Public Transit (OHWSPT), which runs seven days a week between 6:30 AM-7:00 PM and connects La Crosse to these communities; Jefferson Lines, which provides daily service to major nearby cities and airports; and Scenic Mississippi Regional Transit (SMRT), which operates on weekdays and connects destinations within La Crosse, Crawford, and Vernon Counties.

MTU's routing and service schedule provide good coverage, connecting residents and employment centers throughout the City and providing frequent bus transfer opportunities. Service is strong in areas with jobs that pay the lowest wages and public housing, indicating an active effort to match transit supply and demand. However, for those not living *and* working within La Crosse, the current public transit system has proven inadequate to reliably connect residents of surrounding communities to jobs and amenities within the City. Multiple stakeholders have indicated that, due to the limited affordability and supply of housing within La Crosse, many low-income households are moving elsewhere in the region and are now struggling to access the same urban resources through public transit. This is likely due to the limited number of routes and stops outside the City of La Crosse, as well as more confined bus service hours (such as no service on weekends or limited service for those working second or third shift).

Figure 3-13. Current La Crosse Bus Routes
Source: MTU



Commuting

Figure 3-14 shows that, in general, residents in the City of La Crosse have a shorter average commute than La Crosse County and the State of Wisconsin (when looking at all modes of transportation). This is consistent with the fact that the City of La Crosse is a major employment hub in the region, likely drawing employees from other communities as well as City residents. Most residents can get to work within 30 minutes. 74.3% of residents drive themselves to work, 8.4% carpool, and 8.4% walk. Only about 1.7% take public transportation.

Figure 3-14. Travel Time to Work (for all modes of transportation)

Source: 2016-2020 ACS Table S0801

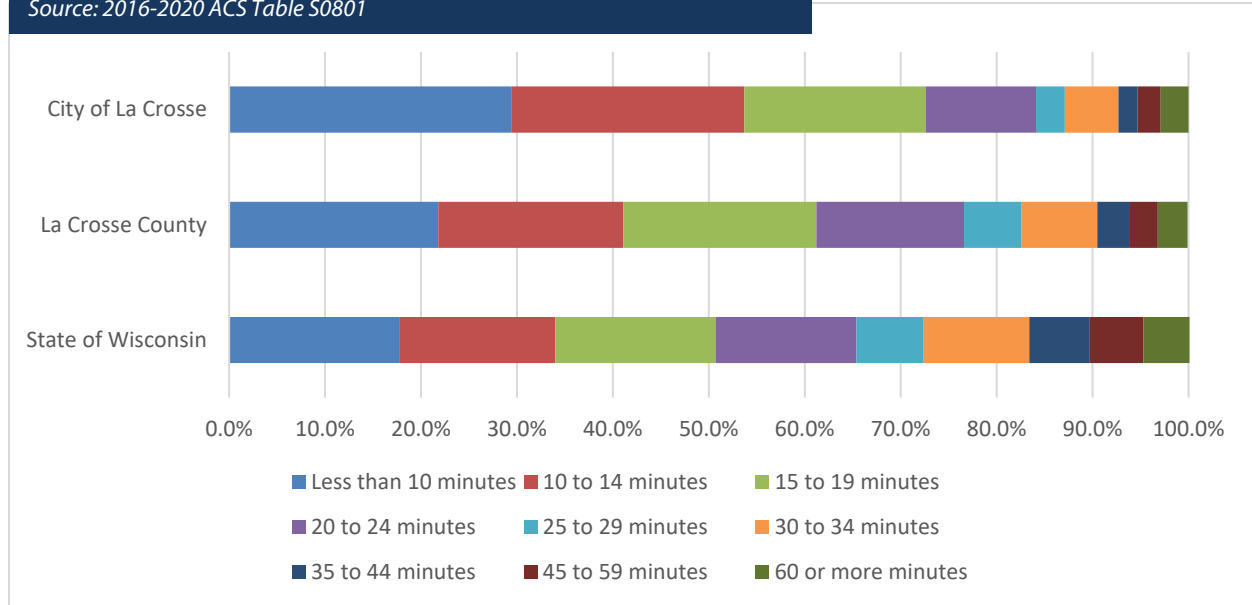
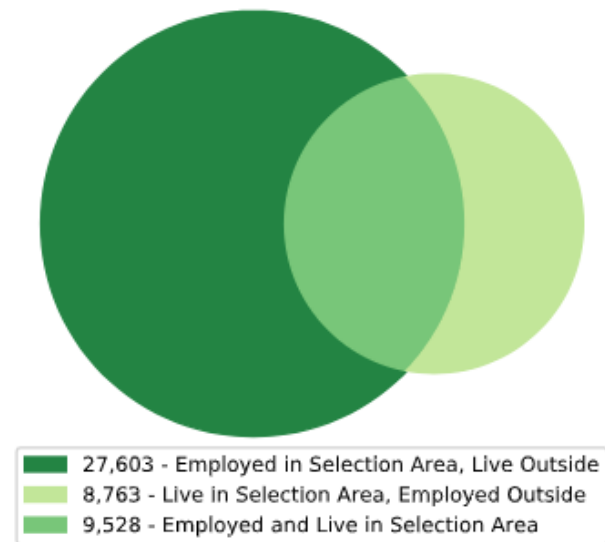


Figure 3-15. Inflow/Outflow Job Counts – All Workers (2020)

Source: U.S. Census OnTheMap



U.S. Census data indicates that the vast majority of La Crosse’s workforce lives outside of the City (represented by the dark green circle in Figure 3-15). The second largest group lives *and* works in La Crosse, followed by the group that lives in La Crosse but commutes elsewhere for work. In addition to La Crosse’s status as a regional employment hub, this could also be a reflection of limited opportunities *within* the City that make commuting more attractive, such as housing options/affordability, property taxes, and school district and childcare quality.

Chapter 4: Housing Profile

Housing Stock

Unit Type

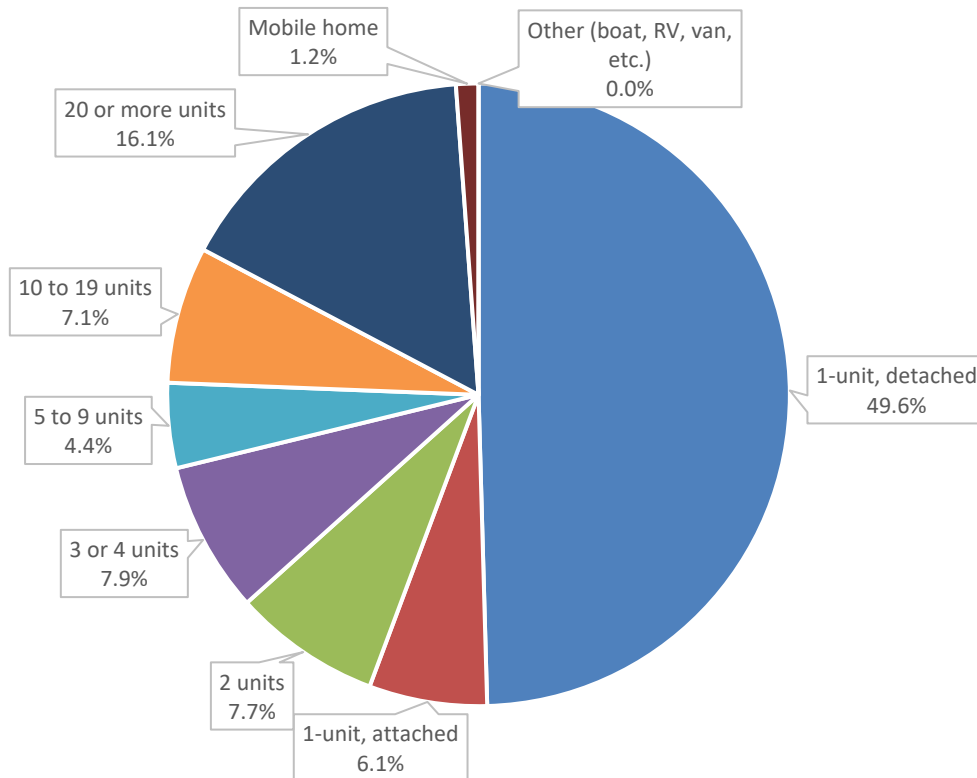
Figure 4-1 shows that the most common unit type in the City of La Crosse is single-unit detached homes (49.6%), followed by multi-family buildings with 20+ units (16.1%), buildings with 3-4 units (7.9%), and buildings with two units (7.7%). Approximately 56.9% of the City’s housing stock is intended for individual families, including single-unit detached homes, attached homes, and mobile homes.

KEY FINDING

Housing stock in the City is over half single-family homes and the remainder is multi-family, including approximately 16.1% of units in buildings with 20 or more units. La Crosse’s homeownership rate is considerably lower than other peer Wisconsin cities, La Crosse County, and the State of Wisconsin. A large majority of the housing was also built before 1940, presenting risks for those that cannot afford to mitigate lead paint and other environmental hazards.

La Crosse’s aging housing stock and the cost of mitigating environmental hazards in these older homes are impediments to fair housing choice, as they disproportionately harm low-income and/or disabled residents for whom such units may be the only viable or affordable housing option.

Figure 4-1. Housing Unit Type
Source: 2016-2020 ACS Table DP04



Number of Bedrooms

Table 4-1 below shows the number of owner-and renter-occupied housing units by size, and how the number of these units has changed between 2010 and 2020. For owner-occupied housing, the City of La Crosse has seen a decrease in 1-3 bedroom units and a slight increase in 4+ bedroom units; the number of renter-occupied units of all sizes has increased over the same timeframe, with the largest growth occurring in units with 4+ bedrooms.

Compared to 2010, the City has a wider variety of rental housing options. However, the overall decrease in 1-3 bedroom owner-occupied housing is undesirable because there are now fewer affordable options for first-time homeowners, aging residents looking to downsize, and low-income households.

Table 4-1. Housing Size by Number of Bedrooms <i>Source: 2006-2010 and 2016-2020 ACS Table S2504</i>						
	2010		2020		Percentage Change	
	Owner-Occupied	Renter-Occupied	Owner-Occupied	Renter-Occupied	Owner-Occupied	Renter-Occupied
No bedroom	11	729	111*	818	918.3%*	12.2%
1 bedroom	414	3486	215	3569	-48.1%	2.4%
2 or 3 bedrooms	8125	5515	6910	6182	-15.0%	12.1%
4 or more bedrooms	2367	824	2436	998	2.9%	21.1%

**Note: While Table 4-1 indicates a significant increase in owner-occupied studio units, the City has not seen this unit type materialize to the same degree in its housing stock. It is more likely that ACS data grouped studio units with those that did not identify a specific number of bedrooms. Therefore, the numbers and calculated percentages in this table are merely estimates, as each unit size category may be missing additional units that were incorrectly reported.*

Housing Unit Construction

Due to La Crosse’s unique geographical position between Granddad Bluff and Mississippi River (and its accompanying floodplain), there are very limited opportunities for new residential development within the City’s boundary. Because of this, the City has prioritized infill development and housing rehabilitation/replacement programs to better utilize existing space and infrastructure.

A five-year review of home construction in the City (see Figure 4-2) reveals little fluctuation in construction of new single family homes since 2011. In this same timeframe, an average of 22 single-family unit homes have been constructed each year.

The City of La Crosse saw a significant increase in multi-family construction in 2013 and 2015, adding over 450 units to the City’s housing stock. Since then, construction has stabilized to between approximately 50–100 units per year. On average, 5 units

KEY FINDING

La Crosse’s unique location between the Mississippi River and Granddad Bluff (as well as rising construction costs and administrative barriers) pose a significant challenge for new residential development. In the last decade, housing construction has stabilized to between 50-100 new units each year, which is not sufficient to meet anticipated demand through 2030.

The inability to substantially increase La Crosse’s housing stock is an impediment to fair housing choice because it escalates competition for existing units, artificially raising costs and blocking many low- and moderate-income buyers and renters from the market.

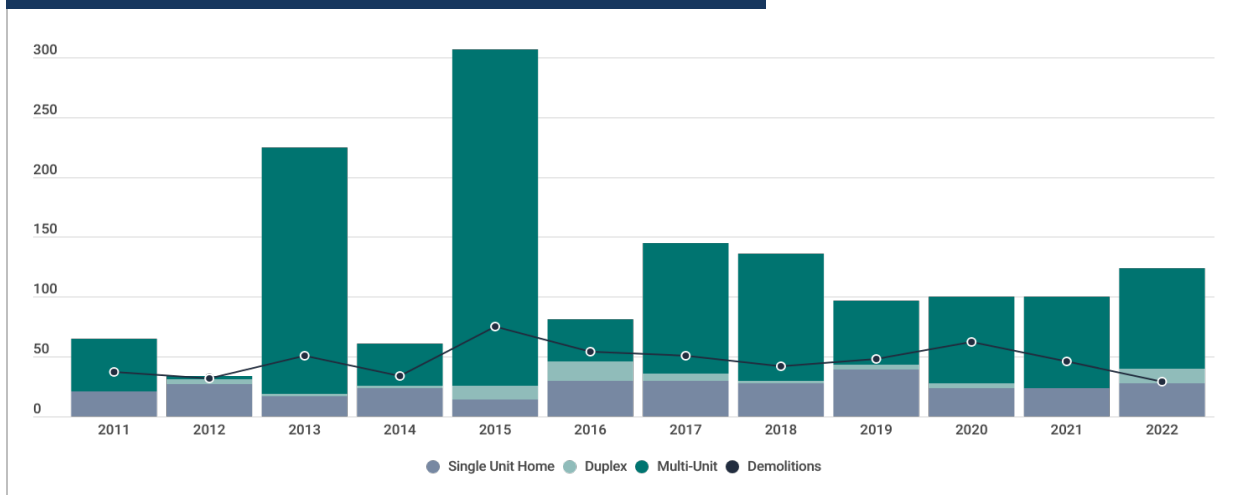
in duplexes and 92 units of multi-family housing are added to the housing stock each year. Simultaneously, approximately 47 units have been demolished annually.

The City’s 2024 Housing Study identified the need for an average annual construction of about 203-232 units. This rate is significantly more than what was produced in the last decade. At the time of this Analysis, the City is on track to add an average of 100 units annually.

Over the last five years, the City of La Crosse has made great progress in increasing the stock of multi-family housing, especially those offering affordable units for families and adults with disabilities, supportive living services, and office spaces for live/work opportunities. These include The Collective on Fourth, 5th Ward Residences, and Haven on Main. The River Point District has also made significant progress, with the Driftless Apartments leasing and more projects breaking ground. Additional development is expected in the coming years, including the redevelopment of Lincoln Middle School and a proposed mixed-use development (“Copper Rocks”) in east-central La Crosse.

Figure 4-2. Construction and Demolition Activity in La Crosse

Source: City of La Crosse, RDG Planning & Design



Housing Quality

Housing Age and Lead Poisoning Risk

As shown in Figure 4-3, the housing stock in the City of La Crosse is generally older, with approximately 68.2% of all housing built before 1980; over a quarter of the City’s homes were constructed before 1940 alone. Owner-occupied housing construction has steadily declined since 1940, while renter-occupied housing construction peaked between 1980–1999, likely due to the high concentration of college students in the City.

Lead-based paint was commonly used before 1978 and poses a risk to children who live in older homes that have not been mitigated. Due to the cost of mitigation, lower-income households are more likely to live in homes where lead paint has not been adequately addressed.

According to Wisconsin Department of Health Services’ 2018-2021 estimates for childhood lead poisoning, 1.98% of children under 6 years old (84 tested total) in La Crosse County had a confirmed blood level of >5µg/dL (signifying lead poisoning). As shown in Figure 4-4, the highest percentages of

childhood lead poisoning occurred in the western-most census tracts of La Crosse, encapsulating Washburn, Powell-Poage Hamilton, and Spence neighborhoods.

Figure 4-3. Year Unit Built

Source: 2016-2020 ACS Table B2504

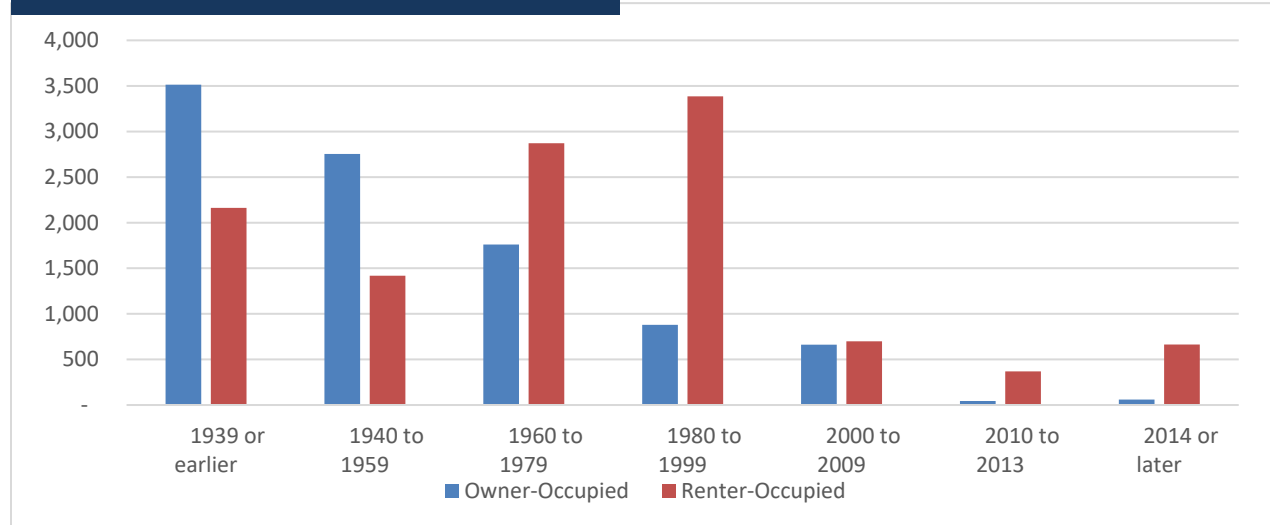
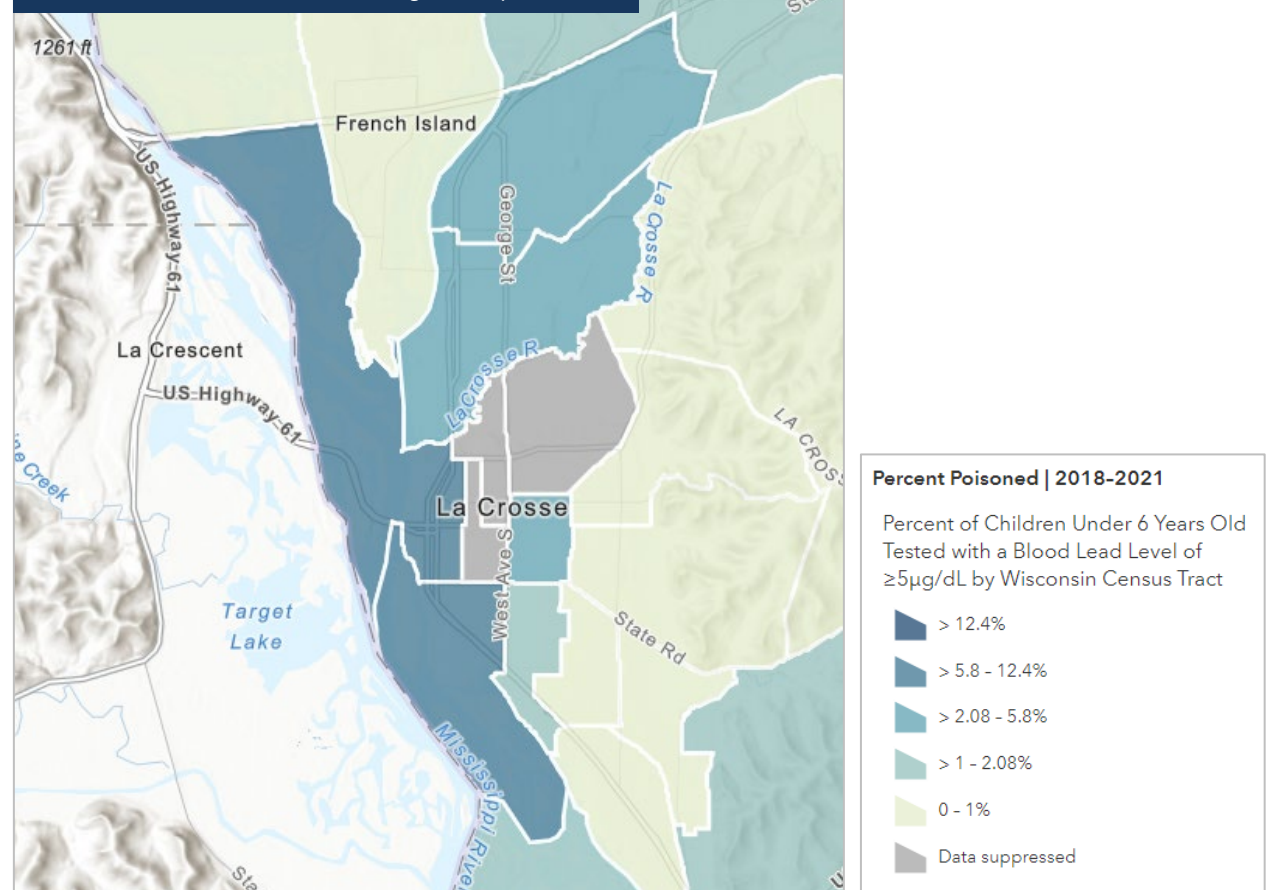


Figure 4-4. Childhood Lead Poisoning Prevalence

Source: WDHS Childhood Lead Poisoning Data Explorer



Substandard Housing – Lacking Complete Plumbing/Kitchen Facilities

Comprehensive Housing Affordability Strategy (CHAS), a custom tabulation of American Community Survey (ACS) data, illustrates the number of households experiencing certain housing problems, including cost burden, overcrowding, or substandard housing (lacking plumbing/kitchen facilities). As shown in Table 4-2, there are a total of 215 renter-occupied units and 24 owner-occupied units that are considered substandard. Extremely low-income renters are most likely to live in housing without adequate bathroom or kitchen facilities due to the lack of high-quality affordable options, increasing the potential for disease transmission, difficulty maintaining personal cleanliness, and limited access to nutritious food. See the “Housing Problems” section of this chapter for more information on this topic within the City of La Crosse.

Table 4-2. Substandard Housing – Lacking Complete Plumbing or Kitchen Facilities
 Source: 2016-2020 CHAS

Renter-Occupied Housing					Owner-Occupied Housing				
0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
135	35	35	10	215	20	0	0	4	24

Occupancy

Housing Tenure

More units are renter-occupied in the City of La Crosse than owner-occupied, as shown in Table 4-3. This is likely due, in part, to the high population of college students attending one of La Crosse’s three major higher education institutions. As shown in Figure 4-6 on the following page, neighborhoods with the highest concentration of rental housing include downtown La Crosse, Washburn, Powell-Poage-Hamilton, and Grandview-Emerson; these areas contain La Crosse’s colleges and accompanying student housing, as well as lower-income and/or diverse populations. Figure 4-7 shows that owner-occupied housing is more prevalent in the western neighborhoods of Bluffside, Spence, Central, and Hass.

Nearly half (48.3%) of all homeowners moved into their current house within the last ten years (Table 4-4), and 82.2% moved in since 2000.

Table 4-5 compares the City of La Crosse’s metrics to other Wisconsin cities, La Crosse/Monroe Counties, and the State of Wisconsin. While the rate of homeownership is lower in each of the four listed cities than the broader Counties and State – rental housing is often concentrated in urban areas due to demand, density, and other factors – the City of La Crosse’s homeownership rate is lower than comparably-sized cities Eau Claire and Kenosha. La Crosse’s homeowners also moved into their current home more recently than all other entities listed – over 80.3% moved in within the last 25 years whereas in the three other cities, only about two-thirds have lived in their homes for the same duration.

Table 4-3. Occupancy
Source: 2016-2020 ACS Table DP04 and B25014

	Number	Percentage
Owner Occupied	9,672	45.5%
Renter Occupied	11,567	54.5%
Vacant	1,485	6.5%
Homeowner Vacancy Rate	-	2.5%
Renter Vacancy Rate	-	4.0%

Table 4-4. Year Homeowners Moved into Unit
Source: 2016-2020 ACS Table B25038

	Number	Percentage
2019 or later	1,727	8.1%
2015 to 2018	8,537	40.2%
2010 to 2014	3,610	17.0%
2000 to 2009	3,596	16.9%
1990 to 1999	1,734	8.2%
1989 or earlier	2,035	9.6%
Total	21,239	100.0%

Table 4-5. Occupancy and Year Moved Into Unit (% of Units)
Source: 2016-2020 ACS Table B25038

	Homeownership Rate	In unit after 2000
City of La Crosse	45.5%	82.3%
City of Eau Claire	56.6%	66.3%
City of Kenosha	57.4%	66.0%
City of Madison	47.6%	68.3%
La Crosse County	62.5%	76.9%
Monroe County	70.7%	71.0%
State of Wisconsin	67.1%	73.0%

Figure 4-5. Percentage of Renter-Occupied Units
Source: ESRI Business Analyst

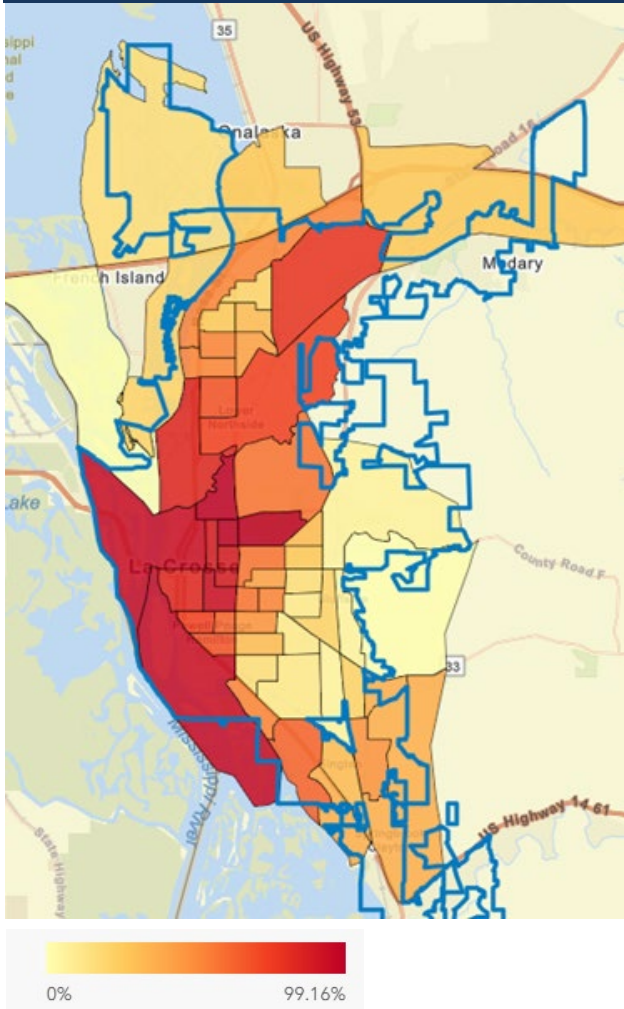
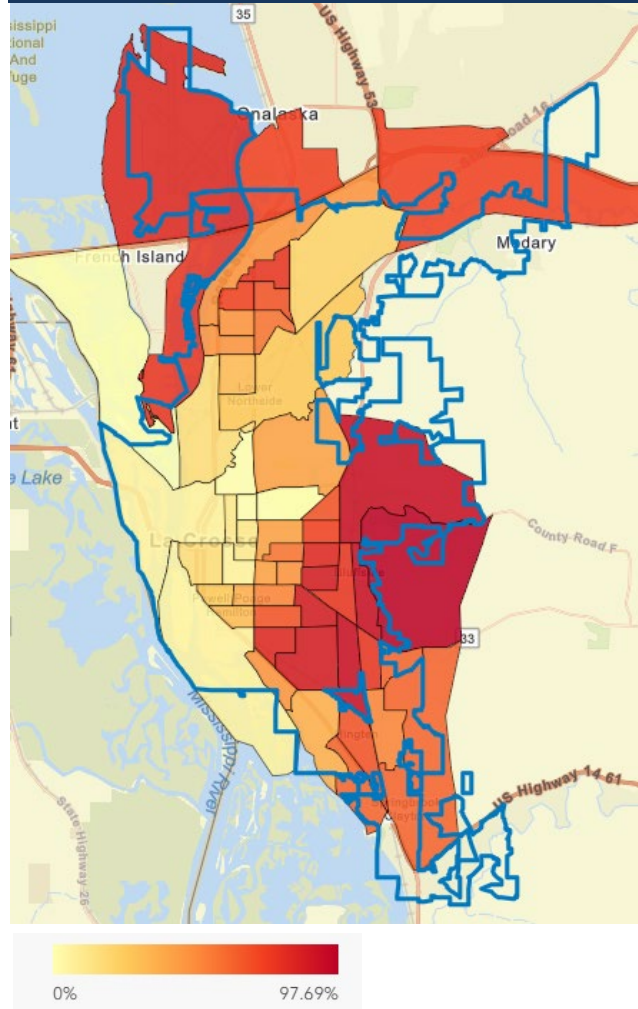


Figure 4-6. Percentage of Owner-Occupied Units
Source: ESRI Business Analyst



Vacancy Rate

Vacancy rate is another important metric to track the health of La Crosse’s housing market. A five percent rental vacancy rate is typically considered ideal because it indicates a balanced market, where potential renters can find units that meet their needs and landlords can keep prices stable. A vacancy rate between one and two percent is considered ideal in the homeowner market.

According to 2016-2020 ACS data, the homeowner vacancy rate was approximately 2.5% in 2020, indicating a relatively healthy owner’s market. The vacancy rate has increased slightly since 2010, where it was 1.9%.

In 2020, the rental vacancy rate was approximately 4% – slightly below the desirable rate for the rental market but still healthy. A lower vacancy rate could lead to rent inflation as supply decreases, enabling bad landlords and substandard properties to stay in the market, and making illegal discrimination in the renter screening process more likely. With a slightly higher vacancy rate, renters have more choices and property owners are forced to compete and to invest in their units to keep them occupied.

Housing Affordability: Owner-Occupied Housing

Median Home Value

Considering owner-occupied housing units, the housing stock in La Crosse has a median value of \$150,500 according to 2016-2020 ACS Estimates, which is lower than La Crosse County (\$184,500), the State of Wisconsin (\$189,200), and the United States as a whole (\$229,800). Approximately half (49.7%) of La Crosse’s housing stock is valued under \$150,000, compared to 32.1% of La Crosse County’s and 34.3% of the State of Wisconsin’s stock. This is likely a reflection of the aging housing stock in La Crosse.

Monthly Owner Housing Costs

In general, housing is considered ‘affordable’ if housing costs do not exceed 30% of the household’s monthly income. Table 4-6 shows that approximately 18.46% of homeowners are exceeding the ‘affordable’ threshold; this is a significantly lower percentage than La Crosse’s renters who exceed the threshold (46.5%).

Table 4-6. Monthly Owner Costs as a Percentage of Household Income Source: 2016-2020 ACS Tables B25070 and B25095	
Monthly Percentage of Household Income Used Towards Owner Costs	Percentage
Less than 20%	56.83%
20% to 24.9%	15.77%
25% to 29.9%	8.57%
30% to 34.9%	4.52%
35% or more	13.94%
Not Computed	36

Lending Policies and Practices

The United States has a history of discriminatory practices in the owner-occupied housing market. One of the most notorious practices, known as redlining, marked certain low-income and/or minority areas as “too risky” for investment, therefore denying residents in these areas necessary credit and insurance for homeownership. This practice left communities vulnerable to exploitation by less reputable, higher cost lenders that increased the incidence of fraud and foreclosure. Patterns of economic and social disparities can still be seen in formerly redlined areas to this day.

KEY FINDING

The HMDA data shows disproportionate loan denial for non-white households, especially Black/African American and American Indian/Alaska Native, which is consistent with nationwide trends.

These different outcomes by race and ethnicity are an impediment to fair housing choice. It is unclear from the data whether these outcomes are the result of bias and discrimination (direct impediment) or simply lesser comfort, knowledge and credit worthiness (indirect impediment).

The Home Mortgage Disclosure Act (HMDA), enacted by Congress in 1975, collects public loan data that can help determine whether financial institutions are serving the housing needs of their communities, aid public officials in distributing public-sector investments, and identify possible discriminatory lending patterns. This regulation applies to banks, savings associations, credit unions, and other mortgage lending institutions. Entities meeting certain thresholds must disclose data on mortgage and home improvement loan applications, originations, and purchases, including the race, sex, and income of applicants, and the property’s location in census geography.

Tables 4-7 and Tables 4-8, 4-9, and 4-10 on the following pages provide a summary of 2020 HMDA data for the City of La Crosse, covering the income, race, and geographical location of all loan applications. The raw HMDA data for the City of La Crosse can be viewed at <https://ffiec.cfpb.gov/data-publication/>.

2020 HMDA data indicates that 9,749 mortgage applications were submitted for the purchase, refinancing, or improvement of properties in the City of La Crosse. Nearly half (49.92%) of these loans were refinance loans, due to the historically low mortgage rates during the COVID-19 pandemic, and are therefore less indicative of the ability of residents to secure housing fairly.

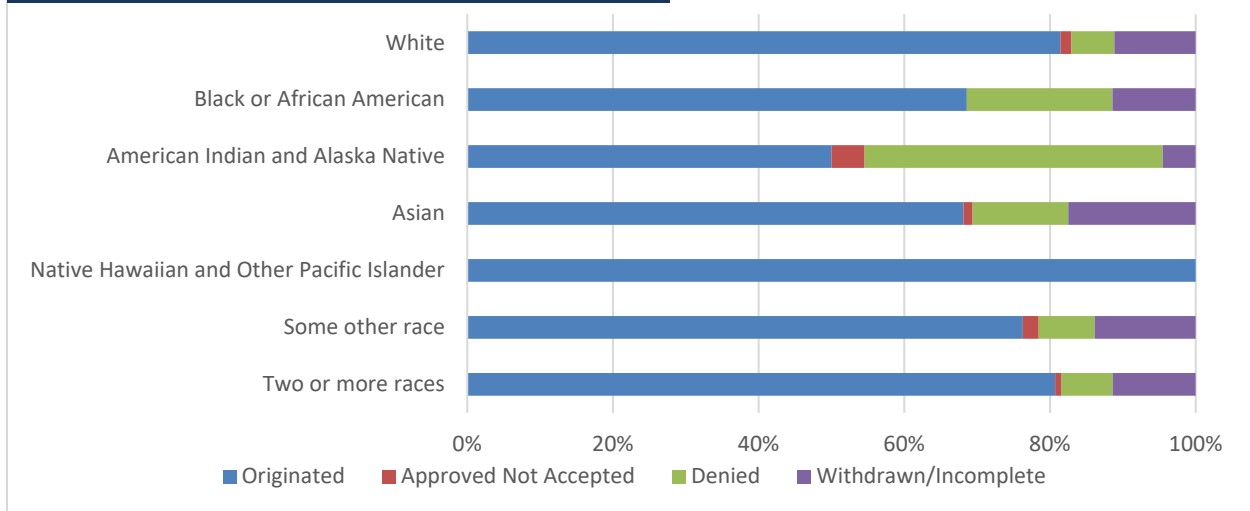
Table 4-7 below summarizes the key findings of the three larger tables that follow, outlining the percentage of loan applications by race or ethnicity for all major loan types (conventional, FHA, USDA, and VA) and comparing those percentages to the racial makeup of City households (2020 Census). For most races/ethnicities, with the exception of Asian households, non-white households make up more of all loan applications than their percentage within the homeownership market. For example, households of “some other race” only make up 0.2% of the City’s population of homeowners, yet they represent over a quarter of FHA, USDA & VA loan applications and 9.3% of all conventional loan applications. This likely means that these households are more dependent on loans to achieve homeownership compared to white households, who have a higher median income that lowers the barriers to buying rather than renting.

Note for all tables: A significant portion of the raw data indicated “race/ethnicity not available,” making it difficult to draw confident and comprehensive conclusions about La Crosse’s loan practices in connection to race or ethnicity. However, this data is still included in this document to further illustrate patterns of homeownership within the City and how lending practices may correlate to lenders’ races.

Race & Ethnicity	Conventional	FHA, USDA & VA	All Loans	Demographic % of City's Owner-Occupied Units
White	87.6%	66.6%	85.1%	95.3%
Black or African American	0.3%	1.1%	0.4%	0.1%
American Indian and Alaska Native	0.2%	0.4%	0.2%	0.2%
Asian	1.3%	3.1%	1.7%	3.3%
Native Hawaiian and Other Pacific Islander	0.0%	0.1%	0.0%	0.0%
Some other race	9.3%	26.8%	1.2%	0.2%
Two or more races	1.1%	1.8%	1.2%	0.8%

Figure 4-7. Results of All Loans by Race and Ethnicity

Source: HMDA 2020 Data



The three tables on the following pages document the results of all submitted loan applications from the previous table. Table 4-8 summarizes the application results of all types of loans, then Tables 4-9 and 4-10 further break separate the data into just conventional loan data and FHA, UDA & VA loan data respectively. For all three tables, the percentages in the “total applications” column read vertically, showing the makeup of all submitted applications based on the category. The following four columns’ percentages read horizontally, showing the application results of each race/ethnicity or census tract category. For example, in Table 4-8, for all types of loans submitted by white households (representing 85.15% of all submitted applications), 80.79% were originated, 1.51% were approved but not accepted, 5.84% were denied, and 11.07% were withdrawn or incomplete.

Figure 4-7 above, using data from Table 4-8, reveals that loan applications from Black/African American, American Indian/Alaska Native, and Asian households are disproportionately rejected compared to white households. For white households, approximately 80.79% result in a successful loan, whereas only 68.57% of loans are issued for Black households; the success rate further drops for American Indian/Alaska Native households, where only half of loan applications are successful. It is important to note that La Crosse has a relatively small minority population, which limits the reliability of this data, and it is difficult to discern which local denials are based on credit worthiness and which are due to discriminatory bias without more detailed data comparing denial rate of race for similarly credit-worthy applicants. However, these findings reflect ongoing nationwide racial disparities in mortgage and improvement loan denials, especially for Black households. This not only makes it difficult for minority households to buy housing, but also to improve subpar or unsafe housing that they *are* able to obtain.²

When looking at the racial composition of census tracts, there does not appear to be a significant difference in loan denials between diverse or less-diverse areas of La Crosse. Therefore, despite loan denials disproportionately affecting non-white households, this is not necessarily concentrated in more diverse areas of the City. This is also true when looking at income composition of census tracts; there is no significant difference in loan outcomes between wealthier or lower-income areas.

² Urban Institute, Washington D.C. (www.urban.org)

Table 4-8. Summary of Mortgage Application Data for All Loans, by Race and Ethnicity

Source: HMDA 2020 Data

	Total Applications		Originated		Approved Not Accepted		Denied		Withdrawn/ Incomplete	
	#	%	#	%	#	%	#	%	#	%
Loan Type										
Conventional	8,593	88.14%	6,997	91.93%	119	80.41%	479	80.23%	888	81.77%
FHA, USDA & VA	1156	11.86%	614	8.07%	29	19.59%	118	19.77%	198	18.23%
Total	9,749	100%	7,611	17,361	148	100%	597	100%	1,086	100%
Loan Purpose										
Refinancing	4,867	49.92%	3,859	50.70%	75	50.68%	247	41.37%	590	54.33%
Home Improvement	455	4.67%	379	4.98%	10	6.76%	43	7.20%	23	2.12%
Applicant Race/Ethnicity, all Loan Types										
White	8,301	85.15%	6,706	80.79%	125	1.51%	485	5.84%	919	11.07%
Black or African American	35	0.36%	24	68.57%	0	0.00%	7	20.00%	4	11.43%
American Indian and Alaska Native	22	0.23%	11	50.00%	1	4.55%	9	40.91%	1	4.55%
Asian	162	1.66%	109	67.28%	2	1.23%	21	12.96%	28	17.28%
Native Hawaiian and Other Pacific Islander	4	0.04%	4	100%	0	0.00%	0	0.00%	0	0.00%
Some other race	1,110	11.39%	665	59.91%	19	1.71%	67	6.04%	121	10.90%
Two or more races	115	1.18%	92	80.00%	1	0.87%	8	6.96%	13	11.30%
Racial Composition of Census Tract Where Property is Located										
Less Than 10% Minority	7,372	75.62%	5,820	78.95%	107	1.45%	403	5.47%	820	11.12%
10-19%	2,004	20.56%	1,493	74.50%	35	1.75%	168	8.38%	236	11.78%
20-49%	373	3.83%	298	79.89%	6	1.61%	26	6.97%	30	8.04%
50%+	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Income Composition of Census Tract Where Property is Located										
Low Income (<50% but not 0%)	65	0.67%	46	70.77%	2	3.08%	6	9.23%	9	13.85%
Moderate Income (≥50% but <80%)	637	6.53%	493	77.39%	8	1.26%	54	8.48%	64	10.05%
Middle Income (≥80% but <120%)	6,983	71.63%	5,425	77.69%	111	1.59%	440	6.30%	764	10.94%
Upper Income (≥120%)	2,017	20.69%	1,614	80.02%	27	1.34%	90	4.46%	242	12.00%
Not Known (0%)	47	0.48%	33	70.21%	0	0.00%	7	14.89%	7	14.89%

Table 4-9. Summary of Mortgage Application Data for Conventional Loans, by Race and Ethnicity

Source: HMDA 2020 Data

	Total Applications		Originated		Approved Not Accepted		Denied		Withdrawn/ Incomplete	
	#	%	#	%	#	%	#	%	#	%
Loan Type										
Conventional	8,593	88.14%	6,997	91.93%	119	80.41%	479	80.23%	888	81.77%
Applicant/Borrower and Co-Applicant / Co-Borrower Race; Conventional Loans										
White	7,531	87.64%	6,211	82.47%	102	1.35%	400	5.31%	763	10.13%
Black or African American	22	0.26%	17	77.27%	0	0.00%	3	13.64%	2	9.09%
American Indian and Alaska Native	17	0.20%	10	58.82%	0	0.00%	6	35.29%	1	5.88%
Asian	126	1.47%	83	65.87%	2	1.59%	19	15.08%	21	16.67%
Native Hawaiian and Other Pacific Islander	3	0.03%	3	100.00%	0	0.00%	0	0.00%	0	0.00%
Some other race	800	9.31%	596	74.50%	14	1.75%	45	5.63%	92	11.50%
Two or more races	94	1.09%	77	81.91%	1	1.06%	6	6.38%	9	9.57%
Racial Composition of Census Tract Where Property is Located										
Less Than 10% Minority	6,544	76.16%	5,370	82.06%	89	1.36%	328	5.01%	677	10.35%
10-19%	1,715	19.96%	1,351	78.78%	26	1.52%	129	7.52%	185	10.79%
20-49%	334	3.89%	276	82.63%	4	1.20%	22	6.59%	26	7.78%
50%+	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Income Composition of Census Tract Where Property is Located										
Low Income (<50% but not 0%)	61	0.71%	45	73.77%	2	3.28%	5	8.20%	8	13.11%
Moderate Income (≥50% but <80%)	569	6.62%	461	81.02%	5	0.88%	40	7.03%	55	9.67%
Middle Income (≥80% but <120%)	6,083	70.79%	4,945	81.29%	88	1.45%	356	5.85%	613	10.08%
Upper Income (≥120%)	1,834	21.34%	1,514	82.55%	24	1.31%	71	3.87%	205	11.18%
Not Known (0%)	46	0.54%	32	69.57%	0	0.00%	7	15.22%	7	15.22%

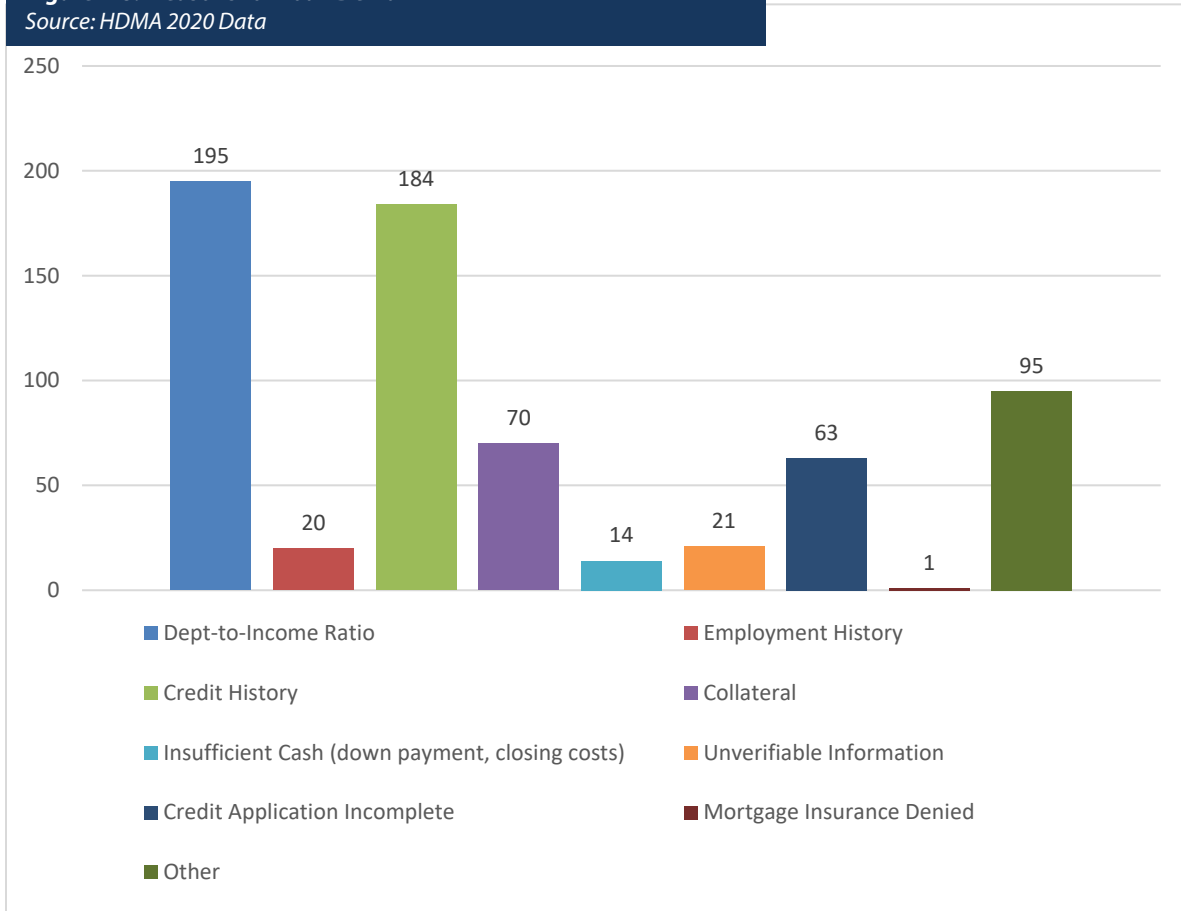
Table 4-10. Summary of Mortgage Application Data for FSA, USDA & VA Loans, by Race and Ethnicity

Source: HMDA 2020 Data

	Total Applications		Originated		Approved Not Accepted		Denied		Withdrawn/ Incomplete	
	#	%	#	%	#	%	#	%	#	%
Loan Type										
FHA, USDA & VA	1,156	11.86%	614	8.07%	29	19.59%	118	19.77%	198	18.23%
Applicant/Borrower and Co-Applicant / Co-Borrower Race; FHA, USDA & VA										
White	770	66.61%	495	64.29%	23	2.99%	85	11.04%	156	20.26%
Black or African American	13	1.12%	7	53.85%	0	0.00%	4	30.77%	2	15.38%
American Indian and Alaska Native	5	0.43%	1	20.00%	1	20.00%	3	60.00%	0	0.00%
Asian	36	3.11%	26	72.22%	0	0.00%	2	5.56%	7	19.44%
Native Hawaiian and Other Pacific Islander	1	0.09%	1	100.00%	0	0.00%	0	0.00%	0	0.00%
Some other race	310	26.82%	69	22.26%	5	1.61%	22	7.10%	29	9.35%
Two or more races	21	1.82%	15	71.43%	0	0.00%	2	9.52%	4	19.05%
Racial Composition of Census Tract Where Property is Located										
Less Than 10% Minority	828	71.63%	450	54.35%	18	2.17%	75	9.06%	143	17.27%
10-19%	289	25.00%	142	49.13%	9	3.11%	39	13.49%	51	17.65%
20-49%	39	3.37%	22	56.41%	2	5.13%	4	10.26%	4	10.26%
50%+	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Income Composition of Census Tract where Property is Located										
Low Income (<50% but not 0%)	4	0.35%	1	25.00%	0	0.00%	1	25.00%	1	25.00%
Moderate Income (≥50% but <80%)	68	5.88%	32	47.06%	3	4.41%	14	20.59%	9	13.24%
Middle Income (≥80% but <120%)	900	77.85%	480	53.33%	23	2.56%	84	9.33%	151	16.78%
Upper Income (≥120%)	183	15.83%	100	54.64%	3	1.64%	19	10.38%	37	20.22%
Not Known (0%)	1	0.09%	1	100%	0	0.00%	0	0.00%	0	0.00%

Figure 4-8. Reasons for Loan Denial

Source: HMDA 2020 Data



Of the 9,749 mortgage applications that were received in 2020, 579 were denied. Figure 4-8 shows the number of occurrences of each reason for loan denial (keep in mind that multiple reasons were sometimes cited for one application). Of all of the reasons for denial, “Debt-to-Income Ratio” and “Credit History” were the most common.

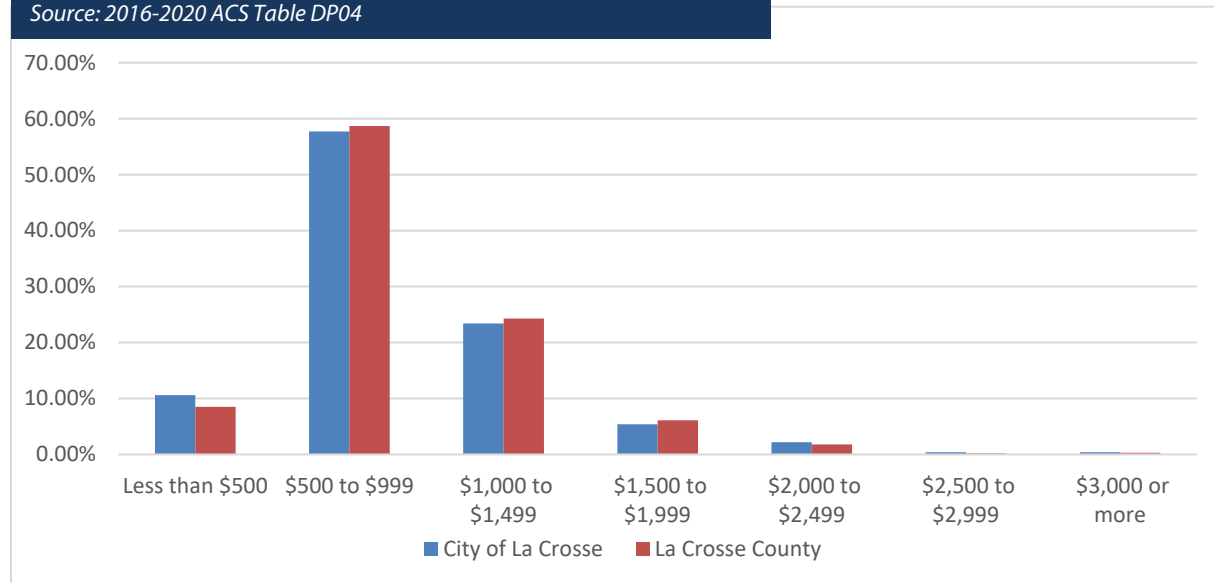
Housing Affordability: Renter-Occupied Housing

Gross Rent

Figure 4-9 shows that the vast majority of rents in the City of La Crosse are between \$500 and \$999 (58.7%), and approximately 23.4% of rents are between \$1,000 and \$1,400. The City of La Crosse has a slightly higher percentage of rents lower than \$500 compared to La Crosse County and a lower percentage available for rent at \$500 or higher. The City of La Crosse’s median rent (\$820) is lower than La Crosse County’s (\$854) and significantly lower than the United States as a whole (\$1,096).

Figure 4-9. Gross Rent (City of La Crosse and La Crosse County)

Source: 2016-2020 ACS Table DP04



Fair Market Rents and HOME Rents

Each year, the U.S. Department of Housing and Urban Development (HUD) releases Fair Market Rents (FMR) for metropolitan areas. FMRs are an estimate of the amount of money needed to cover gross rents (rent and utility expenses) for 40% of the rental housing units in an area, and therefore help determine the maximum amount the Housing Choice voucher (Section 8) program will cover per participant. Table 4-11 compares the FMR of the La Crosse-Onalaska area to several peer cities; La Crosse’s average* rent is higher than Wausau, Appleton, and Eau Claire (despite having a lower population) and lower than those in Madison, WI and the Twin Cities, MN.

KEY FINDING

For all unit sizes, La Crosse’s average monthly rent is higher than comparably-sized cities in Wisconsin. Nearly half of all renters within the City are considered cost-burdened, with approximately 40% spending more than 35% of their monthly income towards housing costs.

Housing affordability is an indirect impediment to fair housing choice, as poverty disproportionately affects households of color, disabled residents, and other protected classes (see Chapter 2 for more information).

*Note that the “average” rent indicated in the table is the average of the five preceding rent amounts by unit size; it is neither the average rent for the City nor a weighted average.

Table 4-11. Fair Market Rents by HUD Metropolitan Fair Market Rent Area

Source: HUD FY 2023 Fair Market Rent Documentation System

Metropolitan Area	Eff.	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	Average
La Crosse-Onalaska, WI-MN MSA	\$ 685	\$ 799	\$ 1,024	\$ 1,409	\$ 1,744	\$ 1,132
Wausau, WI HUD Metro FMR	\$ 623	\$ 708	\$ 932	\$ 1,192	\$ 1,271	\$ 945
Appleton, WI MSA	\$ 681	\$ 748	\$ 949	\$ 1,271	\$ 1,276	\$ 985
Eau Claire, WI MSA	\$ 639	\$ 716	\$ 914	\$ 1,244	\$ 1,427	\$ 988
Madison, WI HUD Metro FMR Area	\$ 1,007	\$ 1,183	\$ 1,378	\$ 1,810	\$ 2,041	\$ 1,484
Minneapolis-St. Paul-Bloomington, MN-WI HUD Metro FMR Area	\$ 1,007	\$ 1,149	\$ 1,410	\$ 1,916	\$ 2,209	\$ 1,538

As shown in Table 4-12 below, La Crosse’s Fair Market Rent is higher than low/high HOME rents for all unit sizes, indicating that the HOME program is offering a potentially subsidized or below-market rent compared to what landlords could typically charge in the current market. However, La Crosse’s median gross rent (\$820 in 2020) is considerably higher than both the Fair Market Rent and HOME rents for efficiency and one-bedroom units, meaning that the average rent for most rental units is currently above what is considered reasonable for the City’s current stock and quality. Since the value of Section 8 vouchers is partially determined by HOME rent levels, high median rent limits the availability of housing that is affordable to a Section 8 voucher holder.

Table 4-12. Comparison of Fair Market Rent and HOME Rent

Source: HUD FMR and HOME Rents

	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	\$685	\$799	\$1,024	\$1,409	\$1,744
High HOME Rent	\$531	\$624	\$826	\$1,140	\$1,429
Low HOME Rent	\$531	\$624	\$826	\$1,021	\$1,140

Monthly Renter Housing Costs

In general, housing is considered ‘affordable’ if housing costs do not exceed 30% of the household’s monthly income. According to the 2016-2020 ACS Estimates, nearly half (46.5%) of La Crosse’s residents who are renting are exceeding the ‘affordable’ threshold. In comparison, approximately 18.46% of homeowners are exceeding the ‘affordable’ threshold (see Table 4-13). Since La Crosse’s fair market rent is higher than most comparably-sized cities in the region (see Table 4-11) and the median household income is lower than these same cities, it makes sense that more residents renting their housing exceed the “affordable’ threshold. This could likely be attributed to La Crosse’s large college student population – characterized by renting short-term housing and an absence of a high-paying, stable income – as well as a portion of the City’s residents falling below the poverty line.

Table 4-13. Gross Rent as a Percentage of Household Income

Source: 2016-2020 ACS Tables B25070 and B25095

Monthly Percentage of Household Income Used Towards Rental Costs	Percentage
Less than 15%	11.2%
15.0% to 19.9%	14.1%
20% to 24.9%	12.9%
25% to 29.9%	11.4%
30% to 34.9%	6.5%
35% or more	40.0%
Not computed	448

Housing Wage

Another way of looking at the cost burden of housing is by using the annual *Out of Reach*³ report. This report discusses the “housing wage” – the hourly wage one must earn in order to afford modest rental housing in a community. Because one-bedroom units are one of the most affordable options for disadvantaged residents, we’ve chosen to focus on this size of apartment for analysis:

According to the Living Wage Institute at the Massachusetts Institute of Technology, one working adult with no children must earn \$19.86 per hour or \$41,309 annually (assuming a 40-hour work week at 52 weeks per year) to afford rent plus utilities (without paying over 30% of income) in addition to other basic necessities such as food, transportation, and medical expenses. For families with children, this living wage increases drastically – up to \$30.13/person per hour or \$125,340 cumulatively annually for two adults and three children – to afford these same amenities. The minimum wage in La Crosse (and across the State of Wisconsin) is currently \$7.25 per hour or \$15,000 annually. The mean wage for workers across all sectors in La Crosse was \$23.28/hour in May 2020 (or \$48,410 annually), which is above the living wage for adults with no children; however, this wage would be inadequate for families with multiple children.

In the La Crosse-Onalaska HMFA (HUD Fair Market Rent Area), the 2023 fair market rent (FMR) for a one-bedroom apartment is \$799. In order to afford FMR for a one-bedroom apartment (without exceeding the 30% income threshold and excluding all other necessities), an individual must earn \$31,960 annually; for a 2-bedroom unit (fair market rent of \$1,024), one must have an income of \$40,958 annually. This is not attainable for a renter solely working a minimum wage job. While this may be attainable for renters earning the mean wage (\$48,410), these same apartments may strain this salary if they exceed the FMR.

Based on the above information, one-bedroom and smaller units are the most affordable housing types for workers making the mean wage in La Crosse, as these units are least likely to push housing costs over the 30% ‘affordable threshold’. As developers prioritize larger, more expensive rental units in their buildings (see Table 4-1), these workers may experience a shortage of smaller, more affordable units.

³ National Low Income Housing Coalition, Washington, D.C. (www.nlihc.org/oor)

Housing Problems

To assess affordability and other types of housing needs, HUD outlines the following four housing problems and four severe housing problems for those under the Area Median Income (AMI):

Housing Problems

1. Lacks complete kitchen facilities;
2. Lacks complete plumbing facilities;
3. More than one person per room;
4. Cost burden greater than 30%.

Severe Housing Problems

1. Lacks complete kitchen facilities;
2. Lacks complete plumbing facilities;
3. More than 1.5 persons per room;
4. Cost burden greater than 50%.

KEY FINDING

Non-white households and college students are more likely to live in homes with subpar kitchen/plumbing facilities, experience overcrowding, or experience cost burden with their housing. Because of the high competition for rental units within the City, property managers are disincentivized from correcting costly nonconformities or maintenance needs. However, this does not appear to be concentrated within specific areas of La Crosse.

Housing quality is an indirect impediment to fair housing choice, as low-income residents (disproportionately households of color, disabled residents, and other protected classes) cannot afford to mitigate these issues or move to better-quality housing.

Table 4-14 outlines the distribution of housing problems across race and income. Within each AMI bracket, the “#” column indicates the number of households within that racial/ethnic group and income that experience at least one of the housing problems identified above; the “% of total” column indicates the percentage of these households out of all households within that racial/ethnic group and income. The prevalence of housing problems is much higher for households making 0%-30% AMI since they have the lowest incomes to acquire quality housing.

According to HUD, *disproportionately greater* need exists when the percentage of a particular racial/ethnic group is at least 10 percent higher than the percentage of persons in the category as a whole. Since white households make up the majority of La Crosse’s population, and therefore comprise the majority of residents under the AMI, the category averages align heavily with the prevalence of housing problems for white households. For households experiencing any of the four housing problems, disproportionately greater need exists for the Black/African American, Asian, and American Indian/Alaska Native populations who earn 0-30% AMI and the Hispanic population who earns 50-100% AMI. For households experiencing any of the four severe housing problems, disproportionately greater need exists for Black/African American and Asian households making 0-30% AMI and Hispanic households making 0-80% AMI.

Figure 4-10 indicates that, while housing burden is distributed throughout the City of La Crosse, up to 45.43% of households experience any of the four identified housing problems in the Powell-Poage-Hamilton (PPH), Grandview Emerson, and Washburn neighborhoods. Grandview Emerson contains UW-La Crosse’s campus and surrounding student neighborhoods, where cost burden or overcrowding may be especially prevalent due to undergraduate students’ lack of stable income and/or willingness to share bedrooms with other students to save money. However, increased competition for convenient rental housing around campus may dissuade property managers from correcting costly nonconformities or properly maintaining these structures.

Table 4-14. Demographics of Households with Disproportionate Housing Needs

Source: 2020 CHAS

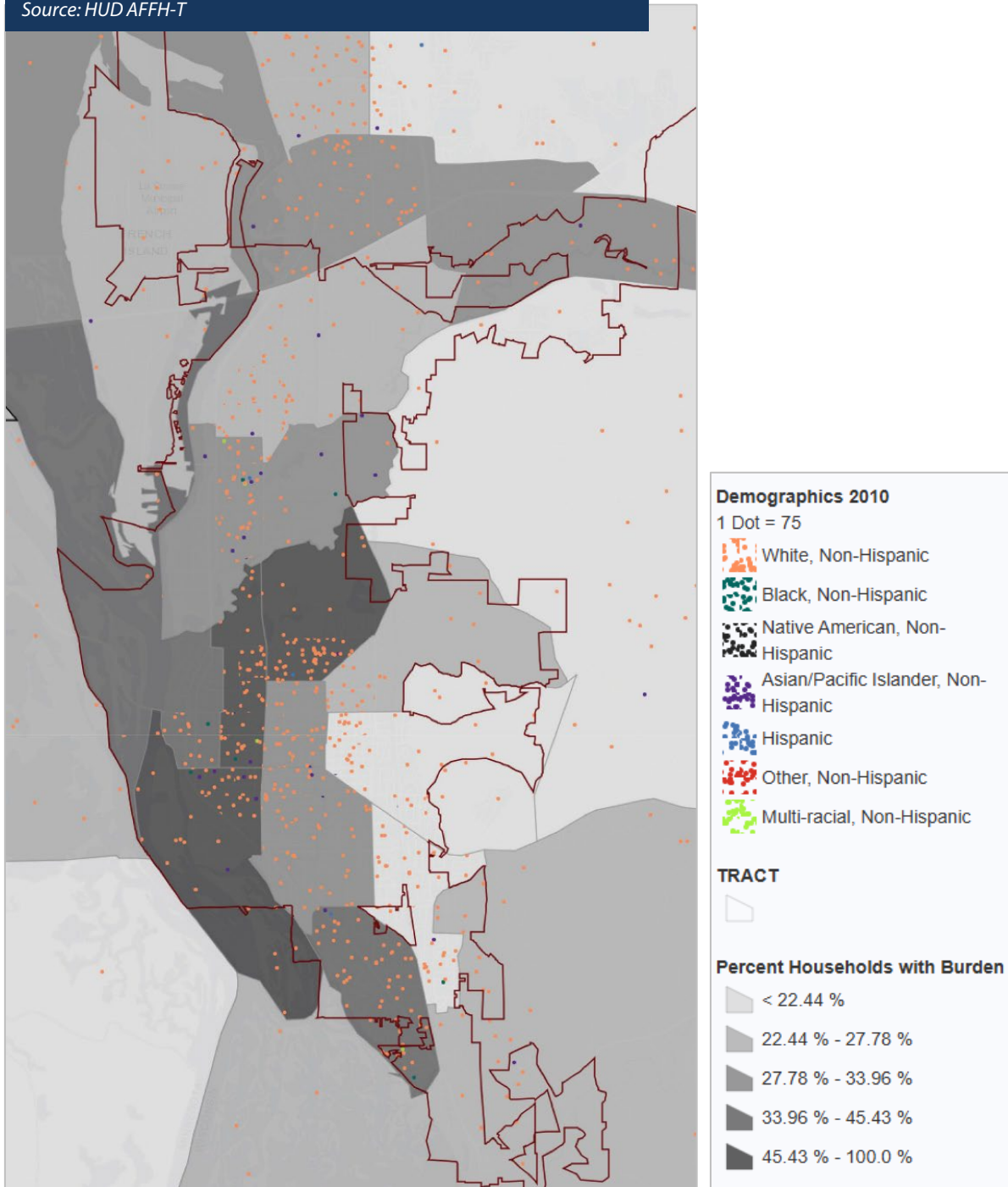
Households Experiencing any of the Four Housing Problems*	0%-30% AMI		30%-50% AMI		50%-80% AMI		80%-100% AMI	
	#	% of total	#	% of total	#	% of total	#	% of total
White	2,765	86.9%	2,145	69.1%	1,345	33.9%	275	9.9%
Black/African American	95	100%	-	0%	10	10.0%	-	0%
Asian	80	100%	45	50.0%	10	8.3%	-	0%
American Indian, Alaska Native	24	100%	-	0%	-	0%	-	0%
Pacific Islander	-	-	-	-	-	-	-	-
Hispanic	70	82.4%	55	50.0%	75	55.6%	20	44.4%
Total	3,045	87.6%	2,270	67.7%	1,440	33.0%	300	10.7%
Households Experiencing any of the Four Severe Housing Problems**	0%-30% AMI		30%-50% AMI		50%-80% AMI		80%-100% AMI	
	#	% of total	#	% of total	#	% of total	#	% of total
White	2,185	68.7%	730	23.5%	180	4.5%	25	1.0%
Black/African American	95	100%	-	0%	-	0%	-	0%
Asian	80	100%	14	15.7%	4	3.2%	-	0%
American Indian, Alaska Native	4	16.7%	-	0%	-	0%	-	0%
Pacific Islander	-	-	-	-	-	-	-	-
Hispanic	70	82.4%	55	50.0%	25	18.5%	-	0%
Total	2,445	70.4%	800	23.9%	200	4.6%	25	0.9%

* The four housing problems are: (1) Lacks complete kitchen facilities, (2) Lacks complete plumbing facilities, (3) More than one person per room, (4) Cost burden greater than 30%

** The four severe housing problems are: (1) Lacks complete kitchen facilities, (2) Lacks complete plumbing facilities, (3) More than 1.5 persons per room, (4) Cost burden greater than 50%

Figure 4-10. Demographics and Housing Burden

Source: HUD AFFH-T



Government-Assisted Housing

Public Housing

The City of La Crosse Public Housing Authority (PHA) provides quality, affordable housing for low-income and fixed-income households, including families, the elderly, and those with disabilities. The PHA currently oversees four family housing properties, nine high-rise towers, and six market rate units for residents with disabilities, totaling 599 units of public housing with the capacity for 611 units. Table 4-15 below summarizes each property, though unit numbers are approximate based on information provided on the Housing Authority’s website.

Residents of each building or development have access to mobile food pantries, resource navigation personnel from various organizations, and youth programming. Entities such as the La Crosse Family Collaborative and School District of La Crosse have embedded social workers in multiple low-income neighborhoods, who can “knit together” location-specific resources and financial aid for public housing tenants and other households in need. However, funding and staff capacity to maintain these programs is tight and as demand for supportive services (especially housing assistance) continues to increase, additional funding and collaboration will be required to adequately address residents’ needs.

KEY FINDING

The La Crosse Housing Authority assists hundreds of low-income households acquire affordable housing by managing public housing developments and administering the City’s Section 8 Housing Choice voucher program. However, availability for both options is low and federal funding is anticipated to decrease over the coming years, severely limiting the number of people that benefit from these programs. Additionally, many Section 8 voucher holders experience discrimination from landlords when seeking market-rate housing.

The limited number of public housing units and vouchers are indirect impediments to fair housing choice, as extremely low-income residents often cannot afford any other option. Discrimination against voucher holders is also an indirect impediment, as this population is not a protected class in the City of La Crosse.

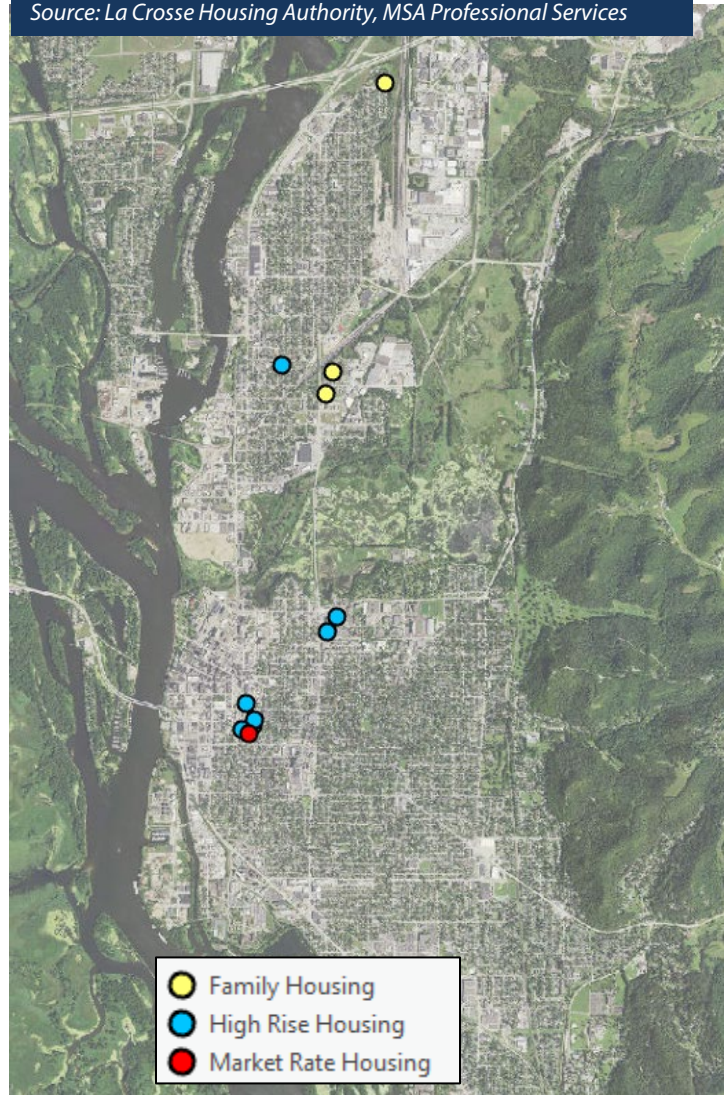
Table 4-15. La Crosse Housing Authority Properties

Source: La Crosse Housing Authority

Property Name	Address	# of Units (approx.)	Unit Types Offered
Family Housing			
Grover Estates	Taylor St. and Hamilton St.	30	2-Bedroom
Huber Homes	Gladys St. and Huber Court	40	1, 2, 3, 4-Bedroom
Mullen Homes	St. James St. and 800 Block of Winneshiek Road	56	2, 3, 4, 5-Bedroom
Schuh Homes	St. Winneshiek Road, Redbird Court, Wood St. and John Flynn Drive	84	1, 2, 3, 4, 5-Bedroom
High-Rise Housing			
Becker Plaza	415 South 7th St.	75	1-Bedroom
Sauber Manor	1025 Liberty St.	82	1-Bedroom
Solberg Heights	215 South 6th St.	78	1-Bedroom
Stoffel Court	333 South 7th St.	74	1-Bedroom
Stokke Tower	421 South 6th St.	73	1-Bedroom
Forest Park	1230 Badger St.	112	1-Bedroom
Ping Manor	1311 Badger St.	60	1-Bedroom
Market Rate Housing			
Alberts House I & II	Division St. and 7th St.	6	1-Bedroom Handicap

Figure 4-11. Public Housing Locations

Source: La Crosse Housing Authority, MSA Professional Services

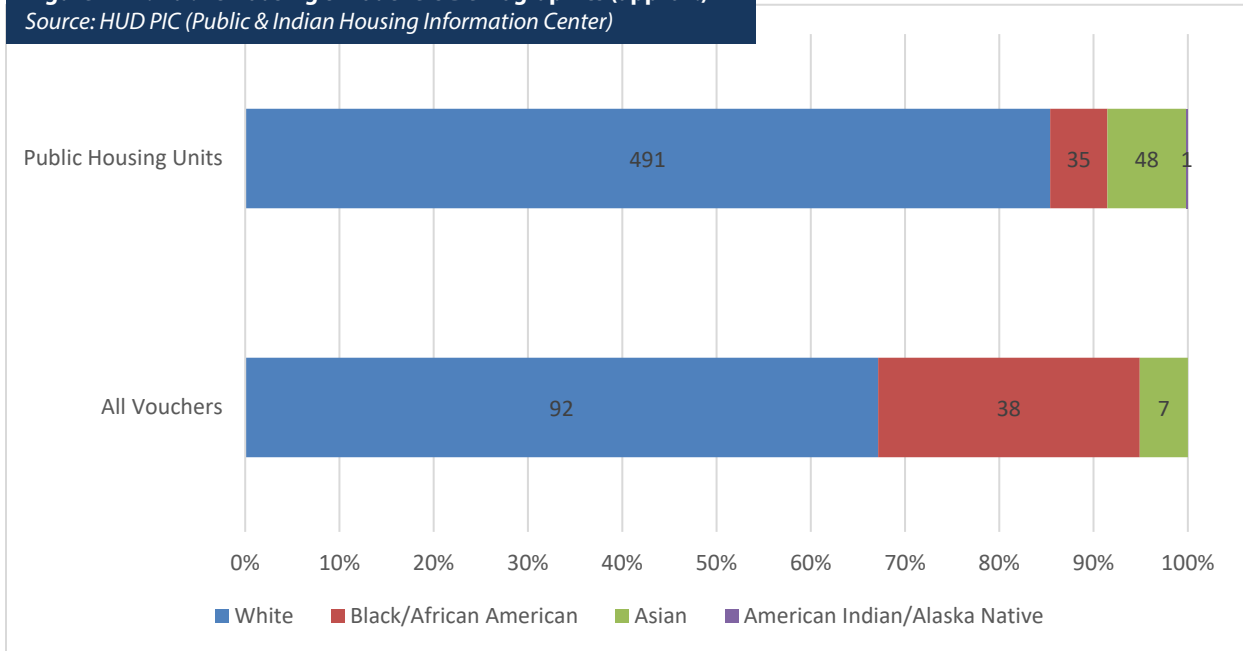


As shown in Figure 4-11, the majority of the Housing Authority's properties are located within the neighborhoods of Washburn, Grandview-Emerson, Lower Northside and Depot, and Logan Northside, with most of the high-rise housing options located within the dense development near downtown La Crosse and the family housing developments located further into the residential areas of the City.

Demand for all unit types is very high. The waitlists for many unit types (especially 1-3 bedroom units in both the high-rise buildings and family developments) can stretch up to a couple years' wait. Of the 611 units that the Housing Authority oversees, 95 (15.9%) are either fully ADA-compliant or partially modifiable; while the waitlists for these units are comparably shorter, turnover is very low.

Figure 4-12. Public Housing & Vouchers Demographics (approx.)

Source: HUD PIC (Public & Indian Housing Information Center)



Section 8 Housing Choice Vouchers

The U.S. Department of Housing and Urban Development (HUD) Section 8/Housing Choice Voucher Program is the federal government’s primary voucher-based housing assistance program. The voucher program provides affordable housing choices for low-income families by subsidizing privately-owned rental units. Generally, program participants pay no more than 30% of monthly adjusted income towards rent and utilities of a unit of their choosing, and the PHA pays the difference between this 30% threshold and the PHA-determined payment standard, about 80% - 100% of the HUD-determined Fair Market Rent (FMR). Eligibility for a rental voucher is determined by the family’s total annual gross income (not to exceed 50% of the area median income), assets, family size, and is limited to U.S. citizens and special categories of noncitizens who have eligible immigration status.

The La Crosse Housing Authority administers the Section 8 Housing Choice Voucher Program, which assists approximately 199 households throughout the City of La Crosse (184 through tenant-based vouchers and 15 through Veterans Affairs Supportive Housing). While this program can help mitigate the demand on public housing stock, landlord discrimination against voucher holders continues to be an issue in the community. Involvement with the Section 8 program requires landlords to navigate stricter tenant screening requirements, regular HUD inspections, and the possibility of delayed rent payments due to bureaucratic processes, therefore pushing them to work with tenants that can pay directly instead. Additionally, La Crosse’s Section 8 allocations are anticipated to decrease moving forward, with HUD recently advising the Housing Authority to “manage their [Section 8] programs prudently to mitigate against potential program shortfalls.” Declining federal funding and limited eligible housing stock therefore threaten the future of the Section 8 program in La Crosse.

Figure 4-12 above shows that, while there are fewer vouchers in circulation than public housing units, a higher percentage has gone towards Black/African American residents. In contrast, white or Asian residents make up a larger population of public housing tenants.

Homelessness

La Crosse saw a significant increase in the number of people experiencing homelessness during the COVID-19 pandemic. Various short-term federal funding streams were used during the pandemic to address the problem, often taking the form of temporary fixes such as sheltering individuals at motels over the winters of 2020 and 2021. However, numbers remained stubbornly high and the City sought a way to unify available services and identify feasible long-term solutions.

In early 2024, the City of La Crosse partnered with La Crosse County to develop *Pathways Home*, a long-term plan aiming to achieve “functional zero” homelessness by 2029. According to the plan, achieving ‘functional zero’ would mean “any instances of homelessness are rare and brief, and the availability of services and resources matches or exceeds demand” within the City. A key component of *Pathways Home* is to adequately pair homeless individuals with the appropriate level of case management for their needs. Local organizations offering these supportive services, including permanent supportive housing, are detailed in Chapter 6. Two of these organizations, Karuna Inc. and Couleecap, received \$1.1 million in ARPA funds in 2024, enabling the anticipated construction of 66 supportive housing units.

According to *Pathways Home* data, approximately 275 individuals were unhoused as of January 1, 2025; 91 individuals were unsheltered, 42 resided in a temporary shelter, and 142 were in an unknown living arrangement. Of this population, 98% are estimated to need some level of case management, with 25% needing light case management, 48% needing moderate case management, and 24% needing intensive case management or 24/7 care.

Rapid re-housing is generally successful for the first-time homeless population, especially those that are displaced due to emergency circumstances. Unsheltered individuals who require additional or ongoing assistance (e.g. financial counseling, mental healthcare, case management, etc.) and the chronically homeless are generally not good candidates for rapid re-housing. These groups often achieve better outcomes through transitional housing programs or permanent supportive housing. At HUD’s guidance in recent years, many transitional housing providers in the City of La Crosse have pivoted their efforts towards permanent supportive housing, due to the longer timeline afforded to individuals that need intensive assistance. However, there are voucher programs that can fill this gap in transitional housing options; for example, Couleecap offers tenant-based vouchers for two years of financial assistance for families as long as they settle in adjacent communities.

KEY FINDING

Homelessness has historically disproportionately affected residents of protected classes such as racial minorities and those with physical and mental illness. The *Pathways Home* plan has been (and will continue to be) instrumental in compiling local homelessness data, identifying implementation strategies, and documenting progress on goals.

Homelessness can be instigated by many factors, making it difficult to identify specific impediments to fair housing choice. However, the disparate outcomes for racial minorities and residents with physical/mental health challenges deserves attention in the City’s efforts to affirmatively further fair housing.

Chapter 5: Zoning & Policy Review

City government directly impacts housing choice through program funding and administration, publicly-owned housing, and fair housing ordinances. Indirectly, policies that regulate land use, building codes, member composition of important boards and commissions, and unintentional bias in public processes can all negatively affect fair housing choice.

Fair Housing Ordinance

Although protections against housing discrimination are codified at the national, state, and county level, it also benefits a community to have one to reinforce these important protections and commitments at the local level. At the time of drafting this document, the City of La Crosse's fair housing ordinance is housed under Section 22-22 (Declaration of Policy) of the Code of Ordinances:

*"The practice of providing equal opportunities in housing, places of public accommodations and amusement, and City facilities without regard to **sex, race, religion, color, national origin or ancestry, age, disability, marital status, lawful source of income, physical appearance, sexual orientation, gender identity or expression, political activity, familial status, domestic partnership, or the fact that such person is a student** as defined herein is a desirable goal of the City of La Crosse and a matter of legitimate concern to its government. Discrimination against any of La Crosse's citizens or visitors endangers the rights and privileges of all. Denial of equal opportunity in housing compels individuals and families who are discriminated against to live in dwellings below the standards to which they are entitled. Denial of equal opportunity in public accommodations subjects those discriminated against to embarrassment and creates distress and unrest within the community. Provision for adequate safeguards against such discrimination is a proper and necessary function of City government. In order that the peace, freedom, safety and general welfare of all inhabitants of the City may be protected and ensured, it is hereby declared to be the public policy of the City of La Crosse to foster and enforce to the fullest extent the protection by law of the rights of all of its inhabitants to equal opportunity to housing, the use of City facilities and places of public accommodations and amusement without regard to sex, race, religion, color, national origin or ancestry, age, disability, marital status, lawful source of income, physical appearance, sexual orientation, gender identity or expression, political activity, familial status, domestic partnership, or the fact that such person is a student as defined herein."*

Zoning Regulations

Recent Zoning Code Amendments

Within the last year, the City of La Crosse has made multiple notable changes to its zoning ordinance, eliminating some barriers to development. While many of these changes have not yet been widely ingrained in City processes, they will be folded into the new zoning and subdivision ordinances, as noted in the “Important Note” box. The changes include:

- Eliminating off-street parking requirements;
- Eliminating all conditional uses in all districts* (in response to Wisconsin’s Act 67, which requires substantial justification for conditions attached to conditional use permits);
- Allowing Accessory Dwelling Units (ADUs);
- Allowing short-term rentals (e.g. AirBnb and Vrbo) contingent upon City registration and County Health Department licensing.

* Since the zoning code has not yet been updated to redesignate former conditional uses or outline performance standards for these uses, **all mentions of conditional uses will be represented by a strikethrough**. This is intended to separate districts that allow these uses by right and others that require additional restrictions, as these restrictions may be carried forward in a different form in the updated zoning code.

Zoning Code Analysis

Zoning policy must carefully balance affirmatively furthering fair housing with protecting neighborhood character and promoting the goals of the City’s Comprehensive Plan. This section analyzes the City of La Crosse’s Zoning Code (Chapter 115 of the Code of Ordinances) based on the following topics identified in HUD’s Fair Housing Guide:

- Opportunity to develop various housing types and densities;
- Definition of family and restriction on number of unrelated persons;
- Group home and community living arrangement regulations;
- Treatment of mobile and manufactured homes;
- Lot size requirements;
- Accessibility.

Opportunities for Varied Housing Types and Densities

Generally, La Crosse’s zoning districts favor single-family and small multi-family residential structures. Single-family residential is permitted in some capacity in nearly every zoning district; ≤4 unit multi-family residential structures are permitted by right within the R-3, R-4, and R-5 Districts and

IMPORTANT NOTE

As of the drafting of this Analysis of Impediments document, the City of La Crosse is currently revising its zoning and subdivision ordinances to increase conformance with the Comprehensive Plan and flexibility for development. Many of the impediments acknowledged in this section may be addressed during this update.

KEY FINDING

Despite recent efforts to remove developmental barriers, the City’s Municipal Code still contains regulatory impediments (such as minimum lot sizes/setbacks and density requirements) that limit residential development, especially multi-family housing.

Outdated zoning can be an impediment to fair housing choice because it can prohibit creative solutions to housing shortages, such as smaller (and therefore more affordable) houses on smaller lots and multi-family/mixed use development of a variety of densities.

conditionally allowed within the CB (Community Business) District. Additionally, R-1, R-2, R-3, R-4, and WR (Washburn Residential) Districts allow Accessory Dwelling Units (ADUs) – secondary living quarters that share a lot with a larger primary home – offering a flexible and affordable housing option.

Planned Unit Developments (PUDs) have been frequently utilized within the City to accommodate a variety of compatible uses and densities not currently permitted by District zoning regulations, such as high-rise apartment developments and mixed-use spaces. The flexibility in PUDs’ site performance standards allows for innovative design that addresses the needs of various demographics while still fitting within the site’ context.

La Crosse’s zoning ordinance defines the following districts that may allow residential uses:

Table 5-1. La Crosse Zoning Districts
 Source: City of La Crosse Zoning Code Chapter 115

District Name	Primary Intention
A1 - Agricultural	Aims to preserve agricultural lands suited to future urban development pending proper timing and economical provision of public utilities and community facilities to ensure compact and orderly land use development. Permitted uses include single-family detached units.
EA - Exclusive Agricultural	Preserves agricultural land for food and fiber production; no intended future urban development. Residences for farm owners are permitted.
R1 - Single-Family Residence	Intended primarily for single-family dwellings
R2 - Residence	Intended for one- and two-family dwellings.
R3 - Special Residence	Intended for one-, two-, and three-family dwellings.
R4 - Low Density Multiple Dwelling	Intended for one-, two-, three- and four-family dwellings; cooperative housing; mobile home parks. Slightly different performance standards than R5.
R5 - Multiple Dwelling	Primarily located around the UW-La Crosse and Western Technical College campuses and is intended for one-, two-, three- and four-family dwellings; cooperative housing; and mobile home parks.
R6 - Special Multiple Dwelling	Intended for one-, two-, three- and four-family dwellings; boardinghouses, roominghouses, fraternities and sororities housing <6 persons. Less required lot area per family than R5 District.
WR - Washburn Neighborhood Residential	Single-family dwellings; pre-existing two-family dwellings. Additional architectural review procedures compared to R1 District.
PD – Planned Development	Intended to permit developments that will, over a period of time, be enhanced by coordinated area site planning, diversified location of structures and/or mixing of compatible uses. Can include residential uses.
TND – Traditional Neighborhood Development	Intended to define a specific area that follows the design guidelines that define a development as traditional. May be considered for approval at locations determined appropriate by the City, following design standards identified by guidelines mentioned in the code. Can include residential uses.
C1 - Local Business	Intended for a variety of commercial and light industrial uses, such as automobile, animal care, building, and cleaning services, as well as manufacturing and construction materials, with some of the services being limited by the number of employees. Dwellings occupied by owners are allowed as conditional uses under certain conditions.
C2 - Commercial	Allows all uses under C1, in addition to garages and bakeries with an area cap for the manufacturing area. It allows taller buildings compared to C1. Owner-occupied dwellings are allowed as conditional uses under certain conditions.
C3 – Community Business	Encapsulates most of downtown La Crosse and is intended mostly for public amenities such as restaurants, retail, news and broadcasting, transportation, and cultural and recreational uses. Multi-family dwellings are allowed as conditional uses under certain conditions. The allowed height is lower than C2.

M1 – Light Industrial	Intended for uses which may be obnoxious or offensive by reason of the emission of odor, dust, smoke, gas or noise. Dwellings are not allowed, except for one owner or a watchman or a caretaker employed on the premises and members of their families. Allows similar heights and areas compared to C2.
M2 – Heavy Industrial	Intended for industrial uses in the following categories: industrial processes, waste management, animal processing, manufacturing and heavy machinery, with some uses needing conditional permits. Dwellings are not allowed, except for one owner or a watchman or a caretaker employed on the premises and members of their families.
PS – Public and Semi-Public	Intended for publicly owned educational, institutional, recreational, transportation, cultural, and historic structures, in addition to bed and breakfasts with restrictions.
Historic Zoning Overlay	Identifies and protects historic and architectural resources, specifically within the Tenth and Cass Neighborhood Historic District, which was added to the National Register of Historic Places in 2000. It establishes design standards and review procedures to guide preservation, rehabilitation, new construction, relocation, and demolitions in the district.

The Zoning Map (Figure 5-1) indicates that most residential areas within the City are currently zoned under R-1 and R-2, with most of the denser housing districts concentrated within downtown La Crosse, around UW-La Crosse and Western Technical College, or along commercial corridors. PUDs of varying sizes are scattered throughout the City, particularly along the Mississippi River and far corners of the City’s boundary. While these PUDs provide pockets of denser multi-family housing throughout La Crosse, it is important to integrate small-scale multi-family housing into more areas to encourage healthy neighborhoods and offer more affordable housing options in more locations.

The Zoning Code does not explicitly name emergency housing/homeless shelters or transitional housing in its lists of allowed uses. The definition of Community Living Arrangements (CLAs) references *“detoxification-only shelters and shelters for the temporary placement of persons suffering from the effects of the over-consumption of drugs and/or alcohol,”* but nothing about similar uses that do not center around substance treatment. Emergency and transitional housing is important to acknowledge within the code to preserve fair housing choices for the homeless, who are disproportionately racial minorities and those with physical and mental illnesses.

Families and Unrelated Persons

La Crosse’s Zoning Code references family size in Sec. 115-396 – Number of Tenants:

*It shall be unlawful for any owner of any dwelling unit to lease or enter any lease of any one dwelling unit to more than **five persons not related by blood, marriage, adoption or legal guardianship** living together as a single housekeeping unit and using common cooking facilities, or more than ten persons living together as a single housekeeping unit and using common cooking facilities in a foster home wherein the foster parents have been licensed by the State Department of Children and Families.*

Additionally, each residential district has restrictions on the number of unrelated persons that can live with a group of related individuals. La Crosse’s definition of “family” prohibits more than two unrelated individuals from living together in the R-1, R-2 with zero lot lines, and WR districts, and not more than three unrelated individuals in the R-2 district, and not more than five unrelated persons in R-5 district. “Family” is defined in Sec. 115-1 as:

- *In the Single Family (R-1) Residence District, Washburn Residential District (WR), any number of individuals related by blood, marriage, adoption or legal guardianship living*

together as a single housekeeping unit and using common cooking facilities, plus **not more than two persons** (total of three unrelated persons) not so related by blood, marriage, adoption or legal guardianship, or not to exceed ten persons living together as a single housekeeping unit and using common cooking facilities in a foster home wherein the foster parents have been licensed by the State.

- In the Residence (R-2) District, any number of individuals related by blood, marriage, adoption or legal guardianship living together as a single housekeeping unit and using common cooking facilities, plus **not more than three persons** (total of four unrelated persons) not related by blood, marriage, adoption or legal guardianship, or not to exceed ten persons living together as a single housekeeping unit using common cooking facilities in a foster home wherein the foster parents have been licensed by the State, except that for two family dwellings which have zero lot lines with a common wall perpendicular to the street the number of individuals not related by blood, marriage, adoption or legal guardianship shall not exceed two persons.
- In the Low Density Multiple Dwelling (R-3), Multiple Dwelling (R-4) and Special Multiple Dwelling (R-5) Districts, any number of individuals related by blood, marriage, adoption or legal guardianship or **not to exceed five persons not so related**, living together as a single housekeeping unit and using common cooking facilities, or not to exceed ten persons living together as a single housekeeping unit using common cooking facilities in a foster home wherein the foster parents have been licensed by the State.
- Notwithstanding subsections (1)a and (1)b of this definition, any rental dwelling unit in existence on **September 1, 1989**, may continue to maintain housing for not to exceed five unrelated persons provided such rental dwelling unit is in compliance with all other applicable codes and regulations, and if the owner of such dwelling unit files an affidavit of such use with the Inspection Department by July 1, 1990, on forms which may be recorded with the register of deeds provided by the City Inspection Department upon payment of a fee of \$10.00 per tax parcel. The right to maintain up to and including five unrelated persons per rental dwelling unit in the single family and residence district shall continue until such time as **total structural repairs or alterations to any such dwelling unit during its life exceeds 50 percent of the assessed value of such dwelling unit or until such time as such dwelling unit is destroyed by fire or casualty or for a period of 15 years from August 26, 1989, whichever shall occur first**. The right to maintain up to and including five unrelated persons per rental dwelling unit provided by this paragraph shall terminate immediately should said tax parcel be found to have more than five unrelated persons living in any rental dwelling unit with the knowledge of the landlord or the landlord's agent.
- Notwithstanding the above provisions, adult family homes and community living arrangements shall be permitted uses allowed as provided in Wis. Stat. § 62.23(7)(i).

Limiting the number of unrelated individuals who can live together can make housing less affordable for those who rely on shared living arrangements to reduce costs, such as college students and low-income individuals. While the intent of the code may be to maintain certain standards of living or community character, it can inadvertently create barriers to fair housing by limiting the flexibility and

affordability of housing arrangements for diverse and non-traditional households. This limit is generally typical throughout the United States, with many places even outright prohibiting cohabitating with non-relatives.

Group Home and Community Living Arrangements

Community living arrangements (CLAs), such as foster homes and detoxification shelters, are generally regulated through conditional use permits within the City of La Crosse**. While they are allowed in a variety of the City's residential districts, they must adhere to specific location and capacity criteria, especially if they wish to be located with districts only permitting one- or two-family structures. Additionally, Sec. 115-364 of the Zoning Code outlines the following criteria for approval by the City Plan Commission:

- ii. *Exercise care to avoid an over-concentration of community living arrangements which could **create an institutional setting and seriously strain the existing social structure of the community.** Considerations relevant to the determination include:*
 - a. *The distance separating the proposed community living arrangement from other such facilities.*
 - b. *The capacity of the community living arrangement and the percentage by which the facility will increase the population of the aldermanic district and/or the City.*
 - c. *The total capacity of all community living arrangements in the City.*
 - d. *The impact on the City of other community living arrangements.*
 - e. *The success or failure of integration into communities or other community living arrangements operated by the individual or group seeking the conditional use permit.*
 - f. *The ability of the City to meet the special needs, if any, of the applicant facility.*

Overall, the Zoning Code emphasizes CLAs' compatibility with the surrounding neighborhood and the concentration of these facilities within certain areas. While these considerations are important to ensure the success of the facility and health and safety of the community, the City must ensure that it is not over-restricting these facilities and creating a shortage of necessary facilities or concentrating them in certain areas.

** Per state statute, group homes have been exempted from Act 67. The City anticipates that that this use will be the only use to require a Conditional Use Permit following the zoning code revision.

Mobile and Manufactured Homes

Chapter 107 of the Code of Ordinances outlines specific regulations for manufactured homes and manufactured home parks. Chapter 115 defines manufactured homes as:

A structure transportable in one or more sections, which is built on a permanent chassis and is designed to be used with or without a permanent foundation when connected to required utilities. The term "manufactured home" includes a mobile home but does not include a "mobile recreational vehicle."

Manufactured home parks are ~~allowed as conditional uses~~ in R-4 and R-5 districts as long as they satisfy the criteria detailed in the table below. There do not appear to be clear impediments to manufactured home parks other than confining their location to only two residential districts and requiring a conditional use permit, which might complicate and extend the schedule of the development process.

Individual manufactured homes are not permitted outside of approved manufactured home parks unless the wheels are removed and it is permanently affixed to the ground, in which case it is considered a dwelling and must comply with zoning regulations for that district. If prospective residents can acquire an adequate lot within the City, this stipulation is a beneficial, cost-effective way to obtain single-family housing.

Table 5-2. Requirements for Manufactured Homes and Manufactured Home Parks

Source: City of La Crosse Zoning Code Chapter 115 and 107

Category	Requirement	Details
Manufactured Home Spaces	Minimum Size	1,500 sq. ft.
	Minimum Width	20 ft.
	Driveway	20 ft. wide, graveled or paved, well-lit, unobstructed
Manufactured Home Parks in R-4 and R-5 Districts	Minimum Park Size	5 acres
	Minimum Lot Size per Home	4,000 sq. ft.
	Minimum Lot Width	40 ft.
	Maximum Home Height	15 ft.
	Minimum Distance Between Homes/Buildings	20 ft.
	Minimum Distance from Service Road	15 ft.
	Minimum Setback from Property Lines	40 ft.
	Drainage	Well-drained, free from stagnant water
	Driveway	30 ft. wide private driveway with access to public street
	Utilities	Water and sewer connections to public systems
	Surfacing	Hard surfaced drives, parking areas, and walkways
	Anchoring	Securely anchored to withstand 100 mph winds
	Commercial Use	Not allowed, except for laundries, washrooms, recreation rooms, maintenance storage, and one office
Definitions	Mobile home: portable dwelling for year-round residence Mobile home park: tract of land for mobile homes, including service buildings	

Lot Size Requirements

Minimum lot sizes in zoning codes can impede fair housing choices; larger lots are more expensive to obtain and require more municipal infrastructure maintenance. As shown in Table 5-3 below, while the minimum lot areas per family or residence are not excessively large, there is no variation in lot size between residential districts of varying densities.

Planned Unit Developments (PUDs) are commonly used to accommodate high-density apartment buildings throughout the City, with the River Point District being the best recent example. However, this reliance on PUDs to diverge from the Code’s stringent lot size and density provisions indicates that these requirements are outdated and restrictive to feasible housing and mixed-use development.

Another restriction ties lot areas to relationship status, stipulating that there must be at least 1,200 square feet of lot area per unrelated person or per bedroom, enclosure, or other room used for sleeping purposes. This adds complexity to housing regulations, further disadvantaging non-traditional families or households with unrelated members.

Table 5-3. Minimum Lot Area Per Family by Zoning District and Dwelling Type

Source: City of La Crosse Zoning Code Chapter 115

District / Use	Minimum Lot Area Per Residence
Exclusive Agricultural District	
Residence or Farm Operation	35 acres
Separate Parcel for an additional persons earning substantial part of their livelihood from the farm operation or parents or children of the farm operator	20,000 ft
Farm residences or structures existing before adoption of the ordinance from which this chapter is derived and which are separated from a larger parcel through farm consolidation	20,000 ft
R-1 Single Family Residence District and Agricultural District	
Lot of record before August 27, 1938	may have an area of less than 5,000 square feet
Lot of record between August 27, 1938, and September 15, 1966	not less than 5,000 square feet
Lot not of record September 15, 1966	not less than 7,200 square feet.
R-2 Residence District	
Lot of record before August 27, 1938	may have an area of less than 5,000 square feet
Lot of record between August 27, 1938, and September 15, 1966	not less than 5,000 square feet
Lot not of record September 15, 1966	not less than 7,200 square feet.
<i>*the lot area requirements contained in this subsection shall not apply to lots occupied by each dwelling unit within a structure containing two attached dwelling units which are attached along a lot line which is located approximately perpendicular to the street right-of-way line so long as the lot of record before division and upon which the single structure is located contains not less than 7,200 square feet. Provided further, however, in no event shall there be less than 1,200 square feet of lot area per unrelated person or per bedroom, enclosure, or other room used for sleeping purposes.</i>	
R-3 Special Residence District	
Lot of record before August 27, 1938	may have an area of less than 5,000 square feet

Lot of record between August 27, 1938, and September 15, 1966	not less than 5,000 square feet
Lot not of record September 15, 1966	not less than 7,200 square feet.
<i>*the lot area requirements contained in this subsection shall not apply to lots occupied by each dwelling unit within a structure containing two attached dwelling units which are attached along a lot line which is located approximately perpendicular to the street right-of-way line so long as the lot of record before division and upon which the single structure is located contains not less than 7,200 square feet. Provided further, however, in no event shall there be less than 1,800 square feet of lot area per family dwelling.</i>	
Low Density Multiple Dwelling District	
<i>*Lot area per family. Every building hereafter erected or structurally altered in the Low Density Multiple Dwelling District shall be provided with a lot area of not less than 1,800 square feet per family.</i>	
Lot of record before August 27, 1938	may have an area less than 5,000 square feet
Lot of record between August 27, 1938, and September 15, 1966	not less than 5,000 square feet
Lot not of record September 15, 1966	not less than 7,200 square feet.
Multiple Dwelling District	
<i>Lot area per family. Every building hereafter erected or structurally altered shall be provided with a lot area of not less than 1,500 square feet per family.</i>	
Lot of record before August 27, 1938	may have an area less than 5,000 square feet
Lot of record between August 27, 1938, and September 15, 1966	not less than 5,000 square feet
Lot not of record September 15, 1966	not less than 7,200 square feet.
R-6 Special Multiple Dwelling District.	
<i>*Lot area per family. Every building hereafter erected or structurally altered shall be provided with a lot area of not less than 400 square feet per family</i>	
Lot of record before August 27, 1938	may have an area less than 5,000 square feet
Lot of record between August 27, 1938, and September 15, 1966	not less than 5,000 square feet
Lot not of record September 15, 1966	not less than 7,200 square feet.
Washburn Neighborhood Residential District	
Lot of record before August 27, 1938	may have an area of less than 5,000 square feet
Lot of record between August 27, 1938, and September 15, 1966	not less than 5,000 square feet
Lot not of record September 15, 1966,	not less than 7,200 square feet.
<i>Provided, however, the lot area requirements contained in this subsection shall not apply to lots occupied by each dwelling unit within a structure containing two attached dwelling units which are attached along a lot line which is located approximately perpendicular to the street right-of-way line so long as the lot of record before division and upon which the single structure is located contains not less than 7,200 square feet; provided, further, however, in no event shall there be less than 1,200 square feet of lot area per unrelated person or per bedroom, enclosure, or other room used for sleeping purposes.</i>	
Local Business District and Commercial District and Light Industrial District and Public Utility District	
Every building hereafter erected or structurally altered	not less than 1,000 square feet per family;
<i>provided, however, that this regulation shall not apply to , motels, hotels or apartment hotels, where no cooking is done in any individual room, suite or apartment; provided, however, this requirement of having a lot area of not less than 1,000 square feet per family shall not pertain to high density residential units in the Central Business District defined as the area between Cameron Avenue, the Mississippi River, the La Crosse River and Seventh Street.</i>	
Heavy Industrial District	
Every building hereafter erected or structurally altered in the industrial	not less than 2,500 square feet per family
Planned Development District (Minimum Area of Principal Uses)	
Residential Planned Development	Two acres

Commercial Planned Development	Two acres
Industrial Planned Development	Two acres
Mixed Compatible Use	Two acres
Conservancy District	
Permitted Uses	not less than 5 acres

La Crosse’s 2024 Housing Study provides the following analysis and recommendations regarding current district bulk standards, which may be reflected in the zoning code update:

Minimum lot size. *Minimum lot sizes can be reduced in many districts to match residential zoning objectives.*

- *R-1 District – The minimum lot size by right is 7,200 square feet. However, any lot platted before 1938 can be below 5,000 square feet, and lots platted between 1938 and 1966 can be as low as 5,000 square feet. If a 5,000 square foot lot is ok in one part of the R-1 district, then it can be permitted in other parts of the same district. These are minimums. The requirement does not require lots to be 5,000 square feet (8.7 gross dwelling units per acre). But it should be allowed as an option. Reduce the minimum lot size in the R-1 district to 5,000 square feet.*
- *R-2, R-3, Low-Density Multiple Family District – Same lot size recommendation as the R-1 district above. Consider a minimum lot size below 5,000 square feet for these districts.*
- *Multiple Dwelling District – Regulation minimum lot size by area per unit or a set number, not both. If regulating by area per unit, reduce the minimum from the current 1,500 square feet per family. At this rate, a four to eight-plex apartment or townhome would require a 6,000 to 12,000 square foot lot, which can limit infill possibilities.*

Minimum lot width. *Minimum lot widths are a significant driver of overall lot size. Even if the minimum lot size is permitted to be low, an overly large minimum lot width still results in larger lots.*

- *Sec. 113-140. Lots – Every lot has to have 30 feet facing a public street and be 60 feet wide at the building setback line. Two attached dwellings separated by a lot line are exempt. However, there is no mention of more than two attached dwellings, and the lot width at the setback line still has to be 30 feet wide in the subdivision code. A statement that lot widths must conform with the zoning regulations could also create contradictions when amendments are made. Reduce this lot width standard. There are several reasons to reduce minimum lot widths:

 - *It gives more options for different housing arrangements where the developer can maximize available overage space in the development.*
 - *It gives more flexibility to provide more moderate to high density single-unit neighborhoods as defined in the district descriptions.*
 - *Lots have to have a minimum average depth of 100 feet. The subdivision standard for a minimum lot depth of 100 feet could be eliminated. Lot depth requirements are generally not needed to regulate density. There are more opportunities for variety in housing types without a lot depth requirement. Additionally, most newer developments (and many older developments) do not subdivide lots with depths less than 100 feet anyway. This is because of consumer preferences for backyards, space for rear yard garages, and other amenities.**

Minimum setbacks. Building codes and safety warrant a level of setback between buildings. But, arbitrary minimum setback distances can limit the buildable area and make building on infill sites difficult by requiring larger lot sizes to make projects work.

- Sec. 113-140. Lots – Eliminate the subdivision standard that corner lots have to have an extra ten feet of width.
- Residential district front setbacks – Front setbacks influence the design, arrangement, and types of housing that can fit on a lot. The 25 foot front setback can be less to allow more room in the rear yard for accessory dwellings and better frame the streetscape like more traditional neighborhoods. Reduce the minimum front setback to at least 20 feet. A front setback of 10-15 feet should also be considered. Twenty feet for the lowest density districts would still allow room for cars to park on a driveway and not obstruct sidewalks.
- Residential district side setbacks – Where required, minimum side yard setbacks can be five feet and still comply with building codes.

Accessibility

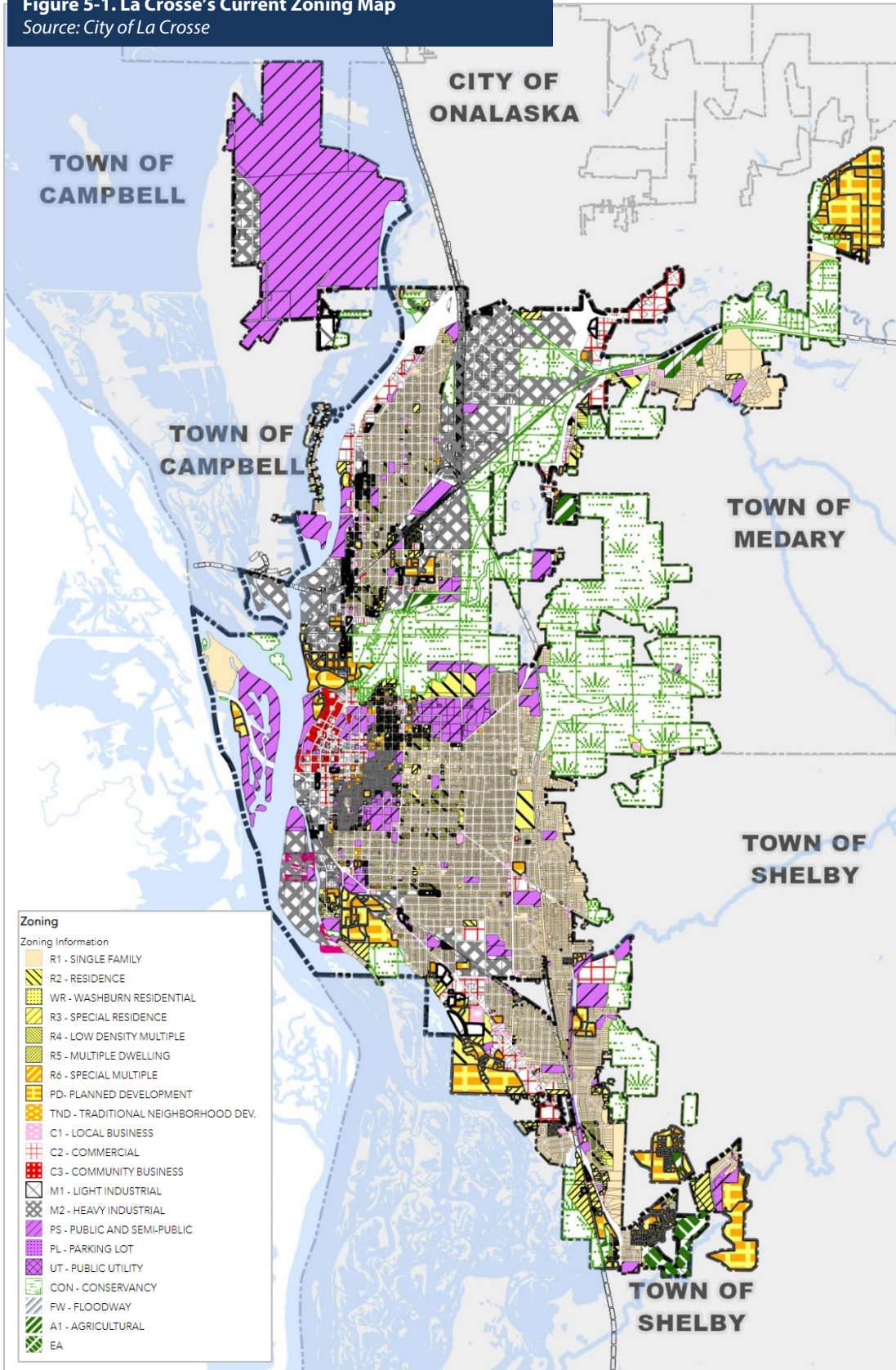
The Zoning Code and Building Code appears to lack proactive policy to improve accessibility. The current language addressing this issue is limited to exceptions for Communal Living Arrangements and Bed and Breakfast. Chapter 22 (Human Rights) of the Code of Ordinances says, *“Nothing in this section shall prohibit the development of housing designed specifically for persons with a handicap and discrimination on the basis of handicap in relation to such housing.”* Yet, there is no specific policy addressing accessibility or visitability (basic features enabling disabled visitors to a home, including a barrier-free entrance and a first-floor bathroom able to accommodate a wheelchair). This lack of proactive policy to improve accessibility is not an impediment, per se, but it is a missed opportunity to improve accessibility over time.

Zoning Map Analysis

La Crosse’s current zoning map (Figure 5-1 on the following page) illustrates the distribution of residential districts throughout the City. For an interactive map that allows enlargement and selection of specific parcels, please visit https://gis.cityoflacrosse.org/maps/LaCrosse_GIS/.

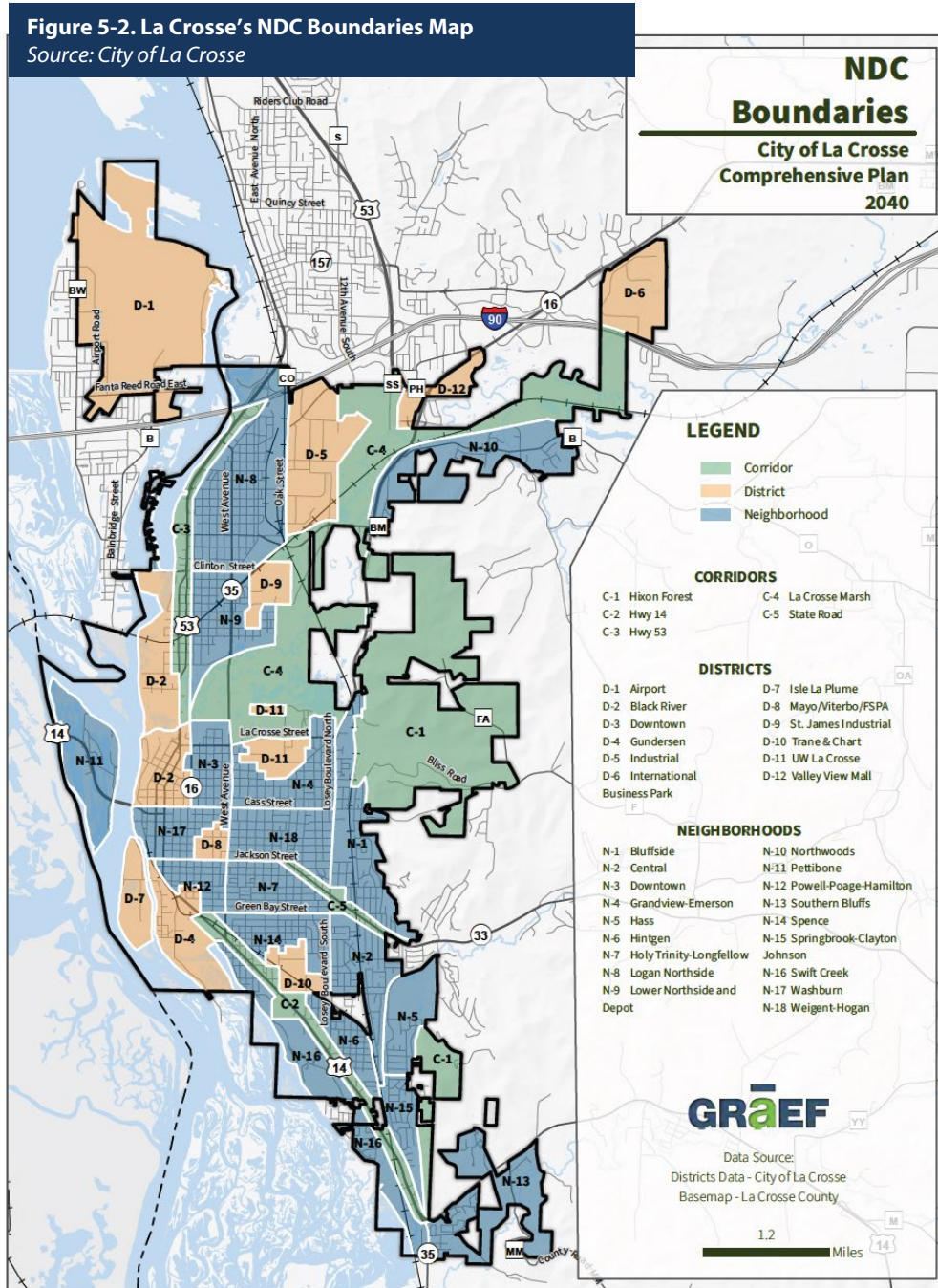
The areas that host the most racial diversity (refer to Figure 3-3: Population Density by Race) include a concentration of public utility and heavy industrial uses, especially in the Washburn, Bluffside, Powell-Poage-Hamilton, and Lower Northside and Depot neighborhoods. Similarly, the areas that host the households with the lowest median household income (refer to Figure 3-6), are dominated by heavy industrial and public and semi-public uses, especially in the Logan Northside, Washburn, and Grandview-Emerson neighborhoods. While properties located within close proximity to utilitarian uses are often more affordable – due to potential visual blight, noise and air pollution, and traffic congestion – the lower-income residents that rely on these housing options are more susceptible to poorer health outcomes.

Figure 5-1. La Crosse's Current Zoning Map
 Source: City of La Crosse



Comprehensive Plan

The following map (Figure 5-2) is located within La Crosse's 2040 Comprehensive Plan and is based on the "Neighborhood, District, and Corridor Framework" (NDC), a system devised by the Congress for New Urbanism (CNU). The NDC is an innovative approach to land use planning, integrating various land uses and urban elements and promoting balanced and sustainable development. By focusing on the unique characteristics of neighborhoods, districts, and corridors, it enhances community identity, connectivity, and adaptability, ensuring that urban growth meets the diverse needs of residents while preserving local character.



The Land Use Desirability Matrix (Figure 5-3) below lists each neighborhood from the NDC Boundaries Map and their desirable, acceptable, and undesirable land uses. Three out of four areas where industrial uses are listed as “desirable” were identified in the previous section as areas with higher diversity and lower median income. Additionally, looking into the same vulnerable neighborhoods identified in the previous section, the following is highlighted:

- **Washburn Neighborhood:** Higher density is not allowed, and industrial uses are desirable.
- **Lower Northside and Depot Neighborhood:** Industrial uses are allowed, and higher densities are desirable.
- **Logan Northside Neighborhood:** Industrial use is desirable, and higher density is allowed.

It is also notable that “low-density residential” is desirable in nearly every neighborhood within the City of La Crosse, yet “high-density residential” is merely allowable in most districts; “high-intensity mixed use,” which may include residential, is undesirable just about everywhere in the City. This future land use planning therefore reinforces the emphasis on single-family and smaller multi-family housing in the City currently set in place by the Zoning Code.

Figure 5-3. Land Use Desirability Matrix
Source: City of La Crosse

		Future Land Use										
This table summarizes the future land use designations described on the following pages of this chapter.		Low-Density Residential	Medium-Density Residential	High-Density Residential	Low-Intensity Mixed-Use	High-Intensity Mixed Use	Neighborhood Retail/Commercial	Commercial	Industrial	Institutional	Parks & Open Space	Conservancy, Wetlands, Agriculture
Neighborhoods	Neighborhoods											
	Bluffside	D	A	A	A	U	A	U	U	U	D	D
	Central	D	U	U	U	U	D	A	U	A	D	D
	Downtown	A	D	A	D	A	A	U	U	U	D	A
	Grandview Emerson	D	A	U	A	A	D	U	U	D	D	D
	Hass	D	D	A	D	U	A	A	U	A	D	D
	Hintgen	D	A	A	A	U	D	A	U	A	D	A
	Holy Trinity-Longfellow	D	A	A	D	U	D	A	U	D	D	A
	Logan Northside	D	A	A	A	U	A	D	D	A	D	U
	Lower Northside & Depot	D	D	D	D	U	D	A	A	D	D	U
	Northwoods	D	A	U	A	U	D	D	A	A	A	U
	Pettibone	U	D	A	A	U	A	A	U	A	D	A
	Powell-Poage-Hamilton	A	D	D	D	A	D	A	U	D	D	U
	Southern Bluffs	D	A	U	A	U	A	U	U	U	D	A
	Spence	A	D	A	D	U	D	A	U	U	D	U
	Springbrook-Clayton Johnson	D	D	U	D	U	A	U	U	A	D	D
	Swift Creek	D	D	U	D	U	D	A	U	A	D	A
	Washburn	D	D	U	A	U	U	U	A	A	D	A
Weigent-Hogan	D	A	U	D	U	D	U	U	A	D	U	

D=Desirable A=Allowable U=Undesirable

The 2040 Comprehensive Plan also outlines three primary goals (with accompanying strategies) for housing, which are listed in Table 5-4 below. Many of the goals outlined in this document reflect similar conclusions discussed in this AI document, especially rental affordability and greater housing diversity to offer more choices for residents with a variety of incomes and needs. The 2024 Housing Study was a key activity prompted by this Comprehensive Plan, allowing the City to further expand upon these goals by identifying housing strategies in each neighborhood.

Table 5-4. 2040 Comprehensive Plan Housing Goals	
<i>Source: City of La Crosse</i>	
Goal 1: Increase the supply of rental units affordable to households making less than the Area Median Income (AMI).	
1-1	Complete a comprehensive review and update of the City’s zoning code to evaluate barriers to development that include: off-street parking requirements, minimum lot size and setbacks, design standards, and permitting of ADUs.
1-2	Continue to actively partner with housing developers to pursue funding opportunities for the development and rehabilitation of income-qualified rental units; continue to promote the City’s Affordable Housing Loan Fund to incentivize affordable multi-family housing developments.
1-3	Investigate and document the condition of dilapidated rental properties; increase building code enforcement for noncompliant properties.
1-4	Fund opportunities for the development of rehabilitation of income-qualified rental units; continue to promote the City’s Affordable Housing Loan Fund to incentivize affordable multi-family housing developments.
1-5	Prioritize resident safety by proactively inspecting rental property and enforcing building codes, especially where exterior conditions indicate cause for concern and enable City action.
1-6	Evaluate and promote stronger education and awareness of existing laws concerning tenant rights.
Goal 2: Foster greater housing diversity through strategic infill development.	
2-1	Within existing neighborhoods, develop more townhomes and buildings with 4 to 16 units as transitional infill development adjacent to large apartment complexes, commercial uses, and transit corridors. Continue to evaluate the financing and regulatory impediments to such housing and offer solutions such as tax incremental financing support as feasible.
2-2	Prioritize underutilized areas within the City for redevelopment into multi-family residential or mixed-use developments, such as surface parking lots and vacant office space.
2-3	Support innovative housing production methods such as pre-fabrication, and partner with local organizations also exploring these new construction methods.
2-4	Evaluate instituting a demolition delay ordinance.
Goal 3: Create more housing opportunities attractive to La Crosse residents, especially households with children.	
3-1	Create more accessible housing opportunities with amenities and formats desired by older adults to encourage the turnover of single-family housing units from older adults to first-time homebuyers. These formats can include assisted living facilities and independent living communities with rental and ownership options.
3-2	Increase public awareness of the City’s housing repair and rehabilitation programs for income-qualifying households. Partner with local organizations like Habitat for Humanity to expand housing rehabilitation assistance for families making 80-120% AMI.
3-3	Encourage and facilitate the construction of new owner-occupied units as infill development projects throughout the City. This could include detached units but should also include various forms of attached unit housing.

Climate Action Plan

In December 2022, the City of La Crosse completed a Climate Action Plan with the goal of reducing community-wide greenhouse gas (GHG) emissions by 40–50% (below 2019 levels) by 2030 and achieving carbon neutrality by 2050. The “Land Use and Housing” section of the document outlines five strategies to contribute to these goals, which are listed in Table 5-5 below. While these strategies are primarily intended to protect the City against climate change, they also tangentially address many of the impediments named in this document, such as improving the City’s aging housing stock, bolstering stormwater management in flood-prone areas, and reducing energy poverty.

Table 5-5. Climate Action Plan Land Use and Housing Goals

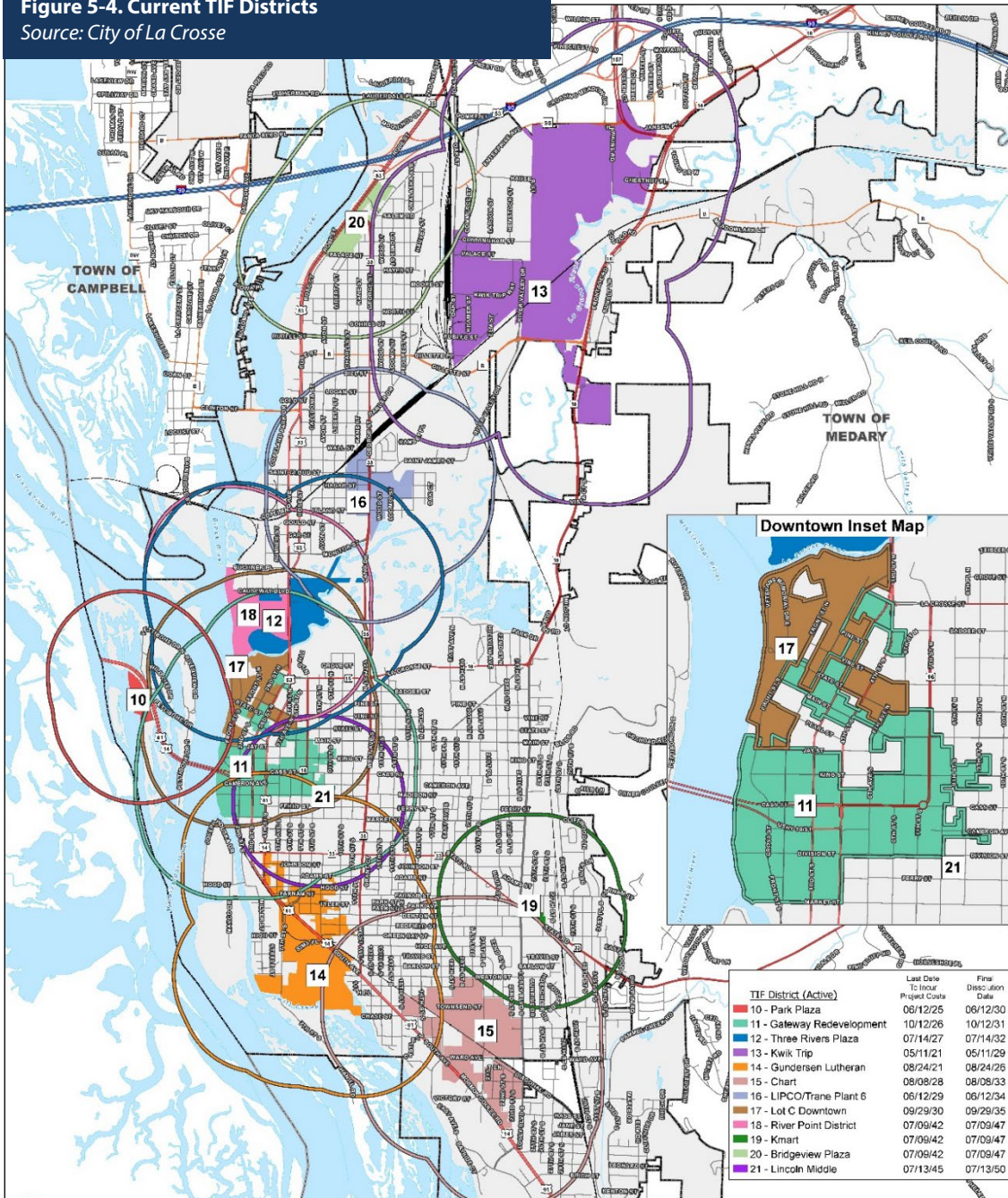
Source: City of La Crosse

#	Land Use & Housing Strategy	Analysis of Impediments Comments
LH 1	Increase the number of housing units within the 2020 city limits by 5% by 2030 (focusing increases in areas most likely to advance all goals of this CAP including increased public transportation, climate resilience, etc.).	By permitting higher density within the City, household travel CO ₂ emissions would significantly decrease. Since La Crosse has limited developable land remaining, increasing density would also enable new smaller housing units on smaller plots, which would be more affordable to develop and obtain by prospective homeowners. Many stakeholders identified higher density as a key solution to the City’s housing shortage.
LH 2	Increase community resilience to increased flooding and flash flooding caused by climate change.	While this strategy focuses on impervious surface reduction, this sentiment should be extended to all mitigation strategies possible in flood-prone areas. Due to the risks and continual upkeep required to live in the floodplain, parcels in high-risk areas are becoming increasingly undesirable for developers – even those building affordable housing – and these homes are falling into disrepair. As climate change continues to progress, stormwater mitigation will be critical to protect existing properties and lessen the maintenance burden on low-income residents that live in these areas.
LH 3	Update community plans, zoning, and design standards to increase housing and community resilience to the impacts of climate change, including flooding and extreme temperatures.	Lower-income residents without access to quality housing disproportionately face risks from extreme heat and weather exposure. In addition to proactive design standards for new development, adequate code enforcement and assistance programs will help keep people safe in aging or substandard housing.
LH 4	Update community plans, zoning, and design standards to mitigate heat island impacts, particularly for populations most vulnerable.	Street trees and other functional beautification strategies will help decrease heat island impacts <i>and</i> improve overall neighborhood quality. Stakeholders have repeatedly reported that investments in one parcel or street element have encouraged residents’ investment in their own properties, improving curb appeal and housing quality.
LH 5	Reduce share of population living in high energy poverty from 16.4% to 11.4% by 2030.	In many cases, even if a housing unit is “affordable,” exorbitantly high electricity or heating bills can be a massive financial hardship for lower-income households. By weatherizing aging housing units and generating on-site renewable energy, housing costs may become more reasonable and ensure that people remain stably housed.

Tax Increment Financing (TIF) Districts

As of the drafting of this document, the City of La Crosse has twelve open TIF districts. Each district has a Project Plan that describes the specific use of tax increment funds to improve blighted areas, such as developing housing and mixed-use communities, installing public infrastructure, or spurring economic growth. In recent years TIF has been leveraged in developments such as Kwik Trip and Gundersen expansions; Logistic Health I, II, & III; downtown parking ramps; the International Business Park; Downtown and Neighborhood Revitalization projects; the redevelopment of the former Trane Plant 6 site; and the ongoing catalytic development of the River Point District.

Figure 5-4. Current TIF Districts
 Source: City of La Crosse



Property Tax Policies

The mill rate is the total amount of the tax apportionment (levy) divided by the total local assessed value for that taxing jurisdiction, expressed in mills per dollar of value (or the amount per \$1,000 of the assessed value of the property). Mill rates are calculated for each taxing jurisdiction (county, municipality, school districts, technical colleges, and special districts), using each jurisdiction’s assessed value within the municipality and apportioned tax levy.

Figure 5-5 shows the 2016-2021 mill rates for the City of La Crosse. While the rates have decreased since the late 2010s, La Crosse’s mill rate is still considerably higher than neighboring communities such as Onalaska, West Salem, Holmen, and Bangor (Figure 5-6). This is likely due to the prevalence of large tax-exempt institutions (schools and universities, hospital systems, churches, etc.), limited residential development opportunities within the City to expand the tax base, high infrastructure maintenance demands due to high volume of commuters into the City, and rising inflation everywhere in Wisconsin.

Figure 5-5. City of La Crosse Mill Rate 2016-2021

Source: Wisconsin Department of Revenue

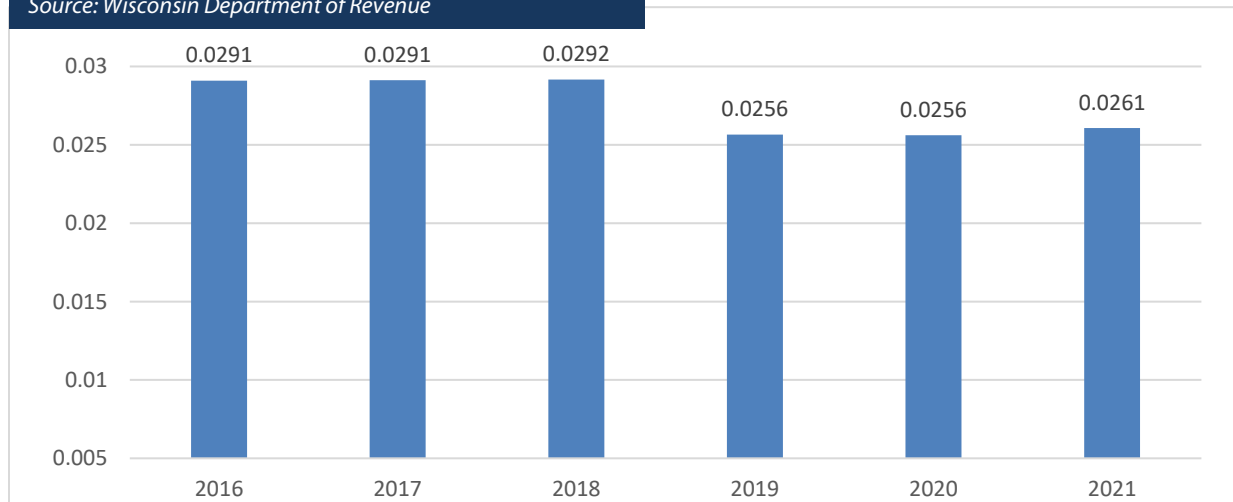
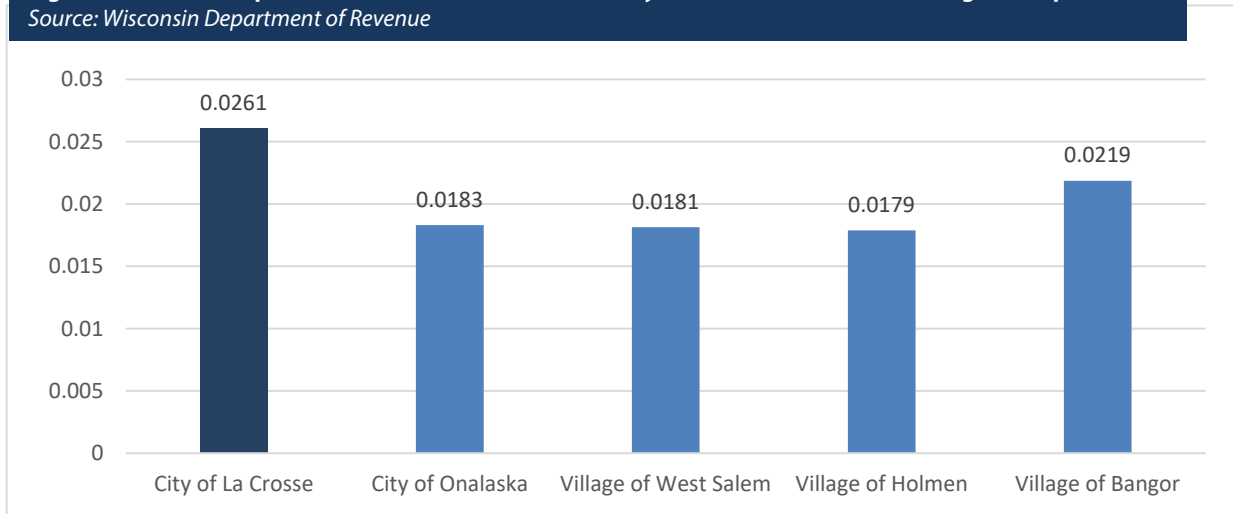


Figure 5-6. 2017 Comparison of Mill Rates between the City of La Crosse and Surrounding Municipalities

Source: Wisconsin Department of Revenue



Relevant Commissions

The City has several committees that routinely make decisions that may affect fair housing choice in La Crosse. These include the Human Rights Commission, Economic and Community Development Commission, City Plan Commission, Heritage Preservation Commission, and La Crosse Housing Authority. These commissions should represent the interests of all La Crosse residents and should be aware of and responsive to the needs of the City's protected classes.

Human Rights Commission

The City of La Crosse Human Rights Commission, appointed by the Mayor and confirmed by the Common Council, consists of seven members committed to equal opportunities and serves without compensation. The Commission's duties include adopting rules, investigating discrimination complaints, holding hearings, issuing orders, and collaborating with other agencies to eliminate discrimination and inequalities within the city, specifically with employment and program implementation. The Commission's fair housing complaint process is outlined in Chapter 6.

Economic and Community Development Commission

The purpose of the Economic and Community Development Commission is to act as an advisory body to the Common Council by implementing the Comprehensive Plan (primarily the Economic Development Element), Tax Increment District Project Plans, CDBG Action Plan, and Consolidated Plan. The Commission shall also advise and approve the City's Housing and Urban Development (HUD) allocations, housing programs, the administration of the City's business assistance programs and address issues common to the City's economic vitality and viability.

City Plan Commission

The City Plan Commission is established to promote and administer all planning functions required by § 62.23, Wis. Stats (make and adopt a master plan for the physical development of the City) (City Code 101-25).

Heritage Preservation Commission

The Heritage Preservation Commission, appointed by the Mayor and confirmed by the Common Council, consists of seven city residents, including one Council Member, and professionals from relevant disciplines. The Commission meets as needed, elects officers, and oversees preservation activities, including maintaining records, managing funds and expenditures of the Council.

Housing Authority

The mission of the La Crosse Housing Authority is to promote adequate and affordable housing, economic opportunity and a suitable living environment free from discrimination.

Chapter 6: Fair Housing Profile

The section provides a brief overview of current fair housing programs and activities, including public programs administered by the City of La Crosse and efforts of private entities that impact fair housing choice.

Public and Private Groups and their Role in Housing

Table 6-1. Public & Private Housing Organizations Serving La Crosse Residents

	Housing Development	Housing Sale	Rental Management	Preservation/ Rehab	Homelessness Assistance/ Prevention	Education/ Advocacy	Fair Housing Enforcement
FEDERAL							
HUD		X	X	X			X
FHA		X					
Fannie Mae		X					
Freddie Mac		X					
Health and Human Services			X				
Internal Revenue Service	X	X	X				
STATE OF WISCONSIN							
DOA (NSP, HCRI)	X	X					
WHEDA	X	X					
State of Wisconsin Equal Rights Division							X
Legal Action of Wisconsin						X	X
COUNTY/REGIONAL							
La Crosse County	X				X	X	
Coulecap			X	X	X	X	
Habitat for Humanity of the Greater La Crosse Region	X			X		X	
Family & Children's Center					X	X	
LOCAL GROUPS							
City of La Crosse	X	X		X			
City of La Crosse Housing Authority			X			X	
YWCA La Crosse					X		
Catholic Charities of the Diocese of La Crosse					X	X	
Salvation Army of La Crosse					X		
New Horizons Shelter and Outreach Centers					X	X	
La Crosse Promise	X					X	

Independent Living Resources					X	X	
REACH Services and Resource Center					X	X	
Karuna Inc.			X		X	X	
The Warming Center					X		
RHYMES (Runaway and Homeless Youth Mediation and Emergency Services)					X	X	
Sia Ciab, Inc.						X	

Government Agencies

Besides housing programs administered at the federal and state level, residents can also receive assistance through La Crosse County and the City of La Crosse.

- La Crosse County**

www.lacrossecounty.org

La Crosse County's various departments offer numerous programs to aid residents. Activities relevant to fair housing include the issuance of Acquisition & Demolition Grants (a competitive process that funds the replacement of deteriorating housing with new housing in mature neighborhoods) and the La Crosse Area Family Collaborative, a proactive approach to child poverty that provides social services and housing stability support to low-income families in specific neighborhoods in the City of La Crosse.

- City of La Crosse**

www.cityoflacrosse.org

The City of La Crosse administers multiple programs that support low- and moderate-income residents looking to buy a home. With its Replacement Housing Program, the City will provide a 2nd mortgage with deferred payments and a forgivable 3rd mortgage for the difference of the asking price and the buyer's financing, subject to eligibility requirements and loan terms. The City also offers up to \$45,000 in 1% deferred loans for housing rehabilitation activities and down payment assistance for first-time homebuyers under a certain income threshold. Lastly, City-owned properties are available for sale to developers and landowners interested in building single-family owner-occupied homes.

- City of La Crosse Housing Authority**

www.lacrossehousing.org

The La Crosse Housing Authority currently oversees four family housing properties, nine high-rise towers, and six market rate units for residents with disabilities, totaling approximately 770 units of public housing. The Housing Authority also administers the Section 8 Housing Choice Voucher Program, which enables eligible residents to select a unit from the private rental market and receive financial assistance.

Housing Non-Profit Organizations

While not directly overseen by the City of La Crosse, there are numerous affordable housing providers, housing counseling service providers, and fair housing counseling and enforcement activities administered by local, regional and statewide entities that serve La Crosse residents.

- **Couleecap**

www.couleecap.org

Couleecap offers a variety of housing programs aimed at providing safe and affordable housing solutions for individuals and families in the Coulee Region, which includes Crawford, La Crosse, Monroe, and Vernon counties. Their housing programs include overseeing affordable rental properties, financial assistance for homebuying and rehabilitation, homeownership counseling, and administering state programs for energy and water conservation. Couleecap also offers programs for homelessness assistance and prevention, which is detailed in the following section.

- **Habitat for Humanity of the Greater La Crosse Region**

www.habitatlacrosse.org

Habitat for Humanity partners with low-income families to build homes with affordable mortgages or rehabilitate existing homes, utilizing donations, volunteer labor, and donated materials to reduce the costs of each project. To qualify for the homeownership program, partner families must fall between 30%-80% of the area median income and commit to at least 150 hours of sweat equity; if selected, Habitat provide the mortgage at 0% interest. Habitat also offers a home repair program which offers minor exterior repairs and maintenance, gutter repair/clean up, siding/trim repair, handrails and other safety repairs. Eligible homeowners must earn less than 80% of the area median income.

- **La Crosse Promise**

www.lacrossepromise.org

The La Crosse Promise Neighborhood Program provides up to \$50,000 in education dollars to those who build, buy, or significantly renovate homes within specific neighborhoods in the City of La Crosse. To date, the program has incentivized construction of 36 new and substantially renovated homes representing \$7.0 million of new private investment in the PPH and Washburn neighborhoods. To qualify, the family must contribute a minimum of \$175,000 in a new construction project investment through personal resources or market-rate financing; or a minimum of \$30,000 personal investment in renovation of a home owned by the family.

Social Support Organizations

In addition to organizations focused on housing affordability and access, there are also numerous local and regional social support organizations that provide assistance to La Crosse residents at risk or currently experiencing homelessness (please note that this list is not exhaustive).

- **Legal Action of Wisconsin**

www.legalaction.org

Legal Action of Wisconsin assists low-income people including the elderly, families, children, and those with disabilities with legal matters affecting housing, benefits, health-care access, and ending family violence. In addition to providing legal advice and in-court representation for housing matters, Legal Action also administers the Eviction Defense Project (EDP), which provides same-day, in-person eviction prevention and diversion services at courthouses in Milwaukee and La Crosse Counties.

- **Couleecap**
www.couleecap.org
In addition to housing assistance, as detailed in the previous section, Couleecap offers a suite of homelessness prevention/assistance programs such as emergency stabilization funding/motel vouchers, permanent supportive housing, and case management.
- **YWCA La Crosse**
www.ywcalax.org
YWCA La Crosse operates the “In the KNO” (Kinship, Navigation, and Outreach) program, which provides case management, support, and navigation assistance through the complex housing system for 18–24 year old young adults. Services include limited security deposit assistance, a monthly stipend for kinship care, and education and employment support.
- **Catholic Charities of the Diocese of La Crosse**
www.cclse.org
Catholic Charities operates multiple short-term homeless shelters and warming facilities in the City of La Crosse and neighboring communities. They also offer homelessness prevention programs designed to assist clients with comprehensive housing counseling, training, advocacy, and technical assistance.
- **Salvation Army of La Crosse**
www.centralusa.salvationarmy.org/lacrosse/
The Salvation Army of La Crosse operates a short-term emergency shelter for up to 64 people experiencing homelessness, serving both individuals and families with children. Case managers are on staff to assist clients find permanent housing, increase economic self-sufficiency, reduce dependency on public assistance, improve individual living skills, and address any mental or physical health concerns.
- **New Horizons Shelter and Outreach Centers**
www.nhagainstabuse.org
New Horizons is the only domestic violence shelter within a 65-mile radius, offering emergency shelter and crisis support to clients of all genders and backgrounds. They also offer a wide range of free and confidential services, including legal advocacy, safety planning, support groups, youth and family advocacy, and housing advocacy.
- **Independent Living Resources**
www.ilresources.org
Independent Living Resources helps people with disabilities achieve or maintain more self-sufficient and productive lives in their communities, providing support through exploring alternatives to institutionalization, teaching independent living strategies, and lessening barriers to life with a disability in housing, employment, and benefits.
- **REACH Services and Resource Center**
www.reachcenterlacrosse.org
REACH is a coalition of partnering organizations – Catholic Charities, Couleecap, Independent Living Resources, New Horizons Shelter, Salvation Amy, and YWCA – that service a walk-in resource center. Services offered include housing resource navigation, homeless prevention, mental/AODA (Alcohol and Other Drug Abuse) support, healthcare, and violence prevention.

Housing support staff include a Landlord Liaison, who provides advice on working with landlords to avoid eviction, and a Coordinate Entry (CE) specialist, who maintains a community housing opportunities list.

- **Karuna Inc.**

www.karunahousing.org

Karuna Housing is a supportive housing complex that offers co-living style apartments, 24-hour onsite support staff, and rehabilitative programming for chronically homeless individuals with mental/physical health concerns and/or substance use disorders. Residents are responsible for supplying monthly rent payments (often subsidized by Karuna), completing 20 hours of community service a month, and developing house rules with their cohorts.

- **Family & Children's Center**

www.fcconline.org

Family & Children's Center (FCC) offers a wide range of social services, including support for domestic and child abuse, mental health programs, foster care, and housing placements for homeless youth.

- **RHYMES (Runaway Homeless Youth Mediation and Emergency Services)**

www.rhymeslacrosse.org

RHYMES is a coalition of community-focused non-profit organizations – B.L.A.C.K; Cia Siab; The Center: 7 Rivers LGBTQ Connection; and the YWCA La Crosse – that assist runaway and homeless youth. Services include a crisis hotline, drop-in and overnight shelter, ongoing case management, financial assistance, and advocacy.

State and Federal Fair Housing Complaint Process

The State of Wisconsin Department of Workforce Development, Equal Rights Division accepts complaints from or on behalf of a person alleging discrimination within 1 year of the discriminatory action. The process begins with the filing of a four-page complaint form. A hearing is held, and the decision may be appealed to the Labor and Industry Review Commission (LIRC), which decision may be appealed to court. The procedure for these appeals differs. A civil action may be filed, taking the complaint directly to court. A civil action may include damages, including punitive damages, court costs and reasonable attorney fees. Complaint forms are readily accessible on the agency website.

HUD's housing discrimination complaint process can be an eight-step process, beginning with a filing a short complaint. The complaint is reviewed by a fair housing specialist to determine if the alleged acts violate the Fair Housing Act. If there is evidence of a possible violation of the Act, the specialist will assist the complainant in filing an official housing discrimination complaint. HUD investigates the complaints at no cost to the complainant. The investigation will collect relevant documents or conduct on site visits, as appropriate. The Fair Housing Act requires parties to be brought together to attempt conciliation on every complaint, if the parties sign an agreement the case is closed. A "No Cause Determination" may be issued by HUD if no reasonable cause that housing discrimination has occurred or is about to occur and closes the case. If the investigation yields reasonable cause that discrimination has occurred and the law has been violated, HUD will issue a charge. A HUD Administration Law Judge (ALJ) will hear the case, unless the party elects to have the case heard in federal civil court. Complaint forms are readily accessible on the agency's website.

City of La Crosse Fair Housing Complaints

The City of La Crosse's Human Rights Commission is currently the primary entity that reviews housing discrimination complaints within the City. The Commission consists of seven mayor-appointed members and is responsible for adopting rules, investigating discrimination complaints, holding hearings, issuing orders, and discussing housing-related inequity within the City.

If the applicant elects to file with the City, the complaints may be filed in person, online or by mail to the City Clerk. The City provides a fillable form on its website for discrimination complaints, encompassing situations related to housing, places of public accommodation/amusement, and city facilities. Applicants must provide their name, the respondent's name, location and nature of the discrimination, and a statement. As outlined in the form and City website, the act must have occurred within the corporate limits of La Crosse and the written complaint must be filed within 180 days.

Key stakeholders acknowledged that, even in cases where discrimination *did* occur, many people avoid filing discrimination complaints with the City for a variety of reasons. This sentiment is reflected in the community input survey. Of the 50 people that reported experiencing housing discrimination, 43 chose not to file a complaint for the following reasons:

- "I was afraid of retaliation" – 22 votes
- "I didn't know what good it would do" – 21 votes
- "I didn't know where to file" – 15 votes
- "I didn't know if it was a violation of the law" – 11 votes
- "I didn't have time to file" – 10 votes

When the Human Rights Commission determines that fair housing violations have occurred, the City typically fines the landlord or property owner. However, under this process, the individual who has experienced discrimination does not receive damages from their claim.

The City is currently exploring the possibility of restructuring the fair housing complaint process to address these barriers. In contrast to the City's process, the State of Wisconsin offers direct counseling, conducts thorough investigations into all types of discrimination complaints, and ensures victims are awarded damages. The City's Legal and Planning departments are examining whether adopting a similar approach could provide better support for individuals reporting discrimination throughout the process.

KEY FINDING

While overt housing discrimination is widely underreported, often due to the fear of retribution or time/effort of the complaint process, qualitative data shows that discriminatory behavior is still prevalent for BIPOC residents and residents with disabilities.

Complicated or time-consuming Fair Housing complaint processes can be an impediment to fair housing choice, as it discourages people from seeking justice for alleged housing discrimination. This prevents problematic landlords from being held accountable and perpetuates discriminatory behavior for future renters.

Chapter 7: Impediments to Fair Housing Choice & Recommendations

The goal of this document is to identify impediments to fair housing choice in the City of La Crosse. Impediments include physical, social, or policy conditions that directly or indirectly restrict residents' housing choice and disproportionately affect members of protected classes.

Each impediment identified in this chapter is accompanied by a set of recommended actions to address the impediment.* The actions are offered in no particular order or priority. Selection, prioritization and scheduling of action items should occur in subsequent planning processes.

Implementation of these actions will require the coordinated effort of various groups in and outside City government, including City Council, various committees, City staff, and many private sector partners. In most cases, the City of La Crosse should serve as the primary actor for the recommendations by either addressing them directly or coordinating efforts with relevant parties.

* *Italicized* recommendations denote strategies that have been carried over from the 2019 Regional Analysis of Impediments to Fair Housing Choice.

1: Housing Affordability Impediments

1.1 Inadequate Supply of Affordable Renter- and Owner-Occupied Housing Units

Nearly every individual consulted for this Analysis of Impediments process (stakeholders across all assistance sectors, community members, City and County staff, etc.) identified the lack of affordable renter- and owner-occupied housing as the biggest barrier to fair housing choice in the City of La Crosse. A wide variety of affordable housing options is critical to attracting new residents and supporting the City's current population, from unsheltered and low-income residents to young professionals, families of varying sizes, and elderly residents.

ACS data indicates that nearly half of all renters in the City of La Crosse are "cost burdened," meaning they spend over 30% of their monthly income on housing costs. This is likely a reflection of both the City's low median household income – lower than La Crosse County, the State of Wisconsin, and the United States as a whole – and uncharacteristically high rents. La Crosse's median gross rent (\$820 in 2020) is considerably higher than both the HUD Fair Market Rent and HOME rents for efficiency and one-bedroom units, meaning that the average rent for most rental units is currently above what is considered reasonable for the City's current stock and quality. The City's average gross rent is also higher than comparable Wisconsin cities Wausau, Appleton, and Eau Claire, despite having a lower population. Additionally, for households that cannot afford market-rate rental housing, the supply of affordable units through the La Crosse Housing Authority and other developments is incredibly limited with long waitlists.

Similar to median household income, the median value of owner-occupied housing in La Crosse is lower than La Crosse County, Wisconsin, and the United States. Despite this, 18% of current homeowners are estimated to be cost burdened. First-time homebuyers and those looking to downsize are severely limited in their options due to the highly competitive housing market. Available homes that *are* affordable are often old or noncompliant, requiring extensive maintenance that can be a significant financial barrier to low- and moderate-income households.

Recommended Actions:

- 1.1.1** *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.*
- 1.1.2** *Consult the 2025-2029 Consolidated Plan to allocate CDBG and HOME funding that supports the construction, acquisition, and/or rehabilitation of high-quality, affordable rental properties in the City of La Crosse.*
- 1.1.3** Leverage Capital Improvement Project dollars to incentivize market rate and affordable housing development.
- 1.1.4** Continue to leverage TIF Districts to finance the improvement of blighted areas and creation of new residential and mixed-use developments.
- 1.1.5** The La Crosse Housing Authority should further evaluate the supply gap in extremely low-income housing and offer strategies to fill the gap in smaller rental units.
- 1.1.6** Continue to incentivize developers to build affordable housing within the City by utilizing the TIF 1-year extension (this allows a TID to be open for an additional year and funds to be used for affordable housing anywhere in the City) and the Affordable Housing Revolving Loan Fund.

1.2 High Ancillary Housing Costs

“Affordable” housing units can still be exorbitantly expensive once ancillary housing costs are factored in, such as utilities, property taxes, and security deposits. In particular, high energy costs perpetuate “energy poverty” in the La Crosse area, which is defined as a lack of access to affordable, reliable, and adequate energy for basic needs. Wisconsin winters necessitate high energy and electricity usage, jacking up energy bills to an additional couple hundred dollars a month (on top of static housing costs). The beginning of April can be a devastating time of year for many families, when landlords can legally shut off heat and the energy payment moratoriums end; those that cannot catch up on payments are vulnerable to eviction/homelessness and demand for financial assistance is high.

Recommended Actions:

- 1.2.1** Promote existing weatherization programs such as Couleecap, Habitat, and Salvation Army.
- 1.2.2** In accordance with the City’s Climate Action Plan, promote high-quality and energy efficient development that lowers utility costs.
- 1.2.3** Research the feasibility and implementation process of codifying a cap on rental security deposits.
- 1.2.4** Explore funding opportunities to incentivize energy efficiency.

1.3 Inadequate Supply & Utilization of Section 8 Housing Vouchers

The La Crosse Housing Authority administers 137 Section 8 vouchers, which allow low-income residents to acquire subsidized market-rate housing throughout the City. The voucher waitlist is currently years long and federal funding is expected to decrease in the coming years, further limiting the number of households that can receive this assistance.

For households that *do* receive a Section 8 voucher, it is often a struggle to find willing landlords and properties that meet federal inspection standards. Quality affordable housing in La Crosse is scarce, even with assistance, and the number of landlords willing to work with Section 8 vouchers is declining locally and regionally. Involvement with the Section 8 program requires landlords to navigate stricter

tenant screening requirements, regular HUD inspections, and the possibility of delayed rent payments due to bureaucratic processes, therefore pushing them to work with tenants that can pay directly instead. The limitations to receiving and using Section 8 vouchers are barriers to fair housing choice because the program’s beneficiaries are some of the lowest-income residents of La Crosse who often do not have other options.

Recommended Actions:

- 1.3.1** *Consider alternative funding sources to increase the number of available rental housing vouchers in the City (e.g. Tenant-Based Rental Assistance under the HOME program, HUD VASH, etc.).*
- 1.3.2** *For existing subsidized housing programs, the City should collaborate with the La Crosse Housing Authority and Pathways Home team to strengthen relationships with cooperative landlords and continually recruit new landlords to increase available rental stock.*
- 1.3.3** Collaborate with local partners to create and promote educational programs and incentives for landlords that address Section 8 Housing Choice voucher holder stereotypes, administrative barriers, and advertising practices.
- 1.3.4** Produce and endorse model language that can be used by landlords in advertising or leasing documents inclusive to Section 8 Housing Choice Voucher holders and participants in other subsidized housing programs.

1.4 Inadequate Supply of Accessible Housing

There is a very limited supply of accessible housing options for residents with disabilities, especially those that are affordable for low-income residents. The La Crosse Housing Authority and several newer developments offer affordable accessible housing, but demand for these units is high and turnover is low. Additionally, partially due to the lack of adequate senior care options in the City, many elderly residents are choosing to age in place and retrofit their homes to improve mobility, which can be prohibitively expensive for low-income or fixed-income households. This shortage of accessible housing not only limits fair housing choice for the elderly and/or residents with disabilities, but also restricts the supply of good starter homes for first-time homebuyers or those in need of affordable options.

Recommended Actions:

- 1.4.1** *Review local funding mechanisms and federal grant sources for opportunities to incentivize development of new accessible housing units.*
- 1.4.2** *Regularly meet with local providers of accessible housing and permanent supportive housing to discuss available resources and collaboration opportunities.*
- 1.4.3** *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.*
- 1.4.4** Continue coordinating with Habitat for Humanity and Couleecap to fund mobility retrofit projects for low-income homeowners.
- 1.4.5** Collaborate with the La Crosse Housing Authority to evaluate shortages in affordable accessible housing and opportunities to grow the available stock.

2: Housing Quality Impediments

2.1 High Proportion of Aging Housing Stock

ACS data indicates that 68.2% of all housing in the City of La Crosse was built before 1980, with over a quarter of structures constructed before 1940 alone. Older buildings are more likely to contain lead-based paint, asbestos, and other toxic environmental hazards, which can be especially harmful to children under age five. These homes often require extensive repairs to meet modern safety and living standards, such as replacing outdated wiring and addressing structural issues, which can be costly, time-consuming, and physically taxing. These demands prove to be a major impediment for many first-time homebuyers and elderly residents looking to age in place.

Recommended Actions:

- 2.1.1** Promote existing home rehabilitation programs such as the City's Housing Rehabilitation Loan Program, Couleecap, and Habitat for Humanity.
- 2.1.2** Continue the City's Replacement Housing program to address the community's most dangerous and dilapidated housing.
- 2.1.3** Support and contribute to larger-scale community projects that focus on revitalizing neighborhoods with aging homes, such as Habitat for Humanity's ReNew the Block. This can include infrastructure improvements, beautification projects, and community events to foster a sense of pride and investment in the area.
- 2.1.4** Explore City-wide renovation programs targeted at specific aging infrastructure (e.g. plumbing, sewer, and electrical issues).

2.2 Commodification of Rental Housing

Largely due to La Crosse's high population of college students, the City's housing stock is saturated with low-quality or deteriorating rental housing, often owned by predatory management companies or "slumlords." Increased competition for rental units – both from college students and the general population – has dissuaded property managers from correcting costly nonconformities or properly maintaining structures. Coupled with high (and rising) rents, many residents are paying too much *and* living in substandard housing. This commodification and neglect of rental units has impeded residents' access to fair and quality housing, and has further strained the housing market by blocking prospective homebuyers from buying these homes.

Recommended Actions:

- 2.2.1** *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.*
- 2.2.2** Develop or expand existing code enforcement programs.
- 2.2.3** Consider piloting and executing a landlord/tenant liaison program, which would provide education and mediation services for housing-related conflicts.
- 2.2.4** Explore the potential of City- or County-held leases.

3: Housing Development Impediments

3.1 Physical Constraints to New Housing Development

Due to La Crosse's unique geographical position between Granddad Bluff and Mississippi River (and its accompanying floodplain), there are very limited opportunities for new residential development within the City's boundary. Acquiring developable parcels can be especially challenging for developers looking to build affordable housing, since they often have to compete with market-rate developers that can afford optimal lots. The remaining available parcels often have significant developmental barriers such as floodplains and abnormal or noncompliant dimensions. The inability to substantially increase La Crosse's housing stock escalates competition for existing units, artificially raising costs and blocking many low- and moderate-income buyers and renters from the market.

Recommended Actions:

- 3.1.1** In tandem with the policies outlined in the City's Climate Action Plan, bolster stormwater management strategies to protect properties in the floodplain.
- 3.1.2** Continue to promote the redevelopment and infill of underutilized sites throughout the City for residential and/or mixed-use uses, including the cleanup and reuse of brownfields.
- 3.1.3** Collaborate with neighboring communities to identify jointly beneficial development opportunities and plan for future regional growth.

3.2 Outdated Zoning Restrictions

The City of La Crosse has made decent progress towards removing zoning barriers to housing and mixed-use development, such as abolishing off-street parking minimums, eliminating nearly all conditional uses in alignment with Wisconsin's Act 67, and permitting accessory dwelling units in appropriate circumstances. However, the City's Municipal Code still contains regulatory impediments (such as minimum lot sizes/setbacks and density requirements) that limit residential development, especially multi-family housing. As of the drafting of this document, the City of La Crosse is currently revising its zoning and subdivision ordinances to address these barriers and ensure compliance with the Comprehensive Plan and other regulatory documents.

Recommended Actions:

- 3.2.1** During the City Code revision process, consult with a variety of stakeholders, including affordable housing developers and social support organizations, to ensure that amendments adequately address housing development and acquisition barriers.
- 3.2.2** Consult previous planning documents and recommended policy changes to ensure that amendments align with existing City vision and goals.
- 3.2.3** Equitably educate members of the public on the importance of zoning and the implications that these regulations can have on development.

3.3 Inefficient City Processes

Many stakeholders expressed frustration with the City's development project approval process, which can be complicated, time-intensive, and resource-intensive, especially for non-profit organizations and affordable housing developers with limited staff capacity to attend meetings or repeatedly revise proposals. Additionally, stakeholders have observed significant siloing within City departments and a general lack of oversight, making it difficult to "get a clear answer about anything." This alleged lack of inter-department coordination has negatively impacted timeliness, clarity, and consistency of

responses when working with community members, impeding beneficial new development and improvements to unsafe or noncompliant properties.

Recommended Actions:

- 3.3.1** Pursue the hiring of a City Administrator or develop a more thorough framework to encourage increased communication/collaboration between City departments.
- 3.3.2** Continue to maintain clear communication with applicants regarding approval process steps, time commitment, and necessary submission materials.

3.4 NIMBYism & Negative Stigma Towards Housing/Assistance Solutions

While not unique to La Crosse, some efforts to develop affordable housing or establish brick-and-mortar support organizations have been subject to negative stigmas towards low-income residents or those with special needs. NIMBY (Not In My Back Yard) sentiments often limit where social support organizations, affordable/supportive housing, emergency shelters, and other beneficial entities can be located within the City. Additionally, stakeholders have acknowledged that certain contractors' negative stigmas have compromised the workmanship of affordable development or renovation projects, with some charging the same fees for shoddy work or ghosting potential clients completely.

Recommended Actions:

- 3.4.1** Provide factual information to dispel myths about affordable housing, such as its impact on property values and crime rates.
- 3.4.2** Engage with the community early in the planning process to build trust and address concerns before they escalate and potentially delay/impede the approval process.
- 3.4.3** Promote and empower neighborhood improvement efforts that foster a sense of pride in one's community and increase consensus for holistic change.
- 3.4.4** Explore and implement strategies to directly address NIMBYism, such as Good Neighbor Agreements.

4: Fair Housing & Education Impediments

4.1 Rental Discrimination Based on Non-Protected Factors

The City of La Crosse's fair housing ordinance protects residents from discrimination based on race, religion, sex/gender, national origin, familial status, sexual orientation, and numerous other protected classes. However, stakeholders have reported alleged landlord discrimination based on non-protected factors, such as mental illness/AODA (Alcohol and Other Drug Abuse), poor rental or credit histories, criminal records, Section 8 voucher holders, and domestic violence victims. While this discriminatory behavior cannot be considered a direct impediment to fair housing choice (since these factors are not statutorily protected), it still prevents many residents from acquiring safe and quality housing.

Recommended Actions:

- 4.1.1** Consider revising Section 22-22 of the City's Code of Ordinances to include "victims of domestic violence, sexual abuse or stalking" as a protected class, which would align with existing state and county statute.
- 4.1.2** Consulting the Fair Housing Act and [HUD guidance](#), create a criminal history rental-housing guide that summarizes best practices in leasing to persons with criminal history and provide landlords with language to use for applications and leases.

- 4.1.3** Coordinate with the Pathways Home Justice Response System to ensure all measures are being taken to address criminal records, when possible.

4.2 Ineffective Fair Housing Enforcement Processes

Of the 50 input survey respondents that reported experiencing housing discrimination within the City of La Crosse, 43 did not file a report. The most popular reasons were because “I was afraid of retaliation” (50%), “I didn’t know what good it would do” (48%), and “I didn’t know where to file” (34%). While there are multiple methods through which citizens can file complaints (City of La Crosse’s Human Rights Commission, State of Wisconsin, HUD), these processes have proven to be inefficient and time-consuming, typically taking between a couple months and a year to complete. To file a complaint with the City, applicants must also reveal their name and address, leaving them feeling vulnerable to retaliation from landlords/property managers. Many survey respondents expressed frustration towards “patterns of inaction to hold harmful landlords accountable,” demonstrating that the fair housing enforcement process does not consistently bring victims the justice that they are seeking.

Recommended Actions:

- 4.2.1** Ensure all staff are well-versed in the Fair Housing Act and up-to-date policies/procedures to provide timely and accurate guidance.
- 4.2.2** Continue to evaluate the role and process of the City’s Human Rights Commission.
- 4.2.3** Explore opportunities to address discrimination complaints to ensure cases are investigated fully and damages are applied appropriately.

4.3 Inadequate Renter & Homeowner Education

Many stakeholders acknowledged that a major barrier to obtaining or upgrading housing is a lack of knowledge, such as awareness of tenant rights/responsibilities, credit counseling, home purchase process (for first time homebuyers), fair housing rights, and available social support services. As described in Chapter 6, there is a wealth of resources in La Crosse that provide these types of programs – often free of charge – but people may not know where to start or even whether these opportunities exist. While organizations can refer households to relevant assistance programs, more can always be done to strengthen this collaborative network and fill gaps in outreach, programming, and populations served. This will ideally lessen the other barriers acknowledged in this chapter by empowering residents and preventing unchecked discrimination.

Recommended Actions:

- 4.3.1** *Either using in-house staff or through a contracted provider, the City and its partners should annually update and coordinate delivery of a fair housing education program that reaches the public, including protected classes, with information about fair housing rights and responsibilities, how to recognize discrimination, and how and where to file a complaint.*
- 4.3.2** Collaborate with local organizations to create a clearinghouse of renter/homeowner assistance resources and educational opportunities, to be hosted on the City’s website or other accessible online resource.
- 4.3.3** Collaborate with local high schools and colleges to educate students on financial literacy, fair housing rights, and renter/homeowner resources.

5: Homelessness Prevention & Assistance Impediments

5.1 Limited Funding & Capacity for Wraparound Services

Many local homelessness organizations employ a “housing first” model, which prioritizes placement within permanent housing (to address individuals’ immediate living needs) before they can then pursue personal goals and work towards self-sufficiency. However, for many of the community’s chronically unsheltered citizens, a roof over one’s head does not automatically guarantee a positive outcome; additional case management is often required to address underlying barriers such as substance abuse, severe mental health issues, employability, and financial stability. Since the COVID-19 pandemic, local organizations across most sectors have reported a substantial increase in demand for homelessness prevention services, prompting many to divert resources away from their core missions/demographics and towards housing resource navigation. Since funding and staff capacity is already limited to adequately address these needs, case management and other wraparound services often must be deprioritized.

Recommended Actions:

- 5.1.1** Continue to participate in the *Pathways Home* initiative, especially to bolster housing resource navigation efforts to free up local non-profits’ capacity to return to their original missions and target demographics.
- 5.1.2** Seek grants and donations from federal, state, and private sources to fund wraparound services and expand housing opportunities.
- 5.1.3** Continue to collaborate with local assistance organizations and philanthropic entities to identify service gaps and opportunities for collaboration/resource-sharing.

5.2 Insufficient Assistance for Emergency Expenses & ALICE Households

For low-income and extremely low-income households barely making housing payments, emergency expenses (e.g. major car repair, hospitalization) can be catastrophic. Catching up on housing and utility costs can become impossible, putting them at risk for eviction and/or homelessness. Many social support organization stakeholders expressed the importance of emergency unrestricted funds to help these at-risk households “get over the hump” and back into relative financial stability. Limited funding and high demand make it difficult to receive timely assistance in emergency situations. This is especially true for ALICE (Asset Limited, Income Constrained, Employed) households, who make too much to qualify for high-need assistance programs but cannot reliably afford basic life necessities.

Recommended Actions:

- 5.2.1** Integrate with the *Pathways Home* plan to establish an emergency fund with the intention to assist ALICE households.
- 5.2.2** Promote existing emergency funds through Couleecap and local/state weatherization programs.

5.3 Siloing of Outreach Efforts

Many key stakeholders cited insufficient inter-organizational collaboration as a primary barrier to meeting housing/social assistance demand in the City of La Crosse. Limited funding opportunities and human capital has resulted in a “scarcity mindset” within the non-profit space that has inhibited the exchange of strategies and knowledge in fear of losing leverage in grant applications and other funding opportunities. Since many assistance programs have specific eligibility requirements and/or

targeted populations, it is difficult for ineligible households to navigate this siloed network of assistance resources.

Recommended Actions:

- 5.3.1** Continue to support and promote the REACH Center (a brick-and-mortar coalition of local support organizations providing assistance across many sectors).
- 5.3.2** Work with local non-profit organizations to identify strategies to increase communication, share resources and knowledge, and secure additional financial resources.

6: Impediments to Housing for BIPOC and/or LEP (Limited English Proficiency) Households

6.1 Disproportionate Loan Denial

Analysis of HDMA data showed that for most races/ethnicities, with the exception of Asian households, non-white households make up more of all loan applications than their percentage within the homeownership market. For example, households of “some other race” only make up 0.2% of the City’s population of homeowners, yet they represent over a quarter of FHA, USDA & VA loan applications and 9.3% of all conventional loan applications. This likely means that these households are more dependent on loans to achieve homeownership compared to white households, who have a higher median income that lowers the barriers to buying rather than renting.

Despite this, loan applications from Black/African American, American Indian/Alaska Native, and Asian households are disproportionately rejected compared to white households. For white households, approximately 80.79% result in a successful loan, whereas only 68.57% of loans are issued for Black households; the success rate further drops for American Indian/Alaska Native households, where only half of loan applications are successful. While the loan approval process is becoming increasingly standardized and automated – with less room for lender bias or error – these conclusions align with nationwide trends of continued BIPOC exclusion from the housing market.

Recommended Actions:

- 6.1.1** *Ensure that opportunities to participate in City of La Crosse homebuyer programs, including those funded using CDBG and HOME funds, are affirmatively marketed (e.g. print media, social media, and targeted outreach).*
- 6.1.2** Provide education and information for local lenders on predatory lending practices and common pitfalls for new buyers, to ensure that efforts to reduce the racial disparities in loan origination do not have the unintended consequence of increased rates of default and foreclosure among BIPOC borrowers.
- 6.1.3** Continue funding public services through HUD CDBG funds that assist BIPOC and/or LEP households (e.g. Cia Siab, Inc.).

6.2 Rental Discrimination

Of the 50 input survey respondents that reported alleged discrimination, 48% cited race or ethnicity as a likely factor for the discriminatory actions. Black renters in the City of La Crosse have reported frequent experiences with discriminatory behavior from landlords, such as ghosting prospective unit applicants or needlessly stringing them along before denying their application, requiring arbitrarily high security deposits or extra fees, adding unnecessary restrictions on televisions and furnishings, delaying urgent maintenance, and inducing illegally short eviction proceedings. While this behavior is

widely underreported – see Impediment 4.2 – landlord discrimination and microaggressions towards BIPOC residents continues to be a barrier to fair housing choice and community well-being.

Recommended Actions:

- 6.2.1** See Recommendation 4.2.3.
- 6.2.2** See Recommendation 4.3.1.

6.3 Limited Culturally Competent Assistance Services

Since the majority of La Crosse’s population is white English-speaking residents, most assistance programs are best able to accommodate individuals from this background. Stakeholders expressed a small but crucial need for intersectional services that are culturally competent (well-versed in cultural customs and nuance), trauma-informed, and/or non-English speaking. These services bolster fair housing choice by assisting BIPOC and LEP residents in navigating housing resources, understanding leases/mortgages and letters from landlords/banks, and providing advocacy support.

Recommended Actions:

- 6.3.1** See Recommendation 6.1.3.
- 6.3.2** Promote County, Regional, and State programs that provide culturally competent advocacy services (e.g. Legal Action of Wisconsin).

7: Transportation Impediments

7.1 Limited Public Transportation

La Crosse Municipal Transit (MTU) provides bus service within the City of La Crosse, as well as connections to La Crescent (Minnesota), Onalaska, Campbell, French Island, and the La Crosse Municipal Airport. Multiple stakeholders have indicated that, due to the limited affordability and supply of housing within La Crosse, many low-income households are moving elsewhere in the region and are now struggling to access the same urban resources through public transit. This is likely due to the limited number of routes and stops outside the City of La Crosse, as well as more confined bus service hours (such as no service on weekends or limited service for those working second or third shift). This limits fair housing choice by restricting where people can live and work.

Recommended Actions:

- 7.1.1** *Research alternative transportation programs that may provide direct transportation linkages between existing housing and employment centers (e.g. vanpools, use of dial-a-ride vehicles) and potential funding sources, especially prioritizing low-income areas outside of City limits.*
- 7.1.2** *Review and actively participate in the development of local/regional transportation plans to ensure alignment with the City’s multi-modal transportation needs and planned strategies.*
- 7.1.3** Evaluate changes to the transit routing system and schedules, including the potential for later routes that better support second and third shift employment, and more routes that serve neighboring communities.