



Assessment of Fair Housing

City of North Las Vegas

DRAFT REPORT

Draft Report

September 1, 2017

Assessment of Fair Housing

Prepared for

City of North Las Vegas

Prepared by

BBC Research & Consulting
1999 Broadway, Suite 2200
Denver, Colorado 80202-9750
303.321.2547 fax 303.399.0448
www.bbcresearch.com
bbc@bbcresearch.com

BBC
RESEARCH &
CONSULTING

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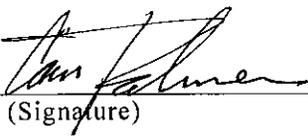
SECTION I.

Cover Sheet

I. Cover Sheet

1. Submission date: October 4, 2017
2. Submitter name: City of North Las Vegas
3. Type of submission: single program participant
4. Type of program participant: Consolidated plan participant:
5. For PHAs, Jurisdiction in which the program participant is located: N/A
6. Submitter members (if applicable): N/A
7. Sole or lead submitter contact information:
 - a. Name: Cass Palmer
 - b. Title: Director
 - c. Department: Neighborhood & Leisure Services
 - d. Street address: 2250 N. Las Vegas Blvd.
 - e. City: North Las Vegas
 - f. State: NV
 - g. Zip code: 89030
8. Period covered by this assessment: July 1, 2018 – June 30, 2023
9. Initial, amended, or renewal AFH: amended AFH: Initial AFH
10. To the best of its knowledge and belief, the statements and information contained herein are true, accurate, and complete and the program participant has developed this AFH in compliance with the requirements of 24 C.F.R. §§ 5.150-5.180 or comparable replacement regulations of the Department of Housing and Urban Development;
11. The program participant will take meaningful actions to further the goals identified in its AFH conducted in accordance with the requirements in §§ 5.150 through 5.180 and 24 C.F.R. §§ 91.225(a)(1), 91.325(a)(1), 91.425(a)(1), 570.487(b)(1), 570.601, 903.7(o), and 903.15(d), as applicable.

All Joint and Regional Participants are bound by the certification, except that some of the analysis, goals or priorities included in the AFH may only apply to an individual program participant as expressly stated in the AFH.



(Signature) 8/30/17
(date)

(Signature) (date)

(Signature) (date)

Departmental acceptance or non-acceptance:

(Signature) (date)

Comments

SECTION II.

Executive Summary

SECTION II.

EXECUTIVE SUMMARY

This section summarizes the main findings from the City of North Las Vegas (CNLV) Assessment of Fair Housing (AFH). Pursuant to HUD's requirements, this Executive Summary:

- Summarizes the primary fair housing issues, significant contributing factors, and goals; and
- Provides an overview of the process and analysis used to reach goals.

It begins with a brief background on the AFH and continues to an overview of the process.

What is an AFH?

An Assessment of Fair Housing, or AFH, is a new approach to identifying fair housing challenges in a city and region. This document differs from the formerly required Analysis of Impediments to Fair Housing Choice (AI) in that embraces a more comprehensive planning process, focusing on economic, as well as housing, barriers. The AFH is required by the U.S. Department of Housing and Urban Development (HUD) of communities that accept federal housing and community development funding.¹

The overall goal of the AFH approach is to help communities analyze challenges to fair housing choice and establish their own goals and priorities to address fair housing barriers in their communities. A secondary goal is to help communities move toward an “access to opportunity philosophy” when making planning and housing policy decisions.

The “access to opportunity” focus of the AFH is rooted in the text of the 1968 Fair Housing Act (FHA). According to the July 2015 Final Rule establishing the AFH, “The Fair Housing Act not only prohibits discrimination, but, in conjunction with other statutes, directs HUD’s program participants to take significant actions to overcome historical patterns of segregation, achieve truly balanced and integrated living patterns, promote fair housing choice, and foster inclusive communities that are free from discrimination.”² Many court decisions have supported this interpretation of the FHA.

A unique AFH. This AFH was conducted for the CNLV before it became an entitlement community. As such, not all of the maps in HUD’s Affirmatively Further Fair Housing data and mapping tool (AFFH-T) were available for the City. Maps for the CNLV were created by zooming

¹¹ It is important to note that a jurisdiction can be found in violation of the Federal Fair Housing Act independent of receiving HUD funding. While the obligation to further fair housing is a condition of receiving federal housing and community development funds, all other provisions in the Fair Housing Act apply to all residents, businesses, and state and local governments.

² https://www.huduser.gov/portal/affht_pt.html#final-rule.

in on regional maps (which were available in the AFFH-T). Some fair housing issues were measured through independent analysis and using the findings from community engagement (e.g., opportunity indicators).

Fair Housing Law and Enforcement

The Fair Housing Act (FHA) was part of the federal Civil Rights Act of 1968. The original language in the FHA prohibited discrimination in the sale, rental and financing of dwellings in housing-related transactions based on race, color, national origin and religion. The FHA was amended twenty years later, in 1988, to prohibit discrimination on the basis of disability or familial status, and to require accessible units in multifamily developments built after 1991.

Developments exempted from the FHA include: housing developments for seniors, housing strictly reserved for members of religious organizations or private clubs, and multifamily housing of four units or less with the owner occupying one unit.

If a resident in the CNLV feels they have experienced a fair housing violation, they can contact the following local enforcement organizations (shown below).

Local Resources for Fair Housing Information and Complaints

Name	URL	Phone Number
Silver State Fair Housing Council	http://silverstatefairhousing.org/	888-585-8634
Legal Aid Center of Southern Nevada	http://www.lacsn.org/	702-386-1070
Nevada Legal Services - Las Vegas – Tenant’s Rights Center	http://nlslaw.net	702-383-6095

Community Engagement

The North Las Vegas AFH’s community participation process resulted in meaningful engagement of residents and stakeholders representing local organizations and coalitions.

Leading up to the AFH, the City conducted the Choice Neighborhood Initiative (CNI) Transformation Plan in collaboration with the Southern Nevada Regional Housing Authority (SNRHA), local stakeholders, social service providers, and residents. The CNI focused on the urban core of North Las Vegas, comprising some of the oldest parts of the City. This also the part of the City that has experienced the most challenges in furthering economic opportunity for residents. As the Las Vegas metro area expanded in the 2000s, the urban core of North Las Vegas struggled to compete with amenity-rich newly developed neighborhoods and experienced a lack of new investment, increased dilapidated housing developments, and crime.

Community participation was a fundamental component of the Transformation Plan and the efforts to engage the public in the planning process was extensive. Outreach and engagement activities included surveying residents, conducting planning workshops, and meeting with residents, community leaders, and stakeholders. The data and public comments obtained through this community engagement process helped inform the AFH.

This AFH also incorporated findings from the regional Analysis of Impediments to Fair Housing Choice (AI) that was conducted in 2015 where they were specific to North Las Vegas.

Methods of engagement. The AFH engagement methods included opportunities for residents and opportunities for stakeholders to participate in the development of the AFH. Resident opportunities included:

- **Resident meeting/hearing.** BBC facilitated a resident meeting with residents of North Las Vega. During this meeting, attendees were engaged in a discussion about barriers to housing choice and economic opportunity; they also had an opportunity to review the AFFH maps and data tables. Refreshments were provided and translation services were available. The meeting was held in the conference room at the Neighborhood Housing Services of Southern Nevada office during a weekday evening, at a time and day recommended by local stakeholders who recruited and hosted the groups.

The study team would like to sincerely thank the Neighborhood Housing Services of Southern Nevada and Valentine Communications for recruiting and hosting the resident meeting.

- **Resident Surveys.** The CNI conducted two types of resident surveys during the Transformation Planning process: a Neighborhood Survey and a Resident Needs Assessment.

The Neighborhood Surveys were completed in person at events or at partner agency locations, door-to-door, or online.

The Resident Needs Assessment was for the Rose Garden Senior Apartments, the only remaining public housing development in the City. It focused on transportation; education; likes and dislikes of the neighborhood; building and resources/services; health; amenities; and indoor and outdoor assets.

- **Public comment period.** The AFH was made available for public comment between September 4 and October 3, 2017. Residents had the opportunity to submit comments via email, by phone, and in person at the public hearing (see below).
- **Public hearing.** On September 14, 2017, during the public comment period, North Las Vegas held a public hearing before city residents, stakeholders, and city staff that included activities and a presentation of the AFH process, results, fair housing issues identified, contributing factors and draft goals.

Stakeholder consultation. Stakeholder consultation to developing the draft AFH took several forms, including:

- Advising the AFH team on the planned community engagement process, focus group scheduling and logistics through a series of conference calls;
- Hosting and recruiting focus group participants;

- Participating in in-depth interviews and providing the study team with program data and studies to inform the AFH elements;
- Participating in a kickoff meeting open to all interested stakeholders;
- Participating in the community open house meeting;

Public outreach. To promote the resident participation, BBC provided the City with public relations tools—press release and outreach email content—that could be adapted to a broad range of audiences.

Partner outreach. Local stakeholders, including organizations, agencies and coalitions, promoted the AFH survey directly to their members, residents, consumers and clients.

Summary of AFH Findings

The findings from the AFH analysis are summarized below. The Goals and Strategies matrix which follows shows how the City plans to address the primary fair housing issues.

- In the CNLV, neighborhoods with the highest poverty levels are also those with large populations of Hispanic and Black residents. City residents feel that these neighborhoods limit residents’ access to opportunity due to high crime, a lack of employment opportunities, and a lack of shopping. Hispanic residents, in particular, are most likely to be affected by high poverty and are disproportionately represented in Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs) than expected (83% of Hispanic residents live in R/ECAPs compared to just 40% of residents in the city overall). Conversely, non-Hispanic White residents are under-represented in R/ECAPs (7% in R/ECAPs v. 28% of residents overall).
- Homeownership has declined in both the CNLV and the Region since 2000. The CNLV had the greatest decline in homeownership, with a 24 percentage point change. Black and Native American households have the lowest homeownership rates in the City (41% and 29%, respectively, compared to 60% for White households).

Limiting the ability of certain residents to own homes—particularly in fast-growing and high-demand markets—prevents wealth creation and widens economic gaps. These limitations also prevent residents from accessing neighborhoods with high quality schools and other community amenities (e.g., recreational facilities and parks), because these are often funded by builders and homeowners’ associations as part of master development agreements and/or fees paid by owners.

- Some land use regulations and development approval processes could be improved to facilitate redevelopment. Housing developers in the stakeholder focus group conducted for this AFH mentioned challenges adhering to the Public Works Department’s requirements; challenges implementing the TOD program; and a need for rezoning existing, vacant parcels for the highest and best use.

In addition, the CNLV does not have a mechanism online to track when Certificates of Occupancy are issued and they do not provide this information over the phone; this makes it difficult for fair housing groups to monitor compliance with fair housing accessibility standards.

- The high poverty areas in the CNLV are predominately older, residential neighborhoods, which could explain the lack of nearby commercial land uses. Most residents who participated in the resident meeting spoke of long commute times to reach their place of employment. Although the regional bus system goes to many areas in the Region, it does not necessarily provide transportation to some of the largest employment nodes, requiring many residents to drive to work. Long commutes in personal vehicles put extra financial stress on individuals who live in these high poverty areas. Residents felt that the lack of nearby commercial properties contributed to the lack of nearby employment opportunities.
- The City's R/ECAPs has the lowest labor market index—and is also home to residents who have historically faced discrimination in employment markets. This is a similar pattern to other access to opportunity maps for the CNLV. When residents were asked what their most needed supportive services were for the CNI Transformation Plan Survey, computer training and job training/job readiness training were in the top needs
- Hispanic and Black children—largely clustered in southern neighborhoods in the CNLV—have low to moderate access to high proficiency schools. In comparison, the census tracts with the highest access to high proficiency school have a large proportion of White, non-Hispanic residents. Resident meeting and stakeholder participants expressed a concern over the negative perception of schools across the entire city. Magnet schools are the exception and parents of children who attend those schools are generally happy with the education.
- Residents consistently emphasized the lack of shopping and retail options in the southern part of the CNLV. Most people travel outside their neighborhood for all their shopping needs, including groceries. Although being able to walk to stores would be ideal, residents expressed a strong desire for any shopping options, regardless of walking distance.
- As part of the enforcement and outreach analysis, the City's and the PHA's webpages were reviewed for fair housing information. The search found little to no fair housing information. City and PHA webpages that provide links to fair housing resources for residents seeking more information about their housing rights are needed.
- Affordable housing that accommodates the needs of persons with disabilities is particularly difficult to find in the CNLV; this is partially due to the age of the City's housing stock. Group/residential homes are not well received in some neighborhoods and there are no disabled-only designated publicly-assisted developments in the CNLV. Finally, many fair housing cases involve violations of the reasonable accommodations laws in the Federal Fair Housing Act, including:
 - Service animals not being accepted;
 - Refusal to provide parking space closer to unit;

- Landlords won't let tenants break leases when they can no longer live by themselves;
- Landlords won't accommodate shift in timing on regular rent payment to accommodate when SSDI checks are received; and
- Refusal to transfer residents from an upstairs unit to a downstairs unit.

FAIR HOUSING PLAN – North Las Vegas

GOAL	CONTRIBUTING FACTORS	FAIR HOUSING ISSUES	PRIORITIZATION	METRICS, MILESTONES, AND TIMEFRAME FOR ACHIEVEMENT	RESPONSIBLE PROGRAM PARTICIPANT(S)
1. Stabilize the decline in homeownership. Strengthen ownership options for CLNV residents	Foreclosure crisis; low incomes of residents	Disproportionate housing needs. Differences in homeownership and access to wealth building. Most pronounced for Black and Native American residents	High	Continue the down payment assistance program and evaluate its potential to reduce homeownership gaps. Also expand partnerships with nonprofits and financial institutions that offer financial counseling and homeownership readiness: 1) Sponsor homebuyer education classes. 2) Hold a roundtable discussion with area lenders to discuss how to assist low income homebuyers through CRA programs, 3) Explore land trust models on vacant parcels to be redeveloped into deeply affordable ownership housing	CNLV, NHSSN, local financial institutions
2. Continue to work to improve economic conditions in high poverty areas	Economic decline in neighborhoods during the Great Recession; lack of private investment	Access to Opportunity in Employment	High	Continue neighborhood investment efforts that are part of the implementation of the Transformation Plan. Specifically: 1) Collaborate with Lutheran Social Services of Nevada to leverage its Empowerment Center programs; 2) Collaborate with the College of Southern Nevada (CSN) and the University of Nevada, Las Vegas (UNLV) to provide classes and programs geared towards business and financial literacy; 3) Establish Youth Targeted Businesses and Employment Opportunities; 4) Support expansion of the Nevada Partners Regional Workforce Development Center	CNLV, NHSSN, private sector partners
3. Encourage private sector investment in low income neighborhoods	Economic decline in neighborhoods during the Great Recession; private capital migrating to high-growth areas in the region. Land use regulations, zoning, development approval process	Access to Opportunity in General; Segregation; Disproportionate Housing Needs	High	1) Evaluate development approval processes, particularly Public Works requirements, for development barriers. Evaluate outdated zoning in low income neighborhoods and the potential to update and streamline the rezoning process to facilitate private investment. 2) Implement the redevelopment of vacant parcels strategies in the Implementation Plan. 3) Explore additional private sector and foundation partnerships for vacant/underutilized buildings and land acquisition programs ("land banking"). Convert these to residential, commercial, and/or mixed-use parcels that are catalysts for neighborhood redevelopment, provision of jobs and employment training, and economic integration. 4) Continue the single family rehabilitation program.	CNLV; private sector partners
4. Create more affordable, quality housing, including housing that is accessible to persons with disabilities	Older housing stock, lack of private sector investment	Disproportionate housing needs; lack of accessible, affordable housing	High	Create more permanently affordable housing in the urban core	CNLV; private sector partners; PHA
5. Improve access to high quality schools	Gaps in educational proficiency among schools in higher poverty areas; lack of magnet school programs	Access to Opportunity in Education	High	1) Work with the school district to implement best practices from high-performing magnet schools into all schools. 2) Seek foundation funding to rebrand the school district to improve its image. 3) Implement youth empowerment initiatives in the Transformation Plan, especially the increase in high school graduation rates (25%). 4) Ensure that every school has adequate social services, mental health care, and , for high schools, job skill building and training opportunities. 4) Increase the array of youth programs in the urban core	CNLV; School District
6. Strengthen access to fair housing and knowledge of fair housing among landlords	Lack of local information on fair housing	Fair Housing Enforcement and Capacity	Moderate	During early 2018, add fair housing information to the City and PHA websites, including links to area fair housing enforcement agencies. Sponsor landlord training events to increase awareness of reasonable accommodations law.	CNLV; PHA

SECTION III.

Community Participation Process

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Community Participation Process

Section III of the AFH follows the organization of the Community Participation Process requirement of HUD's AFH Tool. It describes outreach activities, methods to encourage and broaden meaningful community participation in the AFH, organizations consulted and describes residents' participation in the AFH.

- 1. Describe outreach activities undertaken to encourage and broaden meaningful community participation in the AFH process, including the types of outreach activities and dates of public hearings or meetings. Identify media outlets used and include a description of efforts made to reach the public, including those representing populations that are typically underrepresented in the planning process such as persons who reside in areas identified as R/ECAPs, persons who are limited English proficient (LEP), and persons with disabilities. Briefly explain how these communications were designed to reach the broadest audience possible. For PHAs, identify your meetings with the Resident Advisory Board and other resident outreach.*
- 2. Provide a list of organizations consulted during the community participation process.*
- 3. Describe whether the outreach activities elicited broad community participation during the development of the AFH. If there was low participation, or low participation among particular protected class groups, what additional steps might improve or increase community participation in the future, including overall participation or among specific protected class groups?*
- 4. Summarize all comments obtained in the community participation process. Include a summary of any comments or views not accepted and the reasons why.*

Outreach Activities

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- Advising the AFH team on the planned community engagement process, focus group scheduling and logistics through a series of conference calls;

- Hosting and recruiting focus group participants;
- Participating in in-depth interviews and providing the study team with program data and studies to inform the AFH elements;
- Participating in a kickoff meeting open to all interested stakeholders;
- Participating in the community open house meeting;

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Partner outreach. Local stakeholders, including organizations, agencies and coalitions, promoted the AFH survey directly to their members, residents, consumers and clients.

Stakeholder Consultation Summary

Figure III-1 recognizes the organizations, agencies, and coalitions that participated in making the AFH community participation process a success. In addition to lending their subject-matter expertise to the AFH development, participating organizations promoted resident engagement opportunities to their clients, consumers and coalition members, recruiting focus group participants and encouraging residents to attend the community open house events. Not all organizations that contributed to resident outreach are recognized in Figure III-1; participating organizations were identified through sign-in sheets and other communications.

**Figure III-1.
Participating Stakeholder
Organizations**

Note:

Participating organizations were identified through participation in conference calls, focus group hosts or recruiting support, and focus group participants. As such, some organizations that participated in the AFH development may not be recognized in Figure III-1.

Source:

BBC Research & Consulting.

Stakeholder Consultation Participating Organizations
Catholic Charities of Southern Nevada
City of North Las Vegas, Community Services of Nevada
City of North Las Vegas, Planning Department
HELP of Southern Nevada
Neighborhood Housing Services of Southern Nevada
Nevada Hand, Inc.
Opportunity Village
Silver State Fair Housing Council
Southern Nevada Adult Mental Health Services
Southern Nevada Regional Housing Authority
Southern Nevada Strong - RTC
The Salvation Army
Valentine Communications

Resident Public Participation Summary

Many residents throughout North Las Vegas participated in the AFH community engagement process through the neighborhood survey and community meetings. Some highlights of community engagement include participation by:

- Nearly 1,000 residents, who completed the CNI Neighborhood Survey, 81 percent of which were residents from the urban core neighborhood;
- Three quarters of Rose Gardens public housing residents, who participated in a needs assessment to gather input on publicly supported housing;
- Residents who participated in a community meeting, where they were asked questions about housing preference, desire to move, displacement, discrimination, and community needs;
- Community members who participated in the public hearing and left comments on the AFH draft.

Public Hearings and Public Comment Period

The public comment period for the draft AFH began September 4, 2017. The public hearing was held on September 14, 2017. The public hearing allows the community to review the draft AFH and BBC's recommendations, leave comments on the draft, look at the HUD AFFH maps and data tables, and ask questions.

A summary of public comments received at the community meeting and during the public comment period will be summarized here and appended to the AFH once complete.

SECTION IV.

Assessment of Past Goals, Actions and Strategies

SECTION IV.

Assessment of Past Goals, Actions and Strategies

This section of the AFH requires an evaluation of past fair housing goals in recent Analyses of Impediments to Fair Housing Choice (AI), Assessments of Fair Housing (AFH), or other similar planning documents.

The City of North Las Vegas has not conducted an AI or AFH independent of the region because it is not yet an entitlement community. The last fair housing analysis in which North Las Vegas was included was the 2015 Regional AI. Other partners included Clark County, the City of Las Vegas, the City of Henderson, and Boulder City.

This AI did not include goals specific to North Las Vegas. Instead, the AI included a number of regional action items.

SECTION V.

Fair Housing Analysis

SECTION V.

Fair Housing Analysis

Section V of the AFH follows the organization of the Fair Housing Analysis requirement of HUD's AFH Tool. It includes the following subsections:

A. Demographic Summary

B. General Issues

i. Segregation/Integration

ii. Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs)

iii. Disparities in Access to Opportunity

iv. Disproportionate Housing Needs

C. Publicly Supported Housing Analysis

D. Disability and Access Analysis

E. Fair Housing Enforcement, Outreach Capacity, and Resources Analysis

Demographic Summary

Demographic patterns. *Describe demographic patterns in the jurisdiction and region, and describe trends over time (since 1990).*

This section provides an overview of demographic patterns in the City and region, including the history of segregation patterns. This history is important not only to understand how residential settlement patterns came about—but also, and more importantly, to explain differences in housing opportunity among residents today. In sum, not all residents had the ability to build housing wealth or achieve economic opportunity. This historically unequal playing field in part determines why residents have different housing needs today.

The City of North Las Vegas (CNLV) and the broader Las Vegas region have experienced exponential growth since the 1960's.

After World War II, the Nellis Air Force Base, located adjacent to the City, was used as a demobilization center for returning soldiers. These soldiers eventually settled and the Region saw a major housing development boom. The population of CNLV nearly doubled, but most of the new development in the City was federally-subsidized, low-income housing.

The City experienced another large growth period during the 1980's economic boom. Major home-builders started to develop master-planned communities in the Northern, recently-annexed area of CNLV. By 2007, the CNLV was one of the fastest growing cities in the U.S. ¹

As shown in the figure below, the CNLV experienced an almost 400 percent growth in population during the past 25 years. The largest increase occurred between 1990 and 2000, when the City grew by 142 percent and the region grew by 86 percent. The CNLV's share of the Region's population doubled from 6 percent in 1990 to 11 percent in 2010.

**Figure V-1.
Population Growth and Percent Change, North Las Vegas and Region, 1990, 2000, 2010, & 2015**

	1990	2000	2010	2015 estimate	% change 1990-2000	% change 2000-2010	% change 1990-2015
North Las Vegas	47,707	115,488	217,304	234,793	142%	88%	392%
Region (MSA)	741,434	1,375,734	1,951,269	2,114,801	86%	42%	185%

Source: 1990, 2000, & 2010 Decennial Census, 2015 1-year American Community Survey, and BBC Research & Consulting.

The HUD Demographic Trends tables below show demographic trends between 1990 and 2015 for the City and the Region.

Historically, the CNLV has been more diverse than the region and its surrounding cities. Today, the City continues to experience a population growth in non-White residents. The CNLV is currently about 28 percent White, non-Hispanic, compared with 38 percent in 1990. This shift is largely due to the growth in Hispanic residents (84,000 person increase) and their share of the total population (22% in 1990 v. 40% in 2015). During this period, there was also an increase in Black residents (29,000) and Asian residents (13,000).

These trends are mostly consistent with the region overall, although, in the region, growth in the percent of Hispanic and Asian residents far outpaced the decline in White non-Hispanic resident growth. The CNLV also gained about 20,000 foreign-born residents.

The City's shift in age distribution was modest and the largest change was seen in the proportion of seniors, which increased by 50 percent. This was only slightly similar to the Region, which despite experiencing a small increase in the proportion of seniors (8%), had almost no change in the age distribution of residents.

¹ City of North Las Vegas's Choice Neighborhood Initiative, Transformation Plan, November 2015

Figure V-2.
Demographic Trends, North Las Vegas and Region, 1990, 2000, 2010, and 2015

Race/Ethnicity	(North Las Vegas, NV) Jurisdiction							
	1990 Trend		2000 Trend		2010 Trend		Current	
	#	%	#	%	#	%	#	%
White, Non-Hispanic	18,061	37.86%	64,591	55.93%	67,687	31.20%	66,037	28.13%
Black, Non-Hispanic	17,549	36.78%	21,970	19.02%	41,561	19.16%	46,919	19.98%
Hispanic	10,590	22.20%	43,435	37.61%	84,134	38.78%	94,804	40.38%
Asian or Pacific Islander, Non-Hispanic	988	2.07%	3,740	3.24%	13,122	6.05%	14,039	5.98%
Native American, Non-Hispanic	401	0.84%	943	0.82%	1,684	0.78%	1,010	0.43%
National Origin								
Foreign-born	--	--	28,948	25.07%	47,603	23.34%	48,391	21.33%
LEP								
Limited English Proficiency	--	--	--	--	--	--	4,934	7.00%
Sex								
Male	23,630	49.53%	58,947	51.04%	108,097	49.82%	116,350	49.55%
Female	24,077	50.47%	56,541	48.96%	108,864	50.18%	118,443	50.45%
Age								
Under 18	16,316	34.20%	39,190	33.93%	68,469	31.56%	66,992	28.53%
18-64	28,147	59.00%	69,618	60.28%	132,991	61.30%	143,488	61.11%
65+	3,244	6.80%	6,680	5.78%	15,501	7.14%	24,313	10.36%
Family Type								
Families with children	6,318	43.50%	16,246	47.76%	31,599	47.52%	29,275	41.70%

Race/Ethnicity	(Las Vegas-Henderson-Paradise, NV) Region							
	1990 Trend		2000 Trend		2010 Trend		Current	
	#	%	#	%	#	%	#	%
White, Non-Hispanic	558,616	75.32%	828,498	60.22%	935,955	47.97%	935,955	47.97%
Black, Non-Hispanic	68,622	9.25%	131,635	9.57%	218,545	11.20%	194,821	9.98%
Hispanic	82,669	11.15%	302,013	21.95%	568,644	29.14%	568,644	29.14%
Asian or Pacific Islander, Non-Hispanic	24,257	3.27%	92,084	6.69%	207,320	10.62%	177,595	9.10%
Native American, Non-Hispanic	5,292	0.71%	13,544	0.98%	15,975	0.82%	8,732	0.45%
National Origin								
Foreign-born	70,315	9.48%	247,753	18.01%	418,443	21.44%	431,587	22.12%
LEP								
Limited English Proficiency	42,406	5.72%	163,351	11.87%	263,303	13.49%	264,414	13.55%
Sex								
Male	376,141	50.73%	698,503	50.77%	982,193	50.34%	982,193	50.34%
Female	365,293	49.27%	677,231	49.23%	969,076	49.66%	969,076	49.66%
Age								
Under 18	180,599	24.36%	358,893	26.09%	488,618	25.04%	488,618	25.04%
18-64	483,150	65.16%	870,301	63.26%	1,242,206	63.66%	1,242,206	63.66%
65+	77,684	10.48%	146,541	10.65%	220,445	11.30%	220,445	11.30%
Family Type								
Families with children	88,895	46.43%	129,785	47.48%	219,668	46.95%	219,668	46.95%

Note: The CNLV is a new participating jurisdiction, therefore the HUD AFFH Data and Mapping Tool does not provide any City-specific data. Data was supplemented by the Census and the American Community Survey. Some demographic data was not readily available for CNLV and is shown as a "--". Refer to the Data Documentation for details (www.hudexchange.info).

Source: 1990, 2000, & 2010 Decennial Census, 2015 1-year American Community Survey, BBC Research & Consulting, and HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. <https://egis.hud.gov/affht/>.

Patterns in tenure. Describe the location of homeowners and renters in the jurisdiction and region, and describe trends over time.

As shown in the figure below, homeownership has declined in both the CNLV and the Region since 2000. The CNLV had the greatest decline in homeownership, with a 24 percent change. Although the City has a higher household size, the Region experienced a slight increase (6%) in the average household size. These trends are due to demographic shifts—growth in residents with larger family sizes and younger residents tend to rent—as well as decreasing affordability and, consequently, increased overcrowding.

Figure V-3.
Tenure and Average Household Size, North Las Vegas and Region, 2000 and 2015

	2000			2015			Change 2000-2015		
			Average Household Size			Average Household Size			Average Household Size
	Renters	Owners		Renters	Owners		Renters	Owners	
North Las Vegas	30%	70%	3.36	47%	53%	3.31	57%	-24%	-1%
Region (MSA)	41%	59%	2.65	48%	52%	2.82	17%	-12%	6%

Note: Percentages represent tenure of individuals, not households.

Source: 2000 Decennial Census, 2015 1-year American Community Survey, BBC Research & Consulting, and HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. <https://egis.hud.gov/affht/>

As shown in the table below, there is a significant variation in homeownership rates by race and ethnicity. The overall homeownership rate is about 55 percent. By race and ethnicity:

- White, non-Hispanic homeownership rate is above the City proportion (60%);
- Asian households exceed the City homeownership rate overall at 76 percent;
- Hispanic households are most similar to the City overall and have almost an equal amount of homeowners (51%) as renters (49%);
- Black and Native American households have the lowest homeownership rates (41% and 29%, respectively).

Figure V-4.
Homeownership and Rental Rates by Race/Ethnicity, North Las Vegas

Race/Ethnicity	Homeowners		Renters	
	#	%	#	%
White	22,770	60%	15,114	40%
Black	6,350	41%	9,283	59%
Hispanic	10,723	51%	10,290	49%
Asian or Pacific Islander	3,058	76%	982	24%
Native American	77	29%	191	71%
Other	5,235	51%	4,981	49%
Total Households	37,681	55%	31,005	45%

Note:

Data presented are numbers of households, not individuals. Race and ethnicity are not broken out separately, therefore some householders may be counted twice.

Source:

2015 1-year American Community Survey, BBC Research & Consulting, and HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. <https://egis.hud.gov/affht/>

General Issues

This section addresses additional demographic patterns, which fall under the heading of “General Issues” in the AFH Tool. These include:

- Segregation and Integration;
- Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs);
- Disparities in Access to Opportunity—Education, Employment, Transportation, Low Poverty Environments, and Environmentally Healthy Neighborhoods; and
- Disproportionate Housing Needs.

Segregation/Integration

- a. *Describe and compare segregation levels in the jurisdiction and region. Identify the racial/ethnic groups that experience the highest levels of segregation.*
- b. *Identify areas in the jurisdiction and region with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area.*
- c. *Explain how these segregation levels and patterns in the jurisdiction and region have changed over time (since 1990).*
- d. *Consider and describe the location of owner and renter occupied housing in the jurisdiction and region in determining whether such housing is located in segregated or integrated areas, and describe trends over time.*
- e. *Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future. Participants should focus on patterns that affect the jurisdiction and region rather than creating an inventory of local laws, policies, or practices.*

Segregation levels and patterns. The Dissimilarity Index, or DI, is a common tool that measures segregation in a community. The DI is an index that measures the degree to which two distinct groups are evenly distributed across a geographic area, usually a county. DI values range from 0 to 100—where 0 is perfect integration and 100 is complete segregation. Dissimilarity index values between 0 and 39 generally indicate low segregation, values between 40 and 54 generally indicate moderate segregation, and values between 55 and 100 generally indicate a high level of segregation.

It is important to note that the DI that HUD provides for AFH completion uses White, non-Hispanic residents as the primary comparison group. That is, all DI values compare a particular racial group’s distribution in the City or Region against the distribution of White, non-Hispanic residents.

Figure V-5, below, shows the DI for the CNLV and the Region.

Hispanic residents in North Las Vegas are the only group facing high segregation (61.2). This segregation, as measured by the DI, should be examined in more current years because the Hispanic population has grown exponentially over the last decade. The dissimilarity trends for Hispanic residents are similar to the demographic patterns depicted in Map 1 and 2 in the HUD AFFH Data and Mapping Tool (see Figures V-6 & 7).

Asian residents in both the City and the Region experience the lowest segregation, followed by Native American residents, who also experience low segregation. Segregation of Black residents is similar across the Region.

**Figure V-5.
Racial/Ethnic Dissimilarity Index, North Las Vegas and Region, 2000**

Racial/Ethnic Dissimilarity Index	(North Las Vegas, NV) Jurisdiction	(Las Vegas-Henderson-Paradise, NV) Region
Black/White	47.6	47.4
Hispanic/White	61.2	45.0
Native American/White	32.9	39.1
Asian or Pacific Islander/White	20.2	35.6

Note: Table 3 in the HUD AFFH Data and Mapping tool does not provide data for the CNLV because it is a new entitlement community. Data was supplemented by the Census.

For any group with a small population, the dissimilarity index may be high even if the group's members are evenly distributed throughout the area. Thus, when a group's population is less than 1,000, exercise caution in interpreting its dissimilarity indices.

Source: 2000 Decennial Census.

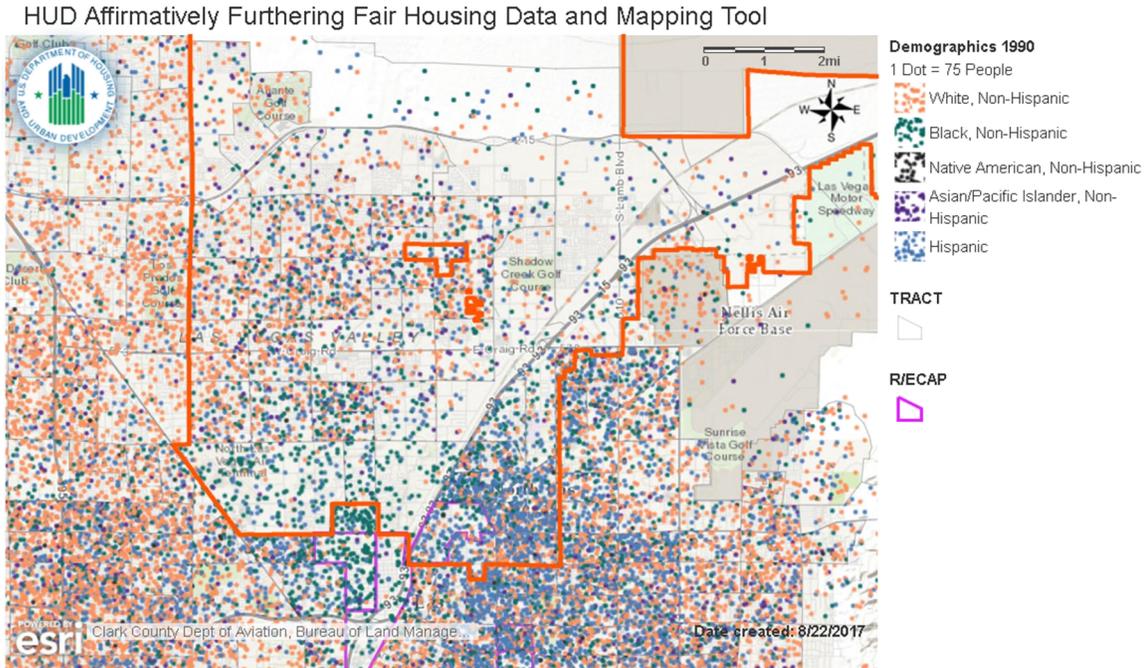
In general, Figure V-5 reveals that the City is relatively well integrated—particularly given its racial and ethnic diversity.²

The following maps compare racial and ethnic distribution patterns in the CNLV in 1990, 2000, and 2010. It is important to note that all of the maps are set to the same dot renderer (1 dot = 75 people) to allow an equal comparison among racial and ethnic categories. The maps reveal:

- An increase in Hispanic residents between 1999, 2000, and 2010 across the southern and western parts of the City;
- A movement of Black residents from the southern neighborhoods in CNLV to central and western areas; and
- A decline in White, Non-Hispanic residents.

² More diverse communities usually have higher dissimilarity indices—and less diverse communities, lower indices. This is due to a number of factors, including settlement patterns and formation of ethnic enclaves, historical practices and policies leading to segregation, and limited housing choices.

Figure V-6.
Map 2 – Race/Ethnicity Trends, North Las Vegas, 1990 & 2000



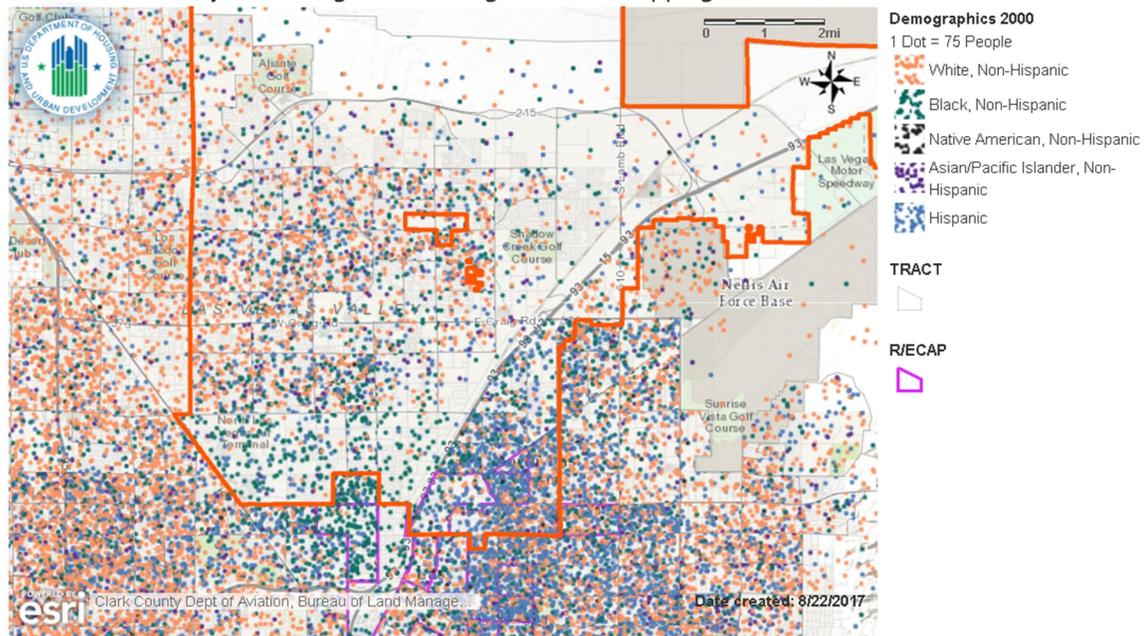
Name: Map 2 - Race/Ethnicity Trends

Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Las Vegas (CDBG, HOME, ESG)

Region: Las Vegas-Henderson-Paradise, NV

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 2 - Race/Ethnicity Trends

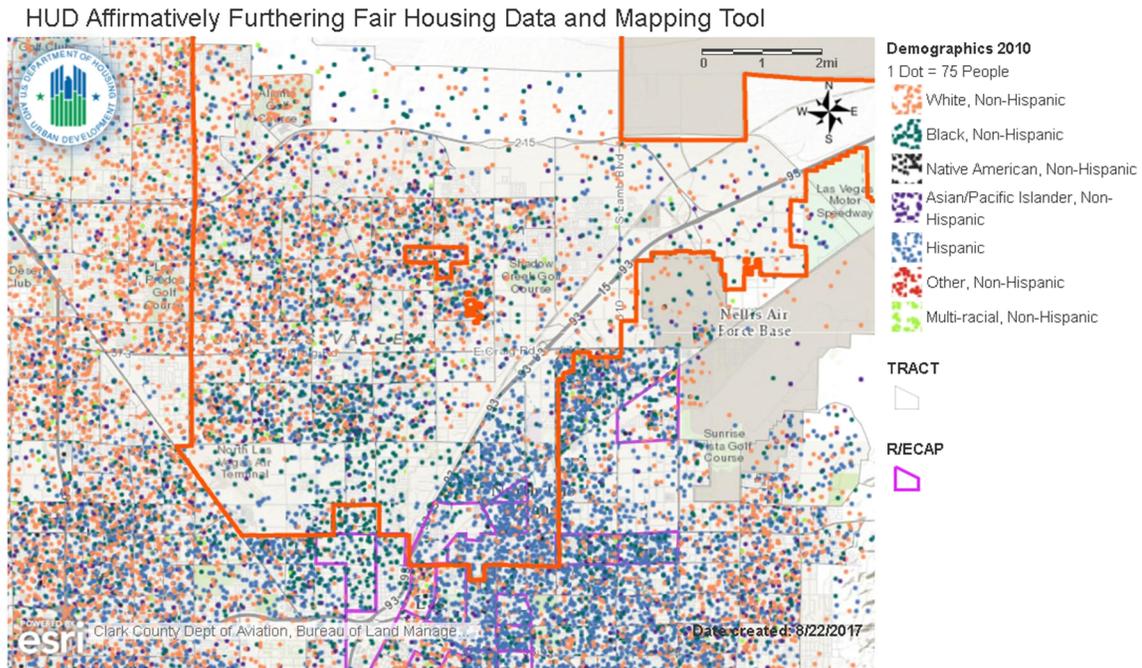
Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Las Vegas (CDBG, HOME, ESG)

Region: Las Vegas-Henderson-Paradise, NV

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. <https://egis.hud.gov/affht/>.

Figure V-7.
Map 1 – Race/Ethnicity, North Las Vegas, 2010



Name: Map 1 - Race/Ethnicity

Description: Current race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Las Vegas (CDBG, HOME, ESG)

Region: Las Vegas-Henderson-Paradise, NV

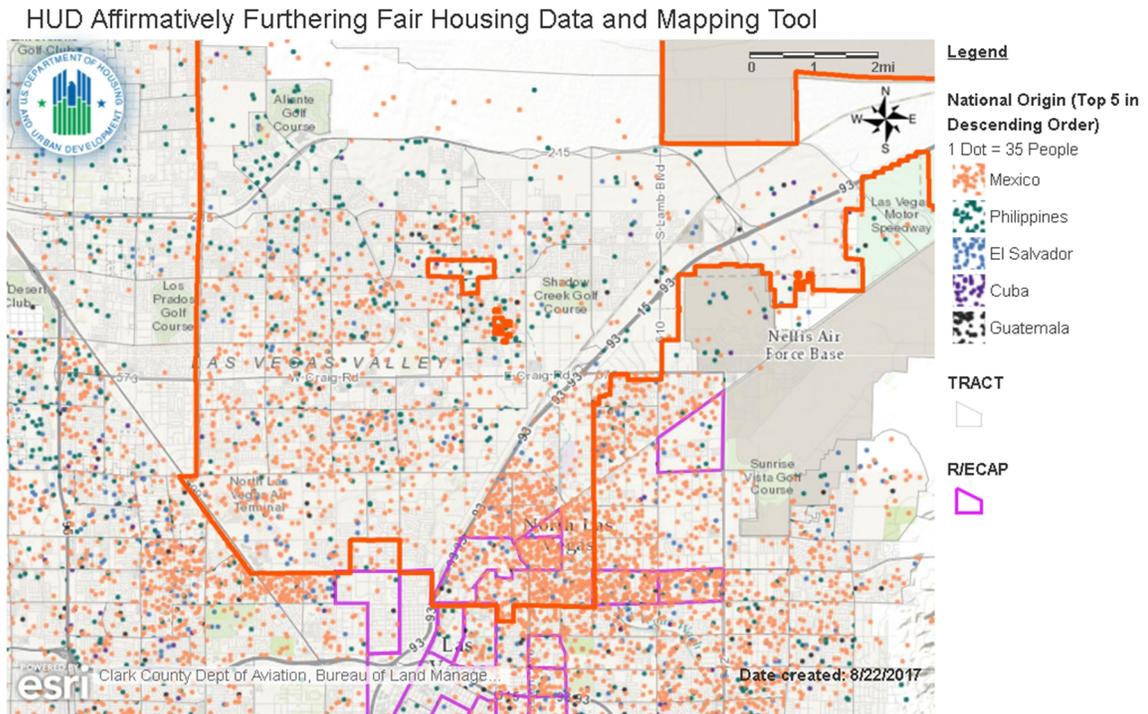
Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. <https://egis.hud.gov/affht/>.

Maps 3 and 4 below show concentrations of residents by National Origin and Limited English Proficiency, respectively, in 2010.³ The maps reveal clusters of foreign-born residents from Mexico in the southern part of the City, south of Interstate-15; this is also the area where most of the LEP residents who speak Spanish live. Three Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs) exist within the neighborhoods that have a large proportion of Mexican and Spanish-speaking residents.

Residents from the Philippines and El Salvador also exhibit some small clustering, although much less pronounced and more widespread throughout the City.

³ 1990 and 2000 trend data are not available for these maps.

Figure V-8.
Map 3 – National Origin, North Las Vegas, 2010



Name: Map 3 - National Origin

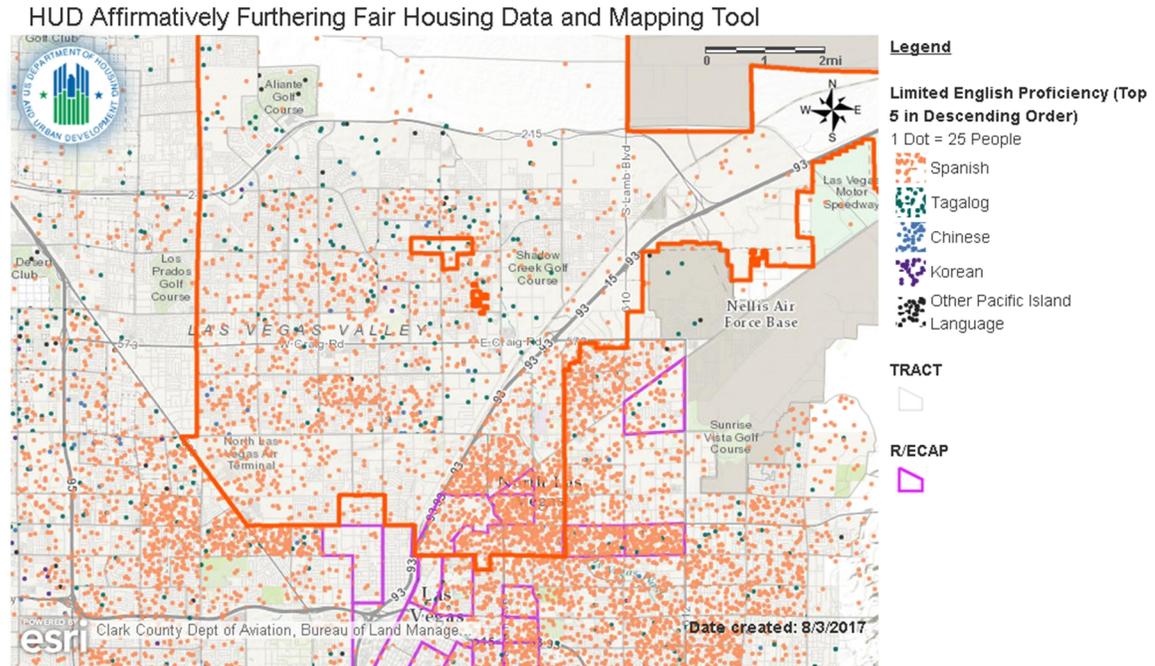
Description: Current national origin (5 most populous) dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Las Vegas (CDBG, HOME, ESG)

Region: Las Vegas-Henderson-Paradise, NV

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. <https://egis.hud.gov/affht/>.

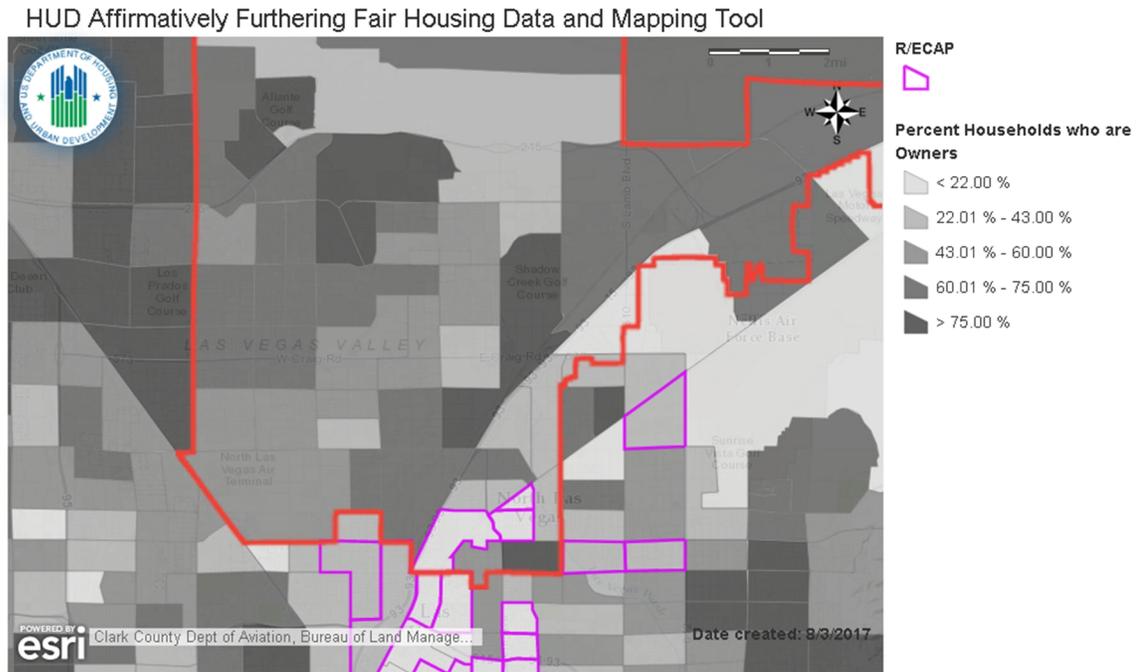
Figure V-9.
Map 4 – LEP, North Las Vegas, 2010



Tenure and segregation. Limiting the ability of certain residents to own homes—particularly in fast-growing and high-demand markets—prevents wealth creation and widens economic gaps. These limitations also prevent residents from accessing neighborhoods with high quality schools and other community amenities (e.g., recreational facilities and parks), because these are often funded by builders and homeowners’ associations as part of master development agreements and/or fees paid by owners.

The maps below show the location of owner and renter occupied housing in the CNLV. The areas with the highest rental rates—and, inversely, lowest ownership rates—are some of the same areas in which Hispanic residents are most concentrated, particularly in the R/ECAPs in the southern part of the City. This is somewhat true for Black residents, although the patterns of association are less clear.

Figure V-10.
Map 16 – Housing Tenure, Owners, 2010



Name: Map 16 - Housing Tenure

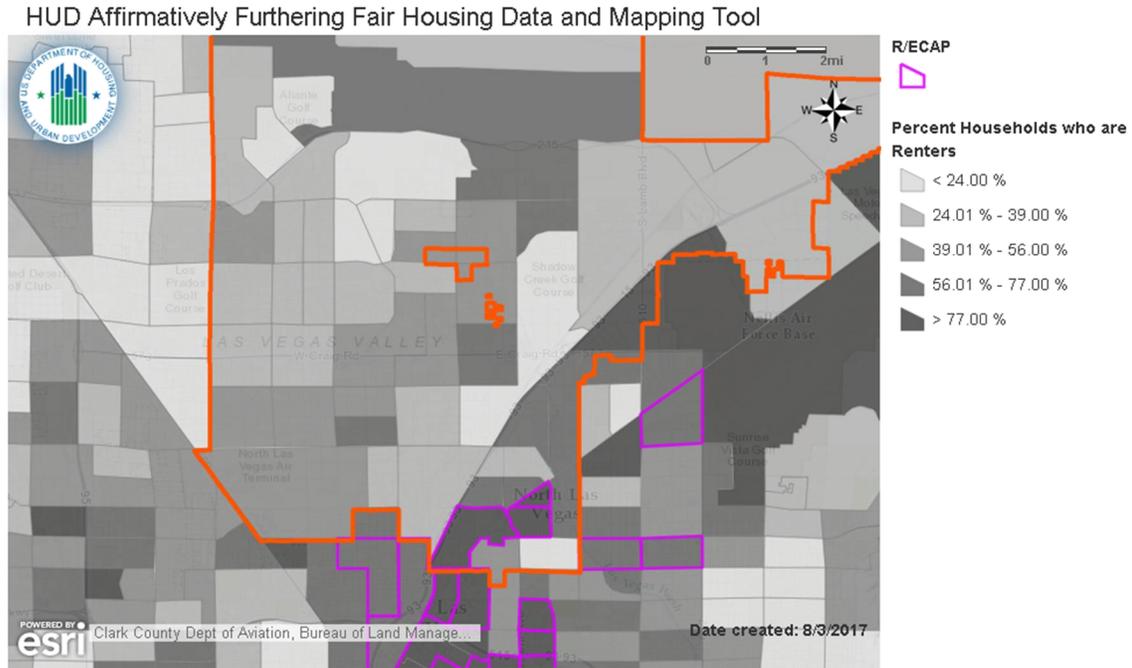
Description: Housing Tenure by Owners with R/ECAPs

Jurisdiction: Las Vegas (CDBG, HOME, ESG)

Region: Las Vegas-Henderson-Paradise, NV

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. <https://egis.hud.gov/affht/>.

Figure V-11.
Map 16 – Housing Tenure, Renters, 2010



Name: Map 16 - Housing Tenure
Description: Housing Tenure by Renters with R/ECAPs
Jurisdiction: Las Vegas (CDBG, HOME, ESG)
Region: Las Vegas-Henderson-Paradise, NV

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. <https://egis.hud.gov/affht/>.

Contributing Factors of Segregation. The AFH template requires an examination of potential contributing factors to each of the fair housing challenges analyzed in this section. As discussed above, segregation in the CNLV is moderate—with indications of increasing segregation for Hispanic residents. Historically, segregation has been highest for Black residents but has declined since the 1990s.

Segregation patterns in North Las Vegas are largely related to strong growth of racial and ethnic minorities, particularly Hispanic residents, which outpaced growth of non-Hispanic, White residents. Findings from the community engagement process suggest that racial and ethnic minorities migrated to the City because of its diversity, presence of cultural enclaves, and relative affordability.

Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)

1. Analysis

- a. Identify any R/ECAPs or groupings of R/ECAP tracts within the jurisdiction and region.
- b. Describe and identify the predominant protected classes residing in R/ECAPs in the jurisdiction and region. How do these demographics of the R/ECAPs compare with the demographics of the jurisdiction and region?

c. Describe how R/ECAPs have changed over time in the jurisdiction and region (since 1990).

A Racially Concentrated Area of Poverty or an Ethnically Concentrated Area of Poverty (R/ECAP) is a neighborhood with a poverty rate of 40 percent and a racial and ethnic concentration.

It is very important to note that R/ECAPs are not areas of focus because of racial and ethnic concentrations alone. This study recognizes that racial and ethnic clusters can be a part of fair housing choice if they occur in a non-discriminatory market. Rather, R/ECAPs are meant to identify areas where residents may have historically faced discrimination and continue to be challenged by limited economic opportunity.

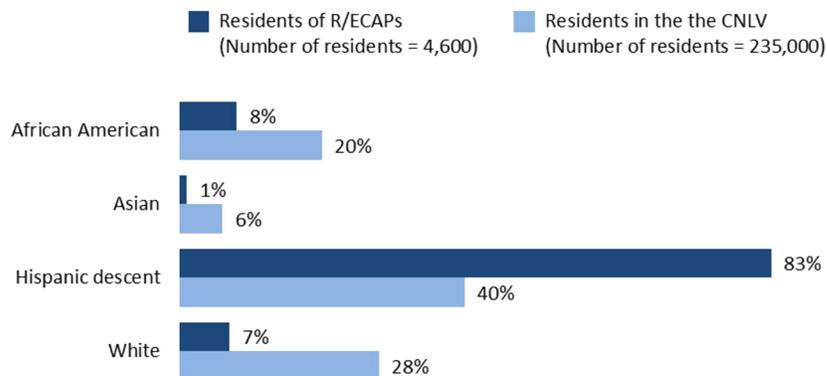
HUD’s definition of a Racially/Ethnically Concentrated Area of Poverty is:

- A census tract that has a non-white population of 50 percent or more (majority-minority) or, for non-urban areas, 20 percent, AND a poverty rate of 40 percent or more; OR
- A census tract that has a non-white population of 50 percent or more (majority-minority) AND the poverty rate is three times the average tract poverty rate for the County, whichever is lower.

According to HUD, there are three Census tracts within the CNLV that qualify as R/ECAPs. These three Census tracts (38, 43.01, 43.02) are located in the southern part of the CNLV, south of Interstate-15.

HUD data on the City’s R/ECAPs report a total population of 4,574 residents. Residents living in the City’s R/ECAPs are most likely to be Hispanic (83%) and limited English proficiency Spanish-Speakers (33%). Compared to the City overall, Hispanic residents are much more likely to live in R/ECAPs than expected (83% live in R/ECAPs compared to just 40% of residents in the City overall). Conversely, White residents are under-represented in R/ECAPs (7% in R/ECAPs v. 28% of residents overall).

Figure V-12.
Demographics of Residents Living in R/ECAPs in North Las Vegas



Source: HUD AFFH Data and Mapping Tool, 2015 1-year American Community Survey, and BBC Research & Consulting.

Disparities in Access to Opportunity

The Access to Opportunity framework in the AFH expands the fair housing analysis beyond housing. It examines barriers that more broadly affect economic opportunity.

How does economic opportunity relate to fair housing? The Federal Fair Housing Act requires that HUD programs and activities be administered in a manner that affirmatively furthers (AFFH) the policies of the Fair Housing Act. Federal courts have interpreted this to mean doing more than simply not discriminating: The AFFH obligation also requires recipients of federal housing funds to take meaningful actions to overcome historic and current barriers to accessing housing and economically stable communities.

Recent research has demonstrated that fair housing planning has benefits beyond complying with federal funding obligations:

- Dr. Raj Chetty's well known Equality of Opportunity research found economic gains for adults who moved out of high poverty neighborhoods when they were children. The gains were larger the earlier the children were when they moved.⁴
- A companion study on social mobility isolated the neighborhood factors that led to positive economic mobility for children: lower levels of segregation, lower levels of income inequality, high quality education, greater community involvement ("social capital"), greater family stability.
- A 2016 study by the National Bureau of Economic Research (NBER) found positive economic and social outcomes for children raised in publicly subsidized housing, regardless of the poverty level of the neighborhood.⁵

This has been articulated by HUD as: "the obligations and principles embodied in the concept of fair housing are fundamental to healthy communities...and...actions in the overall community planning and development process lead to substantial positive change."

This segment of the AFH examines Access to Opportunity in education, employment, transportation, low poverty environments, and environmentally healthy neighborhoods. It draws from data and maps provided by HUD and findings from the community engagement process.

⁴ <http://www.equality-of-opportunity.org> and http://www.equality-of-opportunity.org/images/mto_exec_summary.pdf

⁵ <http://www.nber.org/papers/w19843.pdf>

AFH requirements:

Education

1. *For the protected class groups HUD has provided data, describe any disparities in access to proficient schools in the jurisdiction and region.*
2. *For the protected class groups HUD has provided data, describe how the disparities in access to proficient schools relate to residential living patterns in the jurisdiction and region.*
3. *Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to education.*

Employment

1. *For the protected class groups HUD has provided data, describe any disparities in access to jobs and labor markets by protected class groups in the jurisdiction and region.*
2. *For the protected class groups HUD has provided data, describe how disparities in access to employment relate to residential living patterns in the jurisdiction and region.*
3. *Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to employment.*

Transportation

1. *For the protected class groups HUD has provided data, describe any disparities in access to transportation related to costs and access to public transit in the jurisdiction and region.*
2. *For the protected class groups HUD has provided data, describe how disparities in access to transportation related to residential living patterns in the jurisdiction and region.*
3. *Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to transportation.*

Access to Low Poverty Neighborhoods

1. *For the protected class groups HUD has provided data, describe any disparities in access to low poverty neighborhoods in the jurisdiction and region.*

2. *For the protected class groups HUD has provided data, describe how disparities in access to low poverty neighborhoods relate to residential living patterns of those groups in the jurisdiction and region.*
3. *Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to low poverty neighborhoods.*

Access to Environmentally Healthy Neighborhoods

1. *For the protected class groups HUD has provided data, describe any disparities in access to environmentally healthy neighborhoods in the jurisdiction and region.*
2. *For the protected class groups HUD has provided data, describe how disparities in access to environmentally healthy neighborhoods relate to residential living patterns in the jurisdiction and region.*
3. *Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to environmentally healthy neighborhoods.*

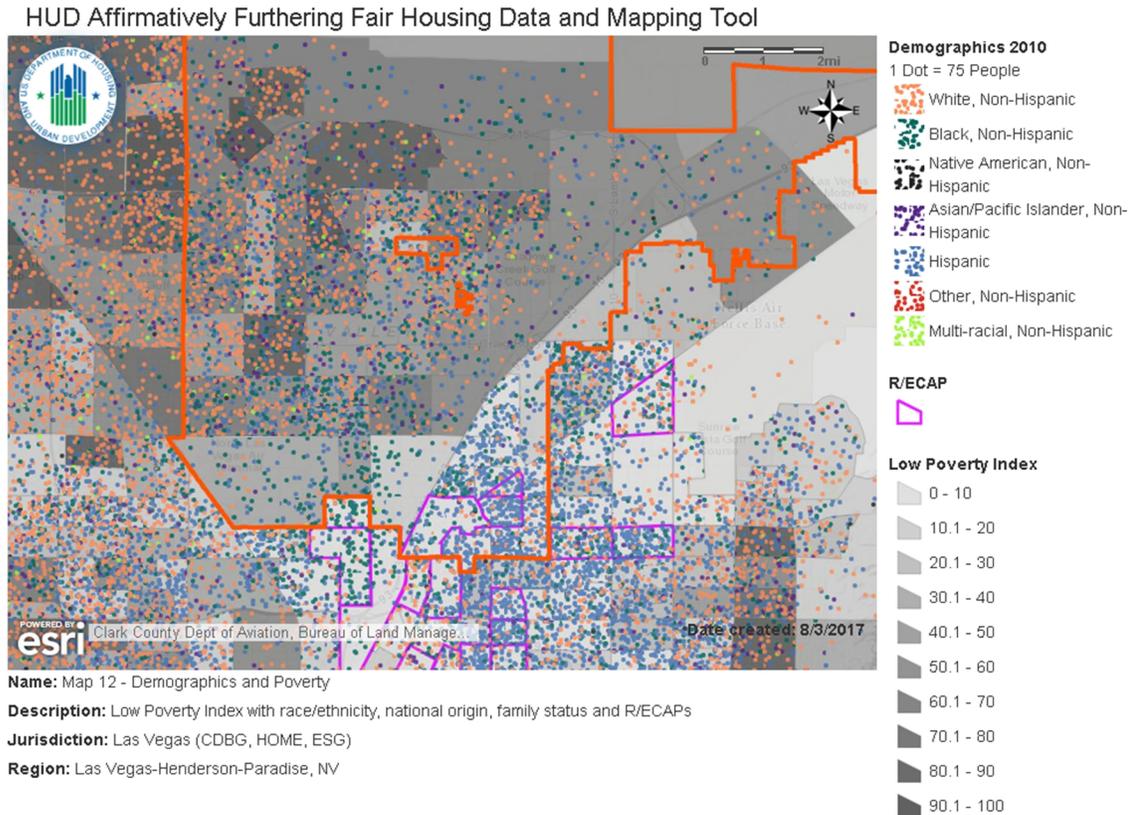
Patterns in Disparities in Access to Opportunity

1. *For the protected class groups HUD has provided data, identify and discuss any overarching patterns of access to opportunity and exposure to adverse community factors. Include how these patterns compare to patterns of segregation, integration, and R/ECAPs. Describe these patterns for the jurisdiction and region.*
2. *Based on the opportunity indicators assessed above, identify areas that experience: (a) high access; and (b) low access across multiple indicators.*

To facilitate the Assess to Opportunity analysis, HUD provides a table that measures access to opportunity by an index. The index allows comparison of opportunity indicators by race and ethnicity, for households below and above the poverty line, among jurisdictions, and to the region. North Las Vegas is a new entitlement community and therefore, the opportunity indicators for the City were not available at the time the AFH was conducted. The AFH will be updated once these indicators become available for the City.

Access to Low Poverty Neighborhoods. The HUD map below, Figure V-12 shows that neighborhoods with relatively low poverty indices (higher poverty areas) are also those with large populations of Hispanic and Black residents.

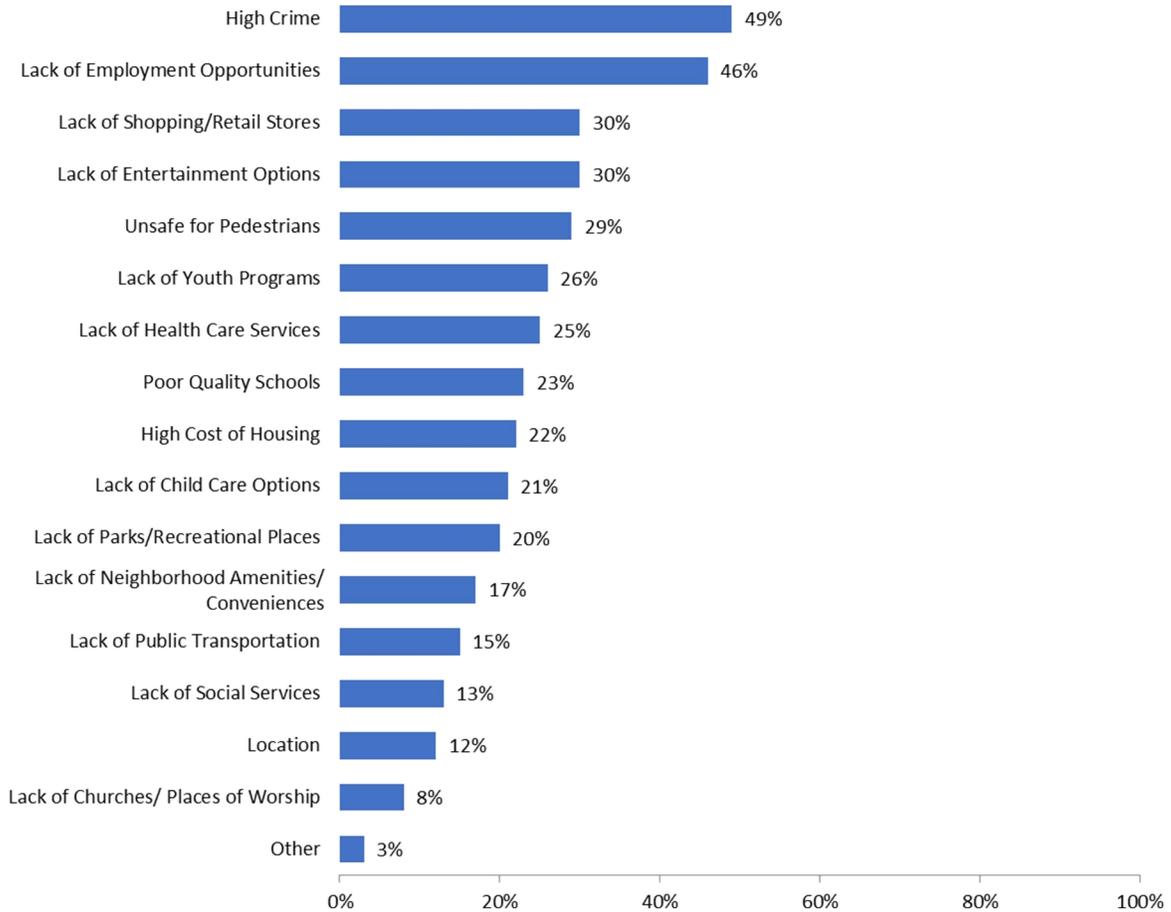
Figure V-13.
Map 12 – Race/Ethnicity and Poverty, 2010



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. <https://egis.hud.gov/affht/>.

Resident perspectives on access to low poverty neighborhoods. The community engagement process elicited resident perspectives about access to opportunity for areas in the Urban Core that have higher levels of poverty. As shown in the figure below, residents’ survey responses demonstrate that in general, neighborhoods in the City with high poverty levels (little to no access to low poverty neighborhoods) have high crime, a lack of employment opportunities, and a lack of shopping.

Figure V-14.
Resident Perspectives on Neighborhoods with Low Poverty Indices



Source: CNI Transformation Plan - Summary of Neighborhood Survey Findings (November 2015) and BBC Research & Consulting.

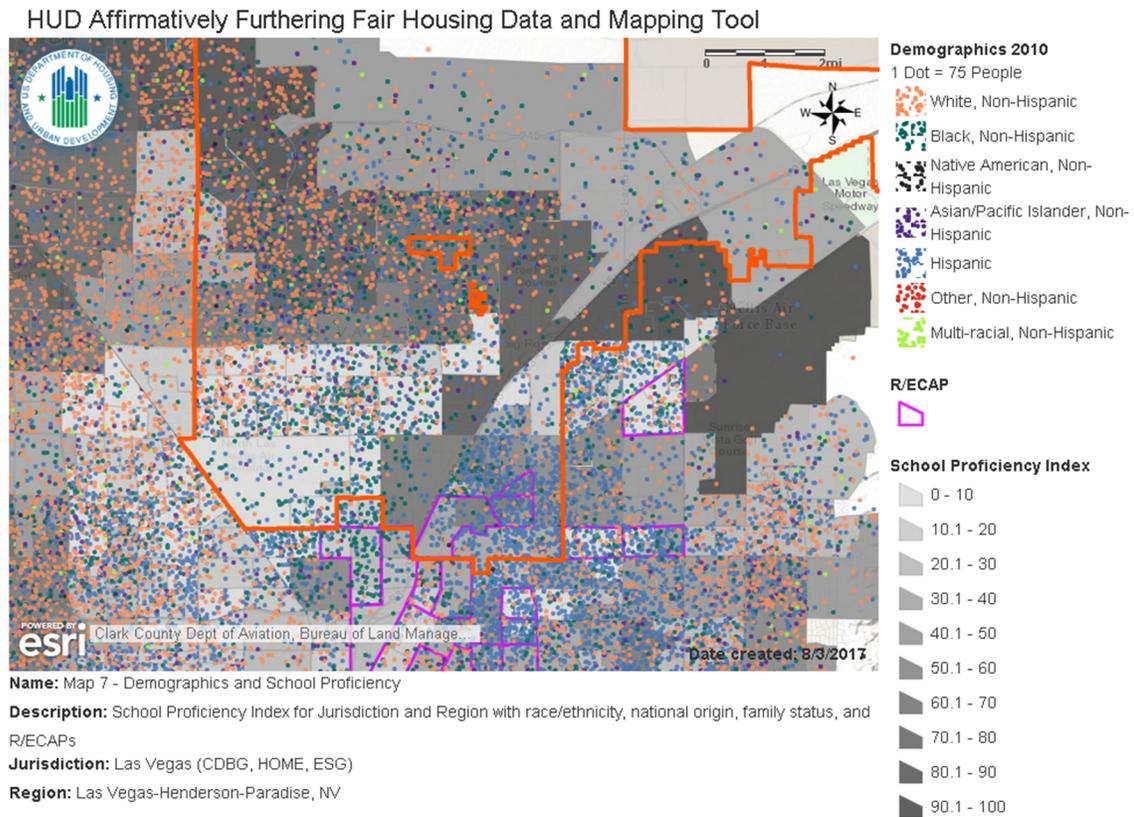
In the resident meeting, residents confirmed the findings of survey respondents; the biggest access barriers for residents in high poverty neighborhoods are crime, lack of employment opportunities, and a lack of shopping.

- **Lack of shopping/retail stores.** Residents consistently emphasized the lack of shopping and retail options in the southern part of the CNLV. Most people travel outside their neighborhood for all their shopping needs – including groceries. Although being able to walk to stores would be ideal, residents expressed a strong desire for any shopping options, regardless of walking distance.
- **Lack of nearby employment opportunities.** The high poverty areas in the CNLV are predominately older, residential neighborhoods, which could explain the lack of nearby commercial land uses. Most residents who participated in the resident meeting spoke of long commute times to reach their place of employment. Although the regional bus system goes to many areas in the Region, it does not necessarily provide transportation to some of the largest employment nodes, requiring many residents to drive to work. Long commutes in personal vehicles put extra financial stress on individuals who live in these high poverty

areas. Residents felt that the lack of nearby commercial contributed to the lack of nearby employment opportunities.

Education. The HUD map below shows access to proficient schools for children of different races and ethnicities. As the map demonstrates, Hispanic and Black children—largely clustered in southern neighborhoods in the CNLV—have low to moderate access to high proficiency schools. In comparison, the census tracts with the highest access to high proficiency school have a large proportion of White, non-Hispanic residents.

Figure V-15.
Map 7 – Demographics and School Proficiency, 2010



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. <https://egis.hud.gov/affht/>.

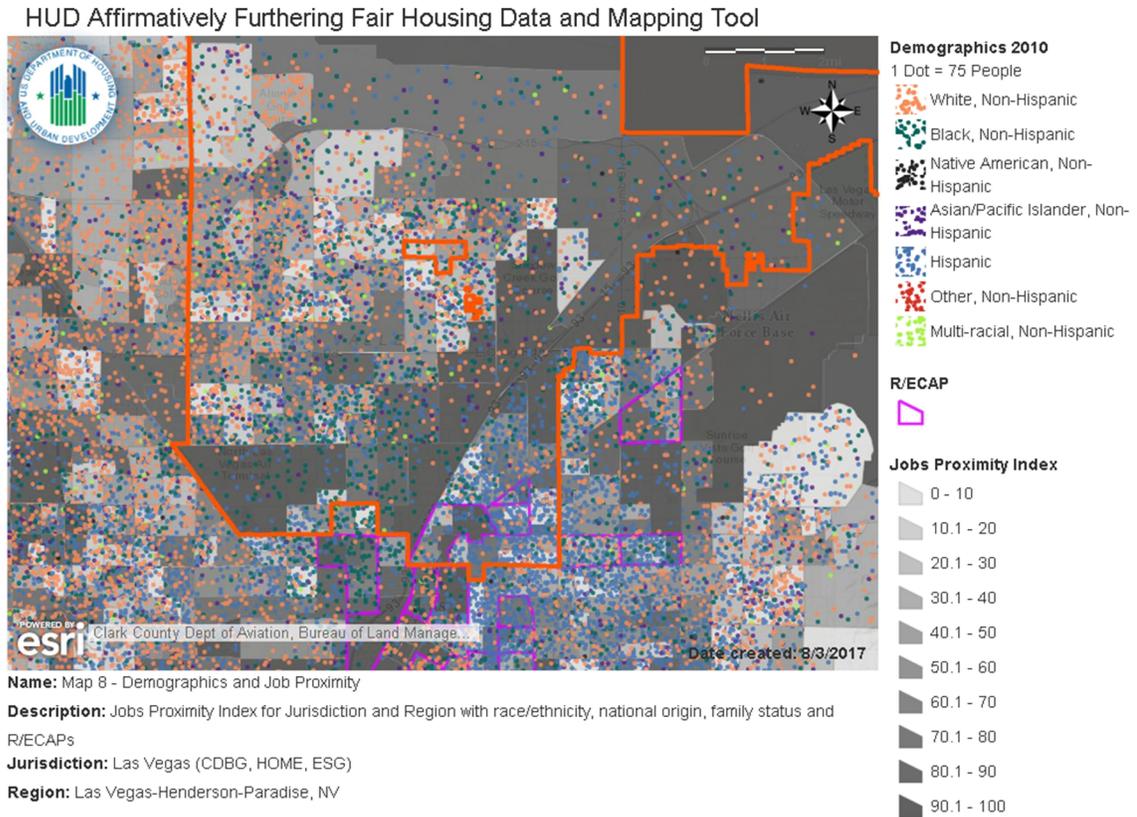
Resident perspectives on access to proficient schools. Resident meeting and stakeholder participants expressed a concern over the negative perception of schools across the entire city. Magnet schools are the exception and parents of children who attend those schools are generally happy with the education.

Despite some residents crediting variations in access to proficient schools to an image issue, other residents expressed concern for schools in low income neighborhoods:

- “Our schools aren’t getting the same resource as those in nicer neighborhoods.” (*Resident meeting participant*)

Employment. The job proximity index measures the distance between a residency and jobs. Figure V-16 shows residents by race and ethnicity and their proximity to jobs. Unlike other access to opportunity maps, access to job opportunities is moderate across the entire city. The areas with the highest access to job opportunities are located north of Interstate-15, away from the cluster of Hispanic residents in the R/ECAPs to the south.

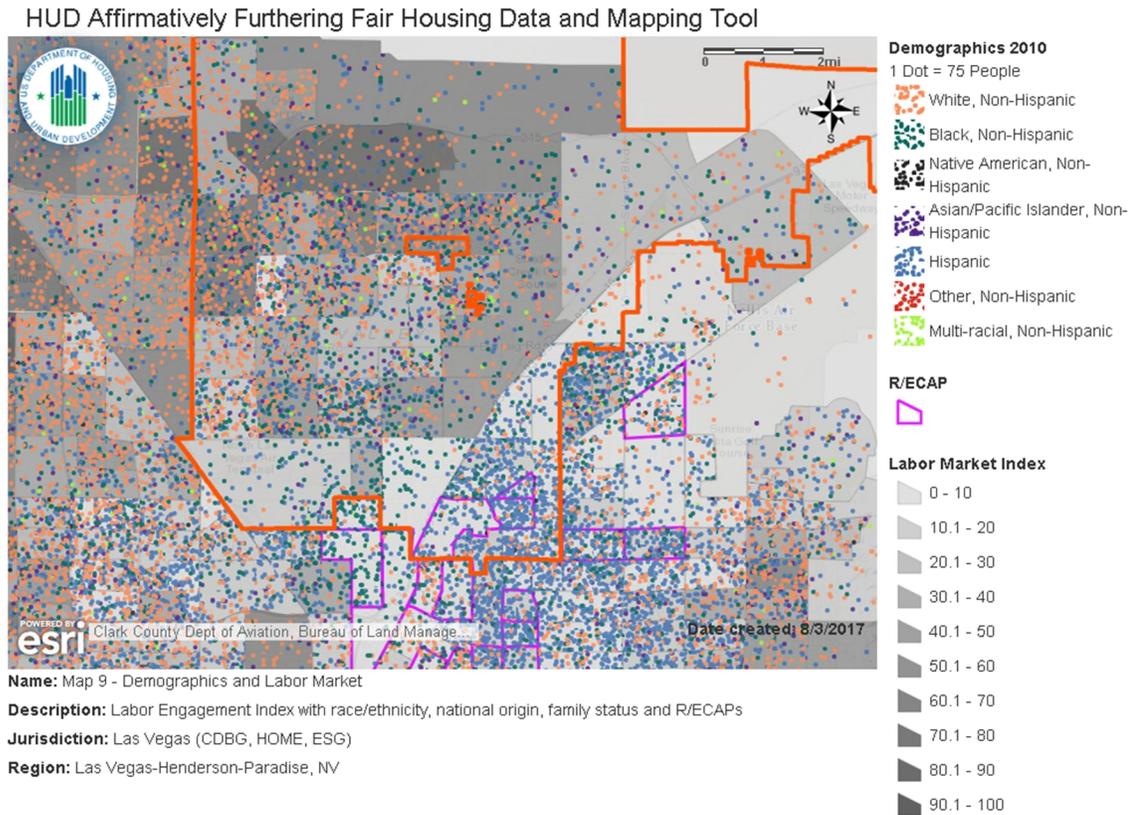
Figure V-16.
Map 8 – Demographics and Job Proximity, North Las Vegas, 2010



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. <https://egis.hud.gov/affht/>.

The labor market index is a reflection of unemployment. As shown in the HUD map below, the neighborhood with the City’s R/ECAPs has the lowest labor market index—and is also home to residents who have historically faced discrimination in employment markets. This is a similar pattern to other access to opportunity maps for the CNLV.

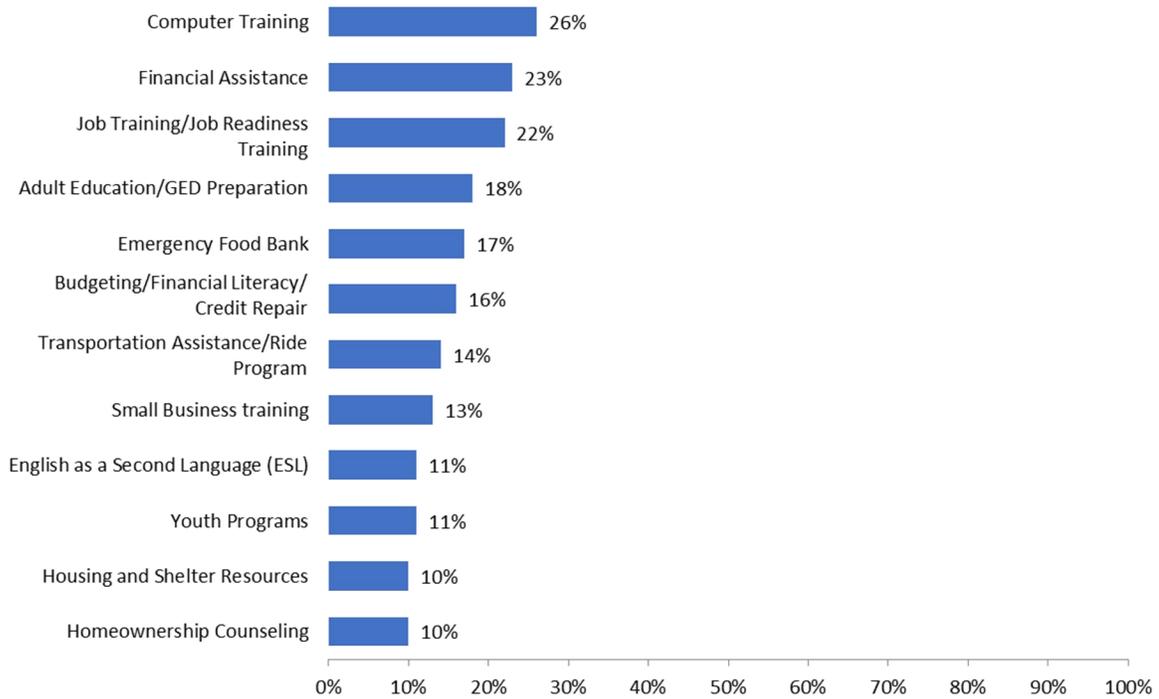
Figure V-17.
Map 9 – Demographics and Labor Market, 2010



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. <https://egis.hud.gov/affht/>.

Resident perspectives on access to employment opportunities. As depicted previously in Figure V-17, access to employment opportunities is one of the biggest issues for residents who live in the impoverished, urban core of the CNLV. As shown in the figure below, when residents were asked what their most needed supportive services were for the CNI Transformation Plan Survey, computer training and job training/job readiness training were in the top needs.

Figure V-18.
Most Needed Supportive Services



Source: CNI Transformation Plan - Summary of Neighborhood Survey Findings (November 2015) and BBC Research & Consulting.

In the resident meeting, participants reinforced the survey finding that good quality employment opportunities are not accessible from their neighborhoods. The CNLV houses many service industry workers who work multiple jobs, but residents would like more opportunities. Participants expressed a strong desire for more and improved job training resources.

In the southern part of the CNLV—including the Choice Neighborhood Initiative Urban Core and the City’s R/ECAPs—residents felt that there was virtually no employment opportunities and stated that many people commute far distances to get to work, putting additional financial stress on low income families.

Transportation. The Regional Transportation Commission of Southern Nevada (RTC) recently conducted the Southern Nevada Strong Regional Plan in January 2015. The Regional Plan aims to develop support for long-term economic success by integrating reliable transportation, quality affordable housing, and job opportunities throughout the Region.

RTC identified the Plan’s top implementation priorities:

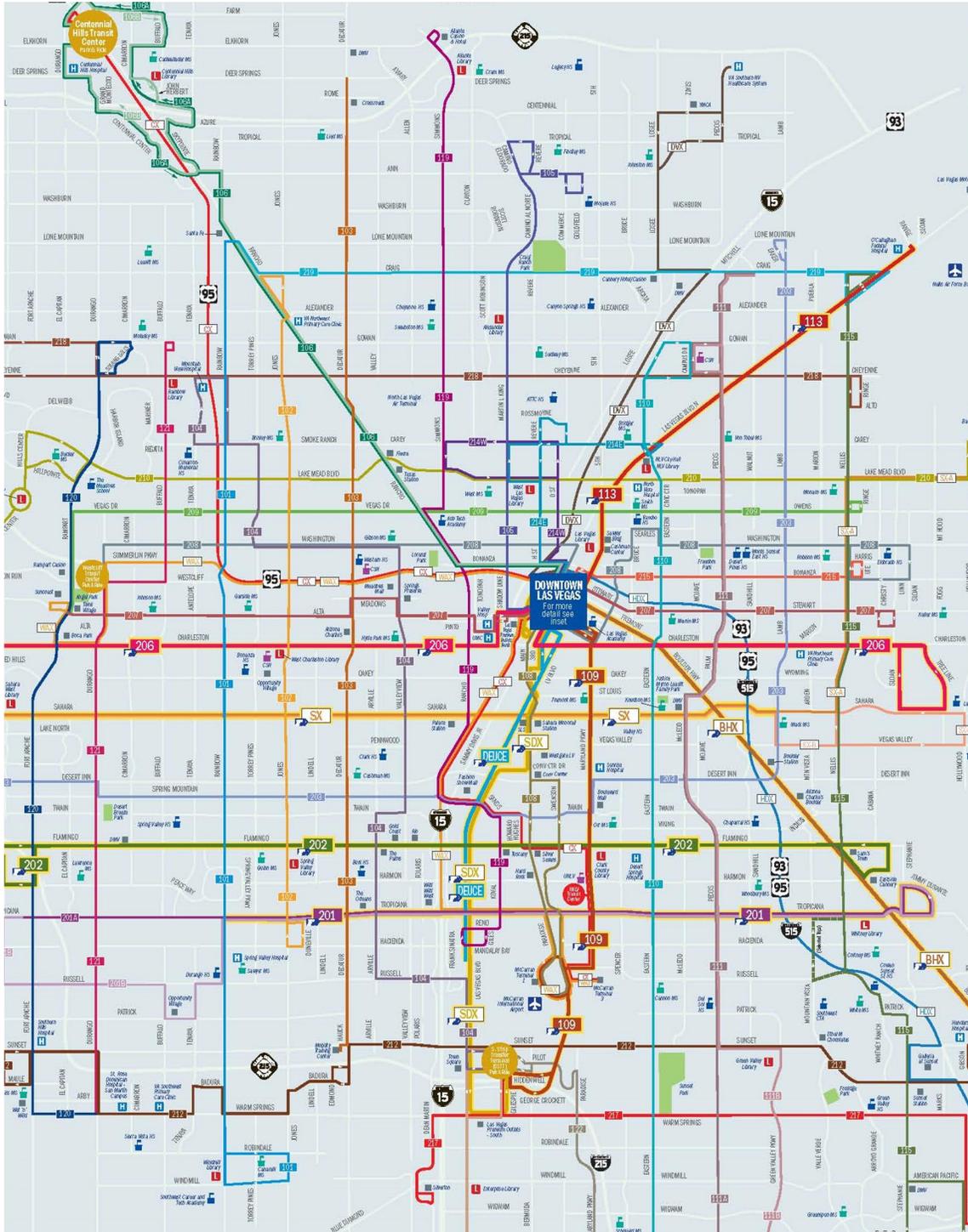
- Implement strategies for revitalization sites;
- Encourage local businesses to support education and school programs;
- Pursue light rail and improved transit options in low and moderate income areas;

- Support access to healthcare, healthy food, parks, and community services;
- Improve neighborhood safety;
- Innovate and improve public-sector-led public engagement efforts; and
- Pursue a strong higher education system.

Through implementation of top priorities, RTC hopes to achieve integration of good jobs with a wide range of housing options located near transit.

Figure V-19 illustrates the RTC's public transit system map. The system includes bus routes that connect to Downtown Las Vegas and other areas in the Region.

Figure V-19.
Regional Transit Commission of Southern Nevada Transit Map



Source:
 RTC of Southern Nev <http://www.rtcnv.com/transit/routes-maps-schedules/transit-guide/>

The neighborhood survey conducted for the CNI Transformation Plan provides a closer look at transportation barriers for residents. The majority of residents participating in the survey and

the meeting expressed access to transportation was not one the biggest barriers, but could still be improved.

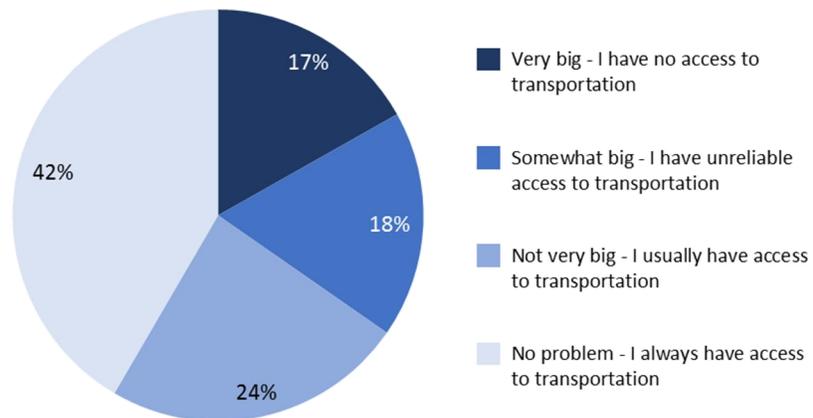
Specifically, Figure V-20 demonstrates how residents feel about access to transportation in their neighborhood. Two-thirds of respondents said they always or usually have access to transportation. The remaining respondents expressed having larger transportation barriers—stating they either have unreliable or no access to transportation.

Participants in the stakeholder focus groups generally agreed with the survey respondents. Access to transportation was not the biggest concern for residents, but was an issue for certain parts of the City, where access is more limited.

- “Public transit can be an issue in certain places – fine if staying downtown, but hard to get to northern parts of the city” (*Social Service Provider*)
- “Need more TOD and infill development that increases density to support transit and other amenities. Instead of trying to reach outskirts with transit, should try to improve neighborhoods where transit already exists.” (*Transportation Planner*)

Figure V-20.
Resident Perspective on Access to Transportation

Source:
CNI Transformation Plan - Summary of Neighborhood Survey Findings (November 2015) and BBC Research & Consulting.



Patterns in Disparities in Access to Opportunity. As discussed previously, the access to opportunity maps demonstrate that compared to other demographic groups, Hispanic and Black households have less access to proficient schools and live in neighborhoods with higher poverty and higher unemployment. These neighborhoods include the City’s three R/ECAPs, exacerbating the problem for low income, non-White households and making it nearly impossible to move and integrate into higher opportunity areas.

Further, while there are few observed differences in proximity to jobs in the access to opportunity map, findings from the community engagement process point to challenges, particularly for service industry workers who work multiple jobs.

Disproportionate Housing Needs

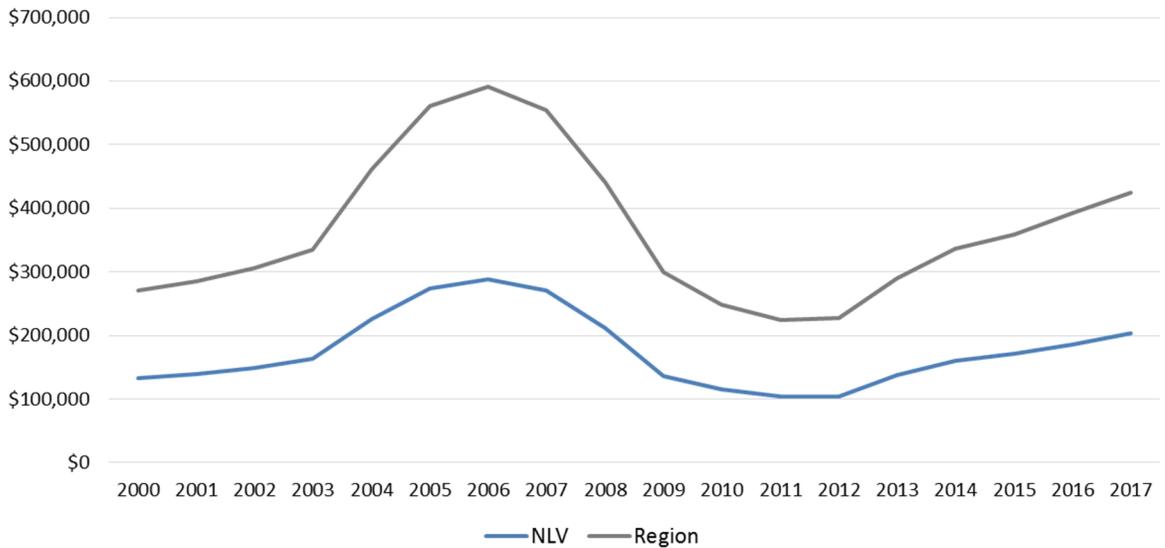
This section examines which protected classes experience the highest rates of housing problems compared to other groups and for the region, examines how housing burden varies

geographically, and examines the needs of families with children. It begins with a discussion of housing affordability trends and challenges in general.

Housing needs. Despite the Region still recovering from the Great Recession, residents are starting to feel a growing affordability issue. The housing needs of residents have been examined and the main findings from these analyses are discussed below.

Increasing housing costs. According to the most recent ACS, the average home value in the CNLV is \$203,000—the highest value since 2008. Although the average home value in the Region has been consistently higher than the City, both geographies exhibited similar housing value trends over the last 15 years.

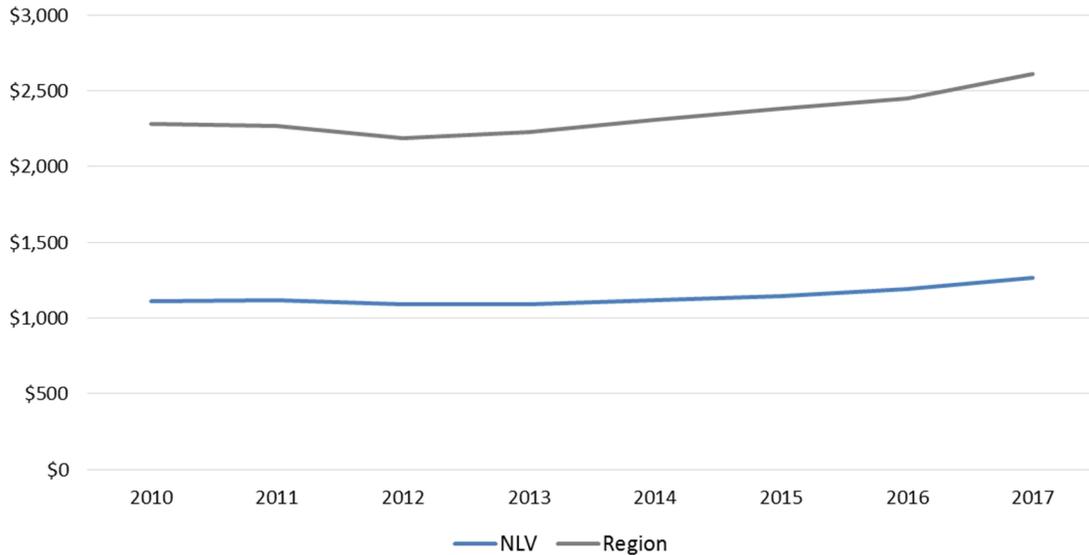
Figure V-21.
Average Home Value in North Las Vegas and Region, 2000-2015



Source: Zillow Data and BBC Research & Consulting.

Rental costs demonstrate a different trend. Unlike home prices, whose peaks and valleys mirror economic strengths and weaknesses, rental costs have been rising consistently. The average asking rent in the CNLV is currently \$1,295, just over a ten percent increase from 2010.

Figure V-22.
Average Asking Rent in North Las Vegas and Region, 2010-2016



Source: Zillow Data and BBC Research & Consulting.

As the following figure demonstrates, housing constraints were more pronounced in the CNLV compared to the Region overall. Historically, rental vacancies have been high and only until recently stabilized. Although owner vacancies tend to be lower than for rentals, the effects of the Great Recession can be seen in the high vacancies in 2008. Today, the CNLV's and the Region's housing market is much less volatile than the last 15 years.

Figure V-23.
Housing Market Trends, North Las Vegas

Source:
 2000 Decennial Census, 2015 1-year American Community Survey, and BBC Research & Consulting.

	North Las Vegas	Region
Vacancy Rate		
2000		
Rental Vacancy	12.0%	9.8%
Owner Vacancy	2.1%	2.5%
2008		
Rental Vacancy	12.4%	11.4%
Owner Vacancy	6.8%	5.6%
2015		
Rental Vacancy	5.5%	9.5%
Owner Vacancy	2.5%	2.9%
New Development		
Units built 2000 and more recently	53.7%	36.7%
Housing Condition		
Lacking complete plumbing facilities	50	2,565
Lacking complete kitchen facilities	149	4,652

Homelessness. The CNLV conducts a Point-in-Time (PIT) count of homeless individuals in coordination with the region. According to the 2017 Homeless Census and Survey

Comprehensive Report for Southern Nevada, there were approximately 6,490 homeless people in the Region on January 24, 2017—a 5 percent increase from the previous year. Of these, 4,300 were unsheltered—living on streets, in vehicles, in encampments. Nearly 2,220 were sheltered, living in shelters, emergency housing, transitional housing, motel voucher programs, residential treatment facilities, and jails or hospitals.

This count does not include persons who are at-risk of homelessness and is thought to undercount families and children, many of whom “float” among temporary residence and may be living in domestic violence situations. The census estimates the annual number of homeless people in Southern Nevada is closer to 25,000.

According to the PIT survey, the “typical” homeless person in Southern Nevada is a White man between the ages of 51 and 50.

Three-quarters of the homeless individuals surveyed for the census reported they had at least 1 disabling condition and one-third indicated having a physical disability.

Both White and Black populations are disproportionately represented among the homeless in the CNLV; 55 percent and 35 percent, respectively, of the total homeless population. Hispanics are significantly underrepresented at only 12 percent, compared to 40 percent of the total CNLV population.

For homeless individuals who took the PIT survey, more than half reported job loss as the primary cause of their homelessness, followed by alcohol or drug use (34%) and mental health issues (15%).

The majority (53%) of these PIT survey respondents reported that they were renting a home or apartment prior to becoming homeless—an 8 percent increase from the previous year. This increase of homeless individuals that previously lived in a housing unit highlights the region’s growing affordability issue.

Differences in housing problems. HUD provides data tables as a starting point in assessing the differences in housing needs among household groups. The CNLV is a new entitlement community and therefore, these data tables were not available for the City at the time the AFH was conducted. The HUD tables were supplemented by the American Community Survey and Census, but are limited.

Figure V-24 below shows the number of households with housing problems in the CNLV and the Region. “Housing problems” are defined as units having incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and households with cost burden greater than 30 percent.

Figure V-24.
Tenure of Households with Housing Needs

	(North Las Vegas, NV) Jurisdiction					Total Households experiencing any of 4 Housing Problems
	Total Occupied Housing Units	With one selected condition	With two selected conditions	With three selected conditions	With four selected conditions	
Tenure						
Owner occupied	38,204	9,713	196	50	-	9,959
Renter occupied	31,999	16,113	1,364	-	-	17,477

	(Las Vegas-Henderson-Paradise, NV) Region					Total Households experiencing any of 4 Housing Problems
	Total Occupied Housing Units	With one selected condition	With two selected conditions	With three selected conditions	With four selected conditions	
Tenure						
Owner occupied	382,183	95,045	1,746	276	-	97,067
Renter occupied	358,783	169,091	13,802	558	-	183,451

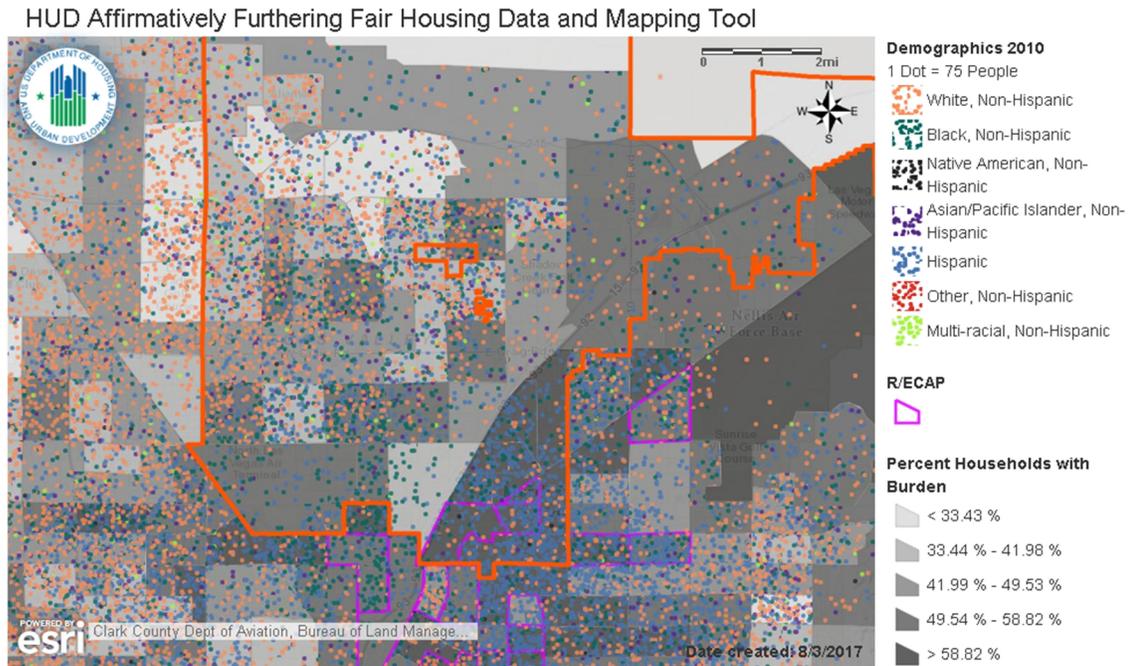
Note: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%.

Source: 2015 1-year American Community Survey and BBC Research & Consulting.

Renter households have the highest rate (over 50%) of housing problems in the CNLV and the region. Although one quarter of owners experience one of the 4 housing problems, these residents do not face the same housing needs as renters. An analysis of the demographics of residents who face housing problems is necessary in understanding disproportionate housing needs.

The map below shows where the neighborhoods with the highest housing burdens exist and how these relate to where households of different races and ethnicities live. In general, housing burden is moderate to high in the CNLV. The highest rates of housing burden exist in the southern Census tracts, where there are higher clusters of Hispanic residents.

Figure V-25.
Map 6 – Housing Problems, North Las Vegas, 2010



Stakeholder perceptions. Stakeholders who participated in focus groups for this AFH described how market pressures were affecting their constituents:

- The housing market has shifted recently and prices are going up for owners and renters. Affordability is now the biggest issues for residents.
- “Availability of affordable units is an issue, especially for those under 30% AMI. There are many programs that serve households that are 50% AMI or above, but that is not where the greatest need exists. All of our properties in North Las Vegas are full, but the greatest needs are for households that can’t qualify because of income” (*Affordable Housing Developer*)

Developer perspectives. In the stakeholder focus groups, housing developers stated the challenges to developing affordable housing included:

- Difficulty adhering to the Public Works Department’s requirements;
- Too expensive to acquire multifamily properties;
- There is no one to oversee TOD requirements or to manage the program;
- A need for rezoning existing, vacant parcels for the highest and best use.

Lending. The CNI’s transformation plan attributes segregation in the Region to historically discriminatory practices and policies, highlighting redlining—as well as segregation that resulted from structural inequities and, to some degree, self-segregation.

A HMDA analysis was completed for the 2015 regional Analysis of Impediments to Fair Housing Choice (2015 AI). The analysis covered home purchase data from 2011 through 2012. The average percent denied during this period was 14.4 percent, with variation during the period: percent denied was 12.3 percent in 2011 and increased to 16.6 percent by 2012. The analysis also found that Black, Native American and Hispanic mortgage loan applicants experienced a slightly higher denial rate than White applicants.

For the AFH, an updated HMDA analysis was conducted with more current home purchase data.

In 2015, there were 9,500 loan applications in the CNLV. The majority of applications were for FHA-insured (39%) and conventional loans (36%) and for the loan purpose of refinancing.

Sixty-two percent of loans were originated and the percent of loans denied was 16 percent—similar to 2012. The denial rate (only compares loans originated and denied) in 2015 was higher, at 24 percent. The

Loan applications by Native Americans had the highest percent of applications denied and lowest percent originated compared to White residents, who experienced the opposite trend: the lowest percent of applications denied and the highest percent of loans originated.

In 2015, there were almost 800 subprime loans, or 13 percent of all originated loans. The average interest rate above prime was 2 percent. This high percentage of subprime loans could explain why many residents in CNLV filled out loan applications for refinancing.

The 2015 HMDA analysis echoes statements heard during the resident meeting in August 2017. Issues with loan denials were brought up as a large concern for younger, Hispanic families looking to become homeowners.

Publicly Supported Housing Analysis

The AFH requires the following analysis of publicly-supported housing, which is covered in this section:

a. Publicly Supported Housing Demographics

- i. Are certain racial/ethnic groups more likely to be residing in one program category of publicly supported housing than other program categories (public housing, project-based Section 8, Other Multifamily Assisted developments, and Housing Choice Voucher (HCV)) in the jurisdiction?*
- ii. Compare the racial/ethnic demographics of each program category of publicly supported housing for the jurisdiction to the demographics of the same program category in the region.*

- iii. *Compare the demographics, in terms of protected class, of residents of each program category of publicly supported housing (public housing, project-based Section 8, Other Multifamily Assisted developments, and HCV) to the population in general, and persons who meet the income eligibility requirements for the relevant program category of publicly supported housing in the jurisdiction and region. Include in the comparison, a description of whether there is a higher or lower proportion of groups based on protected class.*

b. Publicly Supported Housing Location and Occupancy

- i. *Describe patterns in the geographic location of publicly supported housing by program category (public housing, project-based Section 8, Other Multifamily Assisted developments, HCV, and LIHTC) in relation to previously discussed segregated areas and R/ECAPs in the jurisdiction and region.*
- ii. *Describe patterns in the geographic location for publicly supported housing that primarily serves families with children, elderly persons, or persons with disabilities in relation to previously discussed segregated areas or R/ECAPs in the jurisdiction and region.*
- iii. *How does the demographic composition of occupants of publicly supported housing in R/ECAPS compare to the demographic composition of occupants of publicly supported housing outside of R/ECAPs in the jurisdiction and region?*
- iv. (A) *Do any developments of public housing, properties converted under the RAD, and LIHTC developments have a significantly different demographic composition, in terms of protected class, than other developments of the same category for the jurisdiction? Describe how these developments differ.*

(B) Provide additional relevant information, if any, about occupancy, by protected class, in other types of publicly supported housing for the jurisdiction and region.

- v. *Compare the demographics of occupants of developments in the jurisdiction, for each category of publicly supported housing (public housing, project-based Section 8, Other Multifamily Assisted developments, properties converted under RAD, and LIHTC) to the demographic composition of the areas in which they are located. For the jurisdiction, describe whether developments that are primarily occupied by one race/ethnicity are located in areas occupied largely by the same race/ethnicity. Describe any differences for housing that primarily serves families with children, elderly persons, or persons with disabilities.*

c. Disparities in Access to Opportunity

- i. *Describe any disparities in access to opportunity for residents of publicly supported housing in the jurisdiction and region, including within different program categories (public housing, project-based Section 8, Other Multifamily Assisted Developments, HCV, and LIHTC) and between types (housing primarily serving families with children, elderly persons, and persons with disabilities) of publicly supported housing.*

The CNLV previously had their own housing authority, but in January 2010, it merged with two other housing authorities in the Las Vegas Valley to form the Southern Nevada Regional Housing Authority (SNRHA). The SNRHA mainly provides assistance through 1) Housing Choice Vouchers, 2) Project based Section 8 developments, and 3) Public Housing.

Public housing is very limited and there is only one public housing development in the CNLV: Rose Gardens Senior Apartments. There are also a handful of single family homes in scattered sites that are managed by the SNRHA.

According to HUD, the latest inventory of publicly supported housing units in the City is about 1,930. Most of these units are in housing developed through the Low Income Housing Tax Credit (LIHTC), which usually serves residents at various income levels.

Representation of racial and ethnic groups by housing program. HUD provides data on the racial and ethnic make up of households assisted by housing authorities; these are shown below.

A larger proportion of Hispanic and Black residents make up low income households in the CNLV compared to other races/ethnicities. Conversely, a lower proportion of White and Asian residents make up low income households.

Figure V-26.
Table 6 – Publicly Supported Households by Race/Ethnicity

Housing Type	Total	Race/Ethnicity							
		White		Black		Hispanic		Asian or Pacific Islander	
		#	%	#	%	#	%	#	%
Public Housing	120	--	--	--	--	--	--	--	--
Project-Based Section 8	271	14	5%	168	62%	89	33%	3	1%
Other Multifamily	59	25	43%	9	16%	10	17%	14	24%
Total Housing Units	77,708	21,836	28%	15,542	20%	31,394	40%	4,662	6%

Note: Numbers presented are numbers of households not individuals. Demographic data for public housing units was not readily available.

Source: 2015 American Community Survey, BBC Research & Consulting, and HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. <https://egis.hud.gov/affht/>

As previously mentioned, the CNLV is a new entitlement community and HUD’s data tables in the AFFH Data and Mapping Tool were not available for the City at the time the AFH was conducted. Although these HUD tables were supplemented by the American Community Survey and Census, these data are limited and do not have detailed demographic information about residents living in publicly supported housing. Additional analysis into persons with disabilities, families with children, and housing type of publicly supported housing is necessary to understand the conditions and needs of these residents.

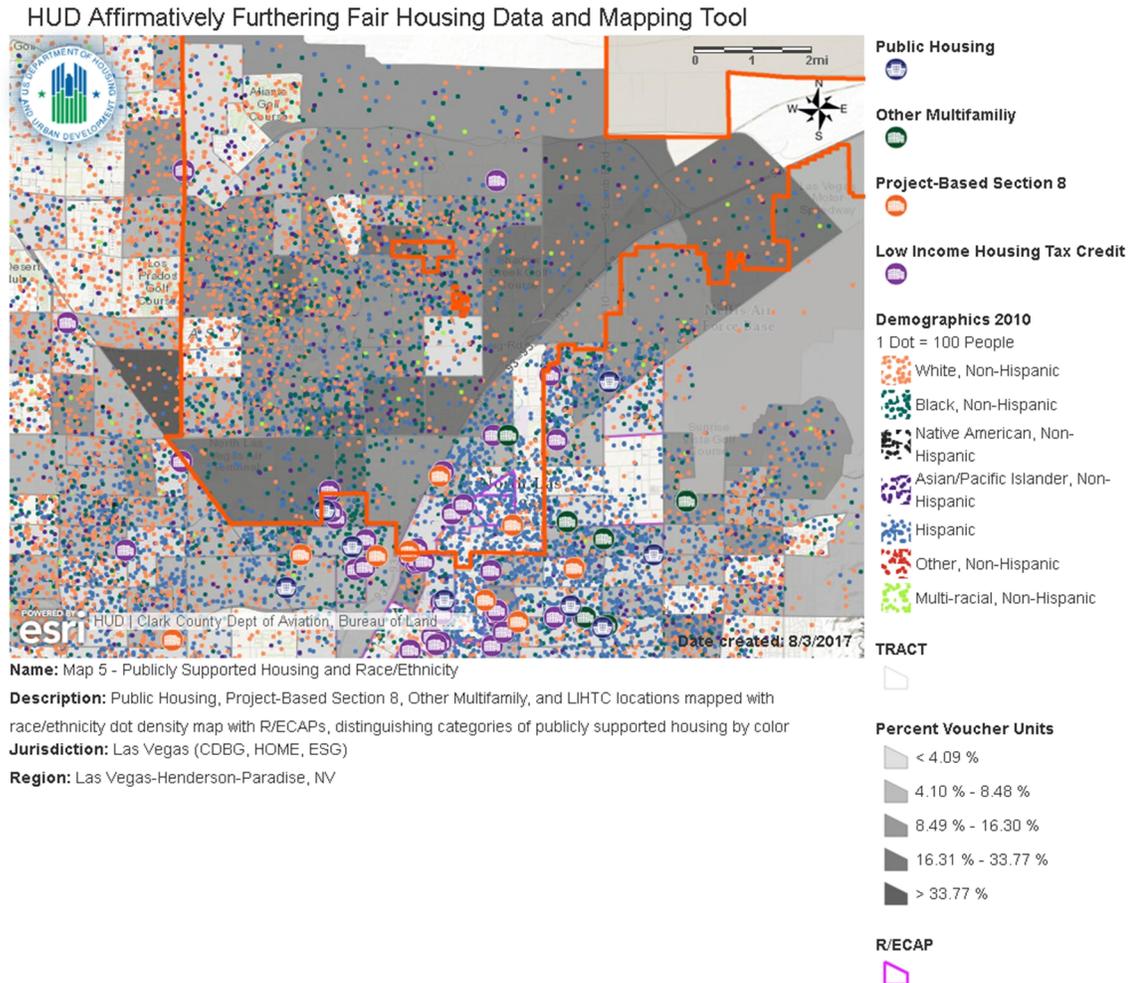
Based on the resident’s demographics and location of the publicly supported housing in HUD’s database, it appears that 1) Hispanic and Black residents disproportionately reside in publicly

supported housing; 2) Public housing options are limited and the City's only development is restricted to seniors, reducing the options for families and younger individuals.

Patterns in location by program. The map below shows the distribution of publicly supported housing relative to where residents of different races and ethnicities live. The icons represent different types of publicly supported housing:

- Blue icons indicate housing that is owned and operated by a public housing authority.
- Orange icons represent affordable rental housing that offers Housing Choice Voucher/Section 8 subsidies.
- Purple icons represent Low Income Housing Tax Credit (LIHTC) developments.
- Green icons show other types of publicly supported rental housing.
- Grey shading shows the percentage of rental units that house Housing Choice Voucher holders. This shading is also shown separately in the second map.

Figure V-27.
Map 5 – Publicly Supported Housing and Race/Ethnicity, North Las Vegas, 2010



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. <https://egis.hud.gov/affht/>

The majority of affordable developments are grouped together near the City’s R/ECAPS, in the area south of Interstate-15. This is also the part of the City where large clusters of Hispanic residents live. Although this area may contain many of the City’s subsidized housing developments, the percent of voucher units are low.

The highest percent of voucher units are located in more central parts of the CNLV. This geospatial pattern of voucher units may indicate that residents with Section 8 vouchers are able to move into neighborhoods with more opportunity and lower poverty rates than where the majority of subsidized housing developments are located.

Disability and Access Analysis

Population Profile

1. *How are persons with disabilities geographically dispersed or concentrated in the jurisdiction and region, including R/ECAPs and other segregated areas identified in previous sections?*
2. *Describe whether these geographic patterns vary for persons with each type of disability or for persons with disabilities in different age ranges for the jurisdiction and region.*

Housing Accessibility

1. *Describe whether the jurisdiction and region have sufficient affordable, accessible housing in a range of unit sizes.*
2. *Describe the areas where affordable accessible housing units are located in the jurisdiction and region. Do they align with R/ECAPs or other areas that are segregated?*
3. *To what extent are persons with different disabilities able to access and live in the different categories of publicly supported housing in the jurisdiction and region?*

Integration of Persons with Disabilities Living in Institutions and Other Segregated Settings

1. *To what extent do persons with disabilities in or from the jurisdiction or region reside in segregated or integrated settings?*
2. *Describe the range of options for persons with disabilities to access affordable housing and supportive services in the jurisdiction and region.*

Disparities in Access to Opportunity

1. *To what extent are persons with disabilities able to access the following in the jurisdiction and region? Identify major barriers faced concerning:*
 - i. *Government services and facilities*
 - ii. *Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)*
 - iii. *Transportation*
 - iv. *Proficient schools and educational programs*
 - v. *Jobs*
2. *Describe the processes that exist in the jurisdiction and region for persons with disabilities to request and obtain reasonable accommodations and accessibility modifications to address the barriers discussed above.*

3. *Describe any difficulties in achieving homeownership experienced by persons with disabilities and by persons with different types of disabilities in the jurisdiction and region.*

Disproportionate Housing Needs

1. *Describe any disproportionate housing needs experienced by persons with disabilities and by persons with certain types of disabilities in the jurisdiction and region.*

Population profile. According to the American Community Survey, there are 25,594 residents in the CNLV with some type of disability. Of these, 9,171 are seniors (36%). A significant number—13,937—are adults. Ten percent are children. In all, 11 percent of residents have a disability. This is a similar distribution as the Region overall.

The most common type of disability is an ambulatory disability followed by a cognitive disability and an independent living disability. The types of disabilities in the City are similar to that of the Region overall.

Figure V-28.
Number and Characteristics of Persons with Disabilities, North Las Vegas and Region, 2015

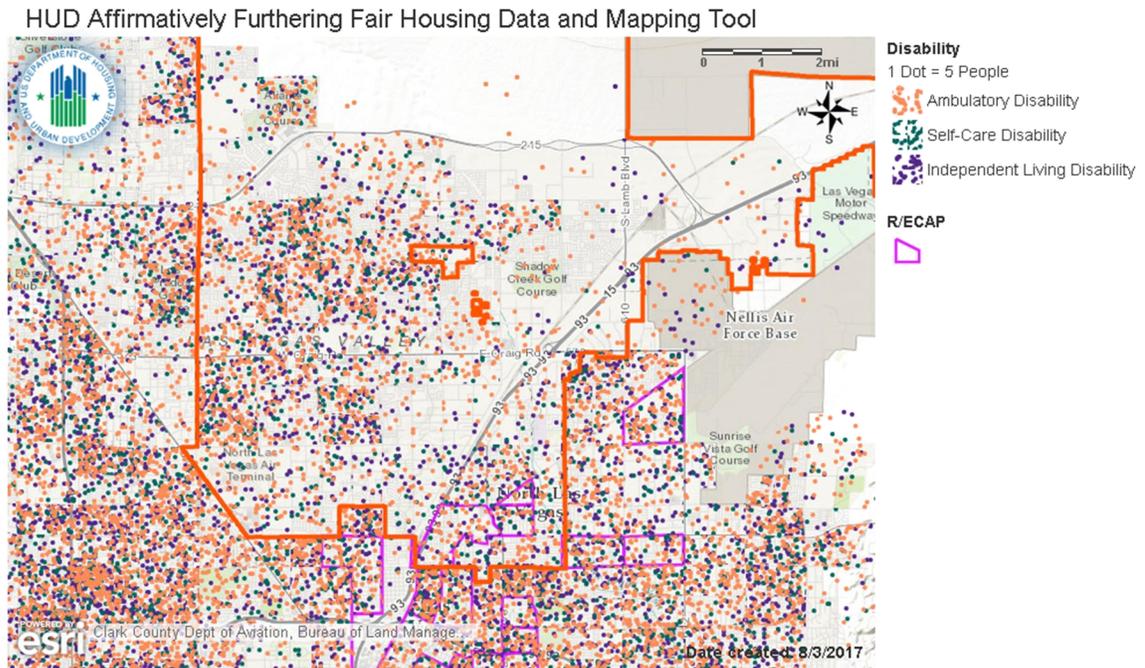
	No. of Residents with a Disability	% of Residents with a Disability	Age Cohort			Disability Type					
			Under 18	18-64 years	65+ years	With Hearing Disability	With Vision Disability	With Cognitive Disability	With Ambulatory Disability	With Self-Care Disability	With Independent Living Disability
North Las Vegas	25,594	11%	2,486	13,937	9,171	6,672	5,852	9,896	14,175	5,205	8,265
Region (MSA)	259,190	12%	19,872	138,039	101,279	70,844	66,600	91,179	136,743	49,111	85,818

Source: 2015 American Community Survey and BBC Research & Consulting.

It is important to note that, just like any household, not all persons with disabilities need or desire the same housing choices. Fair housing analyses often focus on how zoning and land use regulations govern the siting of group homes. Although group homes should be an option for some persons with disabilities, other housing choices—particularly scattered site units—must be available to truly accommodate the variety of needs of residents with disabilities.

The following maps show where persons with disabilities reside in the CNLV. As the maps demonstrate, there is no distinct pattern to where people with disabilities live based on their disability type.

Figure V-29.
Map 14a – Disability by Type: Ambulatory, Self-Care, and Independent Living Disabilities



Name: Map 14 - Disability by Type

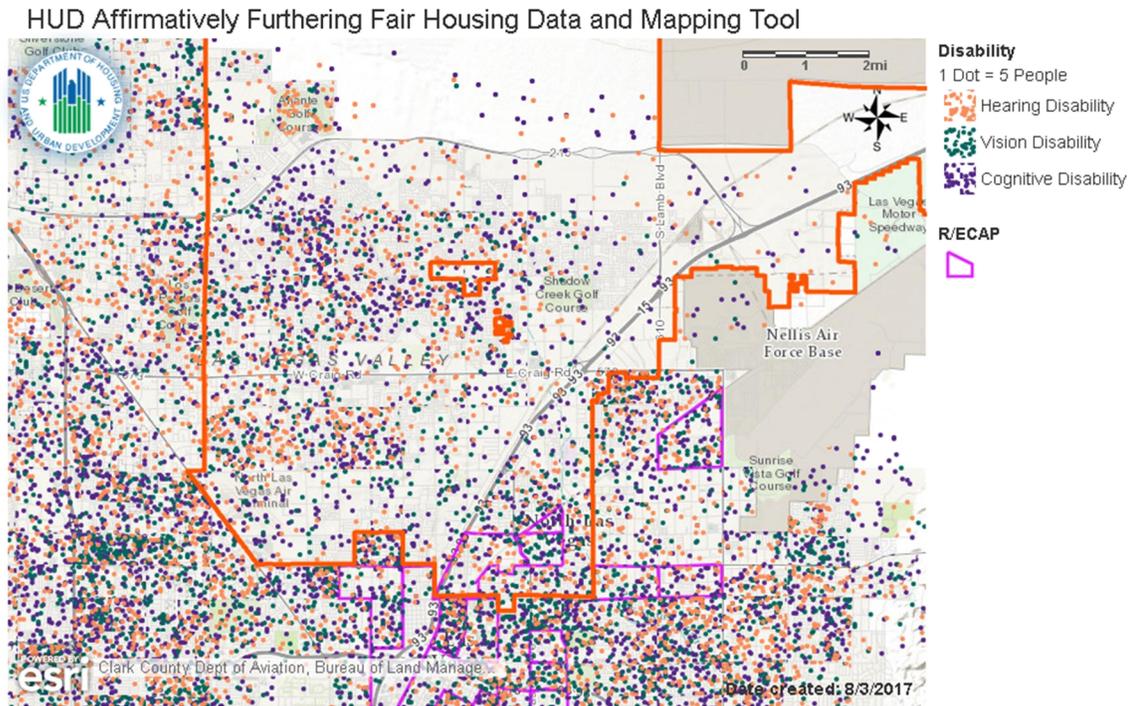
Description: Dot density map of the population of persons with disabilities by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction and Region

Jurisdiction: Las Vegas (CDBG, HOME, ESG)

Region: Las Vegas-Henderson-Paradise, NV

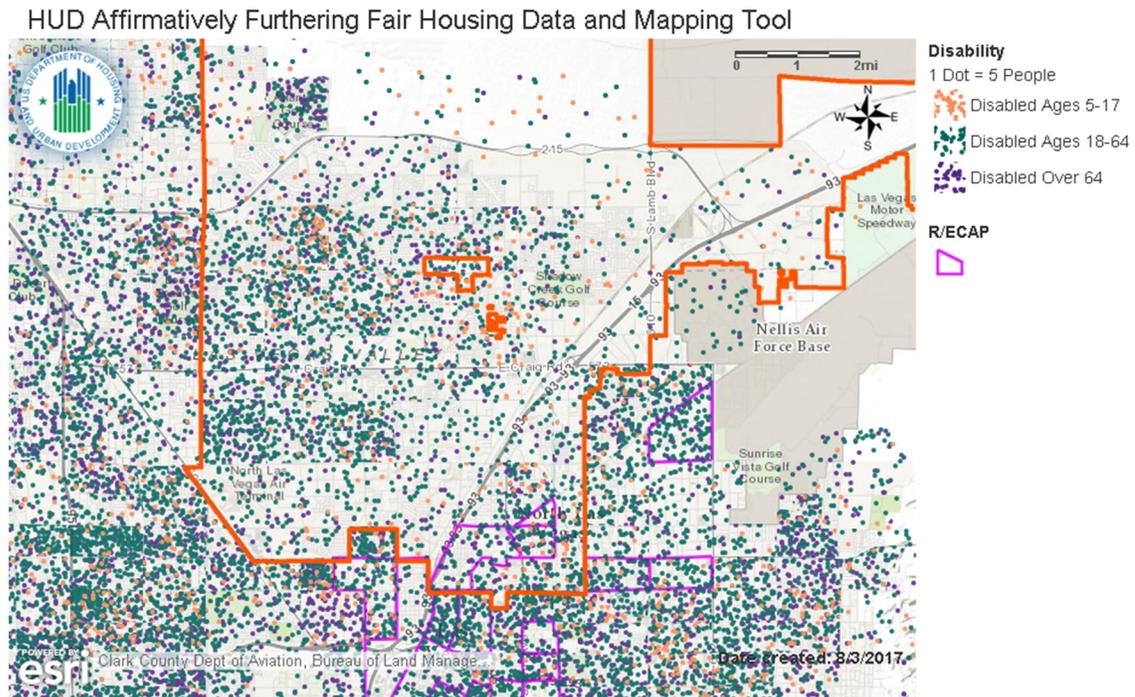
Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. <https://egis.hud.gov/affht/>

Figure V-30.
Map 14b – Disability by Type: Hearing, Vision, and Cognitive Disabilities



Similarly, as Map 15 (below) shows, there are no distinct patterns by age.

Figure V-31.
Map 15 – Disability by Type



Availability of accessible housing. In a stakeholder discussion facilitated for the AFH in August 2017, participants discussed factors that make finding affordable housing that meets the needs of a resident with disabilities more challenging, including:

- Many older, more affordable units are not ADA compliant
- “Neighborhoods don’t want group homes—even homes with fewer than 6 residents, particularly with cognitive disabilities. Neighbors are not friendly/welcoming.” (*Social Service Provider*)
- Service animals are often not being accepted by landlords

Reasonable modification or accommodation requests. The top complaints that Silver State Fair Housing Council (SSFHC) hears from persons with disabilities are:

- Service animals not being accepted;
- Refusal to provide parking space closer to unit;
- Landlords won’t let tenants break leases when they can no long live by themselves;

- Landlords won't accommodate shift in timing on regular rent payment to accommodate when SSDI checks are received; and
- Refusal to transfer residents from an upstairs unit to a downstairs unit.

Building permit monitoring for accessibility compliance: When the CNLV issues a multifamily building permit, Silver State Fair Housing Council (SSFHC) sends a packet of information about the Fair Housing Act (FHA) design and construction requirements to all principals; usually the owner and builder per the building permit report.

The CNLV does not have a mechanism online to track when the Certificates of Occupancy are issued and they do not provide this information over the phone. SSFHC checks periodically on the progress of these projects by driving by each project.

Once the projects are completed, SSFHC contacts the property to request a visit to check for compliance with the seven design and construction requirements of accessibility. Out of all the properties SSFHC has tracked in the CNLV, only one allowed SSFHC to visit the property. This raises concerns that if building officials are not checking for these requirements, properties are not built in compliance.

Integration. Like other residents in the CNLV, the cost of housing, unit accessibility, and access to community amenities are the primary issues that typically hinder an individual with a disability from living in the most independent, integrated setting desired, based on public input received during the community engagement process.

During the stakeholder focus groups, social service providers for people with disabilities stated that many residents live in group homes scattered throughout the City. Although these homes are not segregated in one area of the City, residents do not want group homes in their neighborhoods and are not friendly or welcoming. One social service provider described a new housing model for persons with disabilities that would create a mixed-ability development and help with neighborhood integration.

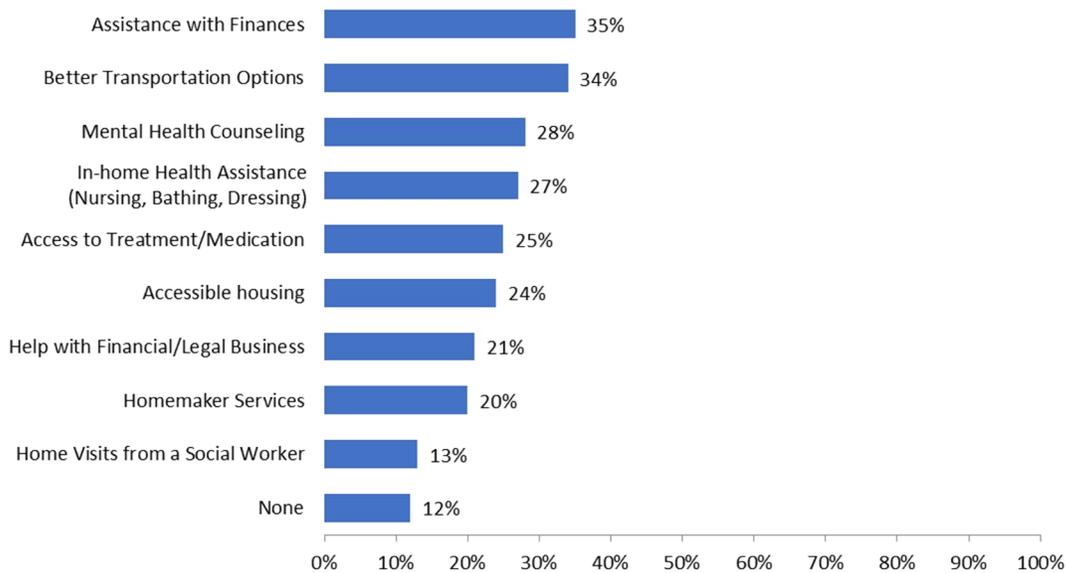
Access to publicly supported housing. There are no disabled-only designated developments in the CNLV. As previously mentioned, the CNLV is a new entitlement community and HUD's data tables in the AFFH Data and Mapping Tool were not available for the City at the time the AFH was conducted. Although these HUD tables were supplemented by the American Community Survey and Census, these data are limited and do not have detailed demographic information about residents living in publicly supported housing. Additional analysis into persons with disabilities, families with children, and housing type of publicly supported housing is necessary to understand the conditions and needs of these residents.

Disparities in Access to Opportunity. The AFH asks *"to what extent are persons with disabilities able to access the following in the jurisdiction and region? Identify major barriers faced concerning: Government services and facilities; Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals); Transportation; Proficient schools and educational programs; and Jobs."*

The CNI Urban Core contains two prominent subpopulations: seniors and persons with disabilities. More than one in five residents has or has a household member with a disability of some type. Persons with disabilities have to travel far distances to access necessary medical and social services and accessing reliable and accessible transportation can be a challenge.

The neighborhood survey conducted for the CNI Transformation Plan provides a closer look at access to services for persons with a disability. Figure V-32 shows that residents who live with a disability are most in need of assistance with finances and better transportation options.

Figure V-32.
Services Needs Among those with a Disability



Source: CNI Transformation Plan - Summary of Neighborhood Survey Findings (November 2015) and BBC Research & Consulting.

Transportation. The neighborhood survey conducted for the CNI Transformation Plan found that one-third of respondents had unreliable or no access to transportation. Thirty-four percent indicated that overall, better transportation options were a top service need among residents with a disability.

Jobs. Seventeen percent of neighborhood survey respondents indicated that their disability or health restrictions were the biggest barriers to employment.

Processes to request and obtain reasonable accommodations and accessibility modifications to address access to opportunity barriers. As discussed above, transportation is a barrier to accessing opportunity for many residents with disabilities. As the primary provider of public transit and paratransit services in North Las Vegas, RTC, has easy-to-find accessibility information on its website. Residents seeking to make a reasonable modification request to a policy, practice or procedure can request a modification by submitting a description of what is

needed.⁶ The RTC ADA Reasonable Modification Department handles these requests and can be reached by phone at 702-676-1947 or email at ADA@rtcsonv.com or mail (Attention: ADA Reasonable Modifications at 600 S. Grand Central Pkwy., Las Vegas, Nevada, 89106).

Fair Housing Enforcement, Outreach Capacity, and Resources Analysis

This section of the AFH discusses fair housing enforcement. It reviews legal cases and complaints, describes fair housing protections, and evaluates enforcement and outreach capacity.

As required by the AFH template, the City must report unresolved fair housing:

- a. *Charge or letter of finding from HUD concerning a violation of a civil rights-related law;*
- b. *A cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law;*
- c. *Any voluntary compliance agreements, conciliation agreements, or settlement agreements entered into with HUD or the Department of Justice;*
- d. *A letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law;*
- e. *A claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing; or*
- f. *A pending administrative complaints or lawsuits against the locality alleging fair housing violations or discrimination.*

City staff and Silver State Fair Housing Council did not report any current unresolved claims, findings, or administrative complaints in the CNLV.

Fair housing protections. Insufficient enforcement at the state level is most critical for residents who fall within protected classes covered by state, but not federal, law. These include residents who have a different sexual orientation, gender identity or expression, and ancestry than the majority.

Fortunately, the Region has a number of local enforcement organizations (shown below).

⁶ <http://www.rtcsonv.com/transit/paratransit/>

Figure V-33.
Local Resources for Fair Housing Information and Complaints

Name	URL	Phone Number
Silver State Fair Housing Council	http://silverstatefairhousing.org/	888-585-8634
Legal Aid Center of Southern Nevada	http://www.lacsn.org/	702-386-1070
Nevada Legal Services - Las Vegas – Tenant’s Rights Center	http://nlslaw.net	702-383-6095

Trends in fair housing complaints and violations. Silver State Fair Housing Council, the primary investigative agency in the state, was consulted about fair housing complaints and violations.

Between April 2015 and February 2017, Silver State Fair Housing Council (SSFHC) received 66 calls from North Las Vegas residents who experienced fair housing issues. The chart below shows the reason for the complaint.

Figure V-34.
Reason for Fair Housing Complaint, 2015-2017

Note:

*Other complaints include in-home care, testing program, and ADA compliance in a commercial building.

Source:

Silver State Fair Housing Council and BBC Research & Consulting.

Complaint issue:	#	%
Landlord/tenant law	46	55%
Housing Discrimination	21	25%
Fair Housing Support	9	11%
Rental Assistance	3	4%
Housing Acquisition	1	1%
Modification Assistance	1	1%
Other*	3	4%

As shown by the chart above, landlord/tenant law is the most common reason for complaint calls, representing 55 percent of all calls. Housing discrimination is second (25%), followed by fair housing support (11% of all calls).

Of the 66 calls SSFHC received, there were 8 enforcement intakes, which were referred to HUD-FHEO. The basis for these discrimination claims were disability and race. Five complaints dealt with discrimination against persons with a physical disability and the remaining three were against Black residents.

The majority of these cases were resolved through conciliation or settlement by HUD. The conciliated cases (3) granted reasonable accommodation requests and the other resulted in a financial settlement of \$5,000. The disposition of cases overall is very successful, with many of the cases resulting in a positive resolution.

Figure V-35.
Resolution of Fair Housing Cases, 2015-2017

Source:
Silver State Fair Housing Council and BBC Research & Consulting.

Resolutions for Complaints	
Conciliated/Settled by HUD	4
No Cause Determination	1
HUD Closure	1
No Valid Basis	1
Pending with HUD	1

Fair housing cases: SSFHC is not aware of any litigation involving fair housing discrimination in the CNLV.

Other local resources. As part of the enforcement and outreach analysis, the City's and the PHA's webpages were reviewed for fair housing information. The search found little to no fair housing information. Jurisdictional and PHA webpages that provide links to fair housing resources for residents seeking more information about their housing rights are needed.

SECTION VI.

Fair Housing Goals and Priorities

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Fair Housing Goals and Priorities

This section presents goals for how the CNLV can address the fair housing challenges identified in this AFH.

Goals Development

The following matrices show the goals and action items the City will employ during the next five years to address priority fair housing challenges.

Following HUD's AFH guidelines, the goals were developed with the SMART acronym in mind:

- S—Specific
- M—Measurable
- A—Actionable
- R—Realistic
- T—Timebound.

Prioritization. Prioritization of the fair housing issues was steered by HUD's guidance in the AFH rule. In prioritizing the contributing factors to address, highest priority was given to those contributing factors that:

- Limit or deny fair housing choice;
- Limit or deny access to opportunity; and
- Negatively impact fair housing or civil rights compliance.

FAIR HOUSING PLAN – North Las Vegas

GOAL	CONTRIBUTING FACTORS	FAIR HOUSING ISSUES	PRIORITIZATION	METRICS, MILESTONES, AND TIMEFRAME FOR ACHIEVEMENT	RESPONSIBLE PROGRAM PARTICIPANT(S)
1. Stabilize the decline in homeownership. Strengthen ownership options for CLNV residents	Foreclosure crisis; low incomes of residents	Disproportionate housing needs. Differences in homeownership and access to wealth building. Most pronounced for Black and Native American residents	High	Continue the down payment assistance program and evaluate its potential to reduce homeownership gaps. Also expand partnerships with nonprofits and financial institutions that offer financial counseling and homeownership readiness: 1) Sponsor homebuyer education classes. 2) Hold a roundtable discussion with area lenders to discuss how to assist low income homebuyers through CRA programs, 3) Explore land trust models on vacant parcels to be redeveloped into deeply affordable ownership housing	CNLV, NHSSN, local financial institutions
2. Continue to work to improve economic conditions in high poverty areas	Economic decline in neighborhoods during the Great Recession; lack of private investment	Access to Opportunity in Employment	High	Continue neighborhood investment efforts that are part of the implementation of the Transformation Plan. Specifically: 1) Collaborate with Lutheran Social Services of Nevada to leverage its Empowerment Center programs; 2) Collaborate with the College of Southern Nevada (CSN) and the University of Nevada, Las Vegas (UNLV) to provide classes and programs geared towards business and financial literacy; 3) Establish Youth Targeted Businesses and Employment Opportunities; 4) Support expansion of the Nevada Partners Regional Workforce Development Center	CNLV, NHSSN, private sector partners
3. Encourage private sector investment in low income neighborhoods	Economic decline in neighborhoods during the Great Recession; private capital migrating to high-growth areas in the region. Land use regulations, zoning, development approval process	Access to Opportunity in General; Segregation; Disproportionate Housing Needs	High	1) Evaluate development approval processes, particularly Public Works requirements, for development barriers. Evaluate outdated zoning in low income neighborhoods and the potential to update and streamline the rezoning process to facilitate private investment. 2) Implement the redevelopment of vacant parcels strategies in the Implementation Plan. 3) Explore additional private sector and foundation partnerships for vacant/underutilized buildings and land acquisition programs ("land banking"). Convert these to residential, commercial, and/or mixed-use parcels that are catalysts for neighborhood redevelopment, provision of jobs and employment training, and economic integration. 4) Continue the single family rehabilitation program.	CNLV; private sector partners
4. Create more affordable, quality housing, including housing that is accessible to persons with disabilities	Older housing stock, lack of private sector investment	Disproportionate housing needs; lack of accessible, affordable housing	High	Create more permanently affordable housing in the urban core	CNLV; private sector partners; PHA
5. Improve access to high quality schools	Gaps in educational proficiency among schools in higher poverty areas; lack of magnet school programs	Access to Opportunity in Education	High	1) Work with the school district to implement best practices from high-performing magnet schools into all schools. 2) Seek foundation funding to rebrand the school district to improve its image. 3) Implement youth empowerment initiatives in the Transformation Plan, especially the increase in high school graduation rates (25%). 4) Ensure that every school has adequate social services, mental health care, and , for high schools, job skill building and training opportunities. 4) Increase the array of youth programs in the urban core	CNLV; School District
6. Strengthen access to fair housing and knowledge of fair housing among landlords	Lack of local information on fair housing	Fair Housing Enforcement and Capacity	Moderate	During early 2018, add fair housing information to the City and PHA websites, including links to area fair housing enforcement agencies. Sponsor landlord training events to increase awareness of reasonable accommodations law.	CNLV; PHA