

Regional Analysis of Impediments to Fair Housing 2015

Clark County, City of Las Vegas, City of Henderson,
City of North Las Vegas, and Boulder City

3/9/2015

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Our region competed nationally and was chosen to receive funding through the Partnership for Sustainable Communities Initiative, an interagency partnership of the Department of Housing and Urban Development (HUD), the Department of Transportation (DOT) and the Environmental Protection Agency (EPA). This collaborative initiative works to integrate housing, land use, economic and workforce development, transportation options and infrastructure to support and empower local communities. Southern Nevada was afforded this opportunity as a region that not only demonstrated need but, moreover, the desire and ability to implement change. Part of the requirements to this grant was the completion of a Regional Analysis of Impediments to Fair Housing Choice.

The Regional Analysis of Impediments to Fair Housing Choice represents the entities of Clark County, the City of Las Vegas, the City of North Las Vegas, the City of Henderson, and Boulder City. Staff from those entities made up the project team, as well as Southern Nevada Strong staff and the Consultant Team. Additionally, input was gathered from the RAI Working Group, made up of housing specialists and nonprofits from the region.



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EXECUTIVE SUMMARY

Over the past 20 years, Southern Nevada was among the fastest growing regions in the nation. New residents have been attracted by the area's unique attributes, which include the climate, combination of urban and rural amenities, 24-hour lifestyle, relative affordability, ethnic diversity, and a strong entrepreneurial spirit. However, the region also faces serious challenges that impact prosperity and quality of life throughout the community. In response, a broad effort was undertaken to engage the public, collaborate across the region and develop a vision for future development. This effort is the Southern Nevada Strong (SNS) Regional Plan.

The purpose of the SNS Regional Plan is to develop regional support for long-term economic success and stronger communities by integrating reliable transportation, quality housing for all income levels, and job opportunities throughout Southern Nevada. Funding to develop the Regional Plan was provided by the HUD Sustainable Communities Initiative. As part of the project's workplan, Southern Nevada was required to complete its first Regional Analysis of Impediments (RAI) to Fair Housing Choice along with the SNS Regional Plan. The purpose of the RAI is to identify both private and public sector barriers to fair housing choice that may exist and recommend actions to pursue a housing market that is free of racial, ethnic, familial status, or disability status discrimination.

In the past, Southern Nevada jurisdictions have completed their own individual Analysis of Impediments (AIs) in order to comply with the fair housing rules associated with Community Development Block Grant (CDBG) funding. By completing the AI process regionally, the partners that currently receive CDBG funding, including Clark County, Las Vegas, North Las Vegas, City of Henderson and Boulder City, have utilized a comprehensive approach to address issues that cross jurisdictional boundaries. Participation in this process brings the entities into compliance for the next five years.

A stakeholder group was made up of staff from the partner jurisdictions, US Department of Housing and Urban Development (HUD), Southern Nevada Regional Housing Authority (SNRHA), Silver State Fair Housing Council, UNLV, and housing related non-profits. This group provided subject matter expertise, background information, overall direction and recommended action items.

The RAI examines the demographics and current policies that provide the backdrop for fair housing issues in Southern Nevada. Data was collected from many sources, including the US Census Bureau, housing and market analyses, academic research, HUD and local fair housing complaint registers, national crime reports, the Kirwan Institute, and stakeholder and focus group interviews. Additionally, since the RAI was developed at the same time as the Regional Policy Plan, SNS Regional Plan data and public outreach results were available and utilized to inform the report.

Additionally, the current housing market is examined to gain perspective on where residents are living and why they chose where they live. The region is evaluated on a neighborhood basis to identify community assets and discrepancies in high opportunity areas versus low opportunity areas. Fair housing compliance, infrastructure and enforcement are assessed, along with mortgage lending rates and reported hate crimes. Public policy is considered within

jurisdictional land-use codes, zoning codes and affordable housing policies. Finally, along with community feedback gained from the Regional Plan effort, separate focus groups with representatives of the HUD protected classes were held in order to gain more personal insight into the discrimination problems facing people at an individual level. The results of these focus groups were used to inform the Regional Plan and RAI and provide a more qualitative, personal approach to pair with the quantitative data. This approach is encouraged by HUD to gain a more full understanding of the range of fair housing issues in a region.

The key recommendations identified in the RAI are regional in nature and are summarized below from the 42 action items identified in Chapter 9. The final RAI does not have one single owner but rather should be used by the partner jurisdictions as a foundation to inform their individual planning documents (comprehensive plans and zoning codes) and Consolidated Plans as required by HUD.

The action items were developed based on Stakeholder Group suggestions, findings from the focus groups with members of the protected classes, national best practices, and the Southern Nevada Strong Regional Plan analysis, outreach findings and strategies.

- **Increase knowledge and research** in all areas related to fair housing in Southern Nevada by increasing training and expanding the role of non-profits and academic institutions in testing and research.
- **Strengthen fair housing enforcement** to support localities and housing non-profits as well as statewide efforts.
- **Increase awareness and understanding of social equity** and policies that affect inequality and commit to public outreach techniques that include vulnerable populations.
- **Provide more housing choice** throughout Southern Nevada and especially in higher opportunity areas with a range of price, income, density, ownership and building types.
- **Develop additional educational choices** in lower opportunity areas and ensure that a wider range of housing options are available near high performing schools.
- **Expand diversity in leadership positions** at all levels of government.
- **Provide convenient, safe and reliable transportation** choices to low-income areas.
- **Encourage regional collaboration on housing issues** and prioritize public reinvestment in lower-income areas.
- **Ensure jurisdictional regulations do not unintentionally limit fair housing choice** including limiting community residences for the disabled and wide ranges in choice for housing densities.

1. INTRODUCTION

Purpose of the Regional Analysis of Impediments to Fair Housing

Like all jurisdictions that receive community development block grant funds from the U.S. Department of Housing and Urban Development, the jurisdictions that comprise Southern Nevada Strong — unincorporated Clark County, Boulder City, Henderson, Las Vegas, and North Las Vegas—are obligated to affirmatively further fair housing. To fulfill this long-standing obligation to foster a genuinely free market in housing that is not distorted by housing discrimination, Southern Nevada Strong has identified, analyzed, and devised solutions to both private and public sector barriers to fair housing choice that may exist within its borders. As is the case throughout the nation, the impediments to fair housing choice are both local and regional in nature—and the approaches to mitigate them necessarily have local and regional components.

In addition to the five jurisdictions noted above, the collaborative regional planning effort that is Southern Nevada Strong includes the Southern Nevada Regional Planning Coalition; Southern Nevada Regional Housing Authority; Regional Transportation Commission; Clark County School District; Southern Nevada Water Authority; Southern Nevada Health District; Conservation District of Southern Nevada; and University of Nevada, Las Vegas.

The Southern Nevada Strong Regional Analysis of Impediments to Fair Housing Choice is the first regional analysis completed in Southern Nevada. This Analysis is being produced along with the Regional Policy Plan under a Sustainable Communities Planning Grant from the U.S. Department of Housing and Urban Development. One of just 29 regions to receive this grant, Southern Nevada Strong is conducting the in-depth research and community engagement needed to analyze the planning issues that face Clark County and the four cities as well as the other entities in Southern Nevada Strong. A key focus of the Southern Nevada Strong regional planning effort is to build a foundation for long-term economic prosperity and community livelihood by better integrating transportation, housing, and job opportunities throughout Southern Nevada. A genuinely free market in housing undistorted by discrimination is essential to achieving this goal and reducing living costs for all Southern Nevada households.

The Vision for Southern Nevada Strong

The Southern Nevada Strong Regional Plan is the culmination of unprecedented regional collaboration, expert input, and community engagement. Using a wide range of methods for gathering community input, Southern Nevada Strong developed the following regional vision for the future:

In 2035, the Southern Nevada region has a strong entrepreneurial spirit sustaining its high quality of life. This vibrant, unique region is characterized by a resilient economy, excellent educational opportunities, urban and natural amenities, and integrated transportation networks.

The vision shows a possible future for Southern Nevada in which:

- New growth occurs in existing neighborhoods and vacant and underused sites are redeveloped.
- Multiple modes of transportation—including walking, biking and transit—are available, safe and convenient.
- More people can live close to work because jobs, services and schools are located within easy reach of a variety of housing types for all budgets and preferences.
- Underutilized retail and industrial land along key corridors is repurposed and attracts small businesses and companies in targeted economic industries.
- Redevelopment occurs along future transit corridors, including North 5th Street, Maryland Parkway, Flamingo Road and Boulder Highway.
- The region’s downtowns provide a variety of jobs and services for local residents; dense housing combined with vibrant commercial spaces; and new employment and workforce development opportunities.
- Through regional collaboration, schools are located in walkable and bikable communities.

The Southern Nevada Strong Regional Plan identifies four main challenges facing the Southern Nevada region in realizing this vision:

Uncoordinated Growth and Disconnected Land Uses;

Economic Volatility and Over-Reliance on Gaming, Tourism and Construction;

Social Disparities and Vulnerable Communities; and

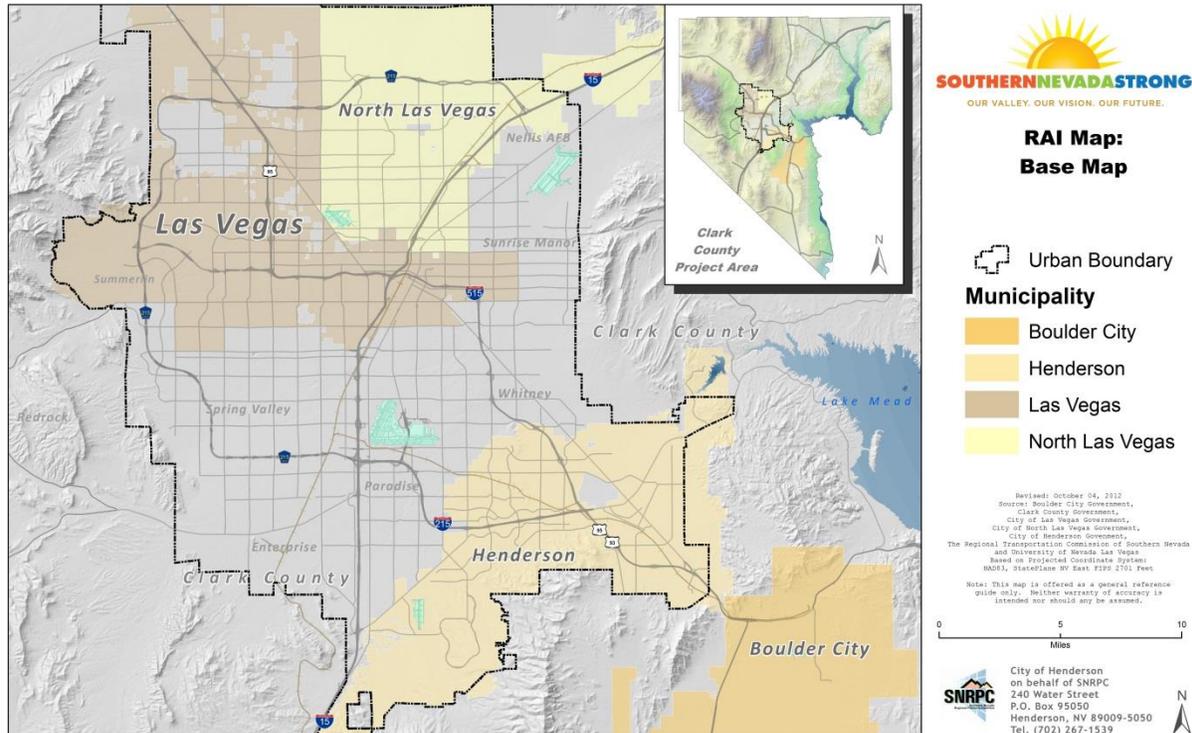
Continued Growth and Changing Demographics.

It is vital that the region has a clear understanding of the status of fair housing in Southern Nevada in order to make the changes necessary to achieve our vision. This report will identify where the region has challenges to fair housing and will make recommendations for change.

2. DEMOGRAPHIC SUMMARY

This Regional Analysis of Impediments to Fair Housing includes unincorporated Clark County and four incorporated jurisdictions: Las Vegas, Henderson, North Las Vegas, and Boulder City as seen in the map below.

Figure 1 Regional jurisdictions: Clark County, Las Vegas, Henderson, North Las Vegas, and Boulder City



Population and Demographics

Over the past 20 years, Southern Nevada was among the fastest growing regions in the nation. This rapid rate of development brought prosperity and opportunity to many, but it also created challenges. Much of the growth came from retirees and international migration. Since 2000, Clark County's population became slightly older, but is younger than the nation overall. The County has also become more diverse with an increasing share of Hispanics and minority populations. Incomes have not grown much in nominal dollars and poverty levels have increased to be above the national average. Since the recession, homeownership has decreased.

Population Growth

Table 1 shows that Clark County has grown rapidly over the last 20 years. Between 1990 and 2013, the average annual growth rate of the population for Clark County was 4.5%.

- North Las Vegas and Henderson grew much faster than the county over the same period.
- Population growth in the county has slowed since 2010 with an annual average growth rate of 1.3%.

Table 1 Population change, U.S., Nevada, Clark County, and select cities, 1990 to 2012/13

Area	1990	2000	2010	2011	2012	2013	Change 1990 to 2012/13		
							Number	Percent	AAGR
U.S.	248,709,873	281,421,906	308,754,538	311,587,816	313,873,685	316,128,839	67,418,966	27%	1.0%
Nevada	1,201,833	1,998,257	2,700,551	2,720,028	2,754,354	2,790,136	1,588,303	132%	3.7%
Clark County	741,459	1,375,765	1,951,269	1,969,975	1,997,659	2,027,868	1,286,409	173%	4.5%
Las Vegas	258,295	478,434	583,756	589,317	596,424	N/A	338,129	131%	3.9%
North Las Vegas	47,707	115,488	216,961	219,020	223,491	N/A	175,784	368%	7.3%
Henderson	64,942	175,381	257,729	260,068	265,679	N/A	200,737	309%	6.6%
Boulder City	12,567	14,966	15,023	15,166	15,168	N/A	2,601	21%	0.9%
Mesquite	1,871	9,389	15,276	15,423	16,062	N/A	14,191	758%	10.3%

Source: U.S. Census 1990 "General Population Characteristics: Nevada," U.S. Census 2000 SF 1 DP-1, U.S. Census 2010 DP-1, U.S. Census Bureau State and County QuickFacts.

Note: AAGR is average annual growth rate.

Components of Growth

Population in Clark County is projected to increase at an average annual rate of 1.3% between 2013 and 2030. This population increase is much slower than the area experienced over the last 20 years. This is due to two major factors, shown below: (1) slowing in-migration (such as for economic purposes and retirement); and (2) decreasing rate of natural changes due to fewer births to deaths among the existing population.

In-migration

- Clark County is expected to realize overall decreasing rates of in-migration as seen in Table 2, largely due to much lower existing and future rates of economic migration.
- Retired and international migrant growth is expected to increase at an annual rate of 2.8% and 2.6% in Clark County between 2013 and 2030, respectively.
- Economic migration decreased precipitously between 2000 and 2013 to the point there was net out-migration of people within this category in 2013.

Table 2 In-migration population change, Clark County 2000-2030

Variable	2000	2013	2030	Total Change 2000-2013		Total Change 2013-2030	
				Number	AAGR	Number	AAGR
Starting population	1,242,570	1,991,520	2,473,880	748,950	3.7%	482,360	1.3%
Economic Migrants	43,580	(3,460)	1,410	(47,040)		4,870	
Retired Migrants	3,770	4,370	7,040	600	1.1%	2,670	2.8%
International Migrants	3,420	8,240	12,650	4,820	7.0%	4,410	2.6%
Total Migrants	50,590	7,600	21,080	(42,990)	-13.6%	13,480	6.2%

Source: "Population Forecasts: Long-Term Projections for Clark County, Nevada 2013-2050." Center for Business and Economic Research, UNLV. Table A9: Demographics, in addition to the projections for 2010-2050 and 1999-2035.

Note: Total migrants also includes a small "special" migration category, not shown.

Note: Starting population figures differ from Table A-1 population counts due to mid-year counts.

Note: AAGR is average annual growth rate.

Natural Change

- Clark County's population is expected to increase but natural population, as seen in Table 3 is projected to grow at a decreasing rate
- Births outpace deaths but the number of deaths is expected to continue to increase faster than the annual average rate of births in Clark County between 2000 and 2030.

Table 3 Natural population change, Clark County, 2000-2030

Variable	2000	2013	2030	Total Change 2000-2013		Total Change 2013-2030	
				Number	AAGR	Number	AAGR
Starting population	1,242,570	1,991,520	2,473,880	748,950	3.7%	482,360	1.3%
Births	19,850	27,870	31,520	8,020	2.6%	3,650	0.7%
Deaths	9,970	13,800	23,580	3,830	2.5%	9,780	3.2%
Net Natural growth	9,880	14,070	7,940	4,190	2.8%	(6,130)	-3.3%

Source: "Population Forecasts: Long-Term Projections for Clark County, Nevada 2013-2050." Center for Business and Economic Research, UNLV. Table A9: Demographics in addition to the projections for 2010-2050 and 1999-2035.

Note: Starting population figures differ from Table A-1 population counts due to mid-year counts.

Note: AAGR is average annual growth rate.

Demographic trends

Age

Table 4 indicates that overall, Clark County's population is slightly aging, but it is younger than that nation overall. The median age increased only slightly from 34.4 years in 2000 to 36.0 in 2012. North Las Vegas is considerably younger than the county overall, and Henderson is considerably older. Boulder City is not included in the table below, but has a median age of 50, according to U.S. Census ACS 2012 data.

Table 4 Median age, Nation, Clark County, and select cities, 2000-2012

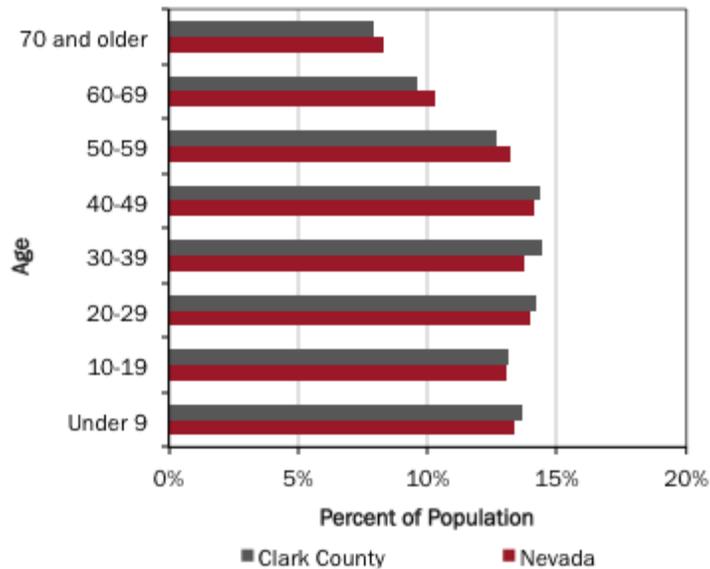
Area	2000	2010	2012
Nation	35.3	37.2	37.4
Clark Co	34.4	35.5	36.0
Las Vegas	34.5	35.9	37.1
North Las Vegas	28.8	30.6	29.5
Henderson	35.9	39.6	41.4

Source: U.S. Census 2000 SF1 DP-1, U.S. Census 2010 SF1 DP-1, U.S. Census ACS 2012 Table B01002.

Figure 2, below, shows us the population distribution by age for Clark County compared to Nevada as a whole in 2012. Population is distributed relatively evenly among the different age groups; no one group composes more than 14% of the total population.

- In 2012, residents aged 65 and older made up 12% of the total population.
- The population group between 25 and 64 years is forecast to grow by 280,000, which represents a smaller growth rate than other age categories. As a result, the share of population in this age category is forecast to decrease from 53% to 48% of the population from 2012 to 2035.

Figure 2 Population by age, Nevada and Clark County, 2012



Source: U.S. Census ACS 2012 Table B01002.

Race

Like America as a whole, Southern Nevada has become more racially diverse over the previous decade. Table 5, below, shows the racial composition of Clark County, Las Vegas, North Las Vegas, Henderson, and Boulder City for 2012 compared with 2000. The increases in minority populations have resulted in the percentage but not the number of Caucasians decreasing. Simply put, the number of minority individuals in Clark County has been rising more quickly than the county's white population.

Table 5 Population by race in 2000 and 2012, Nevada, Clark County, and select cities

Area	2000				2012*			
	Caucasian	African American	Asian	All Other Races	Caucasian	African American	Asian	All Other Races
Clark Co	71.6%	9.1%	5.3%	14.0%	64.5%	10.7%	9.0%	15.8%
Las Vegas	69.9%	10.4%	4.8%	14.9%	67.2%	10.4%	6.1%	16.3%
North Las Vegas	55.9%	19.0%	3.2%	21.9%	47.9%	20.5%	6.0%	25.6%
Henderson	84.5%	3.8%	4.0%	7.7%	80.1%	5.5%	7.4%	7.0%
Boulder City	94.5%	0.7%	0.7%	4.1%	93.9%	0.4%	3.1%	2.6%

Source: U.S. Census 2000 SF1 Table DP-1, U.S. Census ACS 2012 Table DP05, and U.S. Census ACS 2008-2012 Table DP05.
*2012 data for Clark County, Las Vegas, North Las Vegas and Henderson is from the ACS 1-year estimates while data for Boulder City reflects ACS 5 year estimates (2008-2012)

Figure 3 Minority Population per Acre

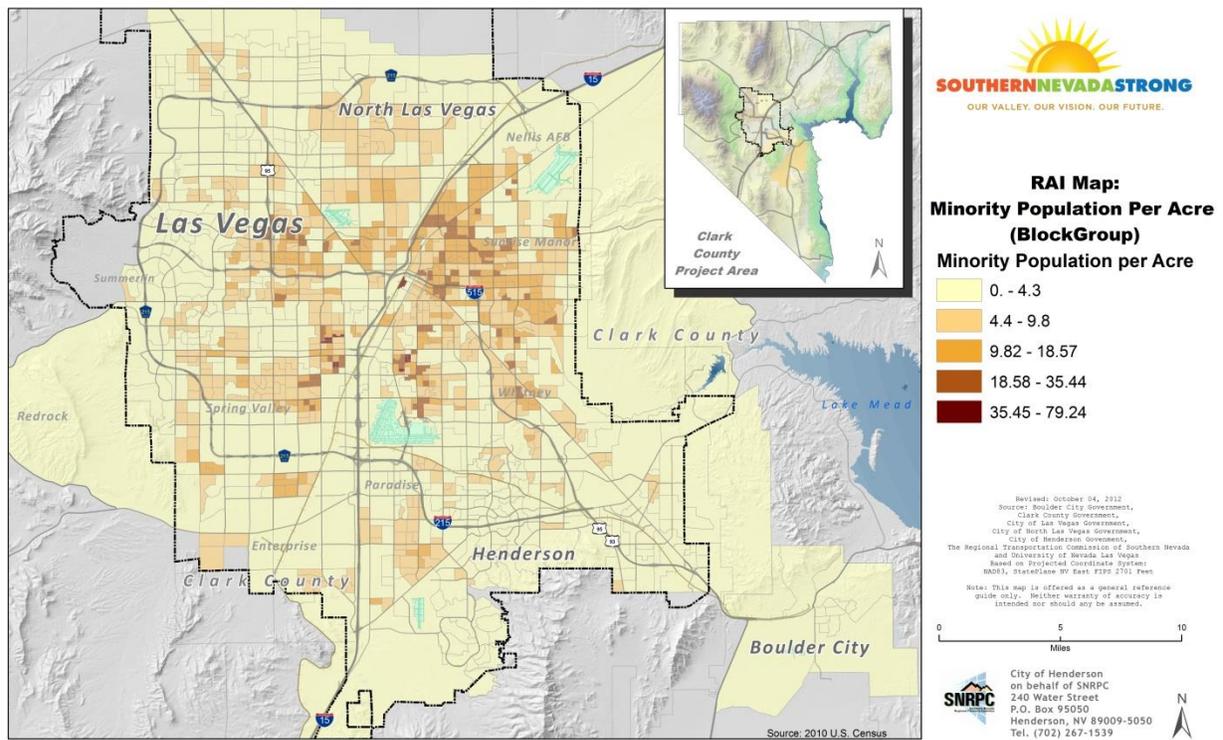


Figure 3 indicates the areas of heavier minority population for all of Clark County. It is similar in concentration to Figure 8, seen under the Income section, which pinpoints the areas of population which live under the poverty level. Figure 3 indicates the proportion of the population that all minorities constitute for all of Clark County. While Clark County's urban core, which is centered around Las Vegas, is quite racially and ethnically diverse, Figure 3 shows that some severe concentrations exist and that racial and ethnic diversity is not uniform throughout the county's urban core. As of 2010, minorities as a whole lived in the vast majority of the county's urban core.

Figure 3 also shows some substantial concentrations of minorities in the southern and eastern neighborhoods of North Las Vegas as well as in the eastern part of Las Vegas and in unincorporated Clark County east of North Las Vegas and south of Las Vegas. Many of these concentrations have become more intense and more widespread since 2000.

Table 6 Racial and Hispanic Composition of Clark County: 1990-2010

Year	White	African American	Asian	All Other Reported Races	Multiple Races	Hispanic of Any Race
1990	81.3%	9.5%	3.5%	5.9%	N/A	10.9%
2000	71.6%	9.1%	5.3%	9.9%	4.2%	22.0%
2010	60.9%	10.5%	8.7%	14.9%	5.1%	29.1%

The percentages for racial groups in a row do not add up to 100 percent due to rounding.

Sources: 1990, 2000 and 2010: *U.S. Census*. 1990: *1990 Census of Population Social and Economic Characteristics, Nevada*, Tables 6 and 7. 2000: *Profiles of General Demographic Characteristics, Nevada*, Table DP-1, 2010: *2010 Census of Population and Housing, Nevada 2010*, Tables 4. <https://www.census.gov/prod/www/decennial.html>

Table 6 shows us that Clark County has become dramatically more diverse over the past twenty years. While the percentage of the population that is Caucasian has decreased almost by 20%, all other races and Hispanics of any race have increased. The African American percentage has only increased a small amount, but the Asian and all other races categories have more than doubled, while the Hispanic category has almost tripled.

Las Vegas, as seen in Table 7, continues to be one of the two most racially and ethnically diverse cities in Clark County, although the City is divided into several separate and unequal racial, ethnic and economic neighborhoods as seen in the map in Figure 3.

Table 7 Racial and Hispanic Composition of Las Vegas: 1990-2010

Year	White	African American	Asian	All Other Reported Races	Multiple Races	Hispanic of Any Race
1990	78.4%	11.4%	3.6%	6.5%	N/A	12.1%
2000	69.9%	10.4%	4.8%	10.8%	4.1%	23.6%
2010	62.1%	11.1%	6.1%	15.8%	4.9%	31.5%

The percentages for racial groups in a row do not add up to 100 percent due to rounding.

Sources: 1990, 2000 and 2010: *U.S. Census*. 1990: *1990 Census of Population Social and Economic Characteristics, Nevada*, Tables 6 and 7. 2000: *Profiles of General Demographic Characteristics, Nevada*, Table DP-1, 2010: *2010 Census of Population and Housing, Nevada 2010*, Tables 4. <https://www.census.gov/prod/www/decennial.html>

Henderson, as seen in Table 8, is becoming more racially and ethnically diverse, however there are no intense concentrations of minority residents in Henderson as seen in the map. Overall, the proportions of African American, Asian, and Hispanic households are a bit less than would be expected in a genuinely free housing market where income is the predominant determinant of who lives in a city.

Table 8 Racial and Hispanic Composition of Henderson: 1990 –2010

Year	White	African American	Asian	All Other Reported Races	Multiple Races	Hispanic of Any Race
1990	91.5%	2.7%	2.1%	3.8%	N/A	7.9%
2000	84.5%	3.8%	4.0%	4.3%	3.5%	10.7%
2010	76.9%	5.1%	7.2%	6.0%	4.8%	14.9%

The percentages for racial groups in a row do not add up to 100 percent due to rounding.

Sources: 1990, 2000 and 2010: *U.S. Census*. 1990: *1990 Census of Population Social and Economic Characteristics, Nevada*, Tables 6 and 7. 2000: *Profiles of General Demographic Characteristics, Nevada*, Table DP-1, 2010: *2010 Census of Population and Housing, Nevada 2010*, Tables 4. <https://www.census.gov/prod/www/decennial.html>

North Las Vegas’s minority composition is broken down in table 9. The in-migration of Caucasians, Asians and Hispanics accounts for the huge population growth North Las Vegas has experienced since 1990. The actual number of African Americans did not fall during the decade but the proportion declined due to the population growth of the other groups.

Table 9 Racial and Hispanic Composition of North Las Vegas: 1990-2010

Year	White	African American	Asian	All Other Reported Races	Multiple Races	Hispanic of Any Race
1990	45.1%	37.4%	2.3%	15.2%	N/A	21.7%
2000	55.9%	19.0%	3.2%	17.1%	4.7%	37.6%
2010	47.4%	19.9%	6.3%	20.6%	5.8%	38.8%

The percentages for racial groups in a row do not add up to 100 percent due to rounding.

Sources: 1990, 2000 and 2010: *U.S. Census*. 1990: *1990 Census of Population Social and Economic Characteristics, Nevada*, Tables 6 and 7. 2000: *Profiles of General Demographic Characteristics, Nevada*, Table DP-1, 2010: *2010 Census of Population and Housing, Nevada 2010*, Tables 4. <https://www.census.gov/prod/www/decennial.html>

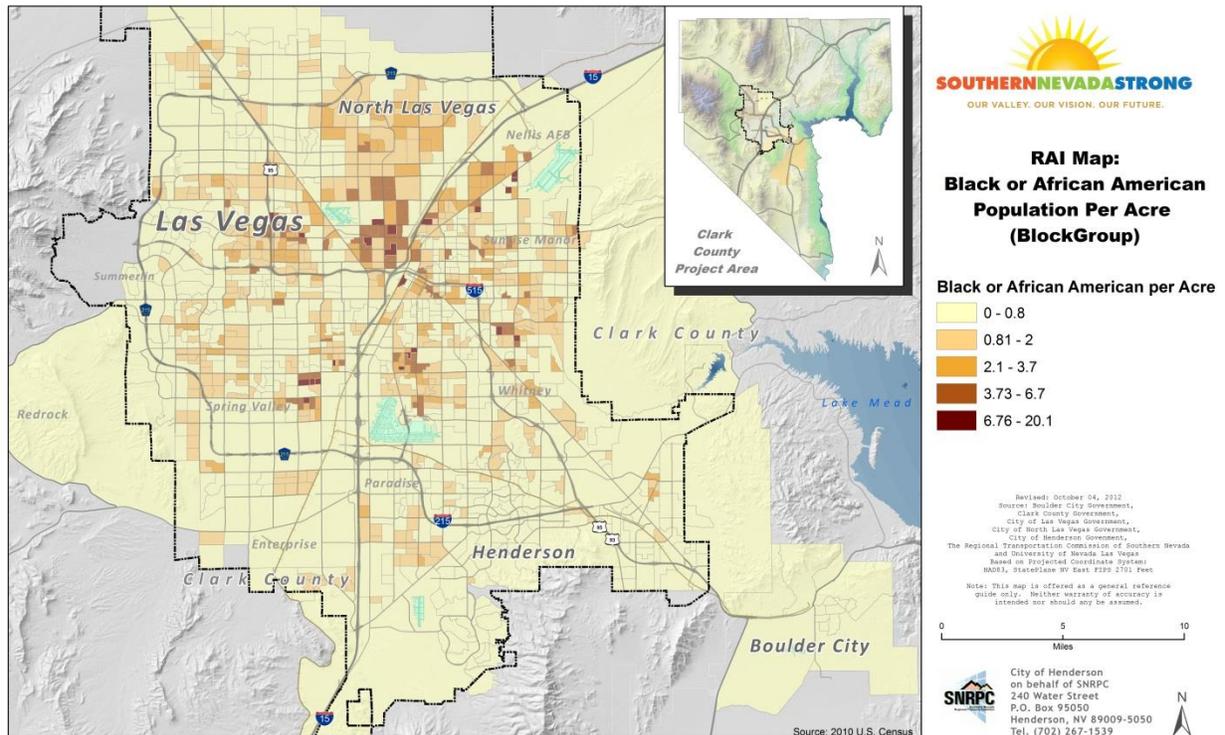
Boulder City is not as diverse as Clark County, North Las Vegas, Las Vegas, or Henderson, as seen in Table 10. As of 2010, Boulder City remained a virtually all-Caucasian community with a small Hispanic population and very few residents who are African American, Asian, multi-racial, or of any other race. Boulder City was created as an all-Caucasian community over 80 years ago, a legacy that can be overcome only through deliberate public and private sector policies and practices to affirmatively further fair housing choice.

Table 10 Racial and Hispanic Composition of Boulder City: 1990-2010

Year	White	African American	Asian	All Other Reported Races	Multiple Races	Hispanic of Any Race
1990	97.0%	0.4%	1.2%	1.4%	N/A	3.7%
2000	94.5%	0.7%	0.7%	2.2%	1.9%	4.3%
2010	92.3%	0.9%	1.1%	2.7%	0.3%	7.1%

The percentages for racial groups in a row do not add up to 100 percent due to rounding.
Sources: 1990, 2000 and 2010: *U.S. Census. 1990: 1990 Census of Population Social and Economic Characteristics, Nevada, Tables 6 and 7. 2000: Profiles of General Demographic Characteristics, Nevada, Table DP-1, 2010: 2010 Census of Population and Housing, Nevada 2010, Tables 4.* <https://www.census.gov/prod/www/decennial.html>

Figure 4 Minority African American Population per acre.



As Figure 4 shows, the region’s African American population is heavily concentrated in North Las Vegas east of Rancho and south of Cheyenne. The heavy concentration continues south of North Las Vegas in adjacent Las Vegas neighborhoods. The African American population is not spread throughout most of Clark County’s urban core. The levels of concentration and segregation in housing appear to be substantially more intense for African Americans in all of Clark County than in other minorities. In addition, less than one percent of the population of Boulder City was African American in 2000.

Ethnicity

Table 11, below, shows the ethnic composition for Clark County, Las Vegas, North Las Vegas, Henderson, and Boulder City. Clark County has become increasingly diverse since 2000, with Hispanics making up the largest minority ethnicity composing almost 30% of the total population in 2012.

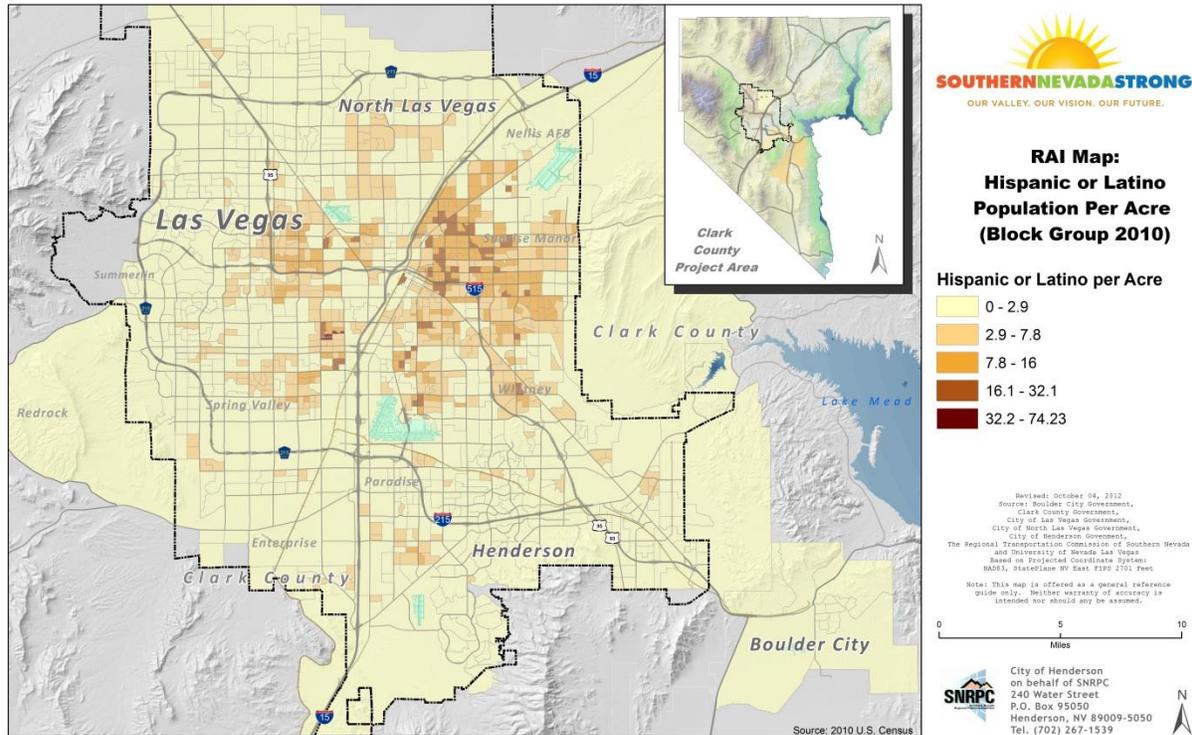
- Between 2000 and 2012 the number of Hispanics increased at an average annual growth rate of 5.8%, faster than the County’s overall rate of 3.2% for the same period.
- North Las Vegas had a majority population composed of minority groups by 2012.

Table 11 Population by ethnicity in 2000 and 2012, Nevada, Clark County, and select cities

Area	2000			2012*		
	White Alone	Ethnic Minority	Hispanic or Latino of any Race	White Alone	Ethnic Minority	Hispanic or Latino of any Race
Clark Co	71.6%	28.4%	22.0%	64.5%	35.5%	29.8%
Las Vegas	69.9%	30.1%	23.6%	67.2%	32.8%	32.8%
North Las Vegas	55.9%	44.1%	37.6%	47.9%	52.1%	37.9%
Henderson	84.5%	15.5%	10.7%	80.1%	19.9%	14.7%
Boulder City	91.9%	8.1%	4.3%	89.9%	10.1%	5.9%

Source: U.S. Census 2000 SF3 Table DP-1, U.S. Census ACS 2012 Table DP05, and U.S. Census ACS 2008-2012 Table DP05.
*2012 data for Clark County, Las Vegas, North Las Vegas and Henderson is from the ACS 1-year estimates while data for Boulder City reflects ACS 5 year estimates (2008-2012)

Figure 5 Minority Hispanic Population per acre.



Within the county's urban core the geographic distribution of minority groups is not uniform. Figure 5 reveals that while the county's Hispanic population is spread out, there are some substantial concentrations in the eastern portion of North Las Vegas and adjacent Las Vegas and adjacent unincorporated Clark County. Hispanic residents live largely on the east side of the urban core.

The minority population maps show rather serious concentrations of minorities in the east end of Las Vegas and south end of North Las Vegas, as well as the adjacent areas of unincorporated Clark County. However, all of these are not necessarily racially- or ethnically-segregated neighborhoods. As can be seen in the Free Market Analysis™ in Chapter 4, some of these tracts have a racial and/or Hispanic composition that would be expected in a free market that is not distorted by housing discrimination. Some though, may be due to private and/or public sector practices that distort the free housing market.

Foreign Born

The foreign born population composes almost 22% of Clark County’s population, as seen in Table 12, below.

- The foreign born population has steadily increased between 2000 and 2012 with an average annual growth rate of 4.8%.
- Henderson realized the highest rate of growth in foreign born population, but has the lowest proportion of foreign born residents to total population.

Table 12 Population by place of birth 2000 and 2012, Nevada, Clark County, and select cities

Area	2000			2012*			Foreign Born Change 2000-2012*	
	Pop	Foreign Born	% Foreign Born	Pop	Foreign Born	% Foreign Born	Number	AAGR
Nevada	1,998,257	316,593	15.8%	2,754,354	530,590	19.3%	213,997	4.4%
Clark Co	1,375,765	247,751	18.0%	1,997,659	436,037	21.8%	188,286	4.8%
Las Vegas	478,434	90,656	18.9%	596,424	125,075	21.0%	34,419	2.7%
North Las Vegas	115,488	28,948	25.1%	223,491	51,251	22.9%	22,303	4.9%
Henderson	175,381	14,678	8.4%	265,679	32,696	12.3%	18,018	6.9%
Boulder City	14,966	478	3.2%	15,194	467	3.1%	-11	-0.2%

Source: U.S. Census 2000 SF3 Table DP-2, U.S. Census ACS 2012 Table DP02, and U.S. Census ACS 2008-2012 Table DP02.
*2012 data for Clark County, Las Vegas, North Las Vegas and Henderson is from the ACS 1-year estimates while data for Boulder City reflects ACS 5 year estimates (2008-2012)

Disability Status

Table 13 shows the number of residents with disability status for Clark County, Las Vegas, North Las Vegas, Henderson, and Boulder City, compared with the state of Nevada in 2012. For all jurisdictions other than North Las Vegas, the percentage has increased since 2000.

Table 13 Disability status for the civilian non-institutionalized population 5 years and over, 2000 and 2012, Nevada, Clark County, and selected cities

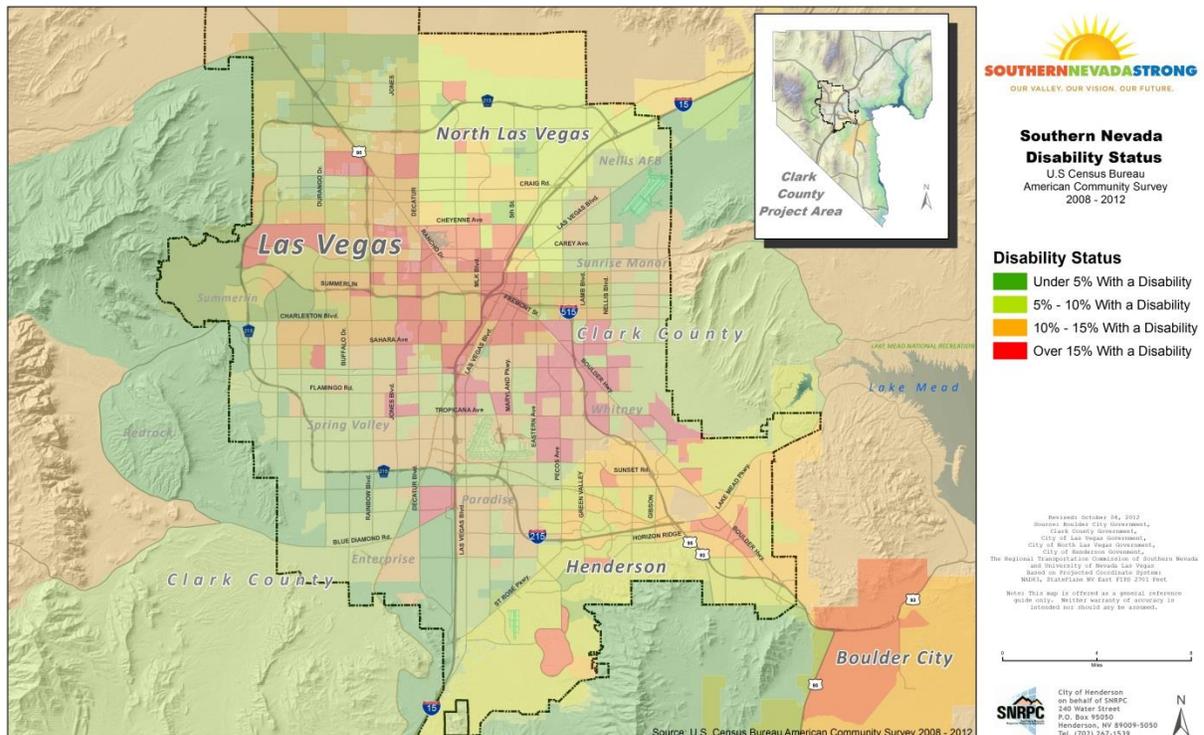
Area	2000		2012*	
	Disability status, civilian non-institutionalized population 5 years and older	% with a disability	Disability status, civilian non-institutionalized population 5 years and older	% with a disability
Nevada	375,910	10.3%	328,715	12.9%
Clark Co	264,470	10.5%	232,068	12.6%
Las Vegas	96,564	11.1%	75,587	13.8%
North Las Vegas	21,330	10.5%	20,450	10.2%
Henderson	26,262	8.1%	27,796	11.1%
Boulder City	2,761	9.7%	2,147	14.9%

Source: U.S. Census 2000 SF4 Table QT-P21, U.S. Census 2012 Table S1810, and U.S. Census 2008-2012 Table S1810. *2012 data for Clark County, Las Vegas, North Las Vegas and Henderson is from the ACS 1-year estimates while data for Boulder City reflects ACS 5 year estimates (2008-2012)

Figure 6 shows that people with disability status live throughout Southern Nevada. As our population ages, Southern Nevada can only expect for the number of disabled residents to increase. As these numbers increase, it will be increasingly important to examine the housing opportunities, transportation options, and improvement plans for physical access for those with disabilities and to ensure that efforts are made to address fair housing.

The locations in Figure 6 show several different scenarios for location choice for disabled residents in Southern Nevada. Some of the darker red areas (areas with over 15% disability status rates) are in areas popular with large concentrations of senior residents, including the Anthem area of Henderson (with several age restricted communities) and the Summerlin area of Las Vegas (also with an age restricted community). A second area of red surrounds the Las Vegas medical district, a large medical community of West Las Vegas, bounded by Charleston Blvd and Alta Drive, west of I-15. This area serves a large medical community of hospitals, medical clinics, and ancillary services, and would naturally welcome a large community in need of medical services. The third area of dark red mirrors the low-income urban core area of Southern Nevada. This area has the lowest income rental units and housing accommodations as well as the most accessible transit and for that reason may be a reason more disabled residents, especially those with a fixed income, locate in this area.

Figure 6 Locations of residents with disability status



Income and Poverty

Median income in Clark County has not kept up with national trends. In 2000 the median income for all of Clark County was above the national median, but by 2012, the median income had fallen below the national median. Table 14 shows the median income and percent of individuals below the poverty level for 2000 and 2012. Figure 7 shows how the income levels are distributed across the Southern Nevada region.

- The percent of the population in poverty has also increased in Clark County and its major cities, and (at 16.4%) is higher than the national average.
- Las Vegas has the lowest median incomes, and North Las Vegas has the highest levels of poverty.
- The median income for Caucasian workers was roughly 40% higher than African American and Hispanic workers for Clark County in 2011.
 - In Clark County for 2011, the median income for a Caucasian employee was \$53,768 compared to \$39,096 for Hispanics and \$37,107 for African Americans.

Table 14 Median income for households and percent of individuals below poverty level 2000 and 2012, Nevada, Clark County as a whole and select cities

Area	2000		2012*		Median Income Change 2000-2012*	
	Median Income	% Poverty	Median Income	% Poverty	Number	AAGR
Nation	\$ 41,994	12.4%	\$ 51,371	15.9%	\$ 9,377	1.7%
Clark Co	\$ 44,616	10.8%	\$ 49,546	16.4%	\$ 4,930	0.9%
Las Vegas	\$ 44,069	11.9%	\$ 47,415	17.6%	\$ 3,346	0.6%
North Las Vegas	\$ 46,057	14.8%	\$ 49,586	19.7%	\$ 3,529	0.6%
Henderson	\$ 55,949	5.6%	\$ 61,404	8.8%	\$ 5,455	0.8%
Boulder City	\$ 50,523	6.7%	\$ 59,842	9.7%	\$ 9,319	1.4%

Source: U.S. Census 2000 SF3 Table DP-3, U.S. Census ACS 2012 Table DP03, and U.S. Census ACS 2008-2012 Table DP03.*2012 data for Clark County, Las Vegas, North Las Vegas and Henderson is from the ACS 1-year estimates while data for Boulder City reflects ACS 5 year estimates (2008-2012)

Figure 7 Median Household Income

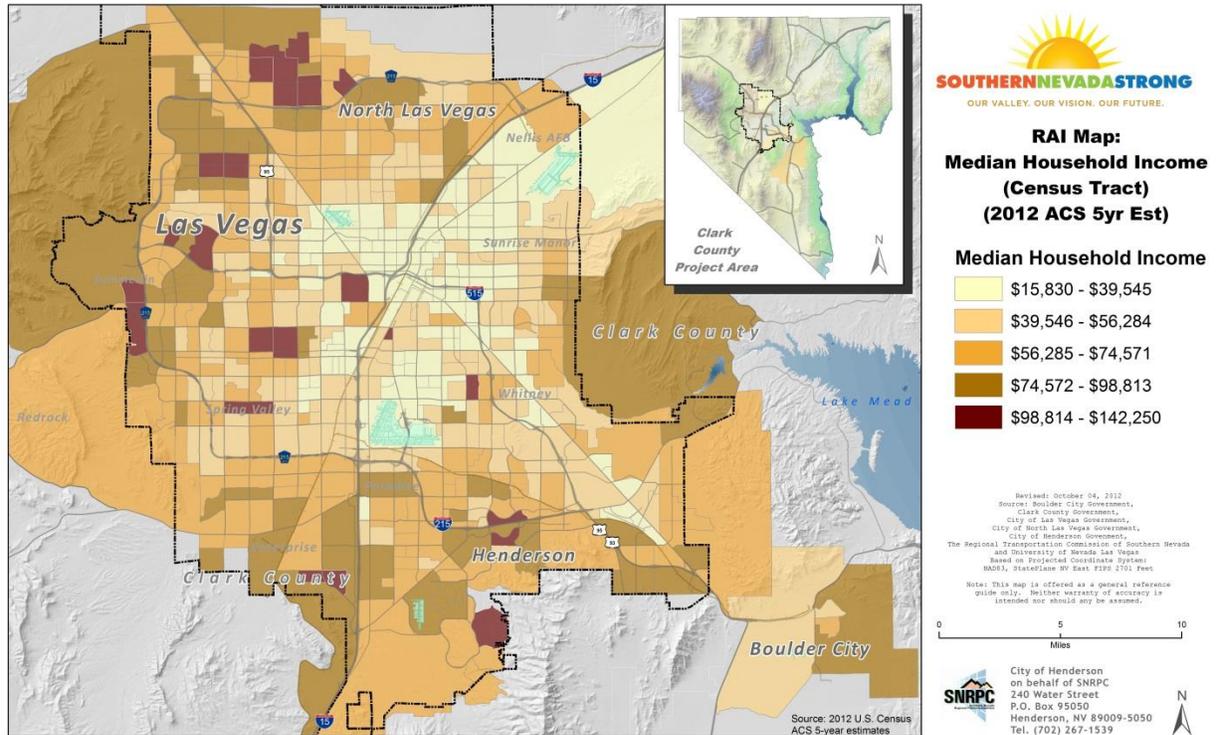


Figure 8 shows where the residents of Clark County who fall under the 150% below poverty line live. It is important to note that it is similar to Figure 3, which shows where the largest minority populations live. The largely Hispanic eastern neighborhoods as well as the large African American communities surrounding the intersection of US-95 and I-15 are disproportionately affected with poverty.

Figure 8 Residents Living under the Poverty Level in Southern Nevada

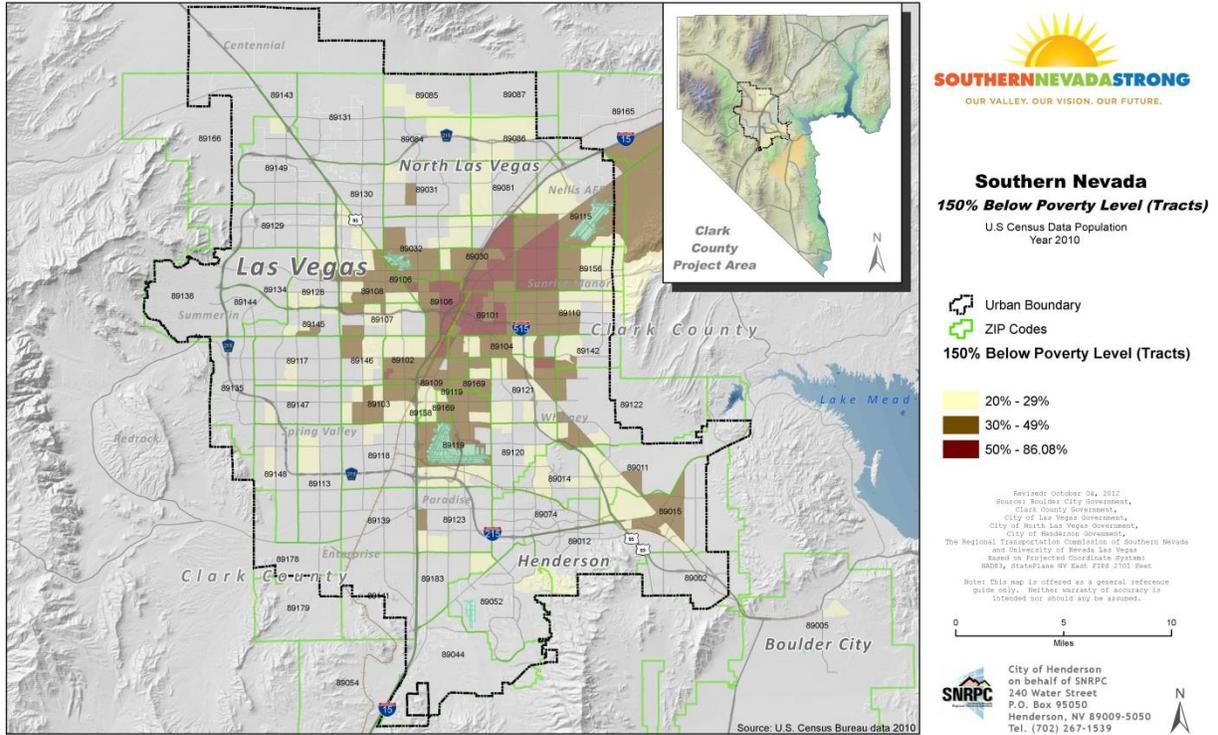
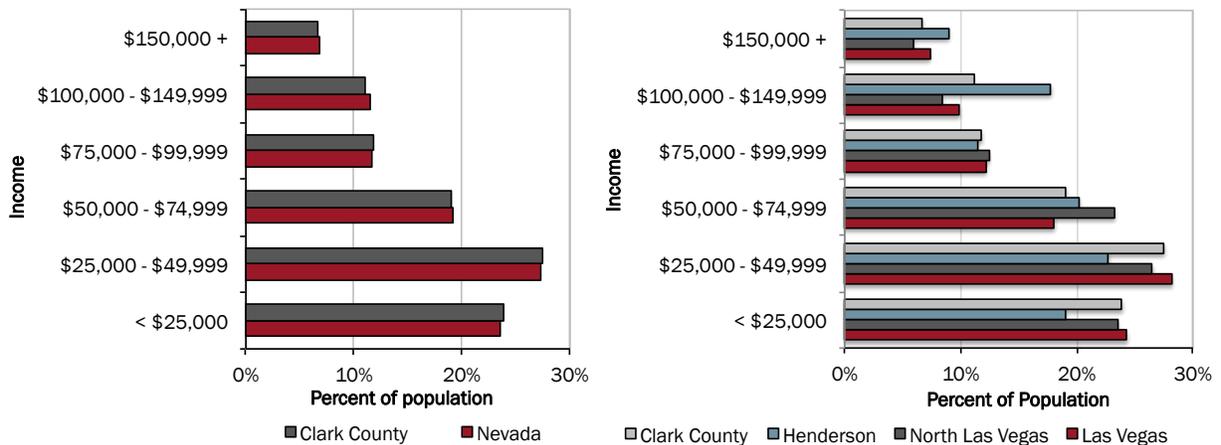


Figure 9 Household income in 2011, Nevada, Clark County, and select cities



Source: American Community Survey 2011 B19001.

Figure 9 shows the distribution of income throughout Clark County for 2011. The graph indicates that a wider proportion of higher level incomes are for residents of Henderson, while Clark County, North Las Vegas, and Las Vegas share a larger proportion of the lower income residents.

Forecasts for regional changes in income

Tables 15 and 16 show the forecast for income and expenditures and change in per capita income for Clark County over the next twenty years. Based on those forecasts, the following conclusions have been made:

- Growth in personal income will result in increases in disposable income and more money available for housing expenditures. During the 1990s and early 2000s, housing costs outpaced income growth. By 2011, income growth and change in housing cost over the last decade had evened out, with income keeping pace with housing cost.
- It is unclear whether housing prices will grow at a similar rate as personal income over the next two decades or whether, similar to the pattern that created the housing bubble, housing prices will outpace change in personal income.
- Younger households and Hispanic households generally have lower incomes than older, white households. These households may struggle to afford ownership costs, unless their incomes increase to closer to the County averages.

Table 15 Forecast of income and expenditures, 2005 dollars, Clark County, 2012 and 2035

Income and Expenditures	2012	2035	Change 2012 to 2035		
			Number	Percent	AAGR
Personal Income (Billions USD)	\$77.76	\$288.10	\$210.33	270%	5.86%
Taxes	\$6.45	\$28.53	\$22.08	342%	6.68%
Disposable Personal Income	\$71.31	\$259.57	\$188.26	264%	5.78%
Real Personal Income (Billions USD)	\$66.36	\$138.06	\$71.70	108%	3.24%
with housing price	\$69.08	\$142.00	\$72.91	106%	3.18%
PCE Price Index	\$117.19	\$208.68	\$91.49	78%	2.54%
with housing price	\$112.57	\$202.89	\$90.32	80%	2.59%
Real Disposable Personal Income (Billions USD)	\$60.85	\$124.39	\$63.54	104%	3.16%
with housing price	\$63.35	\$127.94	\$64.59	102%	3.10%

Source: Population Forecast: Long-term Projections for Clark County, Nevada 2012-2050; Calculations by ECONorthwest

Table 16 Forecast of change in per capita income, 2005 dollars, Clark County, 2012 and 2035

Per Capita Income	2012	2035	Change 2012 to 2035		
			Number	Percent	AAGR
Real Personal Income (Billions USD)	\$66.36	\$138.06	\$71.70	108%	3.24%
Population	1,982,000	2,848,000	866,000	44%	1.59%
Real Income Per Capita (USD)	\$33,479	\$48,474	\$14,995	45%	1.62%

Source: Population Forecast: Long-term Projections for Clark County, Nevada 2012-2050; Per Capita calculation by ECONorthwest

Median income and poverty status by protected class and jurisdiction

Table 17 below, shows the median income and poverty status for Caucasians, African Americans, Asians, other races, Hispanics, residents with disability status and households with female heads of household. Asians and Caucasians have the largest median income and lowest percentage below poverty level and disabled residents and households with female heads of households have the lowest median income. The households with a female head of household are by far the largest percentage living in poverty.

Table 17 Median income and poverty status for Clark County in total

Protected Class Designation	Median Income	Percent Below Poverty Level
White Alone *not a protected class	\$ 56,577	13%
Black Alone	\$ 40,959	22%
Asian Alone	\$ 62,207	9%
Other Race	\$ 48,619	19%
Hispanic or Latino	\$ 44,719	21%
With Disability	\$ 31,136	18%
Households With Female Head of Household	\$ 32,976	27%
Total	\$ 54,218	14%

Source: United States Census Bureau American Community Survey, 2008-2012

This pattern is also seen in the individual jurisdictions, Tables 18 – 20, of Las Vegas, North Las Vegas and Henderson. In all of these jurisdictions, the African American category has the lowest median income and highest percentage below the poverty level of all the races. The disabled category shares a low median income with female head of households, however, does not have as high a percentage below poverty level, probably due to public financial assistance for the disability. Henderson is the only one of these jurisdictions to not have female heads of households as the largest percentage below poverty (African American holds this designation in Henderson).

Table 18 Median income and poverty status for Las Vegas

Protected Class Designation	Median Income	Percent Below Poverty Level
White Alone *not a protected class	\$ 55,793	14.2%
Black Alone	\$ 36,807	24.2%
Asian Alone	\$ 58,331	10.2%
Other Race	\$ 44,145	23.1%
Hispanic or Latino	\$ 42,711	24.0%
With Disability	\$ 24,887	19.5%
Households With Female Head of Household	\$ 32,077	28.5%
Total	\$ 52,601	16.2%

Source: United States Census Bureau American Community Survey, 2008-2012

Table 19 Median income and poverty status for North Las Vegas

Protected Class Designation	Median Income	Percent Below Poverty Level
White Alone *not a protected class	\$ 58,735	15.3%
Black Alone	\$ 45,942	17.4%
Asian Alone	\$ 72,045	8.3%
Other Race	\$ 54,353	16.0%
Hispanic or Latino	\$ 47,483	23.1%
With Disability	\$ 26,017	20.2%
Households With Female Head of Household	\$ 35,144	27.3%
Total	\$ 55,466	15.4%

Source: United States Census Bureau American Community Survey, 2008-2012

Table 20 Median income and poverty status for Henderson

Protected Class Designation	Median Income	Percent Below Poverty Level
White Alone *not a protected class	\$ 67,878	7.7%
Black Alone	\$ 50,674	22.6%
Asian Alone	\$ 64,968	8.6%
Other Race	\$ 59,786	10.2%
Hispanic or Latino	\$ 57,108	11.8%
With Disability	\$ 26,458	12.5%
Households With Female Head of Household	\$ 41,292	16.1%
Total	\$ 66,141	8.9%

Source: United States Census Bureau American Community Survey, 2008-2012

In Boulder City, the data is more difficult to decipher due to the small numbers of actual residents who fit into some of the categories. The Caucasians have a remarkably higher median income than any other category, but they also make up the majority of the city. Thirty percent of the Hispanics in Boulder City are below the poverty level and regardless of race, households with female heads of household have a much smaller median income.

Table 21 Median income and poverty status for Boulder City

Protected Class Designation	Median Income	Percent Below Poverty Level
White Alone *not a protected class	\$ 60,815	9.5%
Black Alone	**	100.0%
Asian Alone	\$ 29,583	0.0%
Other Race	**	6.7%
Hispanic or Latino	\$ 27,500	30.3%
With Disability	**	**
Households With Female Head of Household	\$ 37,352	**
Total	\$ 59,842	9.7%

Source: United States Census Bureau American Community Survey, 2008-2012** Data is too small to report as valid

Comparison to other jurisdictions

The Southern Nevada region boasts an increasingly diverse population with about 31 percent of its population in 2012 as foreign-born. Between 2000 and 2012, the share of foreign born residents in Clark County more than doubled, from 13 percent of the total population in 2000 to 31 percent of the county population in 2012. No other region in the Intermountain West had such a large growth in the share of foreign-born residents. This certainly contributes to the diversity found in Southern Nevada, especially as compared to other areas in the state.

The majority of Nevada is rural and unpopulated with two exceptions, the Las Vegas Valley in the very southern part of the state and the Reno-Washoe County area in the very northern section of the state. This stark contrast between metropolitan area and uninhabited desert make it unique compared with most other states around the Country. Reno-Washoe County is not nearly as large in population as Southern Nevada which makes it difficult to use as a demographic comparison, however, it is the only other area with any concentration of population within the state.

The following section looks at the two areas, Southern Nevada and Reno-Washoe County, for comparisons noting those limitations, and also analyzes the greater Phoenix area, since it is also located in Southwest section of the country and although larger than Las Vegas, has similar demographics in race and ethnicity.

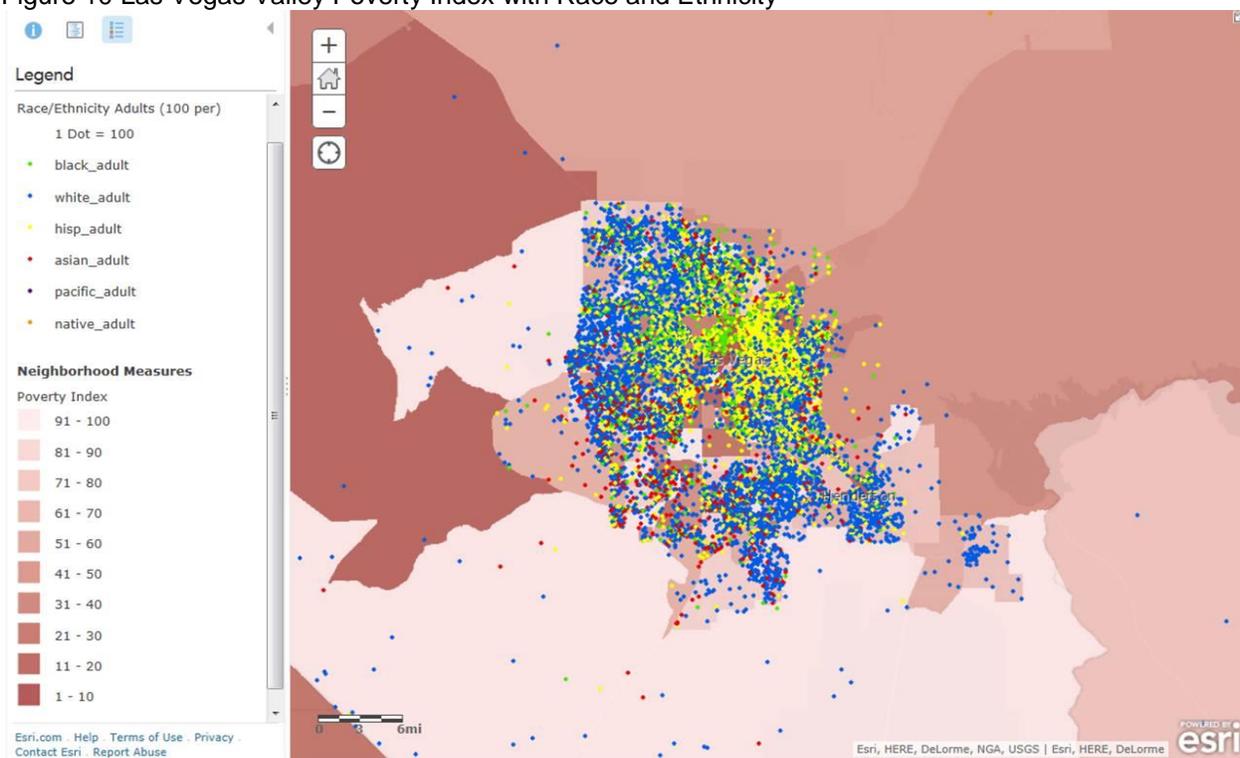
Table 22 Population by race and ethnicity for Southern Nevada, Reno-Washoe County and the greater Phoenix metropolitan area

	Las Vegas-Paradise MSA	Reno-Washoe MSA	Phoenix MSA
Total Estimated Population, 2013	<i>2,027,868</i>	<i>433,612</i>	<i>4,329,534</i>
Population, percent change, April 1, 2010 to July 1, 2013	3.9%	1.9%	3.3%
White alone, percent, 2010	60.9%	77.0%	73.0%
Black or African American alone, percent, 2010	10.5%	2.3%	5.0%
Asian alone, percent, 2010	8.7%	5.1%	3.3%
Other Race, percent, 2010	19.9%	15.6%	18.7%
Hispanic or Latino, percent, 2010	29.1%	22.1%	29.5%
Not Hispanic or Latino, percent, 2010	70.9%	77.9%	70.5%
Median Age, 2010	35.5	37.2	34.8

Source: U.S. Census Bureau

Table 22 indicates that along with having higher populations, Las Vegas and Phoenix have also had the largest population increase from 2010 – 2013. Las Vegas has the lowest percentage of Caucasians at almost 61% compared to 77% for Reno and 73% for Phoenix. Las Vegas has the highest African American percentage at 10.5% compared to 2.3% for Reno and 5.0% for Phoenix. Las Vegas also has the highest percentage of Asian population and Other Race. For ethnicities, Las Vegas and Phoenix both have 29% of their population as Hispanic or Latino, while Reno has a 22% Hispanic population. Las Vegas’ median age is between Phoenix’s 34.8 and Reno’s 37.2. The US median age for that year was 37.2.

Figure 10 Las Vegas Valley Poverty Index with Race and Ethnicity



Source: <http://www.huduser.org/portal/Sustainability/grantees/data.htm>

Figure 10 shows the poverty index (lighter colors correspond to more poverty) for the Southern Nevada region, along with the race and ethnicity population. There are more yellow dots, corresponding to Hispanic residents in the northeast section of the region and more blue dots corresponding to Caucasian residents in the southern areas and northwest areas. This is discussed further in this document, but it is also worth noting that the green and red dots African American and Asian residents, are somewhat distributed more evenly throughout the Valley, although there is a noticeable concentration in the north central areas for the African American population.

Figure 11 Southern Washoe County-Reno MSA Poverty Index with Race and Ethnicity

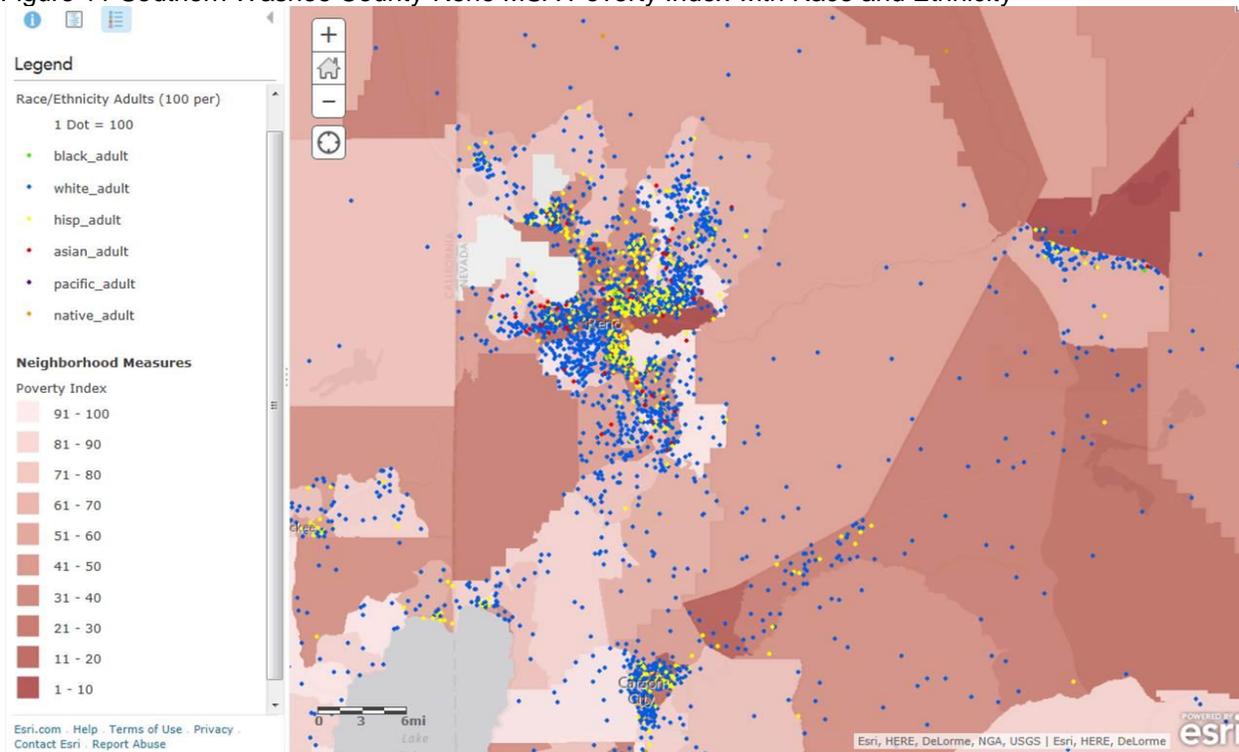
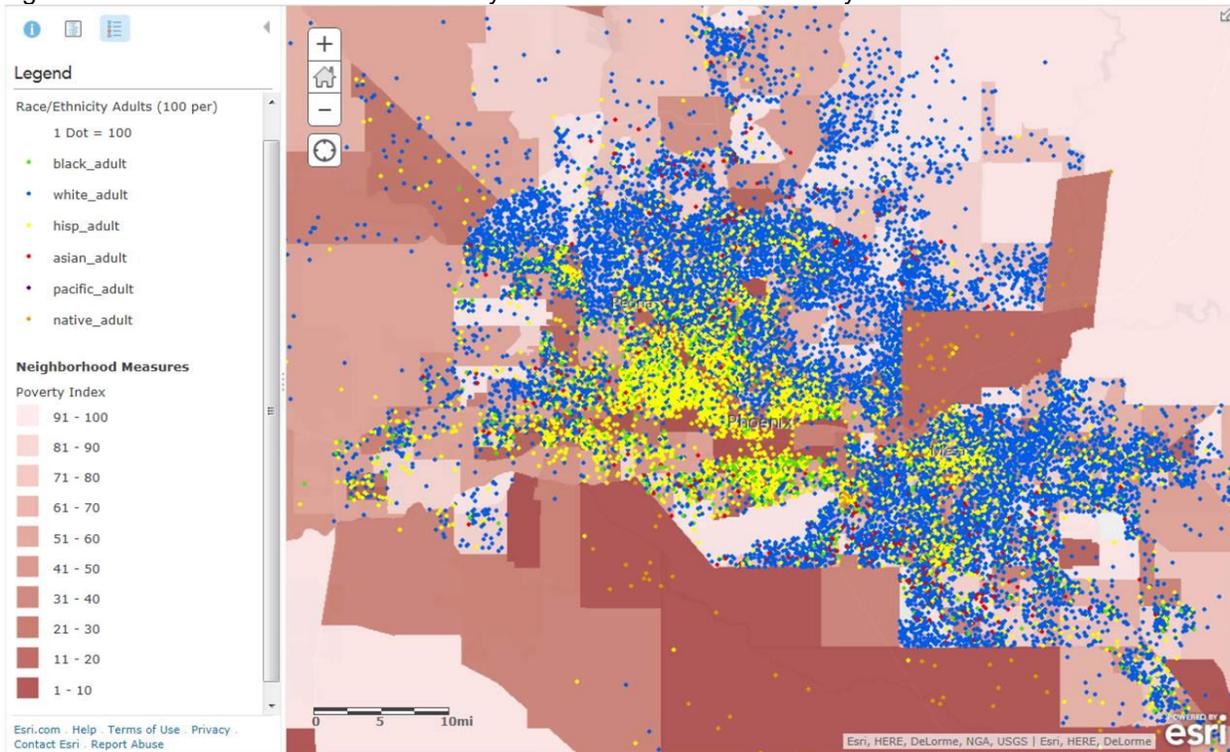


Figure 11 shows the poverty index along with the race and ethnic populations for southern Washoe County and the greater Reno area. The concentration of the Caucasian population is spread somewhat evenly throughout the region, however, the Hispanic and African American population seem to be concentrated in the core areas of Reno. The Asian seems to be fairly evenly spread throughout.

Figure 12 Phoenix-Mesa-Glendale Poverty Index with Race and Ethnicity



Source: <http://www.huduser.org/portal/Sustainability/grantees/data.htm>

Figure 12 shows the poverty index with race and ethnic populations for the greater Phoenix area. Although the population is greater, it seems more ethnically concentrated than the Southern Nevada area. The Hispanic population is very heavily concentrated in the Phoenix urban core as well as the Mesa urban core. The Caucasian population begins at the fringes of each and continues outward (notably to the north of greater Phoenix and the south and east of Mesa). The African American and Asian populations do not seem as concentrated and are more evenly spread out than the Hispanic residents.

Table 23 Population by race and ethnicity, Washoe County and Clark County, 2013

	Washoe County	Clark County
Total Estimated Population, 2013	433,731	2,027,868
Population, percent change, April 1, 2010 to July 1, 2013	2.9%	3.9%
White alone, percent, 2010	85.7%	72.7%
Black or African American alone, percent, 2010	2.6%	11.5%
Asian alone, percent, 2010	5.7%	9.6%
Other Race, percent, 2010	6.0%	6.2%
Hispanic or Latino, percent, 2010	23.3%	30.0%
Not Hispanic or Latino, percent, 2010	76.7%	70.0%
Median Age, 2010	37.0	35.5

Source: U.S. Census Bureau

Table 23 compares the two counties of Washoe County in northern Nevada with all of Clark County. The demographics are comparable to what we saw in the MSA's. Clark County is a larger and more diverse population with more African Americans, Asians, and Hispanics.

Table 24 Population by race and ethnicity for Phoenix, Reno, and Southern Nevada cities, 2013

	Phoenix	Reno	Boulder City	Henderson	Las Vegas	North Las Vegas
Total Estimated Population, 2013	1,513,367	233,294	15,189	270,811	603,488	226,877
Population, percent change, April 1, 2010 to July 1, 2013	4.5%	3.2%	1.1%	5.2%	3.3%	4.7%
White alone, percent, 2010	65.9%	74.2%	92.3%	76.9%	62.1%	47.4%
Black or African American alone, percent, 2010	6.5%	2.9%	0.9%	5.1%	11.1%	19.9%
Asian alone, percent, 2010	3.2%	6.3%	1.1%	7.2%	6.1%	6.3%
Other Race, percent, 2010	24.4%	16.6%	5.7%	10.8%	20.7%	26.4%
Hispanic or Latino, percent, 2010	40.8%	24.3%	7.1%	14.9%	31.5%	38.8%
Not Hispanic or Latino, percent, 2010	59.2%	75.7%	92.9%	85.1%	68.5%	61.2%
Median Age, 2010	32.2	34.3	50.0	40.4	36.0	30.4

Source: U.S. Census Bureau

Table 24 compares the cities of Phoenix and Reno to the cities of Boulder City, Henderson, Las Vegas and North Las Vegas. Reno, Henderson and North Las Vegas have similar population numbers but differ significantly in minority populations. North Las Vegas has the highest percentage population in African American, Other Race and Hispanic, while Henderson has the largest Caucasian and Asian population and the lowest Hispanic population. North Las Vegas has the lowest median age at 30.4 and Henderson the highest at 40.4.

Las Vegas has a smaller population than Phoenix, but has some similarities in demographics. Las Vegas has a smaller Caucasian population and a larger African American. Phoenix however has a larger Hispanic population and a lower median age of 32.3 compared to 36 for Las Vegas.

Boulder City has such a smaller population than any of the cities in the comparison. It has a much larger Caucasian population and a much higher median age of 50.0.

Household Composition

Table 25 shows the average household size for Clark County in 2010 and shows that household size was similar for owner occupants and renters.

- The average household size was 2.7 for both the County and the state in 2010. Owner-occupied households had 2.7 people on average, while renters had 2.5.
- The average household size in North Las Vegas in 2010 was higher than the County average, at 3.2 persons per household for owner-occupied units, and 3.4 for renter-occupied units.

Table 25 Average household size of occupied housing units by tenure in 2010, Clark County and select cities

	Clark County	Las Vegas	North Las Vegas	Henderson
Average household size	2.7	2.7	3.2	2.5
Owner-occupied units	2.7	2.7	3.2	2.6
Renter-occupied units	2.5	2.7	3.4	2.5

Source: U.S. Census 2010 SF1 H12.

Tables 26 and 27 show the household compositions for Clark County and select cities. North Las Vegas had a higher concentration of families with children than the other jurisdictions and Boulder City had fewer. In 2010, households in the County were almost evenly distributed between families with children (35%), families with no children (31%) and non-family households (34%).

Table 26 Household composition in 2010, Clark County and select cities

Household Type	Clark County		Las Vegas		North Las Vegas		Henderson	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Households with children	249,397	35%	75,313	36%	32,111	48%	31,505	31%
Married-couple family	153,650	21%	45,700	22%	20,238	30%	20,995	21%
Female householder, no husband present	64,188	9%	19,945	9%	8,210	12%	6,931	7%
Male householder, no wife present	31,559	4%	9,668	5%	3,663	6%	3,579	4%
Family households without children	221,802	31%	64,359	30%	18,924	28%	37,084	37%
Married-couple family	168,067	23%	48,238	23%	14,095	21%	30,486	30%
Female householder, no husband present	33,306	5%	10,233	5%	3,085	5%	4,274	4%
Male householder, no wife present	20,429	3%	5,888	3%	1,744	3%	2,324	2%
Nonfamily households	244,166	34%	72,017	34%	15,464	23%	32,725	32%
Total Households	715,365	100%	211,689	100%	66,499	100%	101,314	100%

Source: U.S. Census 2010 SF1 P20.

Table 27 Households with own children under 18 years, 2000 and 2012, Nevada, Clark County, and selected cities

Area	2000			2012*		
	Total Number of Households	Households with Children	% Households with Children	Total Number of Households	Households with Children	% Households with Children
Nevada	751,165	238,846	31.8%	1,006,605	298,464	29.7%
Clark Co	512,253	162,295	31.7%	715,837	219,269	30.6%
Las Vegas	176,750	56,363	31.9%	216,779	63,184	29.1%
North Las Vegas	34,018	16,246	47.8%	67,526	29,763	44.1%
Henderson	66,331	21,893	33.0%	100,083	28,139	28.1%
Boulder City	6,385	1,507	23.6%	6,378	1,227	19.2%

Source: U.S. Census 2000 SF1 Table DP-1, U.S. Census ACS 2012 Table DP02, and U.S. Census ACS 2008-2012 Table DP02. *2012 data for Clark County, Las Vegas, North Las Vegas and Henderson is from the ACS 1-year estimates while data for Boulder City reflects ACS 5 year estimates (2008-2012)

Figure 13 shows where the female headed households with children are living, which are concentrated in the northeast section of the Valley. The very north area is one of the newest areas of the Valley, with a suburban lifestyle and high rated schools. This area faced some of the biggest housing price drops after the recession and homes are lower in price than in comparable suburban areas of Henderson and Summerlin. This lifestyle may attract female heads of households with children while still being financially attainable for a single earner. Some of the other areas are still north and begin to mirror the lower income areas of the urban core and may be the only areas affordable for some single earners or those with no income.

Figure 13 Female head of households with children

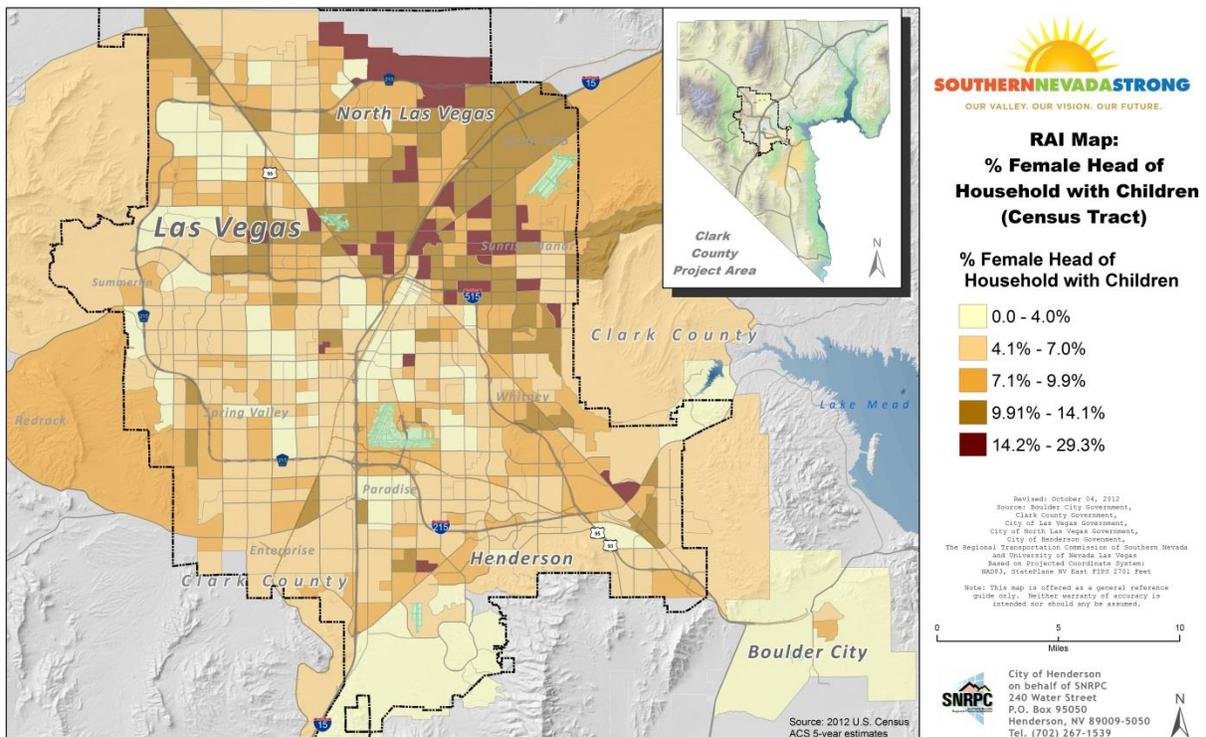
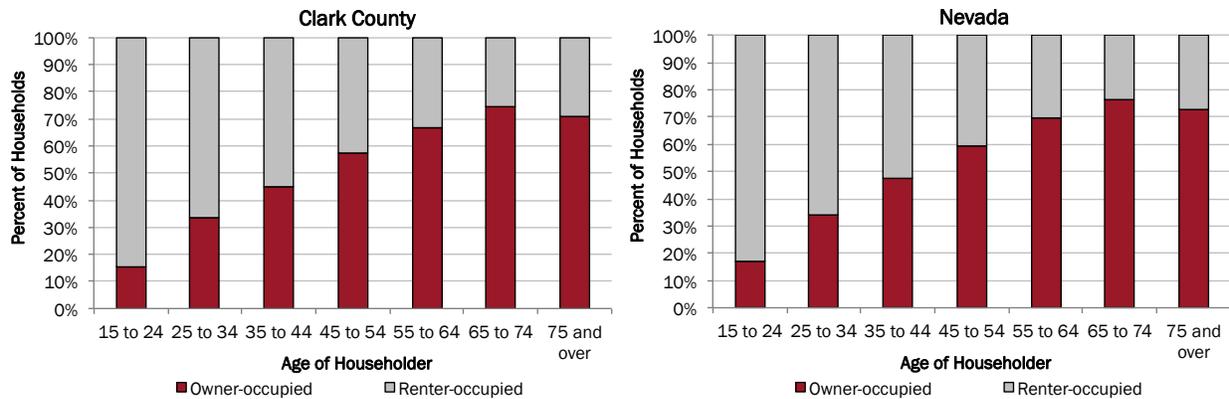


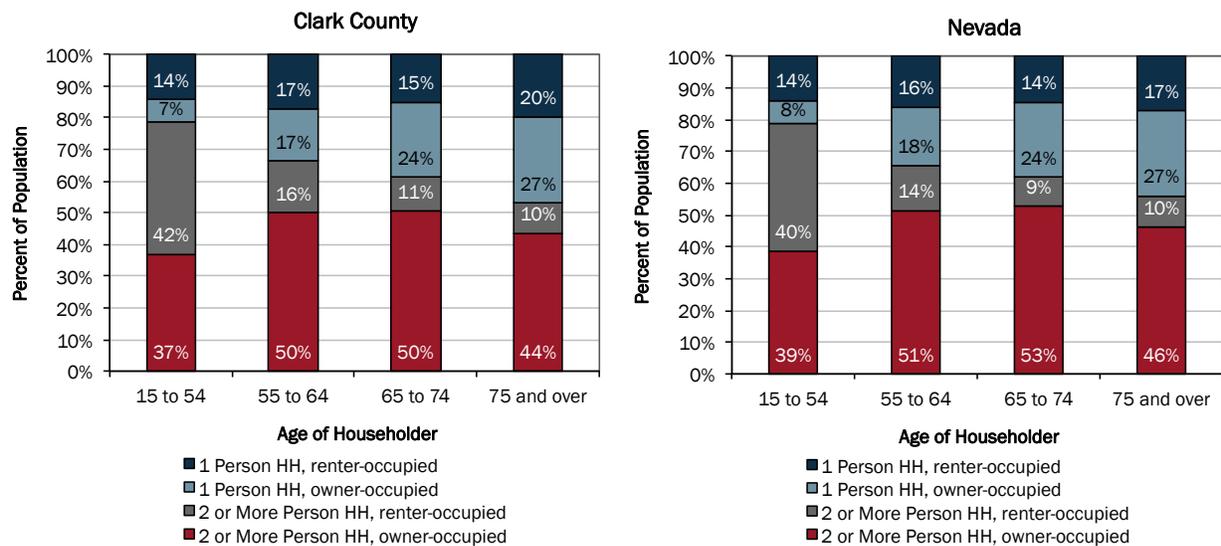
Figure 14 Households by tenure and age of householder in 2011, Clark County and Nevada



Source: American Community Survey 2011 B25007

Figure 14 shows the relationship between age of householder and whether they own or rent their residence for all of Clark County versus Nevada. In both cases, it is apparent that we follow the national trend that those over 55 are more likely to be home owners, and that for those under 65 the older you are, the more likely you are to own your home.

Figure 15 Tenure by household size and age of householder in 2011, Clark County and Nevada.



Source: American Community Survey 2011 B25116.

Figure 15 shows the relationship between household size and age and whether the home is owned or rented. This again shows the younger are more likely to have more people in the household and more likely to be rented.

Table 28 shows the homeownership rates for Clark County which have declined from 59% in 2000 to 53% in 2012. This change is also consistent with the national trend in declining homeownership rates.

- Homeownership rates declined in Las Vegas (59% in 2000 to 53% in 2012), North Las Vegas (70% in 2000 to 55% in 2012), and Henderson (71% in 2000 to 61% in 2012).
- While homeownership rates in Clark County declined 6% between 2000 and 2012, percentage declines were over twice as large in North Las Vegas (15%) and nearly double in Henderson (10%).
- Much of the homeownership decline in Nevada, Clark County, and select cities was observed between 2007 and 2012.
- Boulder City experienced the smallest decline from 76.1% to 74.1%.

Table 28 Homeownership rates 2000, 2007, and 2012, Nevada, Clark County, and select cities

Area	2000		2007		2012*	
	Owner Occupied	Renter Occupied	Owner Occupied	Renter Occupied	Owner Occupied	Renter Occupied
Nevada	60.9%	39.1%	60.4%	39.6%	54.9%	45.1%
Clark Co	59.1%	40.9%	58.6%	41.4%	52.5%	47.5%
Las Vegas	59.1%	40.9%	57.8%	42.2%	53.4%	46.6%
North Las Vegas	70.1%	29.9%	62.4%	37.6%	55.3%	44.7%
Henderson	70.5%	29.5%	67.8%	32.2%	60.5%	39.5%
Boulder City	76.1%	25.9%	75.0%	25.0%	74.1%	25.9%

Source: U.S. Census 2000 SF1 Table H004, U.S. Census ACS 2007 Table B25003, U.S. Census ACS 2007-2011 Table B25003, U.S. Census ACS 2012 Table B25003, and U.S. Census ACS 2008-2012 Table B25003.
*2012 data for Clark County, Las Vegas, North Las Vegas and Henderson is from the ACS 1-year estimates while data for Boulder City reflects ACS 5 year estimates (2008-2012)

Table 29, below, shows the homeownership rates for the protected classes and Caucasians throughout Clark County for the five year period between 2008 – 2012. They are slightly different totals than in Table 28 because they are based on five year estimates which are different than the one year estimate used for Table 28. The Caucasians and Asians have the largest percentage at 59% and 63% respectively. The lowest percentage is seen with the African Americans and Households with Female Head of Households at 34% and 40% respectively. This mirrors the same classes that had the highest and lowest median incomes and percent below poverty level. Data for homeownership rates for residents with disability status was not able to be found for any of the jurisdictions and is noted in the tables below with an UK.

Table 29 Homeowner status by protected class for Clark County in total

Protected Class Designation	Percent Homeowners
White Alone *not a protected class	59%
Black Alone	34%
Asian Alone	63%
Other Race	47%
Hispanic or Latino	44%
With Disability	UK
Households With Female Head of Household	40%
Total	56%

Source: United States Census Bureau American Community Survey, 2008-2012

Las Vegas homeownership rates are very similar to the overall county numbers, as seen in Table 30, however, North Las Vegas had even more discrepancies between their high and low percentages. The Asians, as seen in Table 31, have a homeownership rate of 78% and Caucasians of almost 65% which is significantly larger than in the County and Las Vegas. The other races and Hispanic ethnicity are lower, but still higher numbers than in Clark County and Las Vegas. The households with female head of households is about the same at 40%.

Table 30 Homeowner status by protected class for Las Vegas

Protected Class Designation	Percent Homeowners
White Alone *not a protected class	59.2%
Black Alone	32.8%
Asian Alone	59.7%
Other Race	44.6%
Hispanic or Latino	42.7%
With Disability	UK
Households With Female Head of Household	39.2%
Total	54.8%

Source: United States Census Bureau American Community Survey, 2008-2012

Table 31 Homeowner status by protected class for North Las Vegas

Protected Class Designation	Percent Homeowners
White Alone *not a protected class	64.9%
Black Alone	44.1%
Asian Alone	78.1%
Other Race	54.0%
Hispanic or Latino	51.4%
With Disability	UK
Households With Female Head of Household	40.1%
Total	59.6%

Source: United States Census Bureau American Community Survey, 2008-2012

Henderson, in Table 32, also has high homeownership percentages for Caucasian and Asian residents, with other race and Hispanic about 10 percentage points behind. Households with female head of household follows at 47% and African- Americans are lowest at 38.7%, which is lower than North Las Vegas, but higher than Clark County or Las Vegas.

Table 32 Homeowner status by protected class for Henderson

Protected Class Designation	Percent Homeowners
White Alone *not a protected class	67.5%
Black Alone	38.7%
Asian Alone	69.1%
Other Race	56.1%
Hispanic or Latino	56.2%
With Disability	UK
Households With Female Head of Household	46.9%
Total	65.4%

Source: United States Census Bureau American Community Survey, 2008-2012

Table 33 shows the homeownership rates for Boulder City and again we have data issues due to the small raw numbers for African American and other race residents. The Caucasians have a large number of 75% homeownership, with Hispanic trailing at 40%. Asians are surprisingly low compared to the other jurisdictions at 17%, but this could be due to the low numbers of total Asian residents as well. The households with female head of household are slightly higher than in the other jurisdictions at 50%.

Table 33 Homeownership status by protected class for Boulder City

Protected Class Designation	Percent Homeowner
White Alone *not a protected class	75.4%
Black Alone	**
Asian Alone	17.0%
Other Race	**
Hispanic or Latino	40.0%
With Disability	UK
Households With Female Head of Household	50.8%
Total	74.1%

Source: United States Census Bureau American Community Survey, 2008-2012

** Raw numbers too small to be considered reliable data

3. HOUSING STATUS

Current Housing Characteristics

Housing Vacancy Rates

Recent housing vacancy rates were higher than usual in Clark County. Vacancy rates generally cycle between 4% to 8% in urban areas in a healthy housing market. Vacancy rates in multi-family housing are generally higher than in single-family housing in a healthy housing market. Clark County's vacancy rates appear to be high relative to vacancy rates during the last decade, consistent with vacancy rates in Nevada and the U.S.

- Overall vacancy rates in Clark County in 2010 were about 15%, compared with 11% in 2005 and 8.5% in 2000.
- Vacancy rates in the U.S. in 2010 were 11.4% and 14.3% for Nevada. In comparison, vacancy rates in 2000 were 9% for the U.S. and 9.2% for Nevada.

Multi-family homes had the highest vacancy rate outside of the City of Las Vegas.

- In 2011, Clark County had a larger percentage (14.9%) of vacant housing units compared to the Las Vegas average of 13.1%.
- In 2011, 13% of multi-family homes and 10.5% of single-family homes in Clark County were vacant.

Table 34 Vacancy rates, 2010, Clark County and select cities

	Clark County	Las Vegas	North Las Vegas	Henderson
Total housing units	840,343	243,701	76,073	113,586
Total occupied	715,365	211,689	66,499	101,314
Total vacant	124,978	32,012	9,574	12,272
Vacancy rate	14.9%	13.1%	12.6%	10.8%

Source: U.S. Census 2010 SF1 H3.

Table 35 Vacancy rates by type of housing, 2000 to 2011, Clark County

Year	Single Family	Mobile Home	Multi-family
2000	2.0%	6.4%	6.5%
2001	2.6%	7.3%	6.2%
2002	2.6%	7.3%	6.2%
2003	2.6%	8.0%	7.2%
2004	3.6%	4.5%	5.6%
2005	2.8%	6.6%	6.4%
2006	3.8%	5.5%	6.9%
2007	4.3%	3.1%	6.9%
2008	6.4%	8.4%	6.8%
2009	5.2%	7.1%	11.4%
2010	5.8%	8.0%	11.5%
2011	10.5%	11.6%	13.1%

Source: U.S. Census 2010 SF1 H3.

Homeownership Rates

Homeownership rates declined through 2011 and this decline is related to an increase in foreclosure activity and the continued market problems related to the Great Recession, such as unemployment and underemployment.

- Homeownership rates in Clark County declined from 59% in 2000 to 54% in 2011. This change is consistent with the statewide decline in homeownership from 61% to 56% in 2011. This change is also consistent with the national trend in declining homeownership rates.
- Homeownership rates declined in Las Vegas (59% in 2000 to 52% in 2011), North Las Vegas (70% in 2000 to 58% in 2011), and Henderson (71% in 2000 to 64% in 2011).

North Las Vegas had a greater drop in homeownership rates than Clark County from 2000 to 2011

- Homeownership rates decreased in North Las Vegas from 70% in 2000 to 58% in 2011. In comparison, homeownership rates decreased in Clark County from 59% in 2000 to 52% in 2011.
- Homeownership rates for one-person households in North Las Vegas increased by 2% from 2000-2011. This increase was offset by the 15% reduction in owner occupied households with two or more people.

Foreclosure activity

Foreclosure activity has decreased over the last year; the trend, however, appears to be reversing based on the most recent data

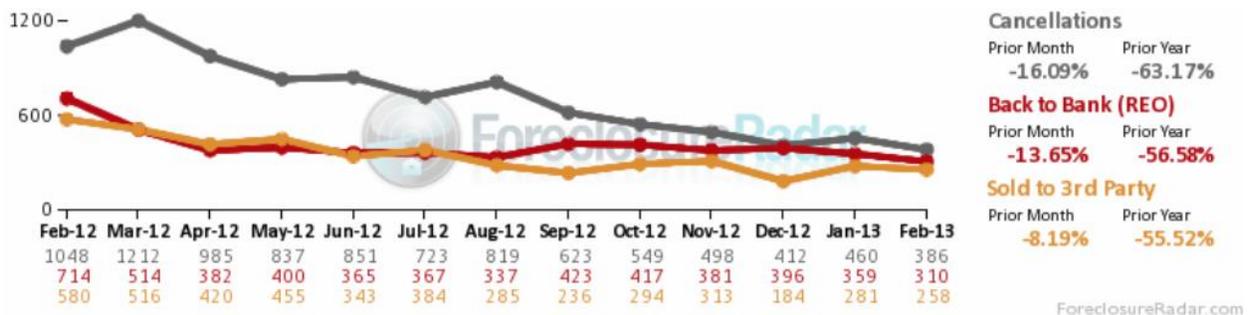
- Notice of foreclosure sales were down 39% year over year from February 2012. However, notices of default were up 102% during the same period. Notices of default are the leading indicator for notice of sales, so it is likely that this number will increase in 2013.
- Preforeclosures increased 11% in from January to February 2013. This is indicative of the trend of increasing notice of sales. There were 0.8 foreclosure cancellations for every sale (3rd party or back to the bank). Since February 2012 the ratio has dropped by 13% to 0.67 cancellations per sale.
- The combination of fewer cancellations and increasing preforeclosures will likely lead to an increase in the number of foreclosures in 2013.
- Bank owned properties (REO) decreased 50% in the past year. As the numbers of REO decrease, the market will stabilize as the supply of low priced inventory decreases.

Figure 16 Foreclosure filings in Clark County



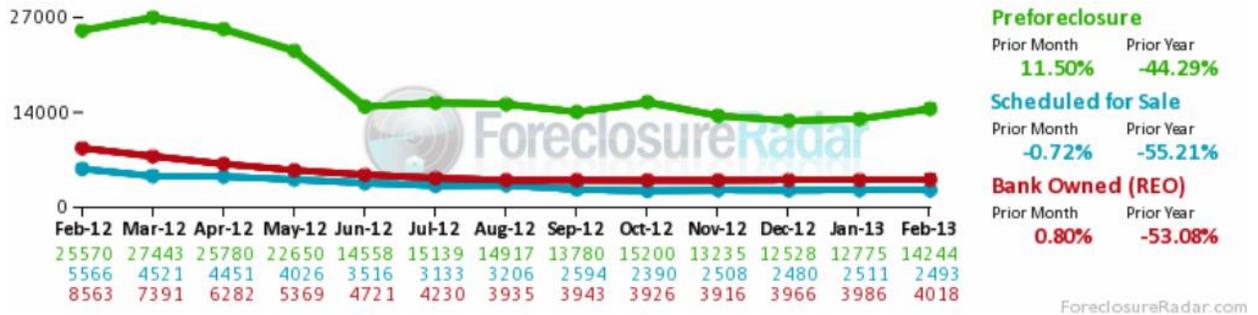
Source: Foreclosureradar.com.

Figure 17 Foreclosure outcomes in Clark County



Source: Foreclosureradar.com.

Figure 18 Foreclosure inventories in Clark County



Source: Foreclosureradar.com.

Figure 19 Foreclosure filings by year built, Clark County



Source: Foreclosureradar.com.

Figure 20 Foreclosure filings by estimated market value, Clark County



Source: Foreclosureradar.com.

Clark County's housing market had a larger-price bubble than the national housing market and it is taking longer for the Clark County housing market to recover from the dramatic increase and decrease in prices between 2003 and 2013. The rapid price changes put many households who purchased homes during the housing bubble (mostly between 2003 and 2007) in a position where they owe more on their mortgage than their home is worth. This contributed to the spike in foreclosure activity.

In the short term, increased foreclosures have caused housing prices to drop and have increased the supply of houses listed for sale. The spike in foreclosures caused by the bursting of the housing bubble will likely not have a significant impact on the long-term demand for housing.

The most significant impact the foreclosure crisis will have on future housing demand is through the decrease in the percentage and number of homeowners. Previous homeowners who are now renting will look to re-enter the housing market in the future as credit restrictions decrease and individual credit scores recover. Housing affordability, specifically for renters, is a problem despite recent decreases in rental rates. Approximately half of Clark County's renter households are cost-burdened; rents would have to drop significantly to be affordable for most renter households.

Figure 21 Foreclosures in Southern Nevada 2008 – 2013

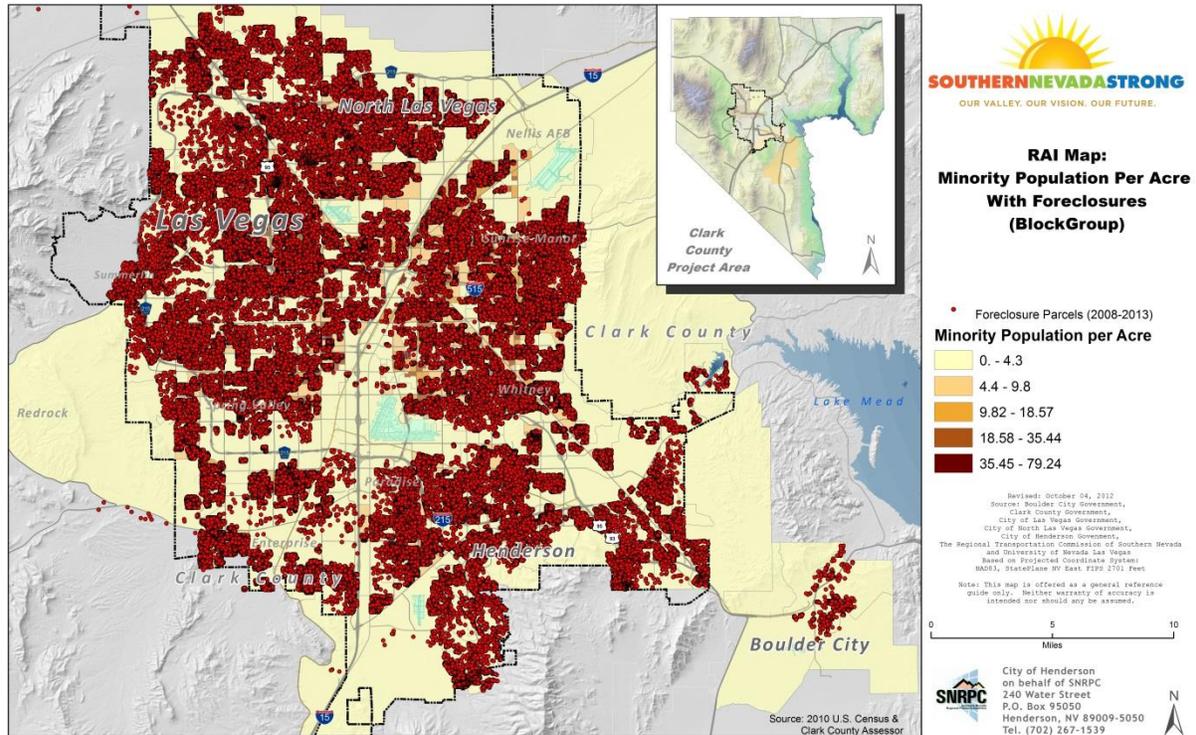


Figure 21 shows us the locations for foreclosures throughout the Valley for 2008 – 2013. Many of these foreclosures are clustered in the newer built neighborhoods, which is echoed in the numbers we see in Figure 19. They do not appear any more prevalent in the high minority neighborhoods, but are spread out throughout the Southern Nevada region. The foreclosure problem was so widespread for Southern Nevada, it does not appear to be especially a problem for any one protected class, but rather a huge problem for the entire Valley. Chapter 6 analyzes the lending rates by minority class.

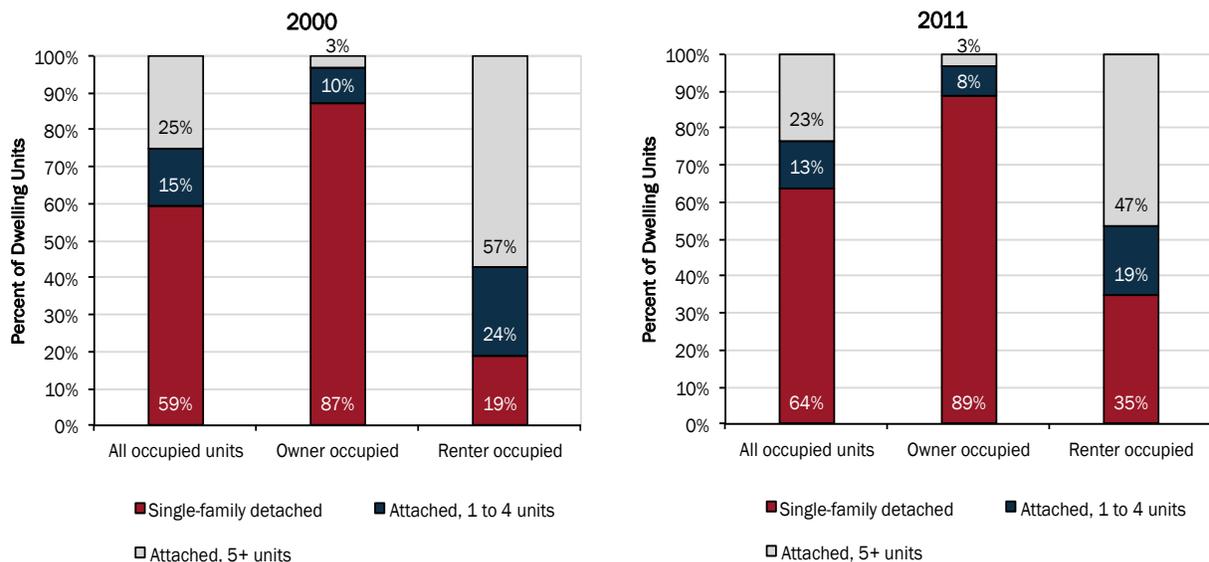
Housing Type

Single-family detached housing accounts for the majority of housing in Clark County. In 2011, the majority (61%) of the owner-occupied housing stock in Clark County was single-family detached homes. 85% of owner occupied homes were single family, with 64% of this group made up of two or three bedroom structures. The share of single-family detached housing increased from 59% to 64% between 2000 and 2011. The share of attached housing decreased by 4% over the same period.

North Las Vegas had a higher percentage of single-family detached rental units than the rest of Clark County in 2011. Single-family detached renter occupied units were the largest share of the rental market in North Las Vegas (50%), compared to 33% in all of Clark County for 2011.

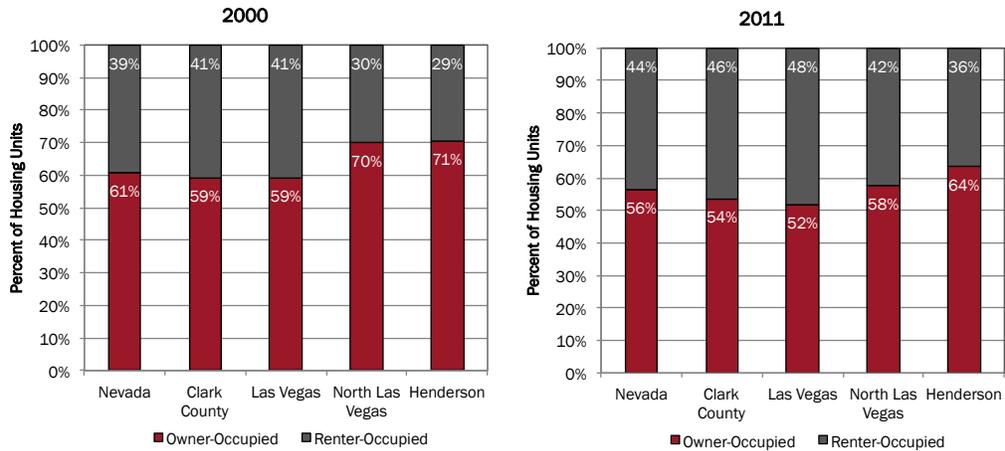
In 2011, about two-thirds of renters lived in attached housing and one-third in single-family detached housing. Since 2000, rental of single-family housing increased, from 19% to 35% of rental units in 2011.

Figure 22 Housing type by tenure, occupied housing units, 2000 and 2011, Clark County



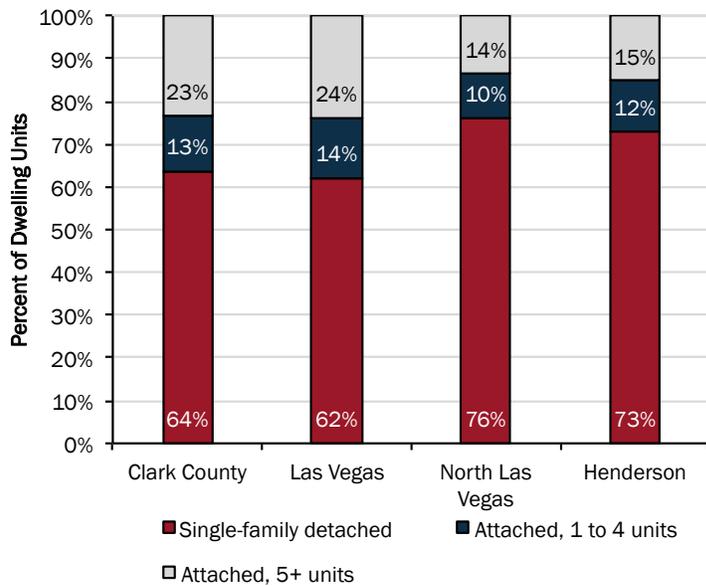
Source: American Community Survey 2011 B25032.

Figure 23 Tenure, Nevada, Clark County, and selected cities, 2000 and 2011



Source: Decennial Census 2000 H004; American Community Survey 2011 B25003

Figure 24 Housing type, occupied housing units, 2011, Clark County and select cities



Source: American Community Survey 2011 B25032.

Table 36 Tenure by units in structure, year built, bedrooms, and total rooms, 2011, total Clark County and select cities

	Clark County			Las Vegas			North Las Vegas			Henderson		
	All occupied units	Owner occupied	Renter occupied	All occupied units	Owner occupied	Renter occupied	All occupied units	Owner occupied	Renter occupied	All occupied units	Owner occupied	Renter occupied
Units in Structure												
Single-family detached	61%	85%	33%	61%	88%	32%	75%	93%	50%	72%	91%	38%
Single-family attached and 2-4 units	13%	8%	19%	14%	7%	21%	10%	4%	18%	12%	6%	22%
Structure with 5+ units	23%	3%	47%	24%	3%	46%	14%	1%	31%	15%	2%	39%
Mobile and manufactured	3%	4%	2%	1%	2%	1%	1%	2%	1%	1%	1%	1%
Year Built												
2000 or later	35%	37%	32%	25%	24%	26%	56%	57%	56%	37%	40%	33%
1990 to 1999	29%	32%	27%	35%	38%	31%	25%	29%	19%	40%	40%	41%
1989 or earlier	36%	31%	42%	41%	38%	43%	19%	14%	25%	22%	20%	26%
Bedrooms												
No bedroom	2%	0%	4%	3%	0%	5%	1%	0%	2%	0%	0%	0%
1 bedroom	10%	1%	21%	11%	1%	22%	7%	0%	15%	7%	1%	18%
2 or 3 bedrooms	64%	64%	64%	65%	66%	64%	60%	57%	64%	66%	66%	68%
4 or more bedrooms	23%	34%	11%	21%	33%	9%	32%	42%	19%	27%	34%	14%
Total Rooms												
1 room	2%	0%	3%	3%	0%	5%	1%	0%	2%	0%	0%	0%
2 or 3 rooms	13%	3%	25%	14%	2%	26%	8%	1%	18%	8%	1%	20%
4 or 5 rooms	41%	35%	48%	39%	32%	47%	41%	37%	46%	40%	35%	49%
6 or more rooms	44%	62%	23%	44%	65%	22%	50%	61%	34%	52%	64%	31%

Source: American Community Survey 2011 B25032, B25036, B25042, and B25020.

Building Permits

The number of residential building permits issued decreased rapidly after 2005. Between 2000 and 2011, more than 284,000 residential building permits were issued, averaging 25,800 permits issued annually. The number of permits issued peaked from 2003 to 2005, with more than 35,000 permits issued in each of these years. Between 2009 and 2010, about 5,000 permits were issued each year, substantially lower than the average number of permits issued annually over the past 11 years.

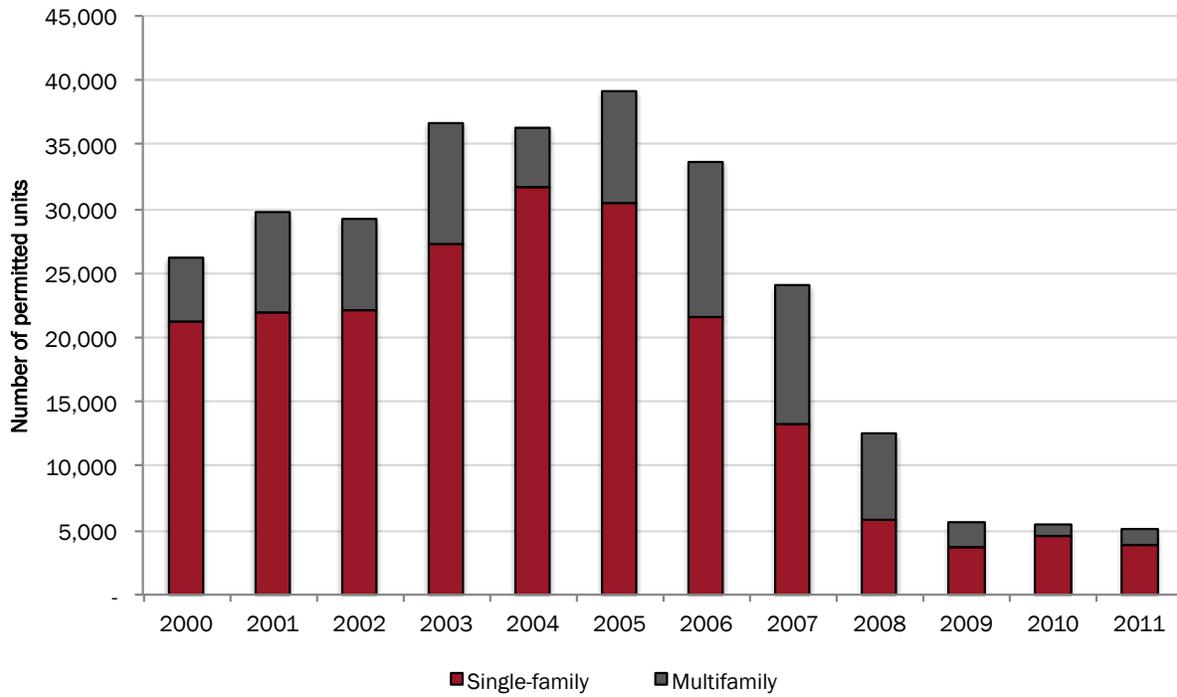
Table 37 shows us that nearly three-quarters of permits issued were for single-family units, with about one-quarter issued for multi-family units. About half of the permits for all housing were issued in Las Vegas, North Las Vegas, and Henderson, while unincorporated Clark County accounted for most of the other half. More than half of the permits for multi-family housing were issued in Las Vegas.

Table 37 Residential building permits issued, 2000 to 2011, Clark County and selected cities

Year	Clark County		Las Vegas		North Las Vegas		Henderson	
	SF	MF	SF	MF	SF	MF	SF	MF
2000	21,282	4,942	4,750	1,134	2,505	519	5,507	379
2001	21,871	7,836	4,295	880	2,665	365	4,109	1,430
2002	22,148	7,008	4,454	1,110	2,735	555	3,980	684
2003	27,354	9,378	6,861	2,322	4,599	497	4,267	602
2004	31,741	4,654	6,200	1,720	6,105	813	4,595	106
2005	30,479	8,758	4,271	2,287	7,007	1,057	4,923	236
2006	21,590	12,138	2,998	2,204	4,262	1,469	4,249	716
2007	13,310	10,779	2,356	547	2,365	391	2,224	377
2008	5,840	6,697	1,085	1,613	834	1,614	1,063	415
2009	3,777	1,911	744	381	498	-	491	786
2010	4,623	851	926	362	648	20	700	68
2011	3,817	1,330	814	114	510	136	752	368
Total	207,832	76,282	39,754	14,674	34,733	7,436	36,860	6,167
% Total	73%	27%	73%	27%	82%	18%	86%	14%
Average	17,319	6,357	3,313	1,223	2,894	620	3,072	514

Source: U.S. Census

Figure 25 Residential building permits issued, 2000 to 2011, Clark County



Source: U.S. Census

Figure 26 Housing Stock Constructed Prior to 1960.

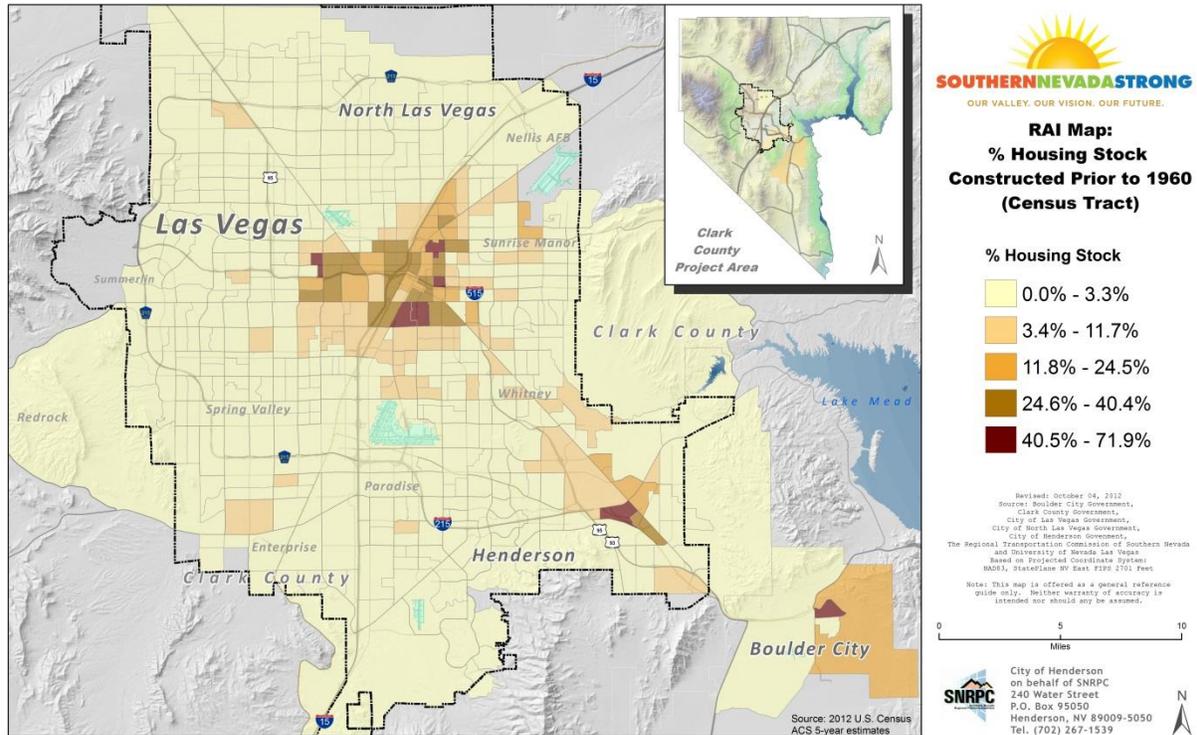


Figure 26 shows the neighborhoods that have a concentration of housing stock constructed prior to 1960. These areas are found in the urban core where the urban areas began and very much mirror the low income and minority concentration areas. *These areas are more prone to urban decay due to the older age of the housing stock and it is important to make sure code enforcement standards are being adhered to and that safety and blight do not become further issues in these areas.*

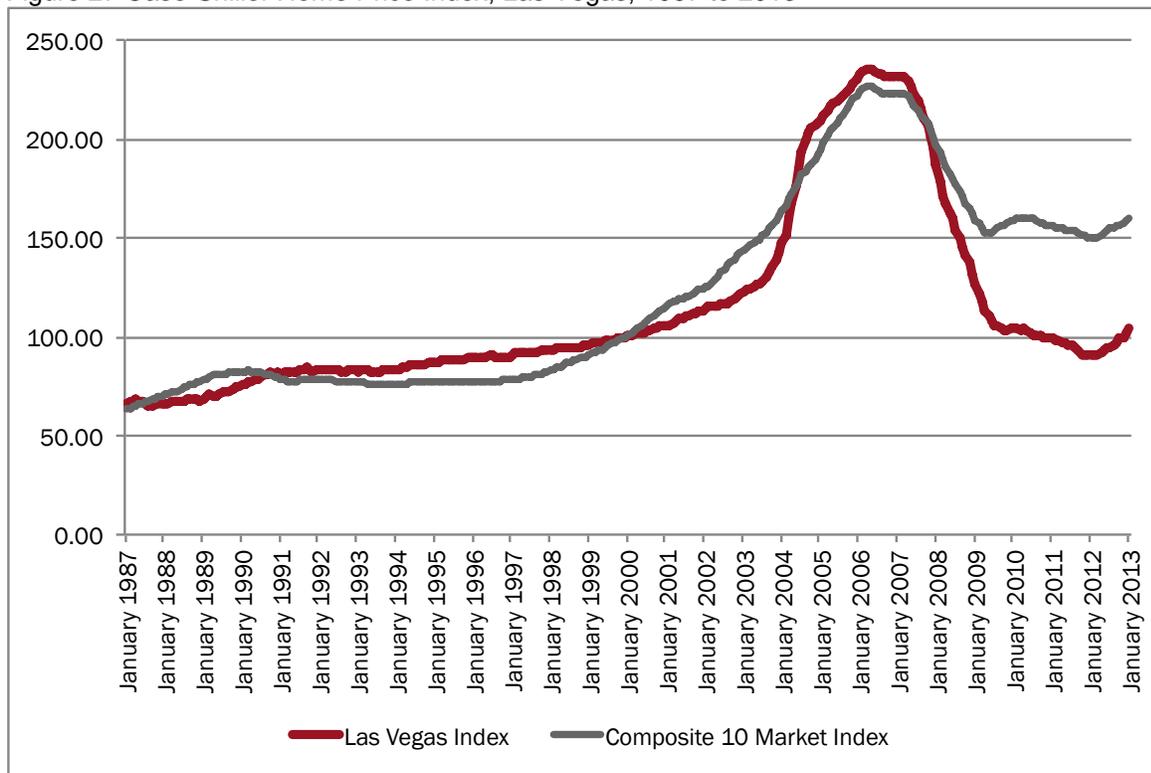
Housing costs

Housing prices in Clark County changed rapidly between 2003 and 2009. Figure 27 shows that Clark County’s housing prices increased gradually between 1987 and 2003. Between 2003 and late 2006, housing prices more than doubled. This change in price is consistent with other large urban housing markets in the U.S.

Starting in 2006, Clark County’s housing prices decreased by more than half. Prices peaked in April 2006, and then dropped to the price level of approximately 1996, when the market bottomed out in January 2012. The price decrease in Clark County was substantially larger than in other large urban housing markets in the U.S.

Housing prices stabilized in 2010, then decreased in 2011 before bottoming out in early 2012. Prices have been consistently increasing (seasonally adjusted) starting in February 2012.

Figure 27 Case-Shiller Home Price Index, Las Vegas, 1987 to 2013



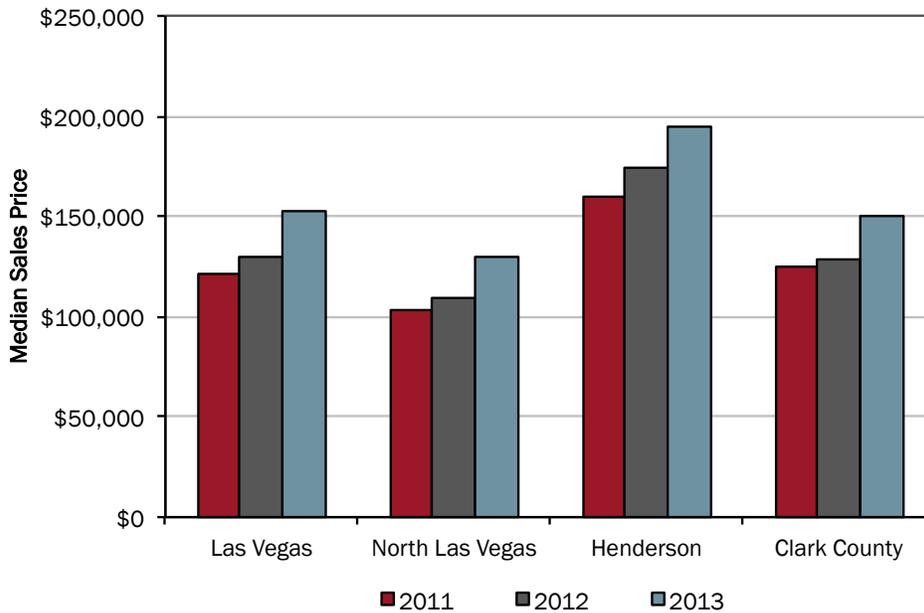
Source: Case-Shiller

Table 38 Median sales price, single-family detached housing, Clark County, April 2003, April 2007, and February 2013

Year	Median Sales Price
2003	\$187,250
2007	\$300,000
2013	\$150,000
Change 2001 to 2011	
Dollar	-\$37,250
Percent Change	-20%
Change 2007 to 2011	
Dollar	-\$150,000
Percent Change	-50%

Source: National Association of Realtors, Greater Las Vegas Association of Realtors

Figure 28 Median sales price, single-family detached housing, Las Vegas, North Las Vegas, and Henderson, selected months in 2011, 2012, and 2013

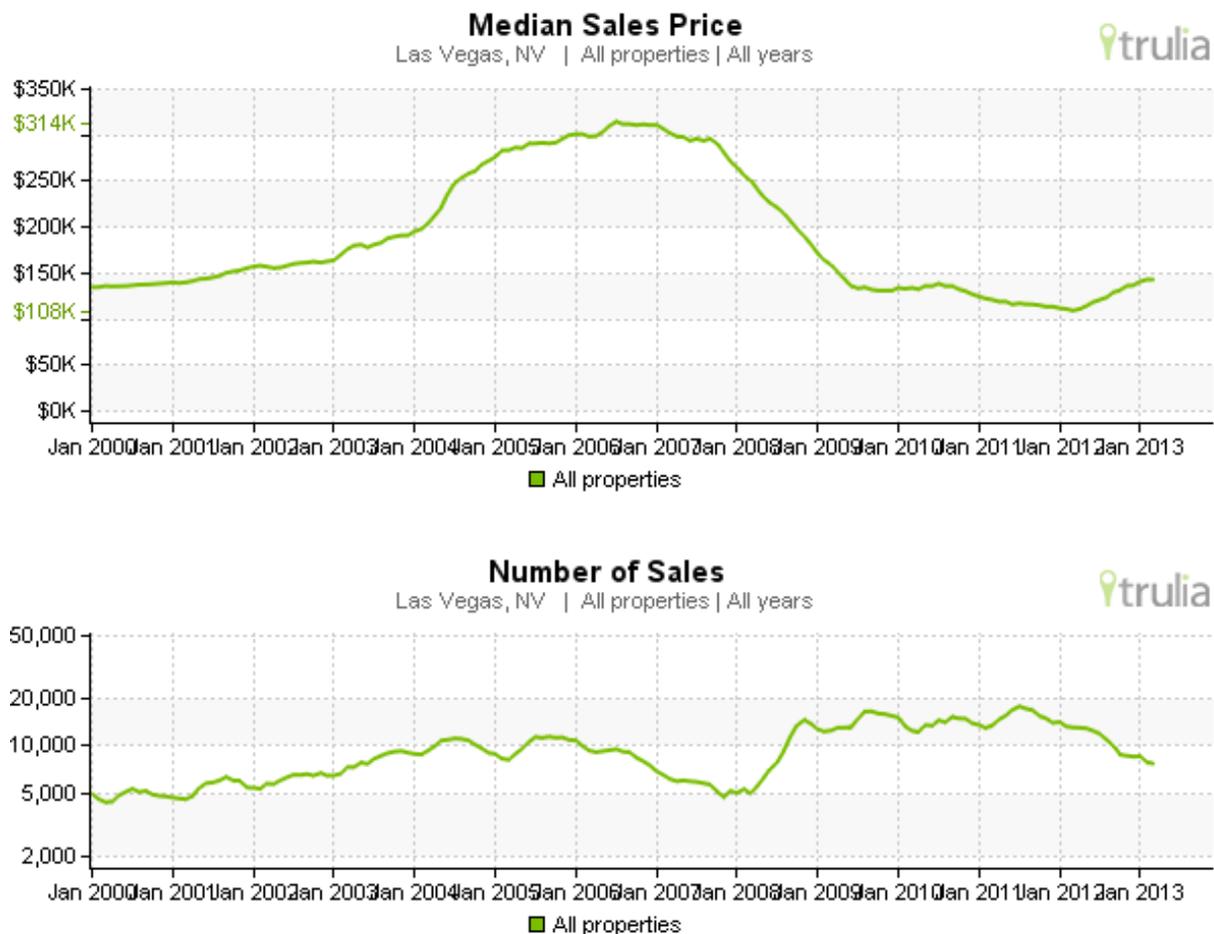


Source: National Association of Realtors, Greater Las Vegas Association of Realtors

Table 38 and Figure 28 show that median sales prices peaked in 2007 and appear to be stabilizing in 2013 for all of Clark County and major cities.

- In 2007, median sales prices for single-family detached housing peaked at about \$300,000 in all of Clark County and by early 2013, had decreased to about \$150,000, a 50% decrease.
- Median sales prices for all housing prices decreased to less than \$150,000 in mid-2009 and appeared to stabilize at about \$150,000 by early 2013.
- Median sales prices for single-family detached housing in Las Vegas, North Las Vegas, and Henderson followed the same pattern as the County as a whole, with the highest median prices in Henderson.

Figure 29 Median Sales Price and Number of Sales, Las Vegas, January 2000 to January 2013



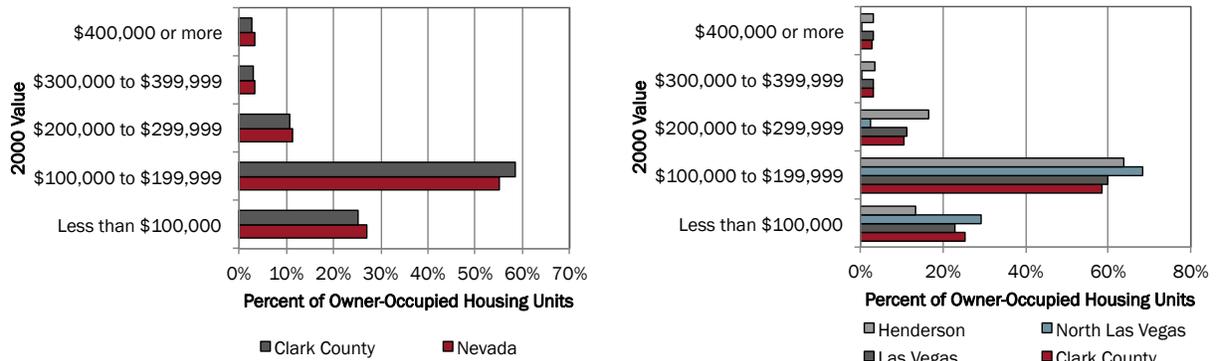
Source: Trulia.com

Table 39 Median value of owner-occupied housing units, Nevada, Clark County, and select cities, 2000 and 2011

	2000	2011	Change 2000 to 2011	
			Amount	Percent
Nevada	\$142,000	\$158,000	\$16,000	11%
Clark County	\$139,500	\$153,800	\$14,300	10%
Las Vegas	\$137,300	\$153,200	\$15,900	12%
North Las Vegas	\$156,000	\$124,200	-\$31,800	-20%
Henderson	\$123,000	\$192,900	\$69,900	57%

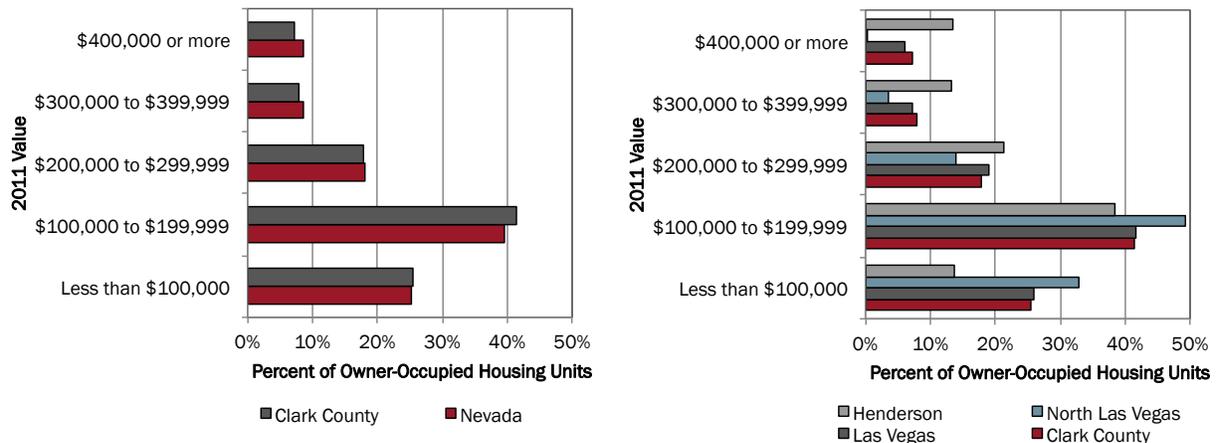
Source: American Community Survey 2011 B25075.

Figure 30 Value of owner-occupied housing units, Nevada, Clark County, and select cities, 2000



Source: U.S. Census 2000 SF3 H84.

Figure 31 Value of owner-occupied housing units, Nevada, Clark County, and select cities, 2011



Source: American Community Survey 2011 B25075.

Table 40 shows that median contract rent has decreased in Clark County since 2008.

- Median contract rent in Clark County increased 27% from 2000 to 2011, from \$648 to \$818. The peak in contract rent was in 2008, with a median contract rent for Clark County of \$899.
- For the same period in North Las Vegas, rents increased 55%.
- In 2000, median nominal rent was lower in North Las Vegas (\$556) compared to Clark County (\$648). By 2011, rent was higher in North Las Vegas (\$864) than the median rent in Clark County (\$818).

Table 40 Median contract rent, Nevada, Clark County, and select cities, 2000 through 2011

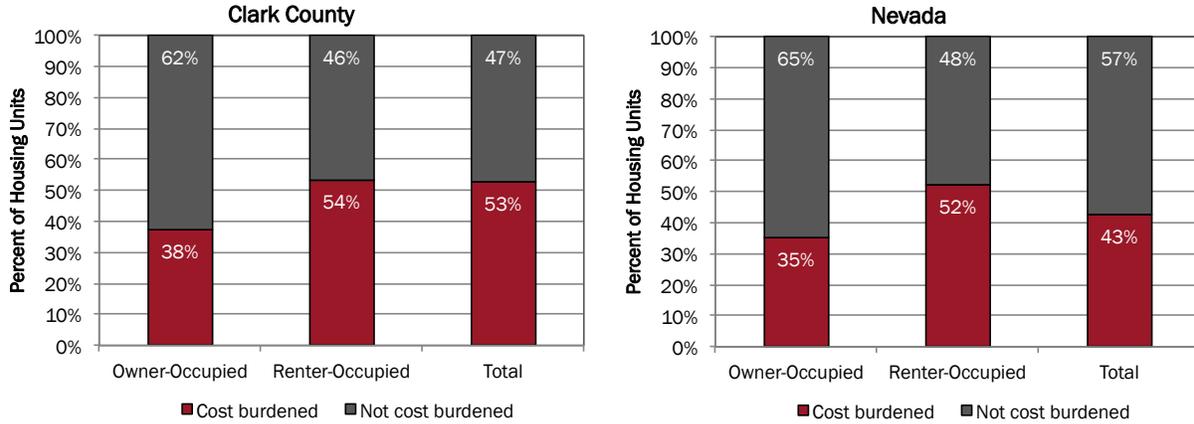
Year	Nevada	Clark County	Las Vegas	North Las Vegas	Henderson
2000	\$630	\$648	\$632	\$556	\$779
2005	\$747	\$772	\$765	\$769	\$876
2006	\$786	\$822	\$784	\$825	\$952
2007	\$842	\$874	\$821	\$935	\$1,012
2008	\$866	\$899	\$861	\$933	\$1,071
2009	\$849	\$883	\$858	\$959	\$1,034
2010	\$811	\$842	\$819	\$867	\$916
2011	\$800	\$818	\$803	\$864	\$943
Change 2000 to 2011					
Amount	\$170	\$170	\$171	\$308	\$164
Percent	27%	26%	27%	55%	21%

Source: U.S. Census 2000 SF3 H56 and American Community Survey 2011 B25058.

Renter households are the most likely to be cost-burdened.

- About 53% of all Clark County households are cost-burdened (i.e., pay more than 30% of their gross income for housing costs). 54% of renter-households and 38% of owner-households are cost-burdened.
- In comparison, 43% of all households in Nevada are cost burdened, with 52% of renter-households and 35% of owner-households being cost-burdened.
- Figure 32 shows cost burden for Nevada and all of Clark County. Cost burden is a measure of housing affordability, based the HUD standard that says that housing is affordable if it costs no more than 30% of a household's gross income.

Figure 32 Housing Costs as a percent of monthly household income by tenure in 2011, Nevada and all of Clark County



Source: American Community Survey 2011 B25091 and B25070.

Figure 33 Median Contract Rent in Southern Nevada

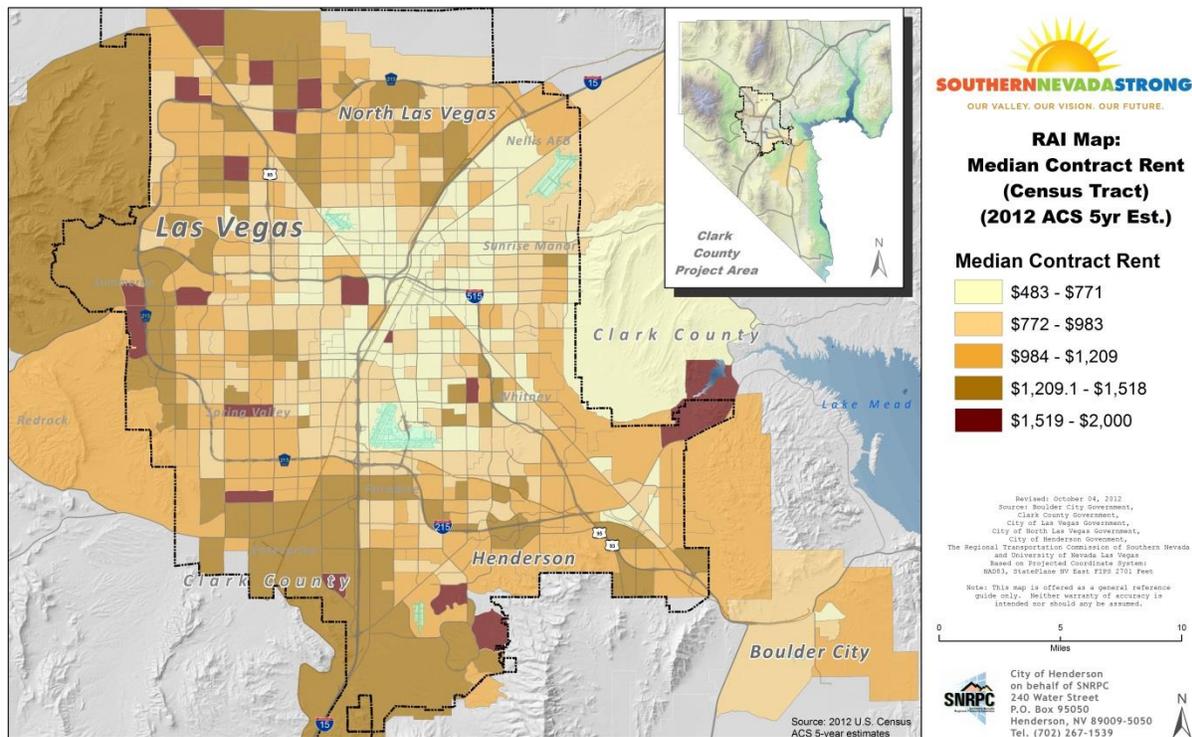


Figure 33 shows the median contract rent throughout the Vegas Valley. The lowest rent areas are typically in the urban core area to serve the same lower income areas. These are the same neighborhoods that contain a higher number of racial and ethnic minorities (as seen back in Figure 3) as well as a higher number of female headed households (as seen in Figure 13). The minority and female headed household residents would be disproportionately impacted by significant increases in median rent because they have a lower median income (Tables 17 – 21) in every jurisdiction. They would not only be disproportionately impacted by increases in rent costs, but also unable to afford the higher rent costs usually found in the suburban higher opportunity areas on the outer edges of the Valley, regardless of jurisdiction. The higher rent areas are in areas with higher opportunity levels (seen in Chapter 4) and those higher costs would present a barrier to those wishing to move to those higher opportunity areas.

Looking back at Figure 6, we note that some disabled residents are also clustered in this urban core area where the contract rents are lowest. These disabled residents may be tied to the area due to a fixed income level which blocks their ability to seek out higher rent locations. There are some disabled residents clustered in other areas, however, as previously noted, that is probably due to the proximity of health care or age-restricted communities. These disabled residents are most likely those not as constrained by income constraints or savings levels.

Table 41 Median household income, owner-occupied housing value, and gross rent in 1999 and 2011, all of Clark County and Nevada

Indicator	Clark County				Nevada			
	1999	2007	2011	Change 1999-2011	1999	2007	2011	Change 1999-2011
Median HH Income	\$44,616	\$55,996	\$48,215	8%	\$44,581	\$55,062	\$48,927	10%
Median Owner Value	\$139,500	\$315,300	\$153,800	10%	\$142,000	\$311,300	\$158,000	11%
Median Gross Rent	\$716	\$1,017	\$957	34%	\$699	\$980	\$936	34%
Ratio of Housing Value to Income								
Median HH Income	3.1	5.6	3.2		3.2	5.7	3.2	

Source: U.S. Census 2000 SF3 P53, H76, and H63; American Community Survey 2007 P53, H76, and H63; American Community Survey 2011 P53, H76, and H63.

Table 41 shows a rough estimate of housing affordability in all of Clark County by income level in 2012. This table is based on American Community Survey data about income, value of owner units, and cost of rent. This table uses HUD standards for housing affordability, which say that housing is affordable if it costs no more than 30% of a household's gross income. The table also uses HUD's estimates for fair market rents in Clark County.

Clark County has a deficit of housing affordable to lower-income households. More than one-fifth of Clark County's households are unable to afford the cost of renting a studio apartment (\$691). About one-third of Clark County's households are unable to afford the cost of a one-bedroom unit (\$864). These findings are consistent with the fact that more than half of Clark County's renters are cost-burdened.

Clark County has a surplus of housing affordable to households with income between \$75,000 and \$150,000. This suggests that some households are living in housing that costs less than they could afford, according to HUD standards.

Table 42 Rough estimate of housing affordability, 2012, all of Clark County

Income Level	Number of HH	Percent	Affordable Monthly Housing Cost	Crude Estimate of Affordable Purchase Owner-Occupied Unit	Est. Number of Owner Units	Est. Number of Renter Units	Surplus (Deficit)	HUD Fair Market Rent (FMR) in 2008
Less than \$10,000	42,600	7%	\$0 to \$250	\$0 to \$25,000	10,496	3,608	(28,496)	
\$10,000 to \$14,999	30,353	5%	\$250 to \$375	\$25,000 to \$37,000	5,434	3,015	(21,904)	
\$15,000 to \$24,999	68,211	11%	\$375 to \$625	\$37,500 to \$62,500	18,525	30,532	(19,154)	
\$25,000 to \$34,999	77,270	12%	\$625 to \$875	\$62,500 to \$87,500	33,075	80,612	36,417	Studio: \$691 1 bdrm: \$864
\$35,000 to \$49,999	102,706	16%	\$875 to \$1,250	\$87,500 to \$125,000	62,226	103,332	62,852	2 bdrm: \$1,064 3 bdrm: \$1,568 4 bdrm: \$1,861
\$50,000 to \$74,999	132,808	21%	\$1,250 to \$1,875	\$125,000 to \$187,500	87,492	52,616	7,301	
Las Vegas-Paradise MSA MFI: \$71,400			\$1,785	\$178,500				
\$75,000 to \$99,999	80,565	13%	\$1,875 to \$2,450	\$187,500 to \$245,000	44,469	17,346	(18,750)	
\$100,000 to \$149,999	71,292	11%	\$2,450 to \$3,750	\$245,000 to \$375,000	48,226	3,637	(19,428)	
\$150,000 or more	31,935	5%	More than \$3,750	More than \$375,000	31,884	1,212	1,162	
Total	637,740	100%			341,829	295,911	0	

Source: American Community Survey 2011 B19001, B25075, and B25063

Figure 34 Median Housing Value

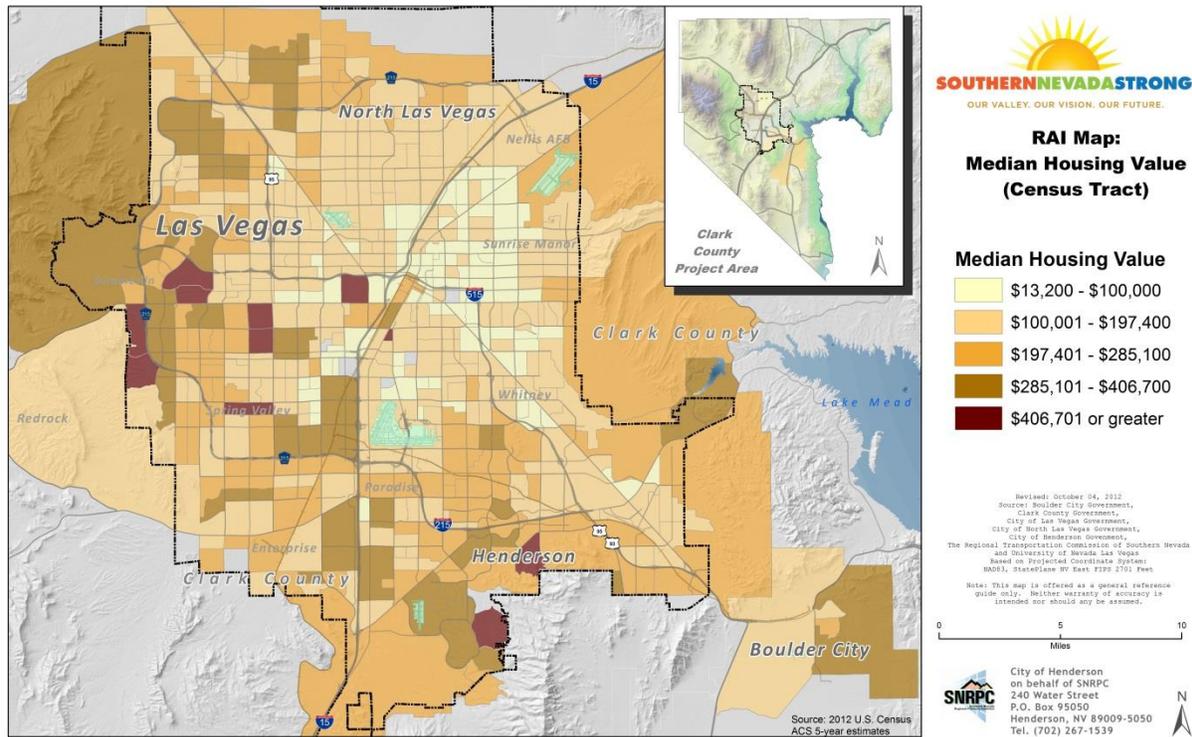


Figure 34 shows the median housing value for the region. The light colors are the lowest values and are concentrated in the northeast section of the Valley and the urban core, with a few higher priced areas near the Las Vegas strip. We have previously seen this area has a higher percentage of racial and ethnic minorities (figures 3, 4, 5) and a higher percentage of female headed households (figure 13). The west and southwest sections of the Valley have a higher concentration of higher priced home values. These areas have a lower percentage of racial and ethnic minorities (figures 3, 4, 5) and also have a larger Caucasian population with higher median income levels (figure 7). These values contribute to higher opportunity levels for those areas with the higher median housing values.

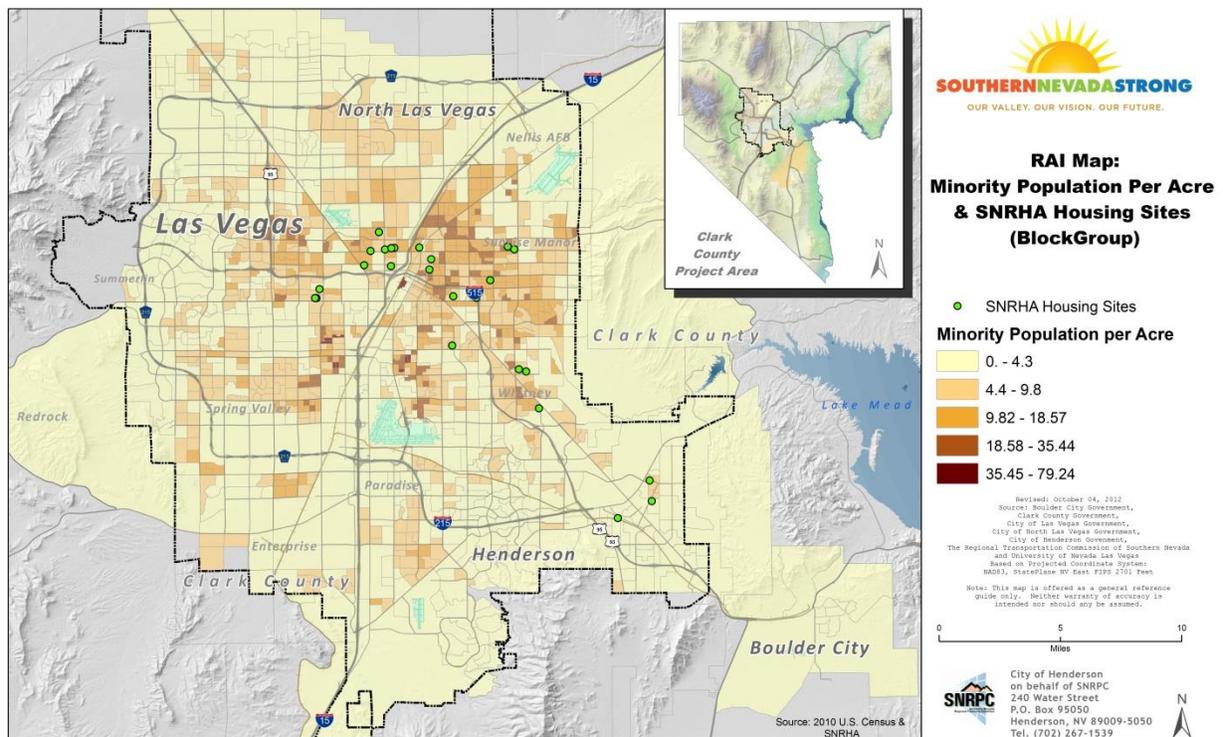
Public Housing Status

The Southern Nevada Regional Housing Authority (SNRHA) is the public housing and voucher agency for Clark County, Las Vegas, Henderson, North Las Vegas and Boulder City. SNRHA was created in 2010 as a consolidation of several different housing authorities within the Las Vegas Valley. They were created into one with the hopes of better serving the residents and of benefiting from a single management and funding system.

The SNRHA has an annual budget of \$137 million and has received approximately \$20 million in ARRA (American Recovery and Reinvestment Act) funds.

The SNRHA has a housing inventory which includes 19 conventional public housing developments as mapped in Figure 35. These units are owned and managed by the SNRHA. Of the 19 developments, 5 are designated senior developments, 5 are designated as elderly/disabled developments and 9 are designated as family developments. The SNRHA currently provides 2870 public housing units to 7606 residents under the conventional public housing program.

Figure 35 Location of SNRHA Public Housing Developments



The majority of the SNRHA public housing developments are located in census tracts with some minority population, but not the highest minority neighborhoods. Most are located in the middle range of minority population per acre as seen in Figure 35 or the second lowest, which would indicate some minority population but not heavy minority populations. They are however, almost exclusively located in census tracts with low or very low opportunity indexes, as will be analyzed in the next Chapter. Many of the residents may come from these lower opportunity neighborhoods so it may make sense for the developments to be located in these neighborhoods, but this makes it difficult for the residents to relocate to higher opportunity areas. As the SNRHA plans for new site locations, it would make sense to locate some developments within higher opportunity neighborhoods.

Table 43 SNRHA Public Housing residents by race

RACE	Public Housing Residents	Percentage
American Indian	18	0.7%
Asian	89	3.3%
Black	1,376	51.6%
Native Hawaiian	30	1.1%
White	1,115	41.8%
Multiple	41	1.5%
Total	2,669	100%

Source: SNRHA data as of 2/18/2015 based on Head of Households.

Table 44 SNRHA Public Housing residents by ethnicity

ETHNICITY	Public Housing Residents	Percentage
Hispanic	539	20%
Non-Hispanic	2,130	80%
Total	2,669	

Source: SNRHA data as of 2/18/2015 based on Head of Households.

Table 45 SNRHA Public Housing residents by disability status

DISABILITY STATUS	Public Housing Residents	Percentage
Disabled	1,025	38%
Non-disabled	1,644	62%
Total	2,669	

Source: SNRHA data as of 2/18/2015 based on Head of Households.

Table 43 shows the breakdown by race of the residents in the public housing developments. The largest percentage of residents by race category is African American at 51.6% with Caucasians as the next highest race at 41.8%. These two races make up the majority of the public housing residents. The 2012 African American population for Clark County is 10.7% as seen in Table 5. This is a large discrepancy between the overall population and the percent in public housing specifically for African American residents. At this point it is unknown why the number of African Americans in public housing is so high. The legacy of a history of segregation most certainly influences this, as well as the lower median income for African Americans in Clark County still today (\$40, 959 for African Americans in 2012 versus \$54,218 for the County as a whole, as referenced in Table 17, Chapter 2). This is in line with national trends and presents a larger social issue than is under the scope of this document. *This does, however, present a prime opportunity to recommend that the SNRHA continue to promote their self-sufficiency programs especially within the African American community.*

Table 44 indicates that 20% of the public housing residents are Hispanic, while 80% are non-hispanic. The 2012 Hispanic population for Clark County was 29.8%, as shown in table 11, meaning that a lower percentage of Hispanics live in public housing than are in the county as a whole.

Table 45 displays the disability status for public housing residents. 38% of public housing residents are disabled, compared with the disability status for the general population, which was 12.6% in 2012, as seen in figure 6 in chapter 2. Although a higher percent live in public housing than in the general population alone, this makes sense when coupled with the harder time these residents face in earning a living wage and finding homes which will accommodate them.

The SNRHA maintains waiting lists for those applicants who have been accepted into the program but have not yet secured housing. For some public housing units, the waiting lists are site-based, while others are maintained under one main database. This process makes utilizing the data for protected class analysis somewhat difficult as the race percentages are not always correct. For that reason, that data is not being displayed completely here. Upon analyzing the data, given the discrepancies, it still appears the waiting list families are similar in race and ethnicity to those who have gained housing and there doesn't appear to be any issues of preferences to any race or ethnicity. *It would be recommended that the SNRHA maintain a more usable database and that local agencies associated with housing, including the SNRHA, research ways to increase their information sharing capabilities for both practical and research applications.*

The SNRHA also administers 10,094 Housing Choice Vouchers (also formerly known as Section 8) that allow families to rent in the private market and receive a subsidy towards their rent. This is a Federal program for assisting low and very low-income families, the elderly, and the disabled to afford decent, safe and sanitary housing in the private market. With this assistance, residents are able to pay approximately 30-40 percent of their annual adjusted income toward rent, while the SNRHA pays the remainder. The SNRHA helps provide housing to approximately 38,000 people under this program.

Figure 36 Locations of Housing Choice by Hispanic Residents with Housing Choice Vouchers, 2014

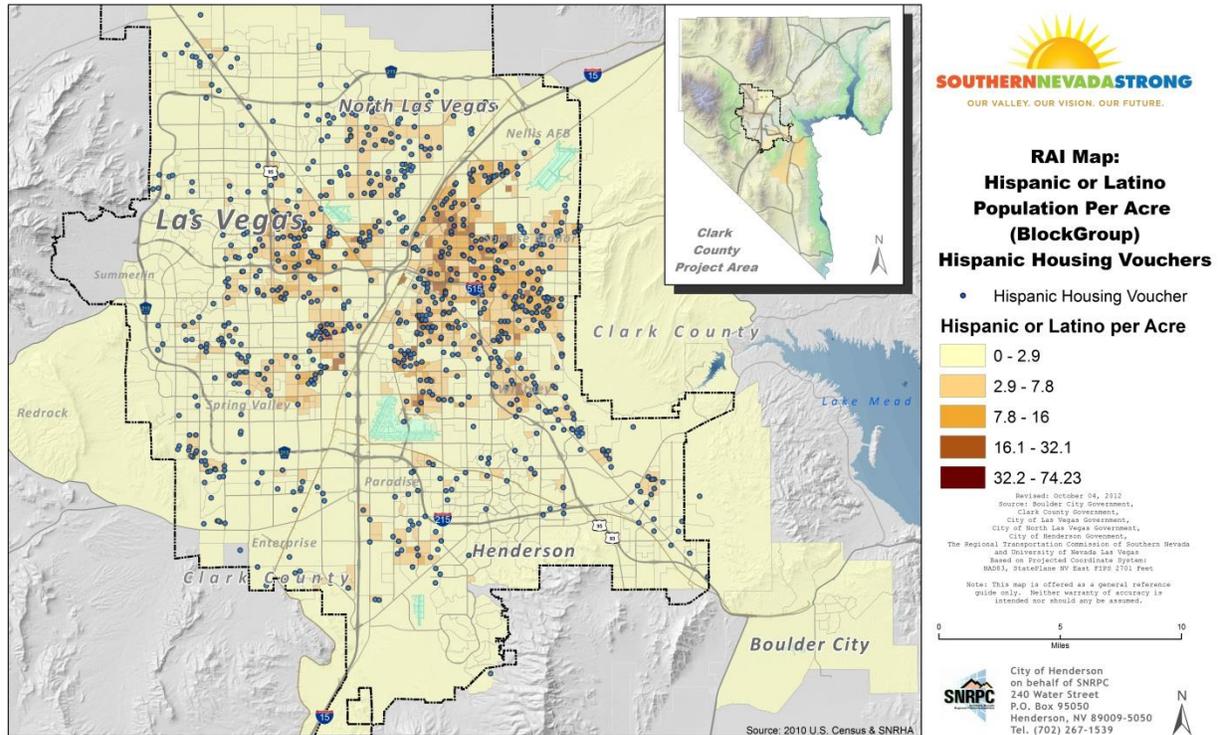


Figure 36 highlights the areas of Hispanic residents with housing vouchers. The locations are fairly spread out throughout the County, with a slightly heavier concentration in the eastern parts of town that already have a higher percentage of Hispanic population. There is an absence of voucher holders living in the southern parts of Henderson (below the I-215) and Summerlin areas, which are areas of high opportunity. It is unknown if this is because the Hispanic population is not choosing to live in these areas or if housing vouchers are less accepted in these areas. *This would provide an excellent opportunity for future review to see if landlords and rental complexes in these higher opportunity areas are not accepting Housing Choice Vouchers.*

Figure 37 Locations of Housing Choice by African American Residents with Housing Choice Vouchers, 2014

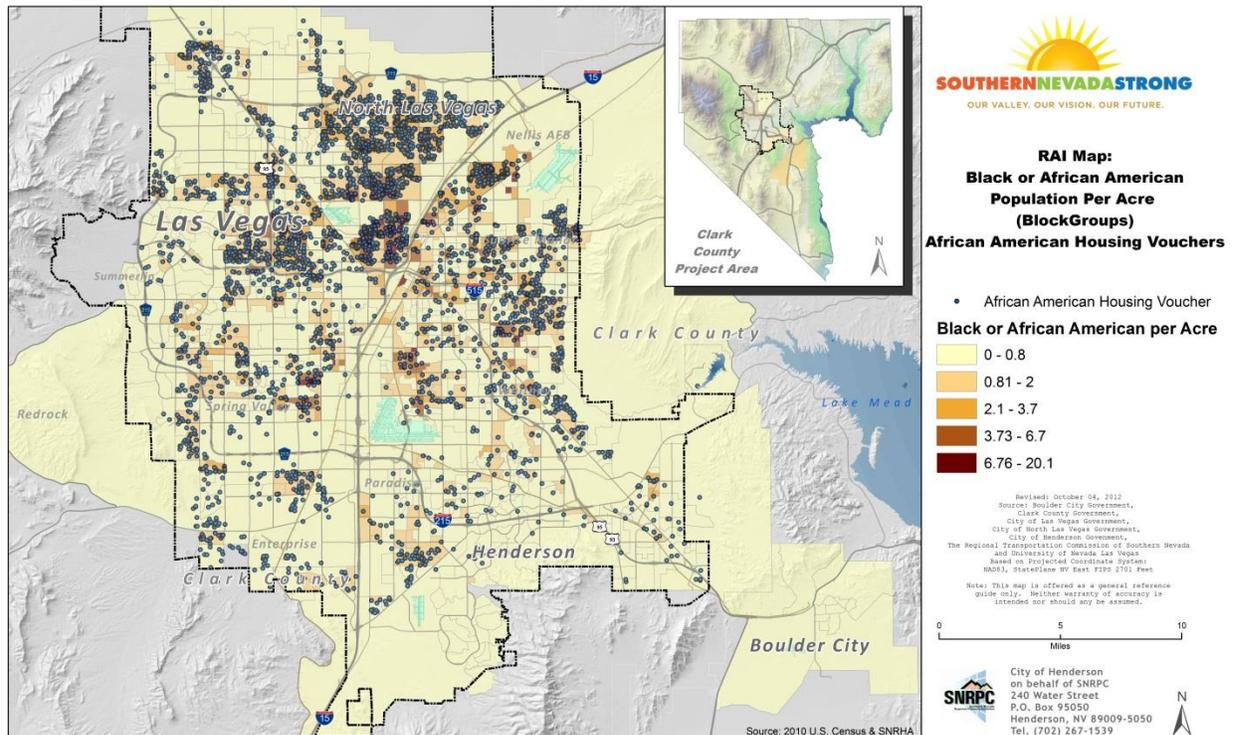


Figure 37 highlights the areas African American residents with Housing Choice Vouchers are residing. The northern part of the valley is heavily concentrated among these residents. There are some scattered African American voucher households throughout the southern half of the Valley, but the majority are located in the northern neighborhoods. They also heavily mirror the areas with an already high percentage of African American residents and low opportunity areas. The southern section of Henderson (south of I-215) is again sparsely populated by African American residents with Housing Choice Vouchers.

It is unknown if these voucher choices are being made by residents wanting to live in these areas, but more than likely, as voiced by Focus Group participants, there are other factors contributing to these residents living in these lower opportunity areas. Many residents voiced concerns of not finding Housing Choice Voucher eligible units in the higher opportunity areas as well as problems relating to the amounts of rental assistance provided, transportation issues, and the application and credit process necessary for rental units in higher opportunity areas.

SNRHA could assist by providing counseling services to help people find housing in high opportunity areas and conduct outreach to landlords and rental complexes in these areas.

Table 46 Voucher holders by jurisdiction and race

Voucher Holders by Jurisdiction	Total Voucher Households	Caucasian	Non-Hispanic Caucasian	African American	Asian	Hispanic of Any Race
Unincorporated Clark County	2977	1071	718	1808	34	395
Las Vegas	2423	718	512	1628	31	220
North Las Vegas	1441	192	108	1232	5	94
Henderson	537	289	231	224	12	66
Boulder City	13	12	12	1	0	0
Total	7391	2282	1581	4893	82	775
Total as a percentage		30.9%	21.4%	66.2%	1.1%	10.5%

Source: SNRHA, April 2014

Table 47 Voucher holders by ethnicity

ETHNICITY	Housing Choice Voucher Residents	Percentage
Hispanic	1,039	10%
Non-Hispanic	9,134	90%
Total	10,173	100%

Table 48 Voucher holders by disability status

DISABILITY STATUS	Housing Choice Voucher Residents	Percentage
Disabled	3,986	39%
Non-disabled	6,187	61%
Total	10,173	100%

Table 46 shows the total number of Housing Choice Voucher holders for each jurisdiction and is also broken down by race. Clark County and Las Vegas have the most total voucher holders, which would not be unexpected by their larger land areas than the other jurisdictions. Henderson seems to be low in the numbers, which was also shown in the maps on previous pages. As a jurisdiction with more high opportunity areas, it would be ideal to find higher participation rates in this area. As noted in the previous paragraph, this could be related to the

amount of rental assistance being provided is simply not enough for participants to be able to afford to live in the higher priced areas.

Table 46 also breaks down the residents by race, and similar to the public housing sites, a disproportionate number of Housing Choice Voucher residents are African American (66.2% compared to 10.7% of total population). As noted above in the public housing section, there are most likely many contributing factors to this. The Southern Nevada Strong Regional Plan provides land use recommendations that would affect many of the social issues that may influence this trend, such as better school siting, improved economic opportunity, and increased transportation choices. However, as noted before this is a larger social trend that needs to be addressed on many fronts. For the purposes of this report, *a recommendation would be made to the SNRHA to continue to promote their self-sufficiency programs, especially within the African American community.*

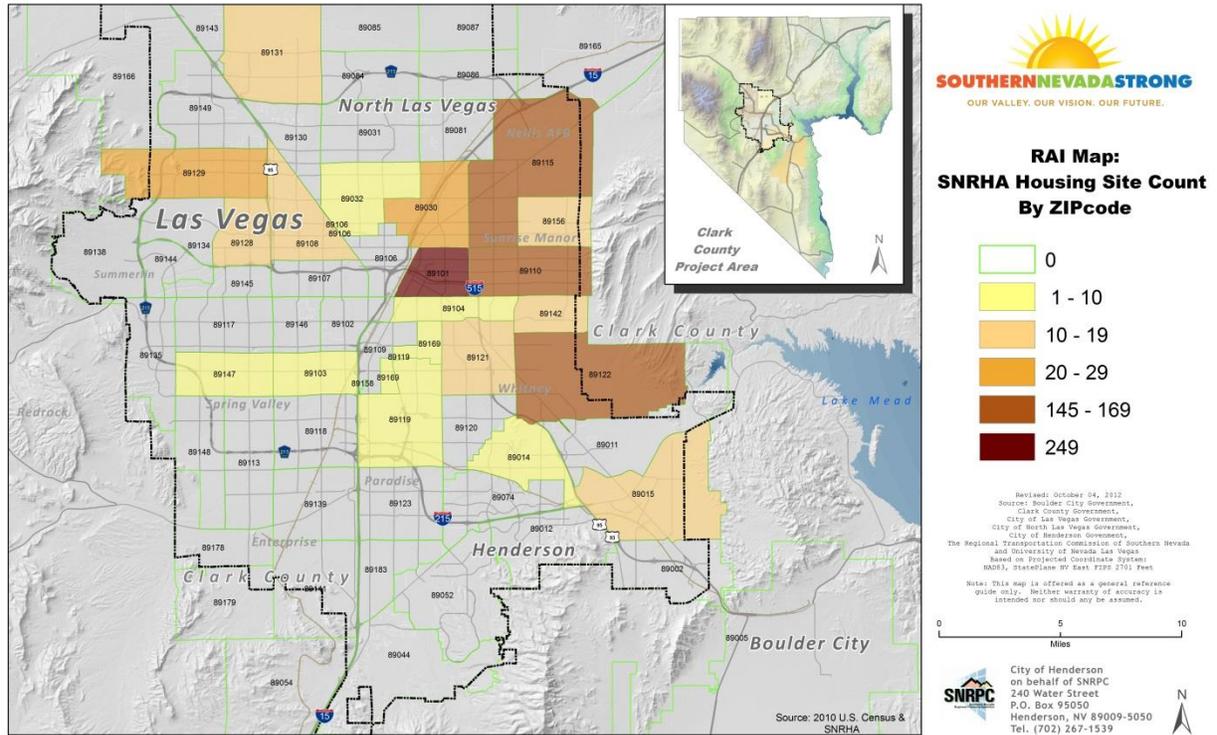
Table 47 indicates that the percentage of residents using Housing Choice vouchers are 10% Hispanic, which is lower than the 29.8% of total population that is Hispanic, and also lower than the 20% that are residents of the public housing units. This population may be affected by a language barrier for any LEP residents who are less familiar with the Housing Choice program than the public housing options. *More SNRHA instruction for LEP residents, as well as more advertising in other languages, especially Spanish may help promote the Housing Choice Voucher program to more Hispanic residents.*

Table 48 displays the percentage of disabled residents who participate in the Housing Choice Voucher program. Approximately 39% of the voucher residents claim disability status, compared with about 12.6% of total county residents, as seen earlier in figure 6. This is comparable to the 38% of public housing residents claiming disability status, probably for much of the same reasons (ie. lack of incomes and necessary housing accommodations).

As noted in the public housing section, the waiting lists for the Housing Choice Voucher applicants was provided by the SNRHA but leaves analysis on the list as very difficult. It again appears to be representative of the residents who are accepted into the program and become voucher residents, however the data as presented is not conducive to a true analysis and therefore, should be better organized for future analysis. As with the public housing waiting lists, *it would be recommended that the SNRHA maintain a more usable database and that local agencies associated with housing, including the SNRHA, research ways to increase their information sharing capabilities for both practical and research applications.*

The SNRHA maintains another 1024 Affordable Housing units shown in figure 38, which includes a multitude of scattered site properties under the Neighborhood Stabilization Program. The affordable housing program was developed by HUD to provide residents struggling with the current economy with an affordable home in which to reside. The rents are a flat fee and set by the individual community, and do not fluctuate based on income. The rents are typically between 30-40% below market. Affordable Housing is available to all residents who qualify, and each individual community has different qualifying criteria. In addition, the SNRHA owns a 60-unit public housing tax credit development called Otto Merida Desert Villas.

Figure 38 Location of SNRHA Affordable Housing Units



The majority of the affordable housing units owned by the SNRHA are in the zip codes 89101, 89110, 89115, and 89122. These zip codes are located in the eastern section of the valley and are concentrated in areas designated as low and very low opportunity index sites. It is a positive program for the SNRHA to be able to utilize these sites in order to provide more affordable housing options for southern Nevada residents, however, SNRHA should attempt to provide more sites in higher opportunity areas. It is obviously a balancing act for SNRHA to weigh the costs of properties versus the amount of families they can help, which very likely contributes to more residences being purchased in these lower priced communities. However, the SNRHA should look for any opportunity to find some lower priced properties in the higher opportunity areas.

There are other affordable housing units available through non-profit and for-profit groups throughout the region. In total (including the SNRHA sites) there are 79 projects for families, 71 for seniors, 11 for residents with disabilities, 1 for mental illnesses, and 2 for veterans for a total of 21,733 units.

Accessible Units

On January 26, 2015, the online database, www.gosection8.com, listed 115 out of 924 accessible units available for use by Housing Choice Voucher participants. This would more than meet HUD's requirement of 5%. Random samples during the month of January and February 2015 produced similar results.

SNRHA defines **ACCESSIBLE DWELLING UNITS** as:

“When used with respect to the design, construction or alteration of an individual dwelling unit, means that the unit is located on an accessible route, and when designed, constructed, or altered, can be approached, entered, and used by individuals with physical handicaps. A unit that is on an accessible route and is adaptable and otherwise in compliance with the standards set forth in 24 CFR 8.32 & 40, (the Uniform Federal Accessibility Standards) is "accessible" within the meaning of this paragraph. “

SNRHA has no HUD-approved disabled-only designated developments.

Offer of accessible units

The SNRHA has units designed for persons with mobility, sight and hearing impairments, referred to as accessible units. No non-mobility-impaired families will be offered these units until all eligible mobility impaired applicants have been considered. Before offering a vacant accessible unit to a non-disabled applicant, the SNRHA will offer such units:

First, to a current occupant of another unit of the same development, or other public housing developments under the SNRHA control who has a disability that requires the special features of the vacant unit.

Second, to an eligible qualified applicant on the waiting list having a disability that requires the special features of the vacant unit.

When offering an accessible/adaptable unit to a non-disabled applicant, the SNRHA will require the applicant to agree to move to an available non-accessible unit within 30 days when either a current resident or an applicant needs the features of the unit and there is another unit available for the applicant. This requirement will be a provision of the lease agreement.

The Authority will make modifications to the unit in keeping with the Section 504 Transition Plan as the need arises and until the agency determines that an adequate number of units have been rehabilitated in numbers sufficient to evidence compliance with the Plan.

Units designated for the elderly

In accordance with the 1996 Housing Act, a Head or Spouse of at least 62 years of age will be selected for admission to such units or buildings covered by a HUD-approved Allocation Plan, except for the units which are accessible, which may be offered to persons with disabilities. In the event that there are insufficient elderly families who wish to reside in a unit designated for

the elderly, near-elderly families (head or spouse ages 50-61) will be selected for this type of unit.

Limited English Proficiency Plan

The SNRHA has an LEP Plan which covers documents, outreach efforts, language services for residents and training for employees. Most of the SNRHA's vital documents are covered and SNRHA will provide free translation/interpretation from bilingual staff as necessary. SNRHA shall provide bilingual staff in all areas that have direct contact with clients. Additionally, these staff shall have specialized knowledge of the area of service or programs that the LEP person is applying or participating in. Staff shall be trained to ensure they understand and adhere to their role as interpreters without deviating into a role as counselor, legal advisor, or other roles.

The Plan states that SNRHA shall maintain a contract with a professional interpreting service provider to ensure all clients with LEP needs receive equal access to all programs and services. Staff shall be informed of this service and advised how to request said service and schedule appointments. SNRHA shall ensure its main telephone line have information translated in Spanish. This information shall inform clients of the free translation services available.

SNRHA shall conduct outreach in a method that is clearly inclusive of LEP persons identified through its annual analysis. Community partnerships have been developed to further assist in the enhancement of this Plan. All notices posted in printed media shall also be posted in the City's Spanish Newspapers and other minority publications. This plan will be coordinated with SNRHA's Affirmative Marketing Plan and shall include direct marketing strategies to promote Home ownership options directly related to SNRHA's Scattered-Site Homeownership/Housing Choice Voucher and all other programs. Such outreach may include, but not be limited to, special briefings for LEP residents and participants to ensure they understand this program option as well as participating in community-wide homeownership events sponsored by agencies with direct contract with disabled and/or LEP persons. SNRHA shall provide telephone menus in the most common languages encountered on its main switchboards. Additionally, SNRHA shall include notices in local newspapers in languages other than English and provide notices in non-English language radio and television stations about the availability of language assistance services. SNRHA staff will make presentations through community organizations to target LEP persons.

SNRHA shall ensure all staff receives a copy of its LEP Plan and training. This training shall address:

- (a) The types of services available to assist clients and how to access these services.
- (b) How to respond to LEP callers.
- (c) How to respond to written communications for LEP.
- (d) How to respond to a LEP person who has in-person contact with SNRHA staff.
- (e) How to ensure competency of interpreters and translation services.
- (f) How to remain in the role of an interpreter verse a counselor, adviser, etc.

This training shall be conducted for all new employees as part of their orientation and for all current employees to ensure full compliance

Residency Preferences

SNRHA gives local preference points for waiting list applicants, however they are not based on current residential location within Clark County. Extra points are given for the following categories:

- Victims of Federally Declared Disasters: 55 points
- Working preference: 30 points
- Veteran preference: 6 points
- Residency preference for head, co-head or spouse who live, work, or enrolled full time in Clark County school: 5 points
- Disabled veteran: 5 points
- Family of deceased veteran: 4 points

Additionally, the SNRHA has an income targeting policy, whereby monitoring of its admissions is done to ensure that 40% of families admitted to public housing in each fiscal year shall have incomes that do not exceed 30% of area median income of the SNRHA jurisdiction.

The SNRHA also has a de-concentration of poverty and income-mixing policy designed to bring higher income tenants into lower income projects and lower income tenants into higher income projects. The SNRHA does not set specific quotas, but rather strives to achieve de-concentration and income mixing in its development. This policy is not restrictive and would not have a negative effect on segregation, but rather could be beneficial in attempting to attract lower incomes into higher opportunity areas and vice versa higher incomes to currently lower opportunity areas, which could benefit those areas and reverse the trend downward.

The SNRHA has a transfer policy for residents who wish to move within the Las Vegas/ Clark County area, as well as outside of the region. Those who wish to move within the area must have completed their lease and must comply with certain regulations. Those wishing to move outside the Clark County area must have been in the program for over a year. These policies do not seem to restrict housing choice based on policy alone. The high numbers of need and availability of vouchers is probably the more limiting factor. *The SNRHA should make every effort to provide more choice and access to higher opportunity areas around the Las Vegas Valley through a housing opportunity escort program, a housing placement program, and/or more work with local landlords to educate them on the program so more landlords will rent to Housing Choice Voucher holders.*

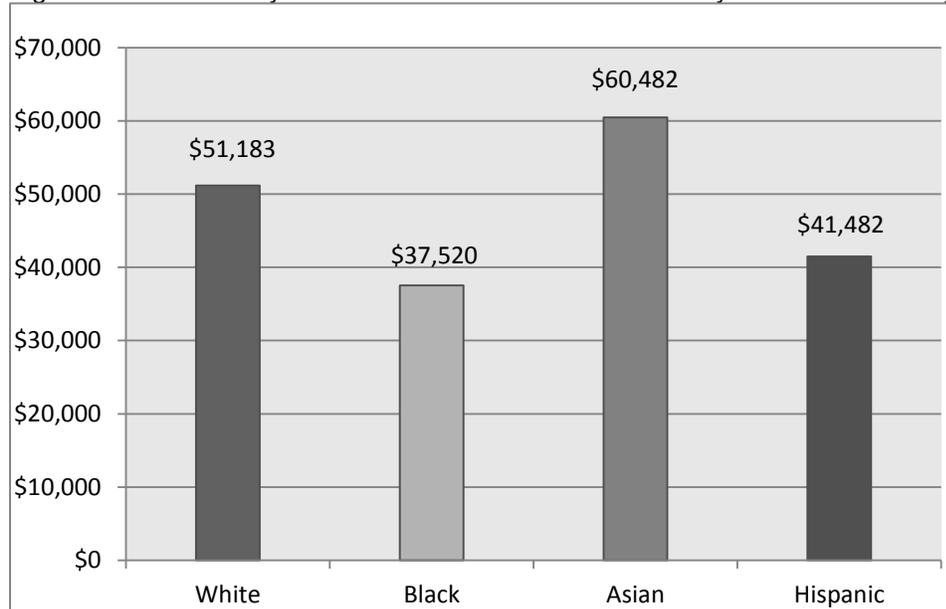
4. FREE MARKET ANALYSIS

The Free Market Analysis™ that follows identifies whether the racial and Hispanic composition of a city and the census tracts within the city is likely due to differences in household income or to discriminatory private and/or public sector practices that distort the free housing market.

Methodology

By taking household income into account, the analysis that follows more accurately identifies possible racial and Hispanic segregation than simply reporting the proportions of each racial or ethnic group within a city or census tract. There is a common misconception that housing is segregated largely because, as a whole, minority households earn less than Caucasian households. As Figure 39 below shows, the median annual household income varies substantially by race and Hispanic ethnicity with Asians having the highest income. The lower annual median incomes of the county's African American and Hispanic residents certainly contribute to the patterns shown on the minority population maps in Chapter 2. However, the analysis that follows controls for these income differences by explicitly taking into account household income to *approximate* the racial and ethnic composition of a city and its census tracts if racial and ethnic discrimination were absent and household income was the primary determinant of where a household lives.

Figure 39 Clark County Median Annual Household Income by Race and Ethnicity: 2012



Source: 2012 American Community Survey, 1-Year Estimates, Tables B19013A, B19013B, B19013D, B19013H, and B19013I.

This approach requires thinking about housing discrimination and segregation a little differently than usual. Discrimination is the likely cause of an area’s racial and ethnic composition when the actual racial and ethnic composition differs significantly from what the composition would be in a free housing market devoid of discrimination. It is very likely that discrimination against racial minorities is the primary cause of a census tract being 90 percent Caucasian if the tract would be expected to be 75 percent Caucasian when taking household income into account.

The approach used here compares the actual racial and Hispanic composition of a census tract or a city with what the approximate racial and Hispanic composition would likely be in a free housing market not distorted by practices such as racial steering, mortgage lending discrimination, discriminatory advertising, discriminatory rental policies, mortgage and insurance redlining, or discriminatory appraisals.¹

Racial and ethnic or national origin discrimination badly warps the free market in housing by artificially reducing demand for housing in some neighborhoods and artificially increasing demand in others.

Racial and ethnic or national origin discrimination in housing also distort property values. When African Americans or Hispanics, for example, move to African American or Hispanic enclaves, they pay a substantial price in lost housing value. It is well documented that the value and appreciation of homes in segregated minority neighborhoods is generally less than in stable integrated areas and predominantly Caucasian areas. Segregated minority neighborhoods also often lack jobs and business investment opportunities, making them economically unhealthy compared to stable integrated and predominantly Caucasian areas.²

For the African American middle and upper classes which had grown so much prior to the Great Recession, living in segregated minority neighborhoods denies them the full economic and educational benefits of middle– and upper–class status enjoyed in stable integrated and in predominantly Caucasian neighborhoods.

For both 2000 and 2008–2012, the tables, listed as the Free Market Analysis in Appendix B, show the actual racial and Hispanic composition of households and the approximate racial composition if household income were the predominant determinant of residency and housing were a genuine free market without the distortions caused by discriminatory housing practices. By using both sets of years, the tables show whether the past decade has resulted in movement toward or away from stable racial and Hispanic integration. When the actual proportions of minorities are significantly less than the proportions that would exist in a free housing market, it is very likely that factors other than income, social class, or personal choice are influencing who lives in the community.

Researchers have concluded “that race and ethnicity (not just social class) remain major factors in steering minority families away from some communities and toward others.”³

Understanding the Free Market Analysis™

The tables that constitute this Free Market Analysis™ provide the following information for each city and each census tract within each city for 2008–2012 and 2000:⁴

- HHs Actual proportions = Actual proportion of households of each race and Hispanic ethnicity
- HHs Free Market = Approximate proportion of households of each race and Hispanic ethnicity when income is the primary determinant of residency in a free market not distorted by housing discrimination.
- HHs Difference = For each race and Hispanics of any race, the difference between the actual proportion of households and the proportion in a free market not distorted by housing discrimination.

An HHs Difference that is close to ten percentage points is a “substantial” or “significant” enough a gap that it likely reflects the current or past presence of housing discrimination. The greater the difference is, the greater the likelihood that housing discrimination has been, and still is, at play. While other researchers have concluded that differences of just five percentage points indicate that discrimination is distorting the housing market,⁵ we set the threshold at eight to ten percentage points as more likely to be indicative of possible discrimination by factoring in those minority households that deliberately choose to live in a predominantly minority neighborhood. We are also taking into account that the proportions in a free market are approximations especially for 2008–2012 since the household income data is based on five-year estimates from the American Community Survey.

The proportions of households in each category in a free market are based on the same household incomes as actual residents had in the years reported and on the same actual cost of rental and ownership housing as it was in the years examined.

We may be allowing for a higher proportion of minority households that prefer to live in a homogeneous minority neighborhood than actually exists. According to the U.S. Census Bureau, the primary reasons households move were for better housing or less expensive housing, for a new job or transfer, to live closer to work and for an easier commute, change in marital status, and to live in a better neighborhood or one with less crime. Living in a homogeneous neighborhood did not even register in the Census Bureau’s most recent survey.⁶ Over half of the African American households moved for housing-related reasons, a higher percentage than any other group.⁷

Differences that suggest distortions of the free housing market possibly caused by racial discrimination are highlighted in two shades of cautionary yellow. The darker yellow highlights differences of ten or more percentage points while the lighter shade of yellow points to differences of eight to fewer than ten percentage points.⁸

A seemingly high proportion of a racial group or Hispanic households in a census tract is not necessarily a concentration. For example, if a census tract’s actual proportion of Hispanic

households is 40 percent, that is not a concentration when the proportion expected in a free housing market is 47 percent. Allowing for the factors discussed above, differences between actual and expected proportions of households that are less than eight percent are close to what would be expected if household income were the predominant determinant of where households live in a free market without housing discrimination. Consequently, this report does not flag such census tracts as having a concentration of a race or ethnicity.

Free Market Analysis™ - The Broad Picture in Each Jurisdiction

The full regional housing market consists of Clark County's urban core. Las Vegas and North Las Vegas are the most racially and ethnically diverse cities in Clark County. Table 49, that follows, shows the actual proportions of Caucasians, African Americans, Asians, and Hispanics of any race city-wide in Las Vegas have been what would have been expected. However, as the analysis of Las Vegas by census tract shows, there is growing segregation and resegregation within the city's borders.

The proportion of Caucasian households in Henderson has hovered close to ten percentage points more than would be expected in a free housing market not distorted by discrimination. The gap between the actual proportion of Hispanic households and the proportion expected in a free market has increased slightly. As the analysis of Henderson shows below, the actual proportion of Hispanic households is generally significantly lower than would be expected in most of the city's census tracts. Overall, the actual proportions of African Americans and Asians are close to what would be expected.

The progress that North Las Vegas was making in the 1990s toward lesser concentrations of minorities and greater racial integration has stalled in the current decade. The difference between the actual proportions of Caucasians and the proportion expected in a discrimination-free market has remained substantially the same with fewer Caucasian households than expected. On the flip side, differences between the actual proportion of African American households and the proportion expected has remained significantly large. Concentrations of Hispanic households have intensified and spread, although the citywide difference between the actual proportion of Hispanic households and the expected proportion declined. The actual proportion of Asian households has continued to be what would be expected.

Boulder City continues to exhibit very substantial levels of segregation city-wide except for its Asian population. Its actual proportion of African American and Hispanic households continue to grow incrementally but remains significantly less throughout the city than what would be expected in a free market not distorted by current and/or past housing discrimination.

Table 49 Clark County Cities Racial and Ethnic Household Composition: 2000–2012

Clark County Cities Racial and Hispanic Household Composition: 2000–2012								
Area	2008–2012				2000			
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race
Las Vegas								
HHs Actual proportions	73.7%	11.8%	5.9%	22.1%	75.2%	10.5%	4.1%	15.5%
HHs Free market	72.7%	10.8%	7.7%	20.9%	76.7%	9.0%	4.5%	14.8%
HHs Difference	1.1%	1.0%	-1.9%	1.1%	-1.5%	1.5%	-0.4%	0.7%
Henderson								
HHs Actual proportions	82.7%	5.4%	6.2%	10.3%	87.9%	4.1%	3.0%	7.7%
HHs Free market	73.7%	9.9%	8.1%	19.4%	78.1%	8.0%	4.6%	14.0%
HHs Difference	9.1%	-4.5%	-1.9%	-9.2%	9.9%	-4.0%	-1.5%	-6.3%
North Las Vegas								
HHs Actual proportions	58.1%	22.0%	5.9%	29.5%	60.6%	20.6%	2.9%	27.7%
HHs Free market	72.8%	10.6%	7.8%	21.0%	76.6%	8.9%	4.5%	15.0%
HHs Difference	-14.7%	11.5%	-1.9%	8.5%	-16.0%	11.6%	-1.6%	12.7%
Boulder City								
HHs Actual proportions	97.3%	0.0%	0.8%	3.3%	96.8%	0.3%	0.8%	2.3%
HHs Free market	73.1%	10.5%	7.9%	19.9%	77.4%	8.6%	4.5%	14.3%
HHs Difference	24.1%	-10.5%	-7.1%	-16.6%	19.4%	-8.3%	-3.7%	-12.0%

Access to Opportunity

The concentrations of “minorities” in parts of Las Vegas, North Las Vegas, and unincorporated Clark County carries with it significant consequences because where you live determines the kinds of life opportunities you can access — one of the reasons that it is so important to end housing discrimination and achieve economic, racial, and ethnic diversity.

To identify the degree to which residents within the Clark County urban core have access to these life opportunities, the researchers at The Kirwan Institute for the Study of Race and Ethnicity engaged in “opportunity mapping” to generate an “overall opportunity index” rank for each Clark County census tract based on 19 variables in three broad subject–area categories:

- Educational opportunity (eight variables measured)
- Health and environmental opportunity (six variables measured)
- Social and economic opportunity (five variables measured)

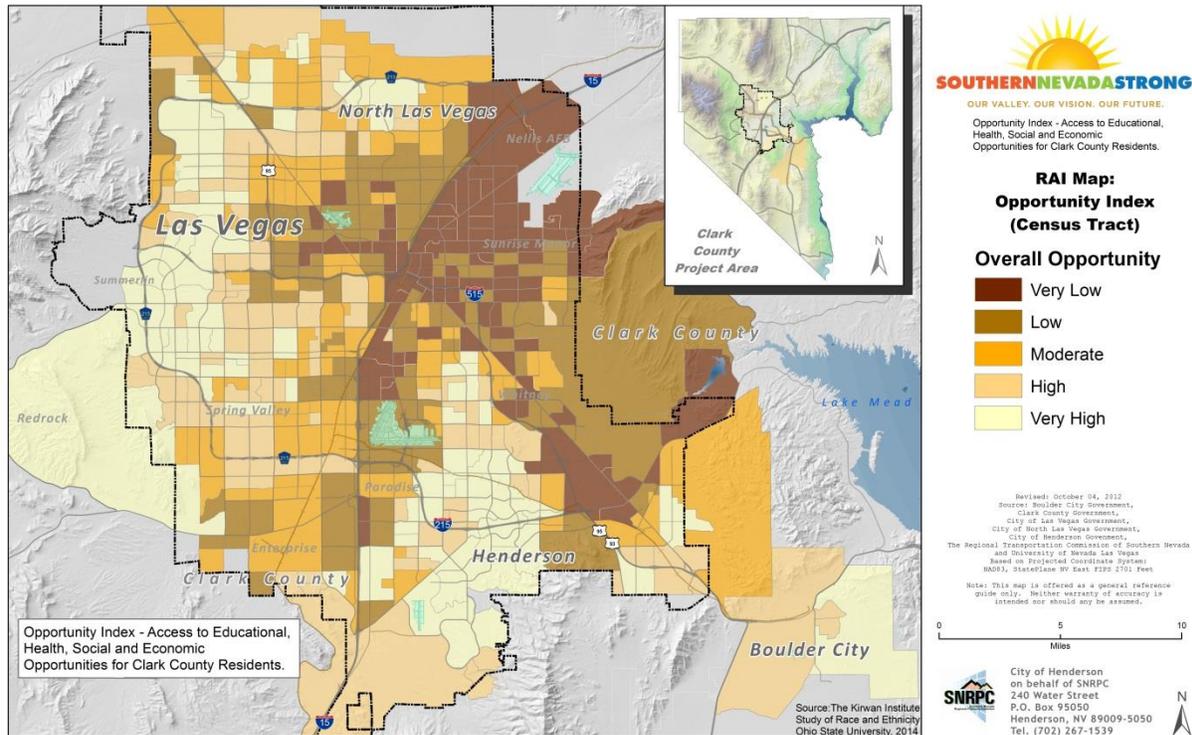
The Kirwan Institute describes “opportunity mapping” as a ...process of collecting, analyzing, and interpreting geographically referenced data to show neighborhood–level areas with more or less access to the infrastructure and services that people need to have healthy and productive lives. The Kirwan Institute pioneered the use of opportunity maps to empower communities, to connect residents to opportunity, and to build opportunity in communities where it is lacking.

The Overall Opportunity Index combines into a single metric data on several factors, each of which has been shown in the literature to influence one’s ability to succeed in life. The chief assumption underlying this approach is that multiple neighborhood factors have a combined influence on neighborhood residents. Some characteristics of one’s neighborhood have detrimental effects — for example, poverty, high crime, and the lack of healthy food choices — while others provide advantages — for example, access to transit and recreation, good schools, and quality early childhood education. The Opportunity Index represents the balance of these positive and negative effects across a community, a city, or an entire MSA [Metropolitan Statistical Area].¹⁰

The Kirwan Institute combined the scores from the three subareas into a single “overall opportunity index” that shows the relative degree of access to opportunity across the county. They sorted the overall opportunity index for the county’s census tracts into quintiles and assigned five overall opportunity rankings: very low, low, moderate, high, and very high.¹¹

The map below, Figure 40, shows the distribution of the five levels of opportunity throughout Clark County's urban core. The concentration of low and very low opportunity census tracts is nearly identical to the concentrations of minorities shown in Chapter 2.

Figure 40 Overall Opportunity Index by Census Tract in Clark County Urban Core



Tables 50 and 51 reveal the uneven distribution of opportunity levels among the four cities in Clark County's urban core.

Table 50 Distribution of Overall Opportunity Index within each Clark County City

Distribution of Overall Opportunity Index Within Each Clark County City								
Overall Opportunity Index	Las Vegas Census Tracts		Henderson Census Tracts		North Las Vegas Census Tracts		Boulder City Census Tracts	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Very High	32	21.5%	30	48.4%	5	10.4%	1	25.0%
High	29	19.5%	16	25.8%	5	10.4%	3	75.0%
Moderate	29	19.5%	6	9.7%	11	22.9%	0	0.0%
Low	33	22.1%	4	6.5%	10	20.8%	0	0.0%
Very Low	26	17.4%	6	9.7%	17	35.4%	0	0.0%
Total	149	100%	62	100%	48	100%	4	100%

Table 50 shows that Las Vegas has the most balanced distribution of overall opportunity rankings among its census tracts, while nearly three-fourths of Henderson's tracts are ranked very high or high. About one-fifth of the tracts in North Las Vegas are ranked very high or high while 56.2 percent of them are low or very low. All of Boulder City is high or very high.

Table 51 Proportion of Each Overall Opportunity Index in each Clark County City

Proportion of Each Overall Opportunity Index in Each Clark County City				
Overall Opportunity Index	Las Vegas Census Tracts	Henderson Census Tracts	North Las Vegas Census Tracts	Boulder City Census Tracts
Very High	47%	44%	7%	1%
High	55%	30%	9%	6%
Moderate	63%	13%	24%	0%
Low	70%	9%	21%	0%
Very Low	53%	12%	35%	0%
Percentage of all Clark County Tracts	57%	24%	18%	2%

As is clear from the map on the previous page and the above table, the lower opportunity areas are concentrated in North Las Vegas, Las Vegas, and tracts in unincorporated Clark County adjacent to the lower opportunity tracts in these two cities. As discussed in the remainder of this chapter, these lower opportunity tracts tend to coincide with tracts that have significant Hispanic and African American populations with lower median household incomes.

Nearly three-fourths of the four cities' high and very high tracts are concentrated in Henderson, which consists of 24 percent of the tracts in the four cities. Additionally, the higher opportunity tracts in Las Vegas are concentrated in the western part of the city.

To affirmatively further fair housing, minority households of modest incomes need access to the higher opportunities in these higher opportunity tracts if they are to attain upward mobility. Henderson and Las Vegas need to proactively foster practices which promote housing affordable to these households with modest incomes in the tracts where these concentrations of high and very high opportunity are located.

Adding housing affordable to households with modest incomes to areas with high and very high overall opportunity index rankings does not reduce those rankings. The factors on which the rankings are based are not changed by the introduction of affordable housing and households with modest incomes — as long as these units are not clustered together. They need to be scattered throughout a development and throughout a neighborhood.

These cities need to look for tools for implementing policies that help affirmatively further fair housing and enable access to higher opportunities for households of modest incomes.

Opportunity Areas for Unincorporated Clark County

Unincorporated Clark County, within the Las Vegas Valley inner core, consists of Spring Valley, South Summerlin and the Enterprise neighborhoods in the southern and western sections of the Valley, stretches though the south portion of the Las Vegas strip, and then curves north up the most eastern portions of the Valley up to Nellis Air Force Base.

The neighborhoods of Spring Valley, South Summerlin and Enterprise make up the southern and western sections of the Valley and, for the most part are moderate to very high opportunity areas. The Spring Valley neighborhoods have some minority concentrations, as seen in Figures 3, 4 and 5 in Chapter 2, as well as some pockets of very low income; however, they have maintained positive opportunity levels. Spring Valley has an area known as China Town, which is a series of commercial establishments and strip malls, made up of Chinese and Asian restaurants, retail establishments and services. This neighborhood has traditionally had a higher than would be expected Asian residential population due to the availability of traditional Asian goods and services.

The South Summerlin and Enterprise neighborhoods have higher home values and rents; however, the Spring Valley neighborhood does have areas and pockets of lower priced homes and rentals. South Summerlin and Enterprise also have much lower percentages of minority populations.

There is an additional area of high and very high opportunity in the unincorporated areas to the east of the Clark County airport and to the west of Boulder Highway. This area has few minority residents, higher home prices and rents, and higher income levels. It continues south to meet City of Henderson's similar higher opportunity areas.

As you move to the east side of the Las Vegas strip, the opportunity levels fall into the low and very low levels in several neighborhoods. This can also be seen adjacent to Boulder Highway, and continues into the City of Henderson's adjacent neighborhoods. These areas have higher numbers of poverty, lower school ratings and lower home and rent prices. These areas do not have high levels of minority residents.

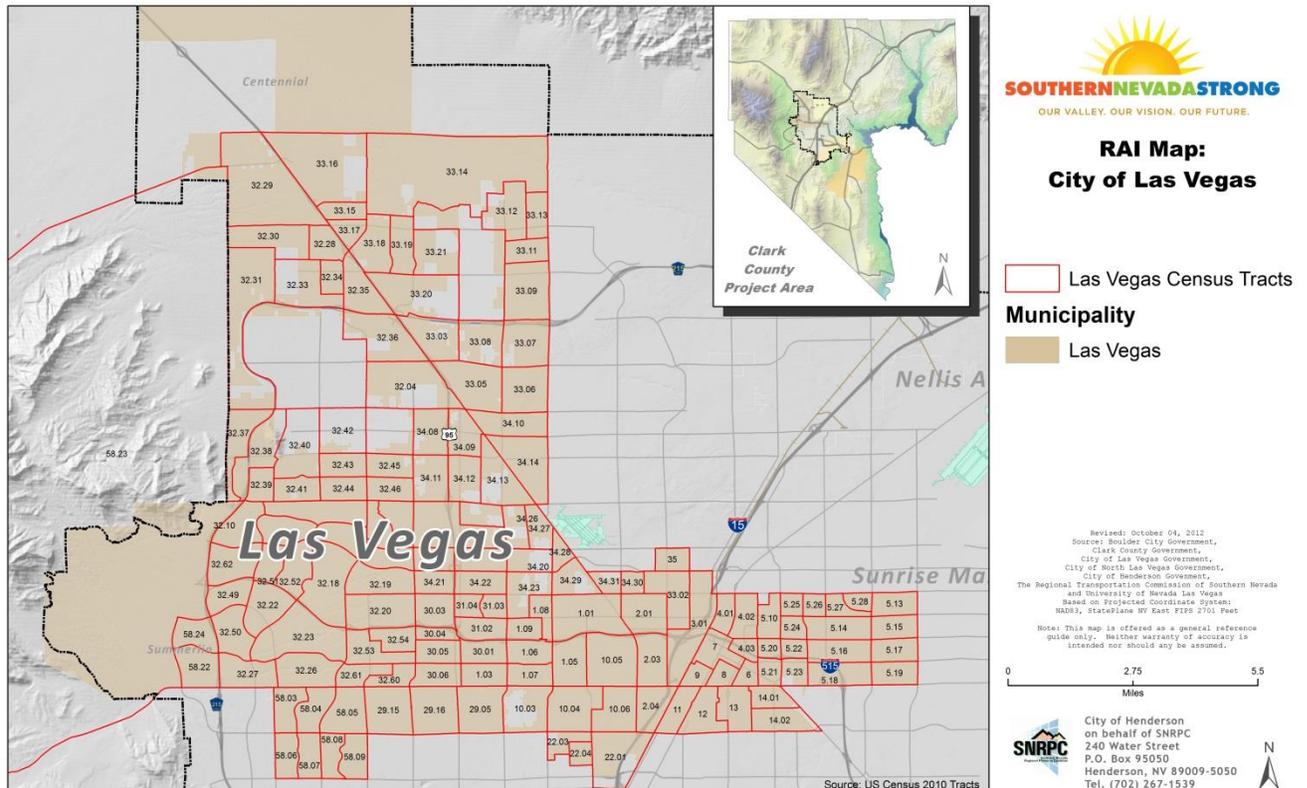
The most concentrated areas of very low opportunity for unincorporated Clark County are located along Las Vegas Blvd in the northeast, just west of Nellis Air Force Base. While this area does have a moderate number of Hispanic residents, it does not appear to be as heavily concentrated as neighboring areas in the cities of Las Vegas and North Las Vegas.

Analysis by City

For each census tract, this analysis of impediments identifies the actual proportions of households of Caucasian, African American, Asian, and Hispanic of any race, comparing the data from 2000 with the data from 2010, and the approximate proportions that would be expected in a genuinely free housing market that is not distorted by racial or ethnic discrimination.¹² The full table and breakdown by Census tract is available in the Appendix B.

Las Vegas

Figure 41 Las Vegas census block map



While the racial and Hispanic composition of the entire city of Las Vegas has been what would be expected in a housing market free of discrimination, a closer look by census tract reveals that while Las Vegas is very diverse, the city is becoming more segregated by race and Hispanic ethnicity during the twenty-first century. At the turn of the century, the actual racial and Hispanic composition of 50 of the city's census tracts — 45 percent of 110 tracts — was close to the composition that would have been expected in a free market not distorted by housing discrimination. But by 2012, the actual proportions were as expected in just 27 of the city's 149 census tracts.

Some extremely intense African Americans and Hispanic enclaves have developed east of Rancho Drive and near the intersection of I-15 and US 95 (known locally as the Spaghetti Bowl). The African American enclaves begin east of Rancho with census tracts 34.30, 34.31, 35.00, 3.02, 2.01, and 2.03 with 3.01, 4.01, and 6.00 at the east end. The actual proportion of African American households is also significantly greater than expected in several additional tracts (4.03, 5.20, 5.23, 5.13, 5.25, and 5.28) that are within an intense enclave of tracts where the actual proportion of Hispanic households is substantially greater than would be expected in

a discrimination-free housing market (tracts 4.02, 5.10, 5.26, 5.27, 5.13 through 5.24, 13.00, 14.01, 14.02).

Many of these tracts are located in the area of Las Vegas that historically known as the “westside”. As a result of property deeds, non-white owned or customer oriented businesses were confined to clubs on the “west side” of the railroad tracks in downtown Las Vegas. This also was enforced in many of the work positions, thus African Americans, except those who provided the labor for low-paying menial positions or entertainment, were limited in employment occupations at the white owned clubs. Additionally segregation of residential properties was occurring so that many of the African Americans who worked in this area also lived there.

The concentration of African Americans in the enclaves with the most intense concentrations in 2000 has decreased, which indicates a step in the direction of affirmatively furthering fair housing choice. However, the areas where the African American concentrations were not as intense in 2000 have generally become more intense during the decade that followed. There are additional Hispanic enclaves already in place and continuing to develop. The concentration that currently exists is immediately east of Rancho (tracts 34.31, 2.01) and west of Rancho (tracts 1.01, 1.04, 1.06, and 1.08). Just a single tract separates that concentration from enclaves in tracts 34.20, 31.02, 31.03, 31.04, 30.01, 1.03, and 10.03.

Tract 33.17 is the only tract far from the Hispanic enclaves where the actual proportion of Hispanics is significantly greater than the expected proportion. However, the actual proportion of Hispanic households in nearly every tract around 33.17 was less than expected in 2012: tracts 33.15, 33.18, 32.35, 32.36, 32.04 through 32.09, 34.10, 32,11, 33.18, 32.20, and 32.21.

The actual proportion of Hispanic households in most of the tracts in the southwest corner of Las Vegas (south of Alexander and west of Rainbow) is substantially less than would be expected in a discrimination-free housing market. A lower median income among Hispanic households does not explain these differences between actual and expected proportions of Hispanic households.

Generally the difference between actual and expected proportions of Hispanic households has widened since 2000 except in the tracts in and around The Strip. In both tracts 7.00 and 9.00, the actual proportions of Hispanic households were slightly less the expected proportions in 2000. By 2012, those differences had become significant.

By 2012, a growing number of tracts had become majority Hispanic or close to it, although in a discrimination-free housing market the proportion of Hispanic households would be substantially less: 1.03, 1.05, 1.08, 4.02, 5.10 through 5.22, 5.25 through 5.28, 13.00, 14.02, 22.03, 22.04, and 34.31. The proportion of actual Hispanic households was more than ten percentage points greater than expected in a free housing market. The cluster of tracts in the southeast end of Las Vegas are immediately south of a cluster of tracts with similar characteristics in North Las Vegas, creating a large Hispanic area at the east end of both cities.

Likely contributing to these concentrations is the common phenomenon throughout the nation of first generation immigrants moving into neighborhoods with a concentration of other Hispanic households. Over time, subsequent generations would be expected to move out of these ethnic

neighborhoods as they become upwardly mobile and are assimilated into the American mainstream. These areas also contain a number of grocery stores and professional services that cater to a Hispanic population and advertise in Spanish.

Away from these African American and Hispanic enclaves are three scattered tracts where the actual proportion of African American households is significantly greater than expected: 33.08 and 32.35 in the city's northwest section; and 34.18 bounded by Smoke Ranch, Lake Mead, Buffalo, and Rainbow. The actual proportion of African American households is much less than expected in the two tracts immediately north of 32.49, tracts 32.62 and 32.10, in tract 32.11 northeast of 32.49, and in tract 58.24, southwest of tract 32.49 in the Summerlin neighborhood.

The actual proportion of African American households is also lower than would be expected in tracts 32.31 along the city's west border and 32.61 at Charleston and Rampart amid an abundance of tracts where the actual proportion of Hispanics is significantly less than expected in a free housing market. While the actual proportion of African American households is close to what would be expected in all but six of the census tracts west of Rancho, the actual proportion of Hispanic households is significantly less than what would be expected in more than 40 of the tracts west of Rancho.

Opportunity Areas in Las Vegas

Broadly speaking, there appears to be two Las Vegas's, separate and with unequal opportunity:

High Opportunity Las Vegas: A primarily non-Hispanic Caucasian Las Vegas west of Rainbow and north of Lake Mead and;

Low Opportunity Las Vegas: A primarily minority Las Vegas east of Rainbow and south of Lake Mead

Nearly all of the census tracts in the Low Opportunity Las Vegas offer "very low" and "low" overall opportunity levels while the vast majority of the tracts in High Opportunity Las Vegas enjoy "very high," "high," and "moderate" overall opportunity levels.

As the map in Figure 40 shows, census tracts with "very low" and "low" opportunity index rankings dominate Clark County's northeast quadrant, encompassing the first area in Las Vegas noted above and North Las Vegas. Moving west of US 95 in Las Vegas, is a mix of tracts in all five rankings. "High" and "very high" opportunity tracts dominate the southwest corner of the city. Most of the census tracts in the west section of Las Vegas offer "medium" and higher overall opportunities, with just three tracts of "low" opportunity and none with "very low" opportunity in the city's northwest corner.

The tracts where the actual proportion of African American and/or Hispanic households is approximately ten or more percentage points greater than would be expected in a discrimination-free housing market overwhelmingly have "low" and "very low" overall opportunity rankings. These tracts tend to be the ones identified earlier as African American or Hispanic enclaves. However, a handful of tracts with this gap that are located outside these

enclaves have “moderate” (1.01, 30.01, 34.18), “high” (10.03), and “very high” (32.49, 33.08) opportunity ranks.

As noted earlier, it is likely that the concentrations of Hispanic households reflect the common phenomenon throughout the nation of first generation immigrants moving to identifiable Hispanic neighborhoods. Over time, subsequent generations would be expected to move out of these concentrations as they become upwardly mobile and are assimilated into the American mainstream. However, these enclaves tend to be located in “very low” and “low” opportunity areas where access to community resources such as high quality education and good-paying jobs that facilitate upward mobility are very few as seen in Chapter 3.

Las Vegas census tracts show these “minority” concentrations are not due just to the lower median incomes of African American and Hispanic households. The African American enclave west of The Strip, mentioned earlier as “The Westside” is both intensely segregated by race and by opportunity. The opportunity levels of these tracts are nearly all “very low” and “low.”

In addition to the actual proportions of African Americans in these tracts being substantially more than ten percentage points greater than what would be expected in a housing market absent discrimination, the actual proportion of Caucasians runs much less than would be expected. For example, see tracts 2.01, 3.01, 3.02, 34.30, 34.31, and 35.00 where the actual proportions of white households are, respectfully, 23.3, 45.8, 53.3, 31.0, 22.7, and 52.7 percentage points less than what would be expected in a discrimination-free housing market.

Concurrently, the actual proportions of African American households living in those tracts are, respectively, 23.6, 51.9, 57.2, 37.2, 18.7, and 57.2 percentage points higher than the levels expected in a free housing market.

These intense levels of racial concentration combine with a lack of access to higher opportunity to make upward mobility very difficult, foster development of a permanent underclass, and pose a serious barrier to affirmatively furthering fair housing choice.¹³ In addition to implementing the recommendations to expand housing choices, *Las Vegas needs to foster the growth of affordable housing to households of modest incomes in the High Opportunity Las Vegas to assure that these affordable dwelling units are affirmatively marketed to households in the racial and ethnic groups whose actual proportions are significantly lower than the proportions expected in a discrimination-free housing market.*

Henderson

From 2000 to 2012, the actual proportions of Henderson households that are African American or Asian are roughly what would be expected in a free market absent any housing discrimination. During this time, the actual proportion of Henderson's households that are Hispanic has been about half of what would be expected in a discrimination-free housing market.

The proportion of the city's households that are African American has hovered around four percentage points less than the expected proportion of African American households. Overall, the percentage of Asian households in Henderson is pretty much what would be expected in a discrimination-free housing market. While the percentage of Henderson households that are Hispanic has grown slightly from 2000 to 2012, the difference between what was expected in a free market without discrimination and the actual proportion of Hispanic households widened slightly. Meanwhile, the percentage of households that are Caucasian decreased by about 5 percentage points, leaving the city with a Caucasian population that is nearly ten percentage points greater than would be expected in a free housing market without discrimination.

No Henderson census tracts have a concentration of African American households. The actual proportion of African American households was less than expected in a free market absent housing discrimination in all but six of the city's 62 census tracts— 90 percent of the city's tracts. The actual proportion in the other six tracts was roughly what would be expected. In a number of those census tracts where the actual proportion of African American households was less than expected in 2000, the gap increased by a few percentage points in 2008–2012. At the same time, this difference declined in a similar number of census tracts.

There are no concentrations of Hispanic households in Henderson that significantly exceed the proportion of Hispanic households that would be expected in a discrimination-free housing market.

Overall, the actual proportion of Hispanic households in Henderson continues to hover just under ten percentage points less than what would be expected in a free market devoid of housing discrimination. In most Henderson census tracts, the actual proportion of Hispanic households continued to be less than would be expected in a free market. This difference, however, declined in a good many other Henderson tracts. Generally speaking, the changes were a handful of percentage points which, given that these data are approximations, may not be significant. But it is clear that from tract 57.13 at Henderson's southwest end up to 54.37 at the city's northeast corner, the percentage of Hispanics living in Henderson is less than would be expected in a discrimination-free housing market.

The proportion of actual Hispanic households is roughly what would be expected in a free market in just three of the city's 61 census tracts — 51.02 (by 2.5 percentage points), 54.22 (by 3 percentage points), and 54.39 (by 1.7 percentage points). The actual proportion of Hispanic households was significantly less than the proportion expected in the absence of discrimination in 32 census tracts, just over half of the city's tracts. The actual proportion of Hispanic households was 15 or more percentage points lower than the expected proportion in just two tracts:

53.15 (17.5 percentage points less than expected) and 53.57 (16.9 percentage points less than expected).

The three tracts with significant Hispanic populations reflect what would be expected in a discrimination-free market. While nearly one-fourth of the households in tract 54.39 are Hispanic, that is roughly what would be expected in a free market absent discrimination. Additionally, while 14 percent of the households in adjacent tract 54.38 are Hispanic, that proportion is less than the nearly 23 percent that would be expected in a free housing market. While more than 18 percent of the households in nearby tract 54.34 are Hispanic, that is about what would be expected in a free housing market.

The question remains, however, why the proportion of Hispanic households in Henderson remains about nine percentage points less than would be expected in a discrimination-free housing market. *Testing may be warranted to see if any steering is taking place.*

There is a possibility that concentrations of Asians are developing in adjacent tracts 57.12 and 57.16 in the southwest corner of Henderson. The proportion of Asian households in census tract 57.12 doubled from 2000 to 2012 and is now more than ten percentage points greater than would be expected in a free housing market.

The proportion of Asian residents in tract 57.16 was nearly five times greater in 2008–2012 than in 2000. It is now twice what would be expected in a free housing market absent discrimination. Meanwhile the proportion of Hispanic households declined from 3.7 percent in 2000 to 0.9 percent in 2008–2012 and is about 18 percentage point less than would be expected in a free housing market. *These figures suggest “testing” should be conducted to determine if Hispanics are facing discrimination and Asians are being steered to this tract.*

Overall, Henderson is well positioned to engage in the practices and programs recommended to expand housing choices, especially those of Hispanics, so that they will consider Henderson and its higher opportunity areas as a place to live. If Henderson is proactive, it has an excellent opportunity to prevent high levels of racial and ethnic segregation from developing.

Opportunity Areas in Henderson

Henderson is a mainstay of high opportunity among the three large cities in Clark County. Nearly three-quarters of Henderson’s 62 census tracts in 2012 have “high” or “very high” overall opportunity levels. Slightly fewer than ten percent are ranked as “medium” while just six percent are “low” and just under ten percent are “very low.” Even though just 23 percent of the census tracts in the four cities are in Henderson, 44 percent of the “very high” opportunity tracts and 30 percent of the “high” opportunity tracts are there. The lowest percentages of “moderate,” “low,” and “very low” tracts are in Henderson.

As noted earlier, the actual proportions of African American households living throughout Henderson are about what would be expected in a free market without housing discrimination — a difference of 4.5 percentage points between actual and expected in 2012 and a nearly identical four percentage points in 2000. In 2012, “very low” opportunity census tract 52.00 was the only Henderson tract where the actual proportion of African American households was

substantially less than what would be expected — 11.2 percentage points, the same gap as for Hispanic residents in the tract.

It is a different picture for Henderson's Hispanic population however. Citywide, the actual proportion of Hispanic households is more than nine percentage points less than expected in a free market, a small increase from the 6.3 percentage point gap in 2000. The actual proportion of Hispanic households is significantly less than what would be expected in 35 of the city's 62 census tracts — 56 percent of the tracts. In 2000, actual proportions were substantially less in just 14 census tracts.

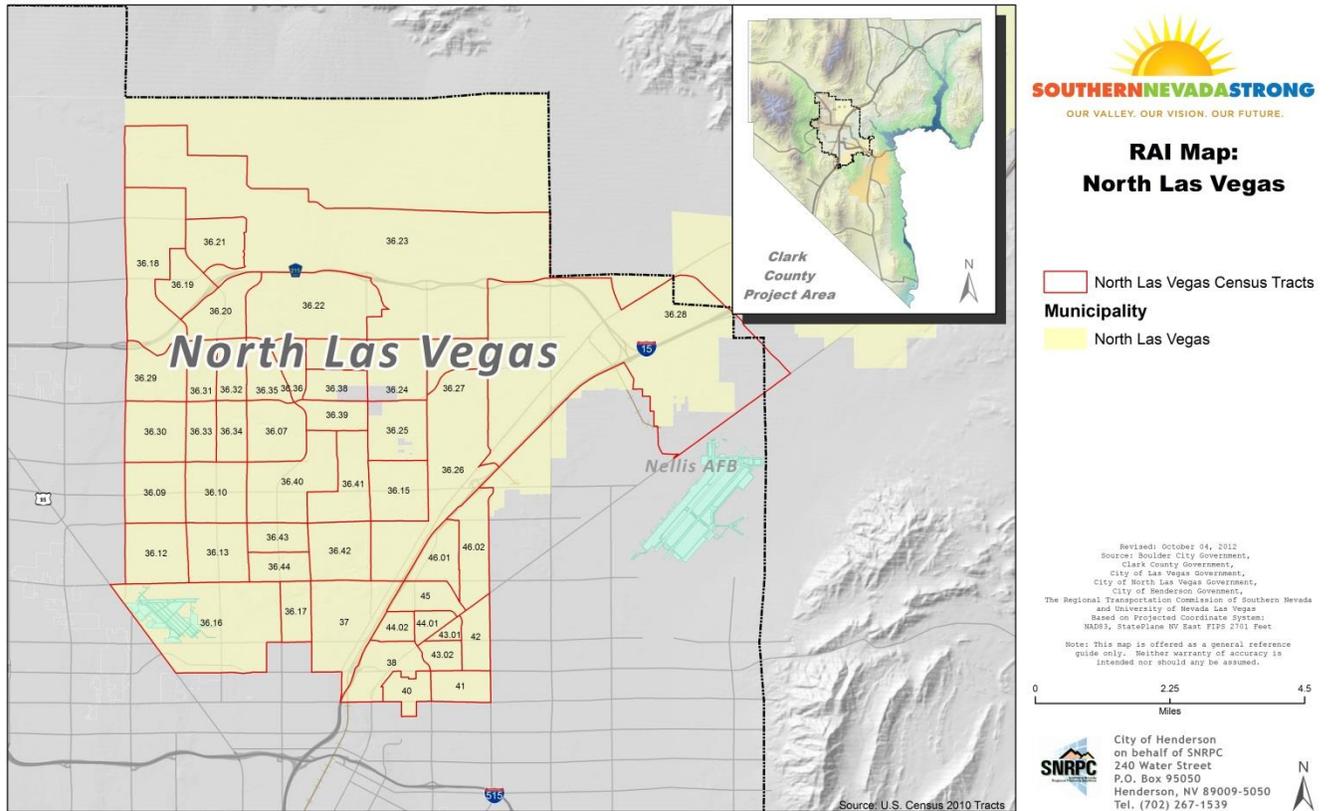
So while it appears that African American households that can afford to live in Henderson are living throughout the city with no concentrations, it appears Hispanic households that can afford to live in Henderson may be encountering obstacles that discourage them from living in Henderson.

Extensive testing in Henderson is needed to help reveal what these obstacles may be. It is also possible that the proportion of Hispanic households is depressed by first generation immigrants seeking homes in established Hispanic enclaves as did their predecessors from other immigrant groups.

To advance fair housing, Henderson needs to fully participate in the programs which would expand housing choices so that more Hispanics will add Henderson — where access to high opportunities is the greatest among the large cities in Clark County — to where they look for housing.

North Las Vegas

Figure 43 North Las Vegas census block map



During the 1990's, North Las Vegas appeared to have made substantial progress toward overcoming discriminatory practices that had created very large differences in 1990 between the city's actual racial composition and what would have been expected in a free market absent housing discrimination.¹⁴ These trends appear to have stalled during the first decade of the new century.

In 1990, the proportion of white households was just 51.6 percent, 31.7 percent less than the proportion expected in a free housing market. By 2000, the actual percentage had risen to 60.6 and the difference between actual and expected had dropped to 16 percentage points — a very healthy movement toward affirmatively furthering fair housing.¹⁵

During the 1990s, the number of minorities living in North Las Vegas did not decline. The increase in the proportion of Caucasians was due to a substantial in-migration of whites to North Las Vegas during a population boom and surge in residential building. As reported below, the proportion of African Americans declined due to this increase in the number of white residents

as well as significant increases in the number of Asians, multi-racial individuals, and people of all other races.¹⁶

In 2012, the proportion of Caucasians was 58.1 percent and the difference between the actual and expected proportion of Caucasian households was 14.7 percent — both pretty close to the 2000 proportions. But there is no indication of further movement toward overcoming suppression of the proportion of Caucasians living in North Las Vegas and increased the actual proportions of African American and Hispanic households.

The population of North Las Vegas boomed again during the 2000s, growing from 115,488 individuals in 2000 to 216,961 in 2012. Of the additional 101,473 residents, 63.7 percent were Caucasian; 20 percent were African American; 9.7 percent were Asian; 10 percent were two or more races; and 40 percent were Hispanic of any race.¹⁷ Note that these proportions of individuals naturally differ a bit from the racial and Hispanic composition of households used in this free market analysis.

In 1990, the proportion of African American households was 34.3 percent, 25 percentage points higher than would have been expected in a free housing market not distorted by discrimination, where African American households would have constituted less than ten percent of the city. By the end of the decade, the proportion of African American households had declined by more than a third to 20.6 percent. The difference between actual and expected had been reduced to 16 percentage points.

In 2012, the proportion of African American households held fairly steady at 22 percent and the difference remained nearly unchanged at 11.6 percentage points.

Between 1990 and 2000, the higher percentage of Caucasian households and lower percentage of African American households, however, were due almost entirely to an influx of Caucasian residents, not a reduction in the number of African American or Asian residents.¹⁸

Within North Las Vegas, the actual proportion of African Americans in 22 of the city's 48 census tracts (46 percent) was close to the proportion expected in a discrimination-free housing market. That was the case in just ten of 26 of the city's census tracts in 2000 (38 percent).¹⁹ During the 2000s, concentrations of African American households declined in more tracts than the grew.

In 2000, census tract 36.03 was huge and largely undeveloped (northern most developable area). Since the housing boom of the 2000's, tract 36.03 exploded with development and significant racial and Hispanic diversification. In 2000, the tract was 100 percent Caucasian, 23.9 percent more than would have been expected in a free market. The population of tract 36.03 grew so much during the past decade that it was divided into eight tracts and parts of three others for the 2010 census (tracts 36.18 through 36.28). In 2012, the actual proportion of African American households was significantly greater than what would be expected in six of the 11 tracts; the proportion of Asians was higher only in tract 36.22; the proportion of Hispanics was higher only in tract 36.21.

In 2012, the actual proportion of white households in eight of the 11 tracts carved out of tract 36.03 was significantly less than would be expected in a free market devoid of housing discrimination. Most of the tracts carved out of 36.03 circle around the north and east borders of North Las Vegas' center where the actual proportion of African Americans is significantly greater than would be expected in a discrimination-free housing market. These tracts experienced a large residential building boom along with the completion of the I-215 northern beltway, and have a large concentration of newer homes.

Concentrations of African American households appear to be developing in adjacent tracts 36.24 and 36.25. These tracts are adjacent to 36.15 where the actual proportion of African Americans has been more than 12 percent higher than would be expected since 2000 (the tract did not exist in 1990). This could indicate a movement of the African American population northward towards the newer areas of North Las Vegas, and away from the more traditionally "African American neighborhoods".

These tracts are within a larger group in the center of North Las Vegas where the disparity between actual and expected proportions is greater, as high as 37.3 percent in tract 36.17 and 36.4 percent in tract 36.16. However in both tracts, this gap declined from 54.3 percent in 2000. The disparity between actual and expected proportions of African American households in tract 36.44 more than doubled from 18.6 percent in 2000 to 39.5 percent in 2012. However, in adjacent tract 37.00 the difference declined from 73 percent in 2000 to 58.2 percent in 2012.

Over the 22 years studied, the difference between the actual and expected proportions of Asian households living in North Las Vegas has remained under two percentage points which suggests that Asian households generally include North Las Vegas among their housing choices and that Asians probably do not encounter widespread housing discrimination when seeking a residence in North Las Vegas. The actual proportion of Asian households in North Las Vegas rose from 1.6 percent in 1990, to 4.1 percent in 2000, and to 5.9 percent in 2012. The actual proportions have been very close to the proportions of Asian households anticipated in a discrimination-free market: 2.6 percent in 1990, 4.5 percent in 2000, and 7.8 percent in 2012.²⁰ This steady, but incremental growth of the city's Asian population represents a healthy pace of diversification in North Las Vegas.

North Las Vegas' Hispanic households are intensely concentrated along the city's northeast end,²¹ just north of the cluster of Las Vegas census tracts with similar concentrations. Concentrations are not as intense in tracts 36.10, 36.13, and 36.16 in the city's southwest corner.

The Clark County's 2011 Analysis of Impediments cautioned that "conditions appear to be ripe for expansion of minority concentrations."²² "Initial 2010 Census data show that all 15 tracts are being consolidated into these Hispanic enclaves."²³

This is exactly what has happened. These neighborhoods have been consolidated into the existing Hispanic enclaves, generating extreme concentrations of Hispanic residents that rival the levels of segregation of African Americans in the nation's most segregated cities. In North Las Vegas, the actual proportion of Hispanic households in this cluster of tracts ranges from 53.4 percent in tract 38.00 (which is 29.4 percentage points greater than would be expected in

discrimination-free housing market) to 86.4 percent in tract 43.02 (which is 62.1 percentage points more) and 80 percent in tract 43.01 (which is 55.6 percentage points more).²⁴

These concentrations are far greater than the concentrations of African Americans in North Las Vegas. The intensity of concentration among the city's most concentrated African American census tracts was 70.7 percent in 2010 tract 37.00 (58.2 percentage points greater than expected, but less concentrated than in 2000 when it was actually 83.3 percent African American, 73 percentage points greater than expected) and 51 percent in tract 36.44 (39.5 percentage points greater than expected and more concentrated than in 2000 when it was 26.6 percent African American, eight percentage points more than expected).

The tracts with the next greatest concentrations of African American households were 36.16 (7.9 percent actual; 11.5 percent expected) and 36.17 (49.2 percent actual; 11.9 percent expected), both of which were not as concentrated as in 2000.

Between 2000 and 2012, the proportion of Hispanic households increased in every North Las Vegas census tract except 36.41 where it remained steady at roughly 13 percent and 36.36 where it declined by about 1.4 percentage points, not necessarily a significant amount. However, in both tracts, the difference between the actual proportion of Hispanic households and the proportion expected in a discrimination-free housing market widened, especially in tract 36.36 where the lower proportion of Hispanic households increased from an insignificant 5.5 percent to a more significant 11.4 percent.

Throughout this nation's history, it has not been unusual for first generation immigrants to initially live in ethnic enclaves. It is extremely likely that the in-migration of Hispanic households to Clark County is contributing to the expanding concentrations of census tracts where the actual proportion of Hispanic households is substantially greater than what would be expected in a free market without housing discrimination.

However, the intensity of these concentrations runs counter to the principle of affirmatively furthering fair housing. As explained below, these concentrations place a huge proportion of the county's — and North Las Vegas' — Hispanic population in "low" and "very low" opportunity areas, denying them access to the resources needed to achieve upward mobility.

While it is possible that over time subsequent generations will have the financial resources and inclination to move from these enclaves to higher opportunity neighborhoods, there is the strong possibility that these increasingly ethnically segregated neighborhoods will continue to be segregated unless steps are taken to expand the housing choices of their residents. The longer the jurisdictions in Clark County wait to implement these recommendations, the longer it will take to reduce these intense concentrations of Hispanic residents and enable them to fully participate in seeking to achieve the American Dream.

Opportunity Areas in North Las Vegas

Access to living in the higher opportunity areas of North Las Vegas appears to be limited largely to the city's wealthier households of any race or Hispanic ethnicity. However, in those tracts where the actual proportion of a "minority" was significantly greater than would have been

expected in a free market devoid of housing discrimination, access to higher opportunity neighborhoods varies considerably.

The census tracts where the actual proportion of African American households in 2012 was significantly greater than what would have been expected in a discrimination-free housing market ran the full spectrum when it came to their overall opportunity indices. Two of the tracts were “very high opportunity” and four were “high” opportunity. Seven tracts each were ranked as “moderate” or “low” opportunity with six tracts identified as “very low” opportunity.

In all the other tracts where the actual proportion of African American households were not out of line with the proportion expected in a free market, African American households lived in neighborhoods with the full range of opportunity levels.

At \$60,482 in 2012, Clark County’s Asian households had a significantly higher annual median income than any other race or Hispanics of any race. The median income of Caucasian households was \$51,183; African Americans was \$37,520; and Hispanics was \$41,482.29.²⁵ Consequently, it is no surprise that Asian households living in North Las Vegas tend to live in higher opportunity neighborhoods.

Within North Las Vegas, the actual proportion of Asian households significantly exceeded the expected proportion in four census tracts:

- Very high opportunity tracts 36.19 and 36.22 towards the northwest end of the city; and
- Adjacent tracts 36.26 (moderate opportunity) and 36.27 (low opportunity) on the city’s east end.

It appears that Asian households are moving into the two very high opportunity tracts 36.19 and 36.22 more than the other very high and high opportunity tracts. There is a possibility that concentrations could be developing in these two tracts. The concentration could be developing due to well-off recent immigrants choosing to live in neighborhoods where a substantial number of other Asians already live, a behavior common to first generation immigrants in this country. *It would benefit the city to conduct testing in the very high and high opportunity tracts to determine whether Asian households are being steered to these two tracts and/or away from other higher opportunity tracts.*

In most of the moderate, low, and very low opportunity census tracts, the actual proportion of Asian households is smaller than the proportion that would be expected in a discrimination-free housing market. The proportion actually living in the very low opportunity tracks hovers around six percentage points lower than would be expected which falls within the range of a free housing market.

In the census tracts where the actual proportion of Hispanic households was not out of line with the proportion expected in a free market without housing discrimination, Hispanic households lived in neighborhoods with the full range of opportunity levels. In 2012, there were just two census tracts in North Las Vegas where the proportion of Hispanic households was more than ten percentage points lower than expected in a free market: 36.21 (actual proportion 2.1

percent; expected 21.1 percent) and 36.36 (actual 6.4 percent; expected 17.2 percent). Tract 36.21 has a “moderate” overall opportunity index while tract 36.36 is ranked “very high.”

Not one of the census tracts where the actual proportion of Hispanic households of any race in 2012 was significantly greater than what would have been expected in a discrimination-free housing market was ranked “very high” or “high” opportunity. Just one tract had “moderate” opportunity. Two were ranked as “low opportunity” while 11 were considered “very low” opportunity. Residents of these tracts lack access to housing in higher opportunity tracts where the resources exist to achieve upward mobility.

Boulder City

To place Boulder City’s racial and Hispanic composition in context, it is important to review the city’s origins. Two years after Congress authorized construction of the Hoover Dam, Six Companies, Inc. hired 4,000 men to work on the Dam in 1930. None was African American. Construction began in 1931. The first housing was occupied in the fall of that year. In 1932, the federal government created and managed Boulder City. African Americans were not allowed to live in Boulder City.²⁶ Responding to pressure from federal officials, Six Companies, Inc. hired the first ten African American workers for the Hoover Dam project. Just 44 of the 20,000 workers employed during the construction period were African American.²⁷

Given this legacy and the city’s distance from the center of Clark County’s urban core, it is not surprising that Boulder City’s demographics would be less than diverse. It is a legacy that will require concerted efforts to overcome and reverse.

Since 1990, Boulder City has become less racially and ethnically diverse. The number of African American residents has been so low — hovering between 107 in 2000 and 130 in 2010 — that African American households barely register in the random samples that the American Community Survey uses for identifying household income — the source of data used in this analysis. That’s why the percentage of African American households in every Boulder City census tracts is reported as 0.0 percent in the table even though the 2010 census reports a small number of African American individuals living in each Boulder City tract.

In a free housing market devoid of racial discrimination, Boulder City would have been about 85.5 percent Caucasian in 1990, not 98.3 percent. Its Hispanic population would have been more than six times greater than it was. Five times as many Asian households would have lived in Boulder City. About 395 African American households (7.7 percent of all households) would have lived there — as noted earlier, the actual number of African American households was so small that it did not register in the American Community Survey’s random sample. Even in 2000, the number of African American households in a free housing market would have been more than 29 times greater than the number that was estimated to actually live in Boulder City.²⁸

In 2000, the proportion of Caucasians in every census tract was 18.2 to 20.3 percentage points greater than would be expected in a free housing market. In 1990, the difference was between 12 to 13.6 percent.²⁹

In three out of four census tracts, the proportion of Hispanics was more than ten percentage points less than what would be expected in a free housing market—the difference was 9.3 percent in the fourth tract. In one tract, less than one-half of one percent of the residents were Hispanic while in a free market absent discrimination the percentage would have been about 14 percent. In the other tracts, the actual proportion of Hispanics ranged from one-sixth to one-third of what would be expected if income determined who lived there. The proportion of Hispanics actually declined during the 1990s. In 1990, Boulder City’s Hispanic population was about one-third of what would be expected absent discrimination. In 2000, it had declined to one-sixth.³⁰

Far fewer Asians lived in Boulder City in 2000 than would be expected in a housing market not distorted by discrimination. The percentage of Asian households grew from 0.5 percent in 1990 to 0.8 in 2000. However, in 2000 approximately 4.5 percent of the population would have been Asian in a discrimination-free housing market — five and a half times more than the actual population. In 1990, the difference was five times.³¹

Both as a whole and in the individual census tracts, the difference between the actual racial and Hispanic composition and what would be expected in a free market without discrimination generally widened between 2000 and 2010. In a free market, proportion of the population of the city and each of its census tracts would be less than three-quarters Caucasian, about 10 percent African American, roughly 8 percent Asian, and approximately 20 percent Hispanic. Instead, the city and each census tract are nearly all Caucasian, nearly without any African American or Asian residents, and with far fewer Hispanic residents than would be expected in the absence of housing discrimination.

Since all of Boulder City’s census tracts present a high or very high overall opportunity index, it is clear that minority households that can afford the housing in Boulder City and not living there are not accessing these higher opportunity areas.

Despite the passage of more than 80 years since segregation was literally forced upon Boulder City in the 1930s, given all the different reasons why households choose to live where they live, and given relatively low actual mobility rates, especially among homeowners, there is no reason to expect today’s Boulder City to exhibit the same levels of diversity present in Las Vegas or North Las Vegas. However, in a genuine free housing market not distorted by discrimination, it would be reasonable to expect the city to be moving in the direction of greater racial and ethnic diversity rather than less.

The data continue to suggest the likelihood that several classic segregative phenomena are at work in Boulder City. It is possible that few African Americans, Hispanics, and Asians even consider moving to Boulder City because most, rightly or wrongly, feel they would not be welcome there. It is also possible that African Americans, Hispanics, and Asians who seek to move to Boulder City have been steered away from Boulder City or encountered housing discrimination. *The only way to know for certain is to conduct extensive “testing” of real estate and rental agents in Boulder City and in nearby portions of Clark County.*

Boulder City needs to implement recommendations for mitigating this racial and Hispanic segregation if the city is to affirmatively further fair housing.

Opportunity Areas in Boulder City

Boulder City residents all live in at least “high” opportunity neighborhoods. Three of the city’s four census tracts rank as “high” on the overall opportunity index. The fourth tract rates “very high.” These higher opportunity neighborhoods however, appear to be unavailable to members of minority groups who can afford to live there. As noted above, far fewer African Americans, Asians, or Hispanics actually live in Boulder City than would be expected absent the city’s founding legacy of housing discrimination and possible ongoing housing discrimination.

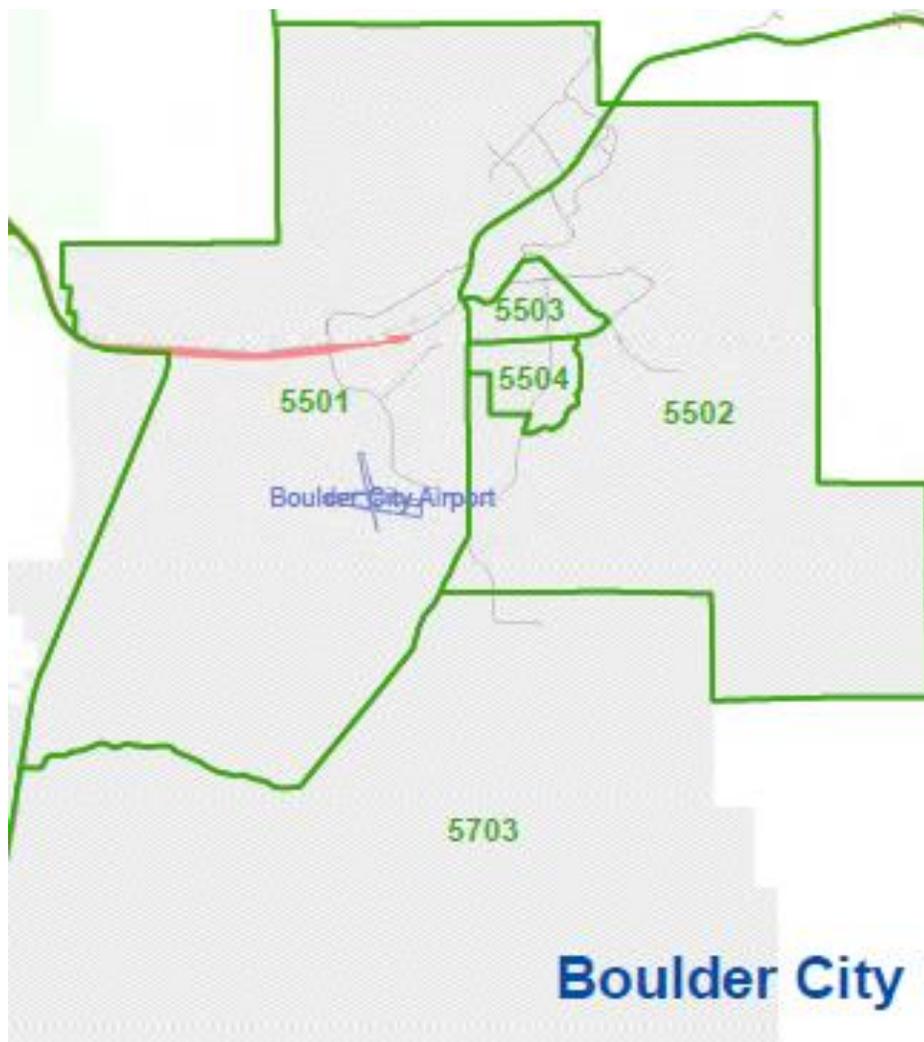


Figure 44 Boulder City Census Tract Map

¹ Determining the approximate racial and ethnic composition of a geographic area like a census tract, neighborhood cluster, or entire city is a fairly straightforward, albeit lengthy, process. Here is the step-by-step procedure using a census tract as an example. First we obtain from the U.S. Census the number of households for the census tract that are in each of 16 income ranges starting with “Less than \$10,000” and “\$10,000 to \$14,999” and ending with “\$150,000 to \$199,999” and “\$200,000 or more.” Within each income range, the census specifies the number of Caucasian, African American, Asian, and Hispanic households. We obtain the same data for the entire housing market within which the census tract is located. *The housing market here consists of all of Clark County, Nevada.*

We then multiply the number of Caucasian households in an income category in that census tract by the percentage of white households in that income bracket for the full housing market. This gives us a good approximation of the number of white households in this income bracket that would live in this census tract if income determined who lived there. We calculate these figures in all 16 income brackets for whites, Blacks, Asians, and Hispanics of any race. *This procedure assures that the census tract income of residents in a free market without discrimination is the same as the income of actual residents.* We then add up the number of households in each racial or ethnic group to get the approximate racial and ethnic composition of the census tract if income were the prime determinant of who lives there. From this we calculate the percentages of the census tract that each group comprises. These percentages are then compared to the actual proportion of each racial or ethnic group within the census tract to identify the difference between actual census numbers and a free housing market without discrimination.

² D. Coleman, M. Leachman, P. Nyden, and B. Peterman, *Black, White and Shades of Brown: Fair Housing and Economic Opportunity in the Chicago Region* (Chicago: Leadership Council for Metropolitan Open Communities, February 1998), 28–29. See chapter 5, note 1.

³ *Ibid.*, v. The methodology, first developed by Harvard economist John Kain, is explained in detail beginning on page 17 of the study. A PDF file of the entire study (28.1 megabytes) can be downloaded at <http://www.luc.edu/curl/pubs>.

⁴ The household incomes for 2000 are from the 2000 U.S. Census. Because the 2010 U.S. Census did not ask for household income, we used household income from the American Community Survey 2012. Five-Year Estimates for 2008–2012. Due to the larger sample size, these were more reliable than one-year and three-year estimates.

⁵ See Black, White and Shades of Brown: Fair Housing and Economic Opportunity in the Chicago Region

⁶ David Ihrke, Reason for Moving: 2012 to 2013 Population Characteristics (Washington, DC: United States Census Bureau, June 2014).

⁷ *Ibid.* 4.

⁸ In this analysis, we will sometimes refer to the composition of Boulder City and Henderson in 1990. That data are available in Planning/Communications, Clark County, Nevada Analysis of Impediments to Fair Housing Choice 2011 (River Forest, IL: April 2011) 26–35. Because Las Vegas and Henderson were not part of that analysis of impediments, 1990 Free Market Analysis™ data are not available for their census tracts..

⁹ For a detailed explanation of these variables and methodology, see The Kirwan Institute for the Study of Race and Ethnicity, *Technical Documentation: Calculating the Diversity Data Kids Overall Child Opportunity Index — Methods and Indicators* (Columbus, OH, Ohio State University) April 2014. This paper is available from Southern Nevada Strong.

Data sources were: U.S. Census Bureau: Decennial Census 2010, American Community Survey 2007–2011, Zip Business Patterns 2009; State Department of Education 2010-2011; National Center for Education Statistics, Common Core of Data 2010–2011; diversitydatakids.org Early Childhood Database (State Early Childhood Care and Education Licensing Database 2012 and 2013, National Center for Education Statistics, Common Core of Data 2009–2010, National Association for the Education of Young Children Accredited Program Database, 2012 and 2013); ESRI Business Analyst 2011; Department of Housing and Urban Development, Neighborhood Stabilization Program 2010; Environmental Protection Agency, Toxic Release Inventory Program 2010.

¹⁰ *Ibid.* 1.

¹¹ *Ibid.* 2.

¹² The number of households in other ethnic groups and racial classifications (“some other race,” “two or more races”) are so relatively small that data based on their samples are not reliable enough to include in the tables that follow. Note also that a substantial proportion of Hispanics report themselves as being “some other race” which explains why, in some neighborhood clusters and census tracts with high proportions of Hispanics, the proportions of whites, Blacks, and Asians do not equal 100 percent.

¹³ For a detailed explanation of this phenomenon, see Douglas Massey and Nancy Denton, *American Apartheid: Segregation and the Making of the Underclass* (Cambridge, MA: Harvard University Press, 1993).

¹⁴ Planning/Communications, Clark County, Nevada Analysis of Impediments to Fair Housing Choice 2011 (River Forest, IL: April 2011) 26-30.

¹⁵ *Ibid.*

¹⁶ *Ibid.*

¹⁷ U.S. Census Bureau, Table QT-P3 “Race and Hispanic or Hispanic Origin: 2010” and Table DP-1, “Profile of General Demographic Characteristics:2000.”

¹⁸ Ibid.

¹⁹ Planning/Communications, Clark County, Nevada Analysis of Impediments to Fair Housing Choice 2011 (River Forest, IL: April 2011) 30

²⁰ Ibid. 27.

²¹ North Las Vegas 2010 census tracts 38.00, 40.00, 41.00, 42.00, 43.01,43.02,44.01,44.02,45.00, 46.01, and 46.02

²² Planning/Communications, *Clark County, Nevada Analysis of Impediments to Fair Housing Choice 2011* (River Forest, IL: April 2011) 29.

²³ Ibid. 31.

²⁴ These two 2010 census tracts replaced the 2000 tract 43.00 which was 79.3 percent Hispanic, 62.8 percentage points more than would be expected in a discrimination-free housing market. Ibid, 29, 30.

²⁵ 2012 American Community Survey, 1–Year Estimates, Tables B19013A, B19013B, B19013D, and B19013I.

²⁶ Rachel J. Anderson, “Timeline of African–American Legal History in Nevada (1861–2011)” (2012) Scholarly Works. Paper 689. <http://scholars.law.unlv.edu/facpub/689>. Published in Nevada Lawyer (Feb. 2012) 10.

²⁷ Ibid.

²⁸ Planning/Communications, Clark County, Nevada Analysis of Impediments to Fair Housing Choice 2011 (River Forest, IL: April 2011) 33.

²⁹ Ibid.

³⁰ Ibid.

³¹ Ibid.

5. ACCESS TO COMMUNITY ASSETS

Factors Affecting Housing Markets and Housing Choice

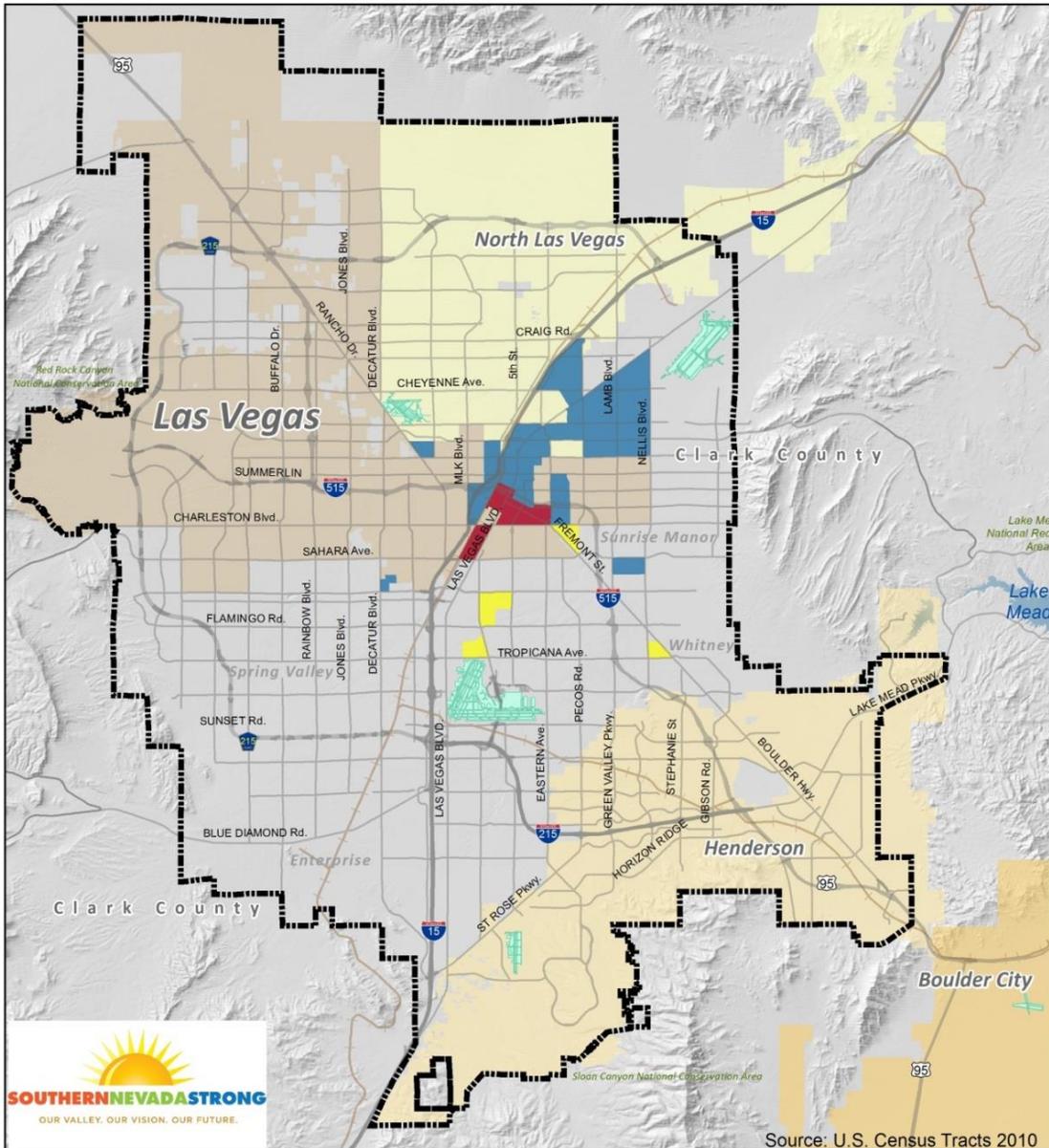
Residential choice means the choice of both a housing *location* and a housing *type*. Factors relating to location include affordability of the neighborhood (housing stock plus cost of living), travel times (to work, shopping, recreation, education), neighborhood characteristics, quality of public services (especially, for many families, schools), and tax rates. Housing type comprises many attributes, the most important of which are structure type (e.g., single-family, multi-family) and size, lot size, quality and age, price, and tenure (own/rent).

Because it is impossible to maximize all these services and simultaneously minimize costs, households must, and do, make tradeoffs. What they can get for their money is influenced by both economic forces and government policy. Different households will value what they can get differently. They will have different preferences, which in turn are a function of many factors like income, age of the head of the household, number of people and children in the household, number of workers and job locations, number of automobiles, and so on.

It is important to analyze different kinds of community assets and whether neighborhoods across the Southern Nevada region have equal access to those assets as well as an equal quality of assets.

The following Social Indicator Map, Figure 45, shows the compilation of four social indicators as described by 2010 Census figures for Southern Nevada: percentage of minority population, percentage of population with no vehicle, percentage of population below the poverty level, and percentage of population with a high school degree or less. These social indicators are used by the San Diego Association of Governments, or SANDAG, in their Healthy Communities Atlas. The purpose of the Healthy Communities Atlas is to compile, visualize and analyze conditions related to health and wellness in the San Diego region.³² This methodology is used here as indicators of community asset levels. The areas in Figure 45 in blue and red would be the areas of greatest social and economic vulnerability in the Southern Nevada region.

Figure 45 Social Indicator Map of Southern Nevada

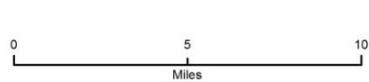


Social Indicator Map

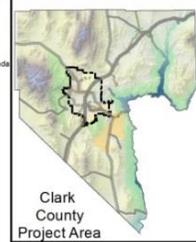
- Four Composite Indicators
- Three Composite Indicators
- Two Composite Indicators

50% or more Minority Population is the baseline for analyzing Composite Indicators. Approach based on the SANDAG methodology

2010 CensusTracts data
Social Indicator Map
1) 50% or more Minority Population
2) % Population w/ No Vehicle
3) 150% Below Poverty
4) % High School Grad or Less (50% and more)



Revised October 04, 2012
 Source: Boulder City Government, Clark County Government, City of Las Vegas Government, City of North Las Vegas Government, City of Henderson Government, The Regional Transportation Commission of Southern Nevada and The University of Nevada Las Vegas
 Based on Projected Coordinate System: NAD83, StatePlane NV East FIPS 2701 Feet
 Note: This map is offered as a general reference guide only. Neither warranty of accuracy is intended nor should any be assumed.



Schools and Educational Attainment

Many Southern Nevadans express concern regarding the low quality of education at all levels in the Region. These opinions ran on a spectrum from “atrocious” to “we need to do a better job.” Clark County’s high school graduation rates are much lower than the national average, at 62 percent in 2014, compared with 80 percent nationally.³³ Students score low in national reading and math assessments. Many neighborhoods lack basic connectivity for children to safely access schools and social services and for residents to access services and jobs without a car. At the same time, college dropout rates also are high and the region has low educational attainment.

About a quarter of children live in households with annual household incomes that fall below the federal poverty line.³⁴ In a 2013 profile of children’s well-being by the Annie E. Casey Foundation, Nevada ranked 48th out of 50. At this point, research documents a variety of symptoms of low socioeconomic standards that are relevant for children’s subsequent educational outcomes. These include, for example, poor health, limited access to home environments with rich language and experiences, low birth weight, limited access to high-quality preschool opportunities, less participation in many activities in the summer and after school that middle class families take for granted, and more movement in and out of schools because of the way the housing market operates for low-income families.³⁵ The 2013 Kids Count Profile for Nevada (Figure 46) shows that Nevada has higher rates of children whose parents lack secure employment, households living with a high cost burden, teens not in school and not working, and children living in families where the household head lacks a high school diploma.

Figure 46. 2013 Kids Count Profile for Nevada

	Nevada	United States
Children in poverty	22%	23%
Children whose parents lack secure employment	34%	32%
Children living in households with a high cost burden	44%	40%
Teens not in school and not working	13%	8%
Children living in high-poverty areas	9%	12%
Children living in families where the household head lacks a high school diploma	23%	15%

Source: The Annie E. Casey Foundation. http://kidscount.unlv.edu/newsletters/2013KC_state_profile_NV.pdf

Figure 47, below, shows the neighborhoods in the Region where those with less than a high school degree live. The neighborhoods with the highest percentage are the northwest section of the Valley, especially those east of I-15 and north of US-95 in the most eastern sections of Las Vegas and the southeastern sections of North Las Vegas. These neighborhoods have a heavy concentration of Hispanic residents, female headed households, and residents with very low median incomes. Access, choice, and opportunities in primary and secondary education provide the basis for success. Educational institutions help our children learn communication and social skills to build their personal confidence and ability to contribute to our community, culture and civil society.

Figure 47 Percentage of Population with less than a high school degree.

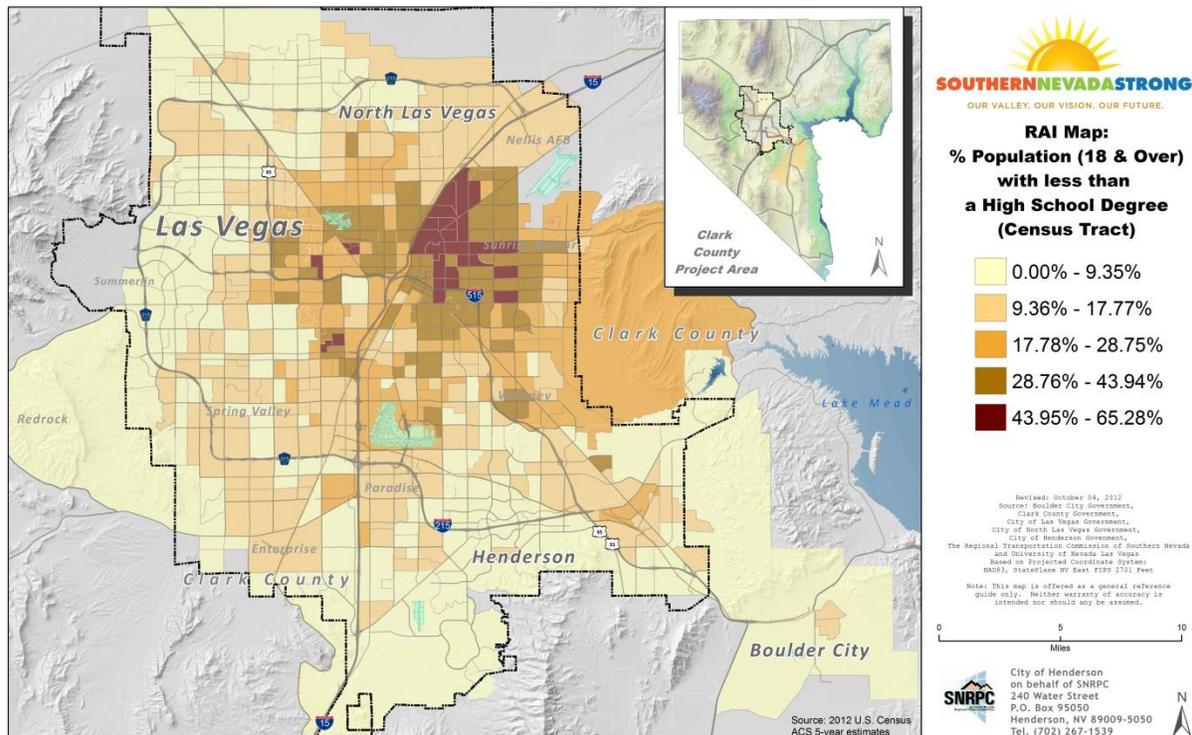


Figure 48, below, shows the star ratings for Clark County public schools in the Las Vegas valley. The green stars are the highest rated schools and are mostly located around the outer edge of the Valley, including the northwest neighborhoods of Centennial Hills and Summerlin, the southwest unincorporated areas and Henderson neighborhoods. We have previously noted that these are the neighborhoods with low levels of minority residents, higher median income levels, and higher median housing values. The red and orange schools are the lowest performing schools and are almost exclusively found in the inner core neighborhoods radiating to the northeast section of the Valley. These are the high minority, high Hispanic areas with lower incomes and housing values. It is interesting to see there are several dark green schools located in the inner core areas and a further point of research might be to see if there is anything different regarding these schools that could be done to create greater opportunities at the neighboring red and orange schools.

Figure 48 Neighborhood School Performance

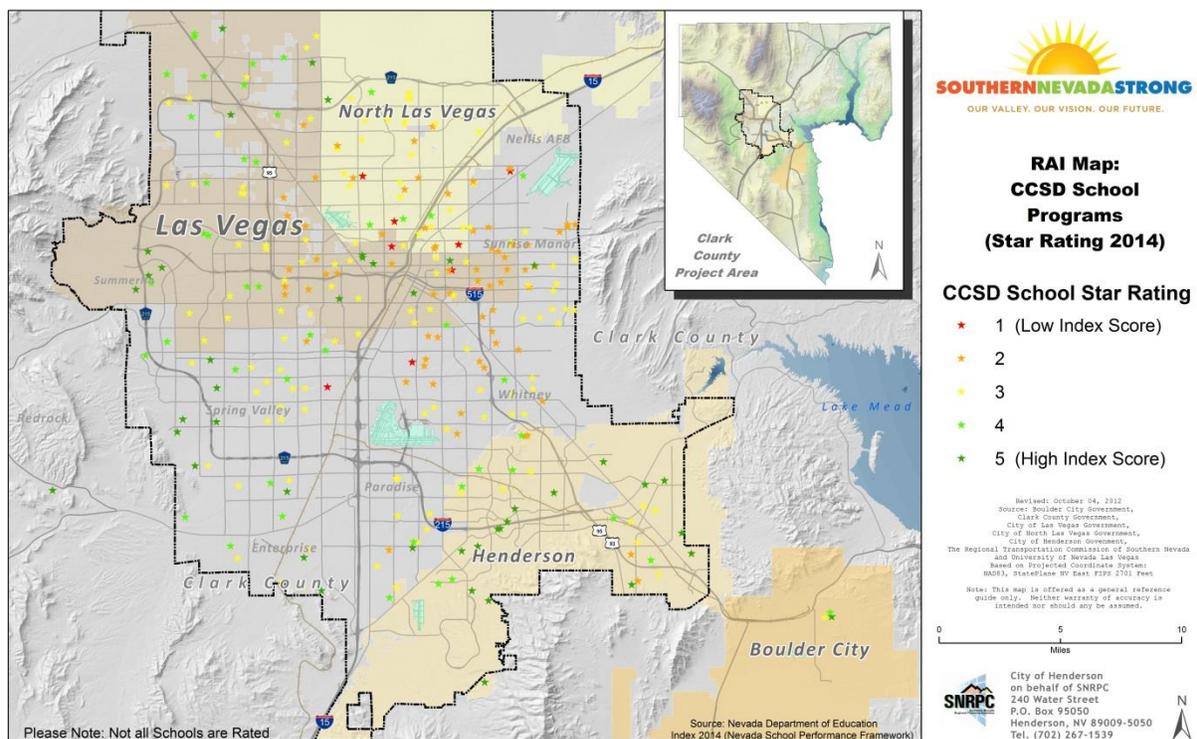


Table 52 Educational attainment of population 25 years and over 2000 and 2012, Nevada, Clark County, and select cities

Area	2000			2012*		
	Less than High School	High School or Associate's Degree	Bachelor's Degree or Higher	Less than High School	High School or Associate's Degree	Bachelor's Degree or Higher
Nevada	19.6%	56.0%	24.4%	13.6%	57.3%	29.1%
Clark Co	20.5%	62.1%	17.3%	15.5%	62.5%	22.1%
Las Vegas	21.5%	60.3%	18.2%	16.6%	61.6%	21.8%
North Las Vegas	33.5%	56.3%	10.2%	22.1%	61.3%	16.6%
Henderson	11.5%	64.8%	23.7%	8.1%	61.6%	30.3%
Boulder City	11.4%	66.7%	22.0%	9.60%	68.10%	22.20%

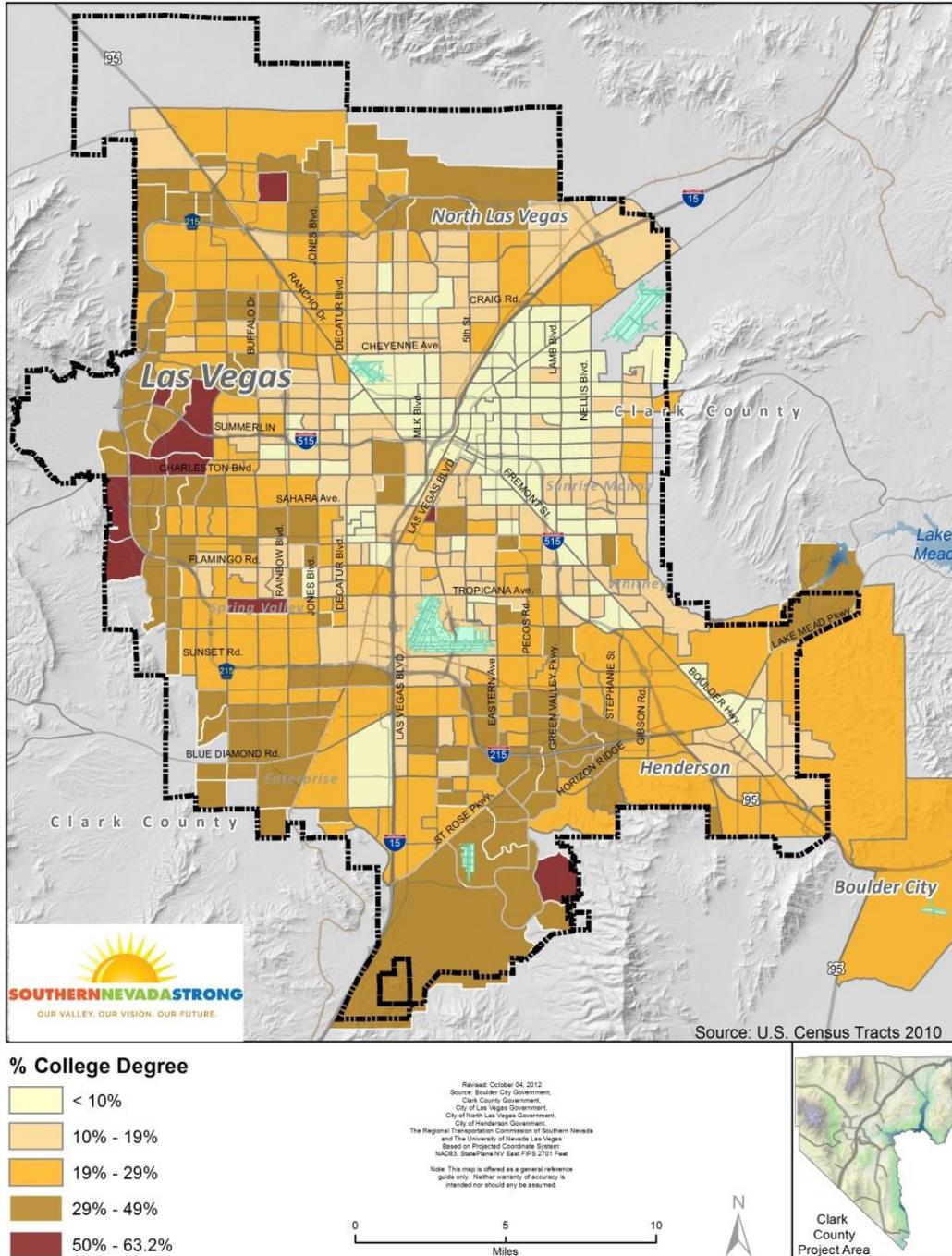
Source: U.S. Census 2000 SF3 Table DP-2, U.S. Census ACS 2012 Table DP02, and U.S. Census ACS 2008-2012 Table DP02.
 Note: The High School and Associate's Degree category includes persons with some college but no degree
 *2012 data for Clark County, Las Vegas, North Las Vegas and Henderson is from the ACS 1-year estimates while data for Boulder City reflects ACS 5 year estimates (2008-2012)

Table 52 shows the educational attainment of residents 25 years and older for all of Clark County, and the cities of Las Vegas, North Las Vegas, Henderson, and Boulder City.

- The share of persons with a bachelor's degree or higher has risen in Clark County, but it is still below the national average.
- Clark County's population of persons over 25 years with at least a bachelor's degree rose by about five percentage points between 2000 and 2012. Henderson realized the largest increase and Las Vegas the smallest.
- North Las Vegas realized the largest gains in educational attainment during the period with its share of persons with less than a high school degree falling by over 11 percentage points.

Figure 49, below shows the percentage of population with a college degree and not surprisingly, the areas with low high school graduates also have low college graduates. These are located mostly in the northeast section, north of US-95 and east of I-15, in the most eastern sections of Las Vegas and the southeastern sections of North Las Vegas. These areas contain a high percentage of Hispanic residents with low median incomes and low housing values.

Figure 49 Percentage of population with a College Degree.



Access to Community Assets for Persons with limited English Proficiency (LEP)

Although we do not have the education data (high school graduation rates, college degree rates) broken down to differentiate the data for LEP residents, it must be assumed that some of the poor education rates noted above for the highly Hispanic neighborhoods of the north east section of the Valley are due to a lack of access to services for the LEP population living there. It is unclear whether the lack of access is due to LEP residents being more distrustful of government services, not understanding how to obtain services or to a real lack of services for the LEP community. However, the results of the focus groups in Chapter 8 show us that there is a feeling from LEP residents that education and health care access are especially lacking for them.

Clark County has a Limited English Proficient Plan which provides a framework for ensuring reasonable steps are taken to provide meaningful access to its programs and services for LEP persons. It includes access to LEP documents, oral language services, inclusive public outreach, staff training, and LEP postings in Spanish and English for County services. The other jurisdictions do not have LEP plans but do have translation services available either in person or via website translations. Additionally, the CDBG program administrators do attempt to monitor the agencies to ensure that advertising for CDBG programs are in English and Spanish.

Hispanics with LEP lack access to information on opportunities and further remedies should be explored and provided.

Employment

Clark County is slowly but perceptively recovering from the “great recession.” Table 53, below displays the distribution of private sector businesses by category and number of employees for 2012. More than half the businesses were very small with one to four employees. Compared to similar data in the *Clark County, Nevada Analysis of Impediments to Fair Housing Choice 2011*, there were two percent fewer businesses since 2008 with Construction (-22 percent), Manufacturing (-12 percent) and Management of Companies & Enterprises (-18 percent) sustaining double-digit loses. At the same time, the number of businesses in Arts, Entertainment, and Recreation (+6 percent) and Accommodation and Food Services (+3 percent) have had modest increases.³⁶

Table 53 Clark County Private Sector Businesses by Industry and Number of Employees, 2012

Industry	Total Number of Businesses	Number of Businesses in Clark County by Number of Employees								
		1-4	5-9	10-19	20-49	50-99	100-249	250-499	500-999	1000+
Total all sectors	40,178	21,734	7,308	5,349	3,506	1,257	697	174	86	67
Forestry	17	15	1	1	-	-	-	-	-	-
Mining	48	32	7	4	4	1	-	-	-	-
Utilities	49	17	8	8	7	2	3	3	1	-
Construction	2,779	1,465	497	378	282	108	47	1	1	-
Manufacturing	905	401	169	140	111	46	27	8	3	-
Wholesale trade	1,906	1,118	357	224	148	37	12	8	2	-
Retail trade	5,722	2,033	1,608	1,096	571	234	150	23	7	-
Transportation and warehousing	810	440	97	94	84	37	27	20	6	5
Information	769	458	113	88	72	23	10	2	2	1
Finance and insurance	2,905	1,932	448	323	132	34	26	6	4	-
Real estate and rental and leasing	2,737	2,023	386	184	88	34	14	6	2	-
Professional, scientific, and technical services	5,659	4,188	689	451	235	67	23	1	2	3
Management of companies and enterprises	409	245	36	46	38	18	17	6	1	2
Administrative and Support and Waste Management and Remediation Services	2,802	1,585	414	317	235	122	89	30	7	3
Educational services	473	248	71	57	60	18	15	4	-	-
Health care and social	4,430	2,317	927	608	367	120	64	11	10	6
Arts, entertainment, and recreation	896	570	80	61	80	64	33	5	3	-
Accommodation and food services	4,091	962	798	990	851	255	118	37	33	47
Other services (except public administration)	2,737	1,654	600	278	141	37	22	3	2	-
Industries not classified	34	31	2	1	-	-	-	-	-	-

Source: U.S. Census Bureau. <http://www.census.gov/econ/cbp/>

Largest employers

Las Vegas and Unincorporated Clark County are hugely dependent on the gaming and tourist industries with few other large employers other than the Clark County School District, the University of Nevada Las Vegas, and the County and local governments.

Table 54 Largest Employers in Las Vegas and Unincorporated Clark County: 2013

Employer	Nature of Employer	Number of Employees
Clark County School District	Regional Elementary and Secondary Schools	30,000 to 39,999
Clark County Government	Local County Government	8,000 to 8,499
WynNorth Las Vegas	Casino Hotels	8,000 to 8,499
Bellagio LLC	Casino Hotels	7,500 to 7,999
MGM Grand Hotel/Casino	Casino Hotels	7,500 to 7,999
Aria Resort & Casino LLC	Casino Hotels	7,000 to 7,499
Mandalay Bay Resort And Casino	Casino Hotels	6,500 to 6,999
Caesars Palace	Casino Hotels	6,000 to 6,499
University of Nevada Las Vegas	Colleges and Universities	5,000 to 5,499
Las Vegas Metropolitan Police	Local County Government	4,500 to 4,999
The Venetian Casino Resort	Casino Hotels	4,000 to 4,499
The Cosmopolitan of Las Vegas	Casino Hotels	4,000 to 4,499
The Mirage Casino–Hotel	Casino Hotels	4,000 to 4,499
University Medical Center of Southern Nevada	General Medical and Surgical Hospitals	3,500 to 3,999
The Palazzo Casino Resort	Casino Hotels	3,500 to 3,999
Encore Las Vegas	Casino Hotels	3,000 to 3,499
Bally's Casino Hotel	Casino Hotels	3,000 to 3,499
City of Las Vegas	Local Municipal Government	2,500 to 2,999
Southwest Airlines	Scheduled Passenger Air Transportation	2,500 to 2,999
Sunrise Hospital And Medical Center	General Medical and Surgical Hospitals	2,500 to 2,999
Luxor	Casino Hotels	2,500 to 2,999
Circus Circus Casinos – Las Vegas	Casino Hotels	2,500 to 2,999
Paris Las Vegas	Casino Hotels	2,500 to 2,999
Flamingo Las Vegas Hotel & Casino	Casino Hotels	2,500 to 2,999
Golden Nugget Las Vegas	Casino Hotels	2,500 to 2,999
Harrahs Casino Hotel Las Vegas	Casino Hotels	2,500 to 2,999
Rio Hotel & Casino	Casino Hotels	2,500 to 2,999
Treasure Island Hotel Casino	Casino Hotels	2,500 to 2,999

Source: Nevada Employer Directory online at <http://www.nevadaworkforce.com/?PAGEID=67&SUBID=169>

Henderson has a diverse economy including manufacturing, big box stores, medium size casino hotels, local and federal governments, and hospitals.

Table 55 Largest Employers in Henderson: 2013

Employer	Nature of Employer	Number of Employees
City of Henderson	Local Municipal Government	2,500 to 2,999
St Rose Dominican–Siena	General Medical and Surgical Hospitals	1,500 to 1,999
Green Valley Ranch Station Casino	Casino Hotels	1,500 to 1,999
M Resort Spa Casino	Casino Hotels	1,000 to 1,499
Sunset Station Hotel & Casino	Casino Hotels	1,000 to 1,499
St Rose Dominican Hospital	General Medical and Surgical Hospitals	700 to 799
Zappos Retail Inc	Electronic Shopping	600 to 699
Fiesta Henderson Casino Hotel	Casino Hotels	600 to 699
Titanium Metals, Corporation Of	Smelting	500 to 599
Unilever Manufacturing (US)	Ice Cream & Frozen Dessert Manufacturing	400 to 499
Wal–Mart Supercenter	Warehouse Clubs and Supercenters	400 to 499
Medco Health	Mail–Order Houses	400 to 499
Bureau of Reclamation	Federal Government	300 to 399
Sunrise Carpentry	Residential Framing Contractors	300 to 399
Poly–West Inc	Unsupported Plastics Bag Manufacturing	300 to 399
Levis Strauss & Co	Mens/Boys Clothing Merchant Wholesalers	300 to 399
Wal–Mart Supercenter	Warehouse Clubs and Supercenters	300 to 399
Costco Wholesale Corp	Warehouse Clubs and Supercenters	300 to 399
Zappos IP Inc	Electronic Shopping	300 to 399
CSAA Insurance Exchange	Insurance	300 to 399

Source: Nevada Employer Directory online at <http://www.nevadaworkforce.com/?PAGEID=67&SUBID=169>

By far the largest employer near North Las Vegas is the federal government (Nellis Air Force Base) employing 35,000 to 40,000 people. Although the Air Force Base is located in unincorporated Clark County, its proximity to North Las Vegas makes it important to mention here. The city's diverse economy has a variety of employers including big box stores, a hospital, casinos, and warehousing and storage.

Table 56 Largest Employers for North Las Vegas: 2013

Employer	Nature of Employer	Number of Employees
Nellis Air Force Base	Federal Government	35,000 to 40,000
City of North Las Vegas	Local Municipal Government	1,000 to 1,499
Marmaxx Distribution Center	General Warehousing and Storage	900 to 999
National Security Technologies	Research and Development	900 to 999
Texas Station Gambling Hall & Hotel	Casino Hotels	800 to 899
The Cannery Hotel Casino	Casino Hotels	800 to 899
Aliante Station Hotel & Casino	Casino Hotels	800 to 899
Republic Silver State Disposal	Solid Waste Collection	700 to 799
Unistaff LLC	Temporary Help Services	600 to 699
North Vista Hospital	General Medical and Surgical Hospitals	600 to 699
Fiesta Casino Hotel	Casino Hotels	500 to 599
Laidlaw Transit Services	Bus/Other Motor Vehicle Transit Systems	500 to 599
Excel	General Warehousing and Storage	400 to 499
Wirtz Beverage Nevada	Wine and Spirit Merchant Wholesalers	300 to 399
Jerrys Nugget Inc	Casinos (except Casino Hotels)	300 to 399
Brady Linen Services	Linen Supply	300 to 399
CPI Card Group – Nevada Inc	Commercial Gravure Printing	300 to 399
US Foodservice Inc	General Line Grocery Merchant Whsle	300 to 399
Wal-Mart Supercenter	Warehouse Clubs and Supercenters	300 to 399
Wal-Mart Supercenter	Warehouse Clubs and Supercenters	300 to 399
Wal-Mart Supercenter	Warehouse Clubs and Supercenters	300 to 399
Bed Bath & Beyond	General Warehousing and Storage	300 to 399
Manpower, Inc.	Temporary Help Services	300 to 399
Medicwest Ambulance Inc	Ambulance Services	300 to 399
Brady Linen Services Llc	Industrial Launderers	300 to 399

Source: Nevada Employer Directory online at <http://www.nevadaworkforce.com/?PAGEID=67&SUBID=169>

Boulder City prohibits gaming but the city’s proximity to the Hoover Dam and Lake Mead and its unique history aids the local economy which is dominated by local, regional, and federal governments as well as tourism.

Table 57 Largest Employers in Boulder City: 2013

Employer	Nature of Employer	Number of Employees
National Park Service	Federal Government	200 to 299
Las Vegas Valley Water District	Regional Government	200 to 299
City of Boulder City	Local Municipal Government	200 to 299
Hacienda Hotel & Casino	Casino Hotels	200 to 299
Office of Veteran’s Services	Federal Government	100 to 199
Vegas Tunnel Constructors	Heavy Construction	100 to 199
Cupertino Electric	Nonresidential Electrical Contractors	100 to 199
Papillon Grand Canyon Helicopters	Scenic/Sightseeing Transportation	100 to 199
Grand Canyon Airlines	Scenic/Sightseeing Transportation	100 to 199
Boulder City Hospital	General Medical and Surgical Hospitals	100 to 199
Battlespace Flight Services	Air Transport	100 to 199

Source: Nevada Employer Directory online at <http://www.nevadaworkforce.com/?PAGEID=67&SUBID=169>

Employment Rates

Employment in Clark County has improved each year since 2010 as seen in Table 58 below. The number of people employed has increased by six percent while the number of unemployed has decreased by 41%.

Table 58 Clark County Work Force: 2010 - 2014

Year	Size of Work Force	Number Employed	Number Unemployed	Unemployment Rate
2014*	992,471	909,807	82,665	8.3%
2013	990,212	891,483	98,729	10.0%
2012	995,722	879,461	116,081	11.7%
2011	999,448	863,813	135,635	13.6%
2010	998,757	857,512	141,245	14.1%

* = 2014 preliminary figures, April, 2014. Not seasonally adjusted.
Sources: U.S. Bureau of Labor Statistics, <http://www.bls.gov/data>.

While Clark County's unemployment rate is still higher than the State of Nevada and the nation, the rate has been improving each year since 2010 as seen in Table 59, below.

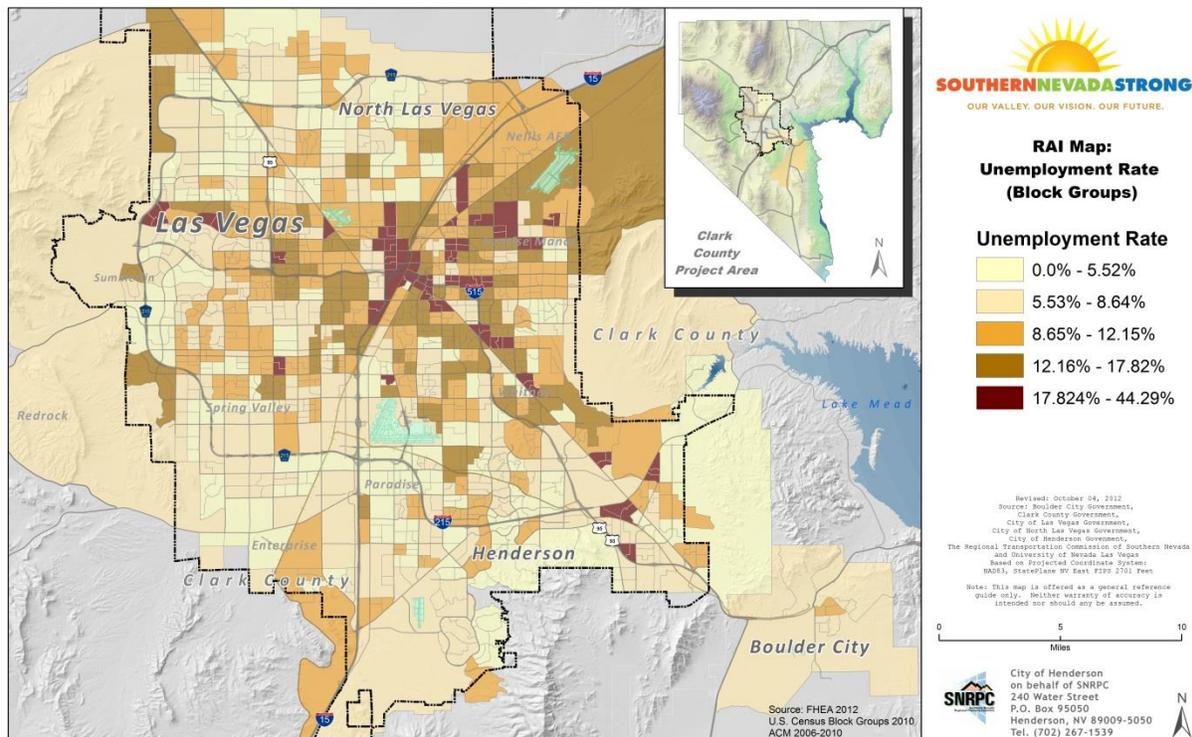
Table 59 Unemployment Rates: 2010-2014

Year	Clark County	State of Nevada	National
2014*	8.3%	7.9%	6.3%
2013	10.0%	9.8%	7.4%
2012	11.7%	11.5%	8.1%
2011	13.6%	13.2%	8.9%
2010	14.1%	13.8%	9.6%

Sources: U.S. Bureau of Labor Statistics, <http://www.bls.gov/data>. *2014 data are from May 2014.

However, as can be seen from Figure 50, the improvement has not been felt valley-wide. There are large discrepancies between neighborhoods from very low rates of 5% to upwards of 40% unemployment rates. The neighborhoods with the highest levels of unemployment are located in the heart of Las Vegas at the intersection of US 95 and I-15. These neighborhoods have a large African American population who also have a low median household income and are especially concentrated in the areas noted in Chapter 4 as the “westside”. There are also some high unemployment rates in the areas to the northeast, previously noted as a largely Hispanic neighborhood, which saw the lowest education values (high school degree, college degree, school performance) and this could affect the current and future unemployment rates. There are more pockets of high unemployment running alongside Boulder Highway to the southeast from unincorporated Clark County down to Henderson. These are not high minority areas but are areas of lower incomes and lower housing values. There is a final pattern of neighborhoods in the western sections of Las Vegas, in the Summerlin neighborhoods. These areas have a high disability status and are located in the age restricted communities of Sun City. These are not neighborhoods with low housing values nor low median incomes, so the high unemployment rate is probably more associated with under employment or semi-retirement situations.

Figure 50 Unemployment Rates for Clark County Neighborhoods



Racial and Ethnic Composition of Workers Compared to Residents

The tables below display the racial and ethnic composition of people who worked in Clark County, Henderson, Las Vegas, and North Las Vegas and of those employed residents who live in these jurisdictions. The Census Bureau did not publish this data for small cities like Boulder City.

In all jurisdictions Caucasians accounted for disproportionate percentages of professional workers. Hispanics were concentrated in lower paying blue collar and service occupations while African Americans and Asians were underrepresented in finance and management as well as some blue collar jobs although somewhat more equal in the other professions. Asians were concentrated in healthcare professions.

Racial and Ethnic Workforce Concentrations in Clark County

There is little difference between the racial and ethnic configuration of Clark County's workforce and of Clark County employed residents. Given the large size of the county and its isolation from other major metropolitan areas, it is no surprise that residents would comprise the workforce. However, there were large differences in the racial and ethnic composition within individual occupation groups in each municipality as seen in Table 60.

While Caucasian workers comprised 53.1 percent of the workforce, they accounted for high percentages of professional workers: 71.6 percent of management, business and financial workers, almost 70 percent of science, engineering and computer professionals, and 69.9 percent of other professional workers. They also constituted 61.9 percent of protective service workers. Hispanics, who were 25.9 percent of the workforce, were a little over half of the construction and extractive craft workers, half the laborers and 37.3 percent of the service workers--not protective. Although African Americans were 9.2 percent of those who worked in Clark County, they were almost 17 percent of transportation and material moving operative workers, 15.2 percent of protective service workers, 10 percent of other professional workers, and just 3.2 percent of construction and extractive craft workers. Twenty-seven percent of healthcare practitioner professionals were Asian yet they constituted 9 percent of the workforce. They made up 14.2 percent of technicians and less than 1 percent of construction and extractive craft workers and 3.6 percent of laborers and helpers.

Table 60 Racial and Ethnic Composition of Who Worked in Clark County 2006-2010

Occupational Group	All Groups	White Non-Hispanic	Hispanic of Any Race	Black Non-Hispanic	Asian Non-Hispanic	Others and Multi-Racial Non-Hispanic
Clark County Residents Who Work*	100%	52.7%	25.9%	9.2%	8.8%	2.1%
Total Employed in Clark County	100%	53.1%	25.9%	8.8%	9.0%	2.0%
	900,595	478,255	233,465	78,880	80,900	18,940
Management, Business, and Financial Workers	100%	71.6%	12.5%	6.8%	6.4%	1.9%
Science, Engineering, and Computer Professionals	100%	69.9%	8.2%	7.2%	11.6%	2.3%
Healthcare Practitioner Professionals	100%	55.9%	6.6%	7.1%	27.4%	2.5%
Other Professional Workers	100%	69.6%	11.4%	8.7%	6.7%	2.6%
Technicians	100%	58.2%	14.2%	10.0%	14.2%	2.6%
Sales Workers	100%	57.9%	19.9%	8.7%	10.1%	2.2%
Administrative Support Workers	100%	57.6%	19.4%	11.2%	7.7%	2.7%
Construction and Extractive Craft Workers	100%	42.4%	51.3%	3.2%	0.8%	1.1%
Installation, Maintenance, and Repair Craft Workers	100%	58.2%	25.0%	7.0%	6.8%	1.6%
Production Operative Workers	100%	32.8%	54.5%	5.4%	4.8%	1.5%
Transportation and Material Moving Operative Workers	100%	51.2%	23.5%	16.8%	5.6%	1.3%
Laborers and Helpers	100%	34.6%	50.0%	9.2%	3.6%	1.6%
Protective Service Workers	100%	61.9%	13.1%	15.2%	5.4%	2.8%
Service Workers, except Protective	100%	37.8%	37.2%	8.4%	13.6%	2.1%

*= The "Residents Who Work" row is the total civilian employed workforce that lives in Clark County. File is EEO-ALL01R. Files for Occupations and Total Employed are EEO-ALL03W and EEO-All01W. Source: 2010 Census EEO Data Tool at <http://factfinder2.census.gov/faces/nav/jsf/pages/searchresults.xhtml?refresh=t>. Totals exclude American Indians/Alaska Natives and Native Hawaiian and Other Pacific Islander since the percentages are so small.

Racial and ethnic workforce concentrations in Las Vegas

Like Clark County, there were few differences between the racial and ethnic configuration of Las Vegas’s total workforce and of those Las Vegas residents who were employed.

Table 61 Racial and Ethnic Composition of Who Worked in Las Vegas 2006-2010

Occupational Group	All Groups	White Non-Hispanic	Hispanic of Any Race	Black Non-Hispanic	Asian Non-Hispanic	Others and Multi-Racial Non-Hispanic
Las Vegas Residents Who Work*	100%	51.1%	29.0%	9.9%	6.6%	2.2%
Total Employed in Las Vegas	100% 313,225	50.2% 157,365	27.6% 86,555	10.6% 33,150	8.2% 25,585	2.2% 7,170
Management, Business, and Financial Workers	100%	68.4%	13.8%	8.3%	6.3%	2.1%
Science, Engineering, and Computer Professionals	100%	66.6%	9.1%	11.0%	10.9%	1.5%
Healthcare Practitioner Professionals	100%	52.9%	6.5%	7.4%	30.4%	2.3%
Other Professional Workers	100%	66.9%	12.5%	10.1%	6.6%	2.9%
Technicians	100%	51.8%	15.3%	15.8%	13.9%	2.2%
Sales Workers	100%	55.1%	21.0%	10.3%	9.9%	2.3%
Administrative Support Workers	100%	55.4%	19.1%	14.1%	6.6%	3.3%
Construction and Extractive Craft Workers	100%	34.1%	59.1%	3.9%	0.8%	1.1%
Installation, Maintenance, and Repair Craft Workers	100%	50.9%	30.9%	7.5%	8.0%	1.5%
Production Operative Workers	100%	27.1%	61.2%	7.7%	2.8%	0.9%
Transportation and Material Moving Operative Workers	100%	27.1%	61.2%	7.7%	2.8%	0.9%
Laborers and Helpers	100%	28.5%	58.6%	8.4%	2.8%	0.9%
Protective Service Workers	100%	60.9%	12.9%	17.1%	3.9%	3.2%
Service Workers, except Protective	100%	35.9%	38.6%	10.6%	11.6%	2.5%

*= The "Residents Who Work" row is the total civilian employed workforce that lives in Las Vegas. File is EEO-ALL01R. Files for Occupations and Total Employed are EEO-ALL03W and EEO-All01W. Source: 2010 Census EEO Data Tool at <http://factfinder2.census.gov/faces/nav/jsf/pages/searchresults.xhtml?refresh=t>. Totals exclude American Indians/Alaska Natives and Native Hawaiian and Other Pacific Islander since the percentages are so small.

Caucasian workers predominated professional occupation groups in Las Vegas although not to the extent as in the other municipalities. A little over 50 percent of the workforce was Caucasian and they were 68.4 percent of management, business and financial workers, 66.6 percent of science, engineering, and computer professionals, and 60.9 percent of protective service workers. Hispanics, who were 27.6 percent of the worker force, were almost 60 percent of construction and extractive craft workers, 61.2 percent of production operative workers as well as transportation and material moving operative workers, and 58.6 percent of laborers and helpers. African Americans were 10.6 percent of those who work in Las Vegas. They made up 17.1 percent of protective service workers, 15.8 percent of technicians, and 3.9 percent of construction and extractive craft workers. Asians, who were 8.2 percent of the workforce, made up 30.4 percent of healthcare practitioner professionals, almost 14 percent of technicians, and less than 1 percent of construction and extractive craft workers.

Racial and ethnic workforce concentrations in Henderson

Fewer Caucasians worked in Henderson (63.8 percent) compared to Caucasian residents who work (72.8 percent). Conversely, more Hispanics worked in Henderson (18.8 percent) compared to Hispanics workers who lived there (12.5 percent). Percentages of African Americans and Asians who worked in Henderson versus workers who lived in Henderson were fairly comparable. As in Clark County, Caucasian workers dominated professional occupation groups. With 63.8 percent of the workforce, Caucasians were over 77 percent of management, business and financial workers as well as science, engineering and computer professionals, and 80.6 percent of other professional workers. They also constituted 75.5 percent of protective service workers. As in Clark County, Hispanics, who were 18.8 percent of the Henderson workforce, were 44.1 percent of construction and extractive craft workers and 37.4 percent of laborers. They were 34.4 percent of production operative workers.

While African Americans made up 6.1 percent of Henderson' workforce, they comprised 16.6 percent of transportation and material moving operative workers, 12.3 percent of protective service workers, and just over 2 percent of construction and extractive craft workers. Asians, who made up 7.9 percent of the workforce, constituted 22.9 percent of healthcare practitioner professionals and 15.8 percent of technicians. As in Clark County, they made up 3.5 percent of laborers and helpers and 2.4 percent of protective service workers.

Table 62 Racial and Ethnic Composition of Who Worked in Henderson 2006-2010

Occupational Group	All Groups	White Non-Hispanic	Hispanic of Any Race	Black Non-Hispanic	Asian Non-Hispanic	Others and Multi-Racial Non-Hispanic
Henderson Residents Who Work*	100%	72.3%	12.5%	5.0%	7.1%	1.9%
Total Employed in Henderson	100%	63.8%	18.8%	6.1%	7.9%	2.1%
	78,155	49,900	14,735	4,795	6,205	1,620
Management, Business, and Financial Workers	100%	77.9%	10.5%	4.0%	4.8%	2.6%
Science, Engineering, and Computer Professionals	100%	77.3%	7.6%		9.4%	0.6%
Healthcare Practitioner Professionals	100%	57.1%	8.4%	6.4%	22.9%	4.6%
Other Professional Workers	100%	80.6%	6.2%	4.3%	6.3%	2.5%
Technicians	100%	61.4%	12.7%	5.4%	15.8%	0.8%
Sales Workers	100%	66.6%	15.4%	6.4%	8.7%	2.1%
Administrative Support Workers	100%	65.9%	16.4%	7.8%	7.7%	2.2%
Construction and Extractive Craft Workers	100%	50.5%	44.1%	2.1%	0.6%	0.9%
Installation, Maintenance, and Repair Craft Workers	100%	65.9%	17.9%	9.0%	3.8%	3.1%
Production Operative Workers	100%	46.5%	34.4%	7.2%	7.0%	3.9%
Transportation and Material Moving Operative Workers	100%	46.3%	27.2%	16.6%	3.0%	0.6%
Laborers and Helpers	100%	43.9%	37.4%	9.6%	3.5%	2.4%
Protective Service Workers	100%	75.5%	4.3%	12.3%	2.4%	4.5%
Service Workers, except Protective	100%	52.6%	29.0%	4.2%	11.1%	1.2%

*= The "Residents Who Work" row is the total civilian employed workforce that lives in Henderson. File is EEO-ALL01R. Files for Occupations and Total Employed are EEO-ALL03W and EEO-All01W. Source: 2010 Census EEO Data Tool at B9 Totals exclude American Indians/Alaska Natives and Native Hawaiian and Other Pacific Islander since the percentages were so small.

Racial and ethnic workforce concentrations in North Las Vegas

There were considerably more Caucasians in the city workforce (48.5 percent) than White North Las Vegas residents who work (34.8 percent). Conversely, there were more African American, Hispanic, and Asian residents in the workforce than those whose jobs were in the city (19.1 vs. 11.8 percent, 35.2 vs. 31 percent and 7.8 vs 5.5 percent, respectively).

Continuing the pattern of Caucasian workers dominating professional occupations, 80.5 percent of science, engineering, and computer professionals in North Las Vegas were Caucasian while 48.5 percent of the workforce was Caucasian. They made up 70.7 percent of management, business and financial workers, 65.8 percent of other professional workers, and two thirds of technicians.

Hispanics comprised 31 percent of the workforce and 62.4 percent of construction and extractive craft workers and 65.9 percent of production operative workers. African Americans were 11.8 percent of those working in North Las Vegas and constituted 24.6 percent of protective service workers, 22.3 percent of transportation and material moving operative workers, and 16.1 percent of other professional workers. They made up only 1.5 percent of production operative workers and 1.2 percent of construction and extractive craft workers. A little over a quarter of healthcare practitioner professionals were Asian while they comprised 5.5 percent of the workforce. Almost 11 percent of technicians were Asian but they were less than 1 percent of laborers and helpers and construction and extractive craft workers.

Table 63 Racial and Ethnic Composition of Who Worked in North Las Vegas: 2006-2010

Occupational Group	All Groups	White Non-Hispanic	Hispanic of Any Race	Black Non-Hispanic	Asian Non-Hispanic	Others and Multi-Racial Non-Hispanic
North Las Vegas Residents Who Work*	100%	34.8%	35.2%	19.1%	7.8%	3.2%
Total Employed in North Las Vegas	100%	48.5%	31.0%	11.8%	5.5%	3.2%
	53,095	25,750	16,475	6,275	2,915	1,675
Management, Business, and Financial Workers	100%	70.7%	15.8%	7.3%	3.1%	3.0%
Science, Engineering, and Computer Professionals	100%	80.5%	7.3%	7.7%	4.1%	0.8%
Healthcare Practitioner Professionals	100%	48.7%	17.8%	5.7%	25.3%	2.5%
Other Professional Workers	100%	65.8%	12.5%	16.1%	2.5%	3.0%
Technicians	100%	66.7%	12.3%	6.7%	10.8%	3.1%
Sales Workers	100%	45.5%	30.1%	10.7%	9.4%	4.3%
Administrative Support Workers	100%	49.5%	27.1%	14.5%	5.9%	3.1%
Construction and Extractive Craft Workers	100%	34.3%	62.4%	1.2%	0.7%	1.4%
Installation, Maintenance, and Repair Craft Workers	100%	58.7%	22.8%	6.1%	9.6%	2.9%
Production Operative Workers	100%	29.0%	65.9%	1.5%	2.1%	1.5%
Transportation and Material Moving Operative Workers	100%	45.0%	26.3%	22.3%	2.3%	4.2%
Laborers and Helpers	100%	38.5%	42.9%	14.6%	0.5%	3.4%
Protective Service Workers	100%	56.7%	13.5%	24.6%	5.0%	0.6%
Service Workers, except Protective	100%	32.0%	37.2%	15.8%	10.1%	4.7%

*= The "Residents Who Work" row is the total civilian employed workforce that lives in North Las Vegas. File is EEO-ALL01R. Files for Occupations and Total Employed are EEO-ALL03W and EEO-All01W. Source: 2010 Census EEO Data Tool at <http://factfinder2.census.gov/faces/nav/jsf/pages/searchresults.xhtml?refresh=t>. Totals exclude American Indians/Alaska Natives and Native Hawaiian and Other Pacific Islander since the percentages were so small.

Poverty

According to the 2000 American Community Survey, about 33.3 million people or 12.2 percent of the U.S. population had incomes below their respective poverty levels. In 2012, the number of people in poverty increased to about 48.8 million people or 15.9 percent.³⁷

Nevada was one of 44 states that had increases in poverty between 2000 and 2012. Nevada's increase of 6.5 percentage points was tied with Georgia and exceeded only by Michigan.

In 2000, only North Las Vegas had a higher poverty rate for families and individuals compared to the national average. By 2012, Clark County overall, Las Vegas and North Las Vegas had higher poverty rates than the national average.

Nationally as well as in Nevada, Clark County, Las Vegas and North Las Vegas, married couples and people 65 and older had the lowest percent in poverty. The highest rate of families or individuals in poverty in all jurisdictions were families with female householder, no husband present; families with female householders with no husband present who had children under 18; and unrelated individuals 15 years old and over.

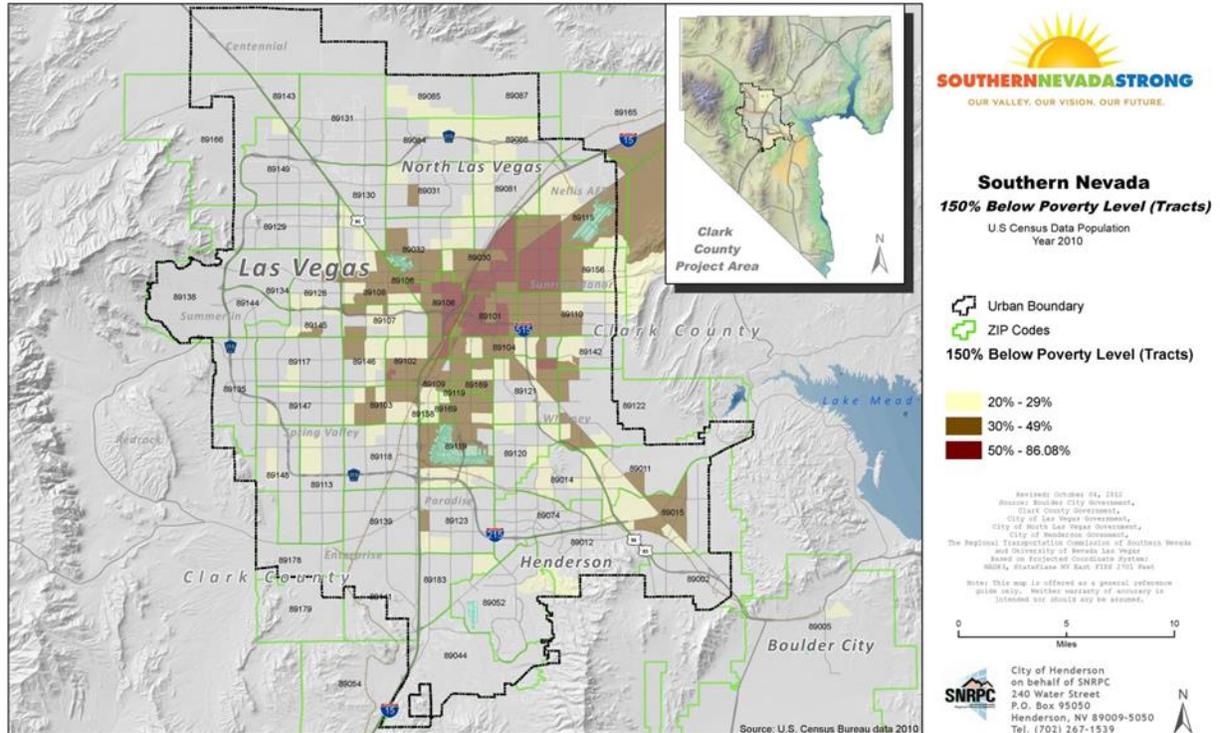
As can be seen in Table 64 and the map in Figure 51 below, North Las Vegas had the most families and individuals in poverty. Henderson and Boulder City had the fewest.

Table 64 Percentage in Poverty by Jurisdiction and Category: 2012

Category	Clark County	Henderson	Las Vegas	North Las Vegas	Boulder City	Nevada
All people	16.4%	8.8%	17.6%	19.7%	9.7%	16.4%
Age 65 and over	8.7%	7.4%	9.4%	13.6%	7.4%	8.1%
Under 18 years old	23.6%	11.2%	24.2%	27.2%	14.1%	24.0%
Unrelated individuals, 15+ years old	23.8%	16.6%	26.6%	27.3%	21.0%	24.4%
All families	12.6%	6.2%	13.3%	16.3%	5.9%	12.6%
Families with related children under 18 years old	19.4%	9.7%	20.5%	22.6%	10.3%	20.0%
Married couple families	7.4%	2.7%	8.8%	10.2%	4.9%	7.2%
Female-headed households, no husband present	26.1%	13.6%	24.6%	31.4%	19.7%	28.0%
With related children under 18	32.3%	15.2%	30.6%	36.1%	40.2%	35.5%

Sources: "Selected Economic Characteristics," 2012 American Community Survey 1-Year Estimate for Clark County, Henderson, Las Vegas and North Las Vegas and 2008-2012 American Community Survey 5-Year Estimates for Boulder City. The margin of error for some of the 5-year Boulder City estimates is in double digits which lessens confidence in their accuracy.

Figure 51 Residents Living under the 150% Poverty Level in Southern Nevada



Transportation

For a large majority of U.S. households, at least one member of each household, and often two members, commutes to work daily. While other factors influence location decisions, access to work remains an important determinant of household location. A lack of viable transportation choices causes the Southern Nevada region to be auto-dependent. Faced with rapid growth of the 1990s and 2000s, the region invested heavily in a comprehensive network of wide, high-speed arterial roadways, making it relatively easy to drive in what is still, in terms of geography, a relatively small region. Congestion is a growing issue in the Region, increasing by 35% from 21 to 28 hours spent delayed in traffic between 2000 and 2010.³⁸ By comparison, the average for all urban communities in the U.S. was 34 hours. For urban areas similar to Las Vegas (population between 1 and 3 million), including Salt Lake City and Denver, the average was 31 hours.³⁹

As illustrated in the following table, the vast majority of Southern Nevadan residents who don't take public transportation commute less than 45 minutes to work: Clark County (93.5 percent), Henderson (93.2 percent), Las Vegas (93.2 percent), and North Las Vegas (90 percent). In fact, from 56.8 to 71.6 percent of those who drive (very few walk or take taxis), spend less than 30 minutes driving.

Table 65 Commute Time by Location and Travel Mode: 2010-2012

Time Length of Commute	Clark County	Henderson	Las Vegas	North Las Vegas
Public transportation				
Less than 30 minutes	20.3%	25.7%	19.2%	20.2%
30 to 44 minutes	17.3%	17.1%	16.4%	8.9%
45 to 59 minutes	11.6%	6.4%	10.3%	14.2%
60 or more minutes	50.8%	50.8%	54.0%	56.7%
"Other means" (Car, van, truck, motorcycle, walking, taxi)				
Less than 30 minutes:	68.8%	71.6%	64.0%	57.1%
30 to 44 minutes:	24.7%	22.1%	29.2%	32.9%
45 to 59 minutes:	4.1%	3.7%	4.3%	6.6%
60 or more minutes:	2.5%	2.6%	2.5%	3.5%
Source: Clark County, Henderson, Las Vegas and North Las Vegas, Table B08134, "Means of Transportation to Work by Travel Time to Work," 2010-2012 American Community Survey 3-Year Estimates.				

The situation is completely different for those residents who take public transportation. At least half of those taking public transportation spend one hour or more getting to work. Compared to people who drive, far fewer users of public transportation spend less than 45 minutes commuting: Clark County (37.6 percent), Henderson (42.8 percent), Las Vegas (35.6 percent), and North Las Vegas (29.1 percent).

The percentage of Clark County residents who spend an hour or more to get to work on public transportation has increased since 2000 from 39.5 percent to 50.8 percent. The Region's public transit system, while well-used and among the most fiscally-efficient in the country⁴⁰, is limited in its service, frequency and coverage across areas of the valley, also exacerbated by the fragmented development patterns and design issues. The region is the only one of its size in the Intermountain West without a fixed-rail, high-capacity transit system, making the region less attractive for a growing demographic segment.

In 2012 the percent of households with no vehicles available were: Clark County 8.6%, Henderson 3.8%, Las Vegas 10.2%, and North Las Vegas 6.2%. The percentage of households with no vehicles has increased slightly between 2010 and 2012 in all the jurisdictions. The percentages of households with one, two or three vehicles were fairly consistent between 2010 and 2012.⁴¹

Figure 52 Southern Nevadans with no vehicle and where they live

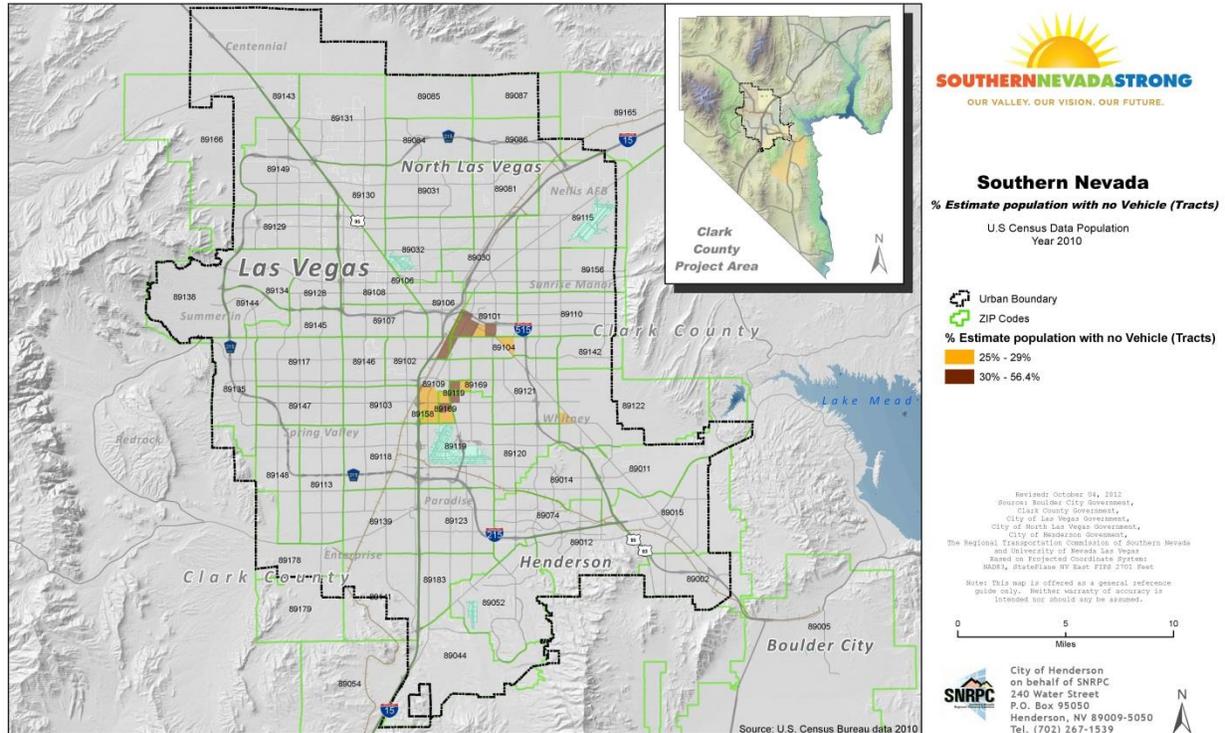


Figure 52 shows where Southern Nevadans with no vehicle live. These neighborhoods are not especially high in any minority status, unemployment rate or income level. They are however, all very close in proximity to the Las Vegas strip and UNLV. These residents are most likely either students or employees from the University or the Las Vegas strip and do not feel the necessity to own a vehicle.

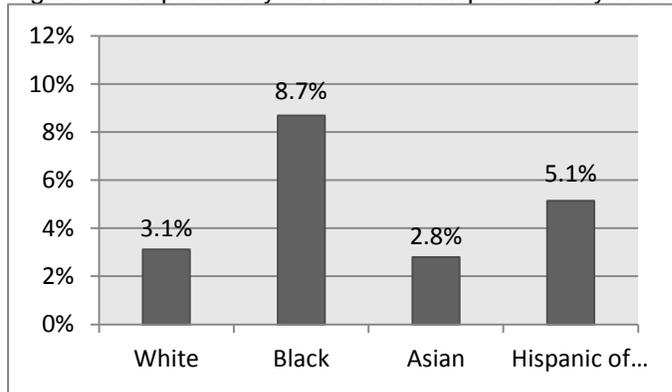
Households in the entire region are fairly close to transit stops and public transit service is fairly comprehensive throughout the Valley. In 2011, the Brookings Institution published an analysis of data from transit providers in the nation's 100 largest metropolitan areas. The report revealed that transit access in Las Vegas is much higher than the U.S. metro average. In terms of peer regions, the percent of working-age residents within three quarters of a mile of a transit stop (86%) is more than the Denver metro area (84%) and less than Salt Lake City (89%).⁴² Transfers and trip lengths do increase, however, as one moves away from the urban core area and may preclude extensive transit use in the outer suburban neighborhoods. This could be a barrier for residents who wish to move from the lower opportunity inner core areas to the suburban higher opportunity areas if they are dependent on public transportation.

Job location within a metro area affects how many jobs are accessible via transit. In addition, the distribution of different types of industries within a region may affect the kinds of jobs residents can reach via transit. As a result, the degree to which transit systems "match" workers and the jobs for which they are most qualified depends on a range of factors that vary across metro areas.⁴³

Dependency on Public Transportation by Race and Ethnicity

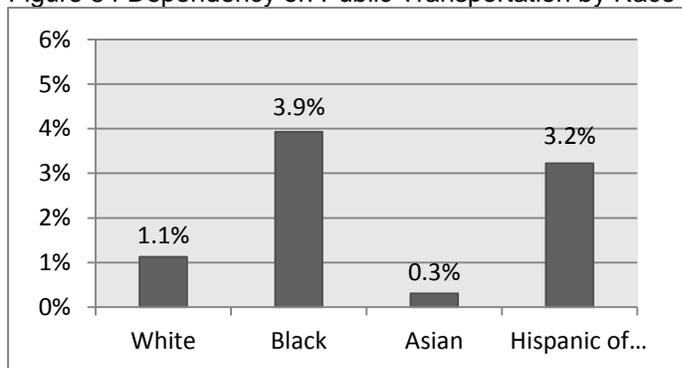
Residents who are dependent on public transportation endure significantly longer commutes than those who drive. It is clear from figure 53 below that greater proportions of African Americans and Hispanics used public transportation compared to Caucasians and Asians in Clark County in 2010-2012.

Figure 53 Dependency on Public Transportation by Race and Ethnicity in 2010-2012: Clark County



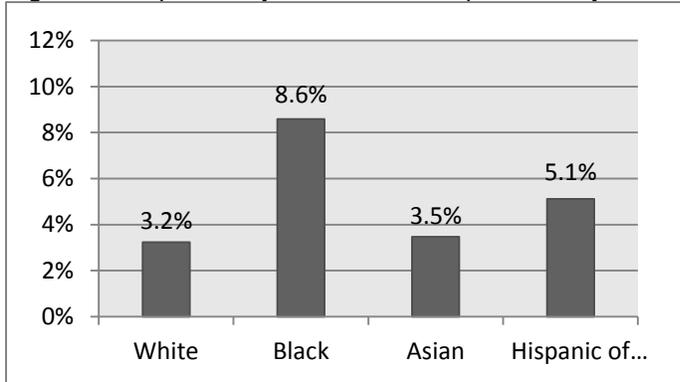
The disparity, as seen in the figures below, is greatest in Henderson, Clark County, and Las Vegas and a little less in North Las Vegas. In Henderson, more than three times as many African Americans and almost three times as many Hispanics used public transportation as Whites.

Figure 54 Dependency on Public Transportation by Race and Ethnicity in 2010-2012: Henderson



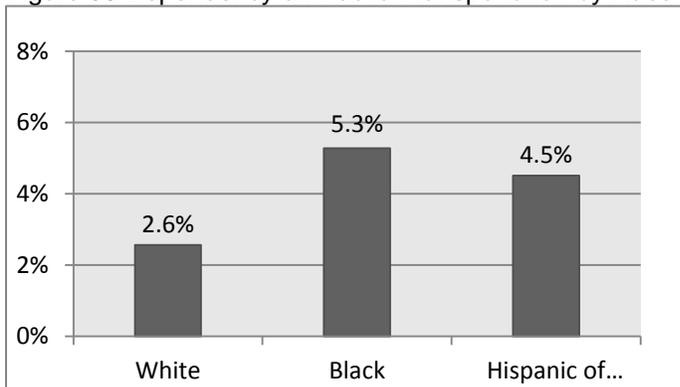
Two and a half times as many African Americans and one and a half times as many Hispanics compared to Caucasians in Clark County and Las Vegas used public transportation.

Figure 55 Dependency on Public Transportation by Race and Ethnicity in 2010-2012: Las Vegas



Twice as many African Americans and more than one and a half times as many Hispanics used public transportation as compared to Caucasians in North Las Vegas.

Figure 56 Dependency on Public Transportation by Race and Ethnicity in 2010-2012: North Las Vegas



Low-income residents are more dependent on public transportation since lower income people are less likely to own a car or have more than one car for each working member of the family. It is likely that the higher public transit ridership among African Americans and Hispanics is due to the larger proportions of lower-income people in both groups.

As can be seen in the above graphs, the long commuting times of those who use public transportation in Clark County, Henderson, Las Vegas and North Las Vegas disproportionately affect African Americans and Hispanics. Since over half the people who use public transportation in these jurisdictions spend at least an hour commuting to work, this reduces time available for other important areas of people's lives and partially dictates which jobs are available to them based on their current neighborhood. Alternatively, fewer neighborhoods are available to them based on their current jobs, especially those even further from public transportation routes.

Residents who are dependent on public transportation for employment are also dependent on it to access educational services, health care, childcare and social services. Public transportation is affordable and easily accessible for these services when residents are attempting to access services close to their current neighborhoods. However, when attempting to reach services that may be located further from their neighborhoods or closer to the outlying higher opportunity areas, there may be longer wait times, more transfers, and longer rides.

A majority of the transit system is accessible to LEP Spanish speaking residents. The more concentrated Hispanic areas of the northeast and east parts of the region are covered, with the only areas not covered being the southeast, very north and very west neighborhoods. Additionally, almost all of the transit lines are covered as paratransit lines for the physically disabled.

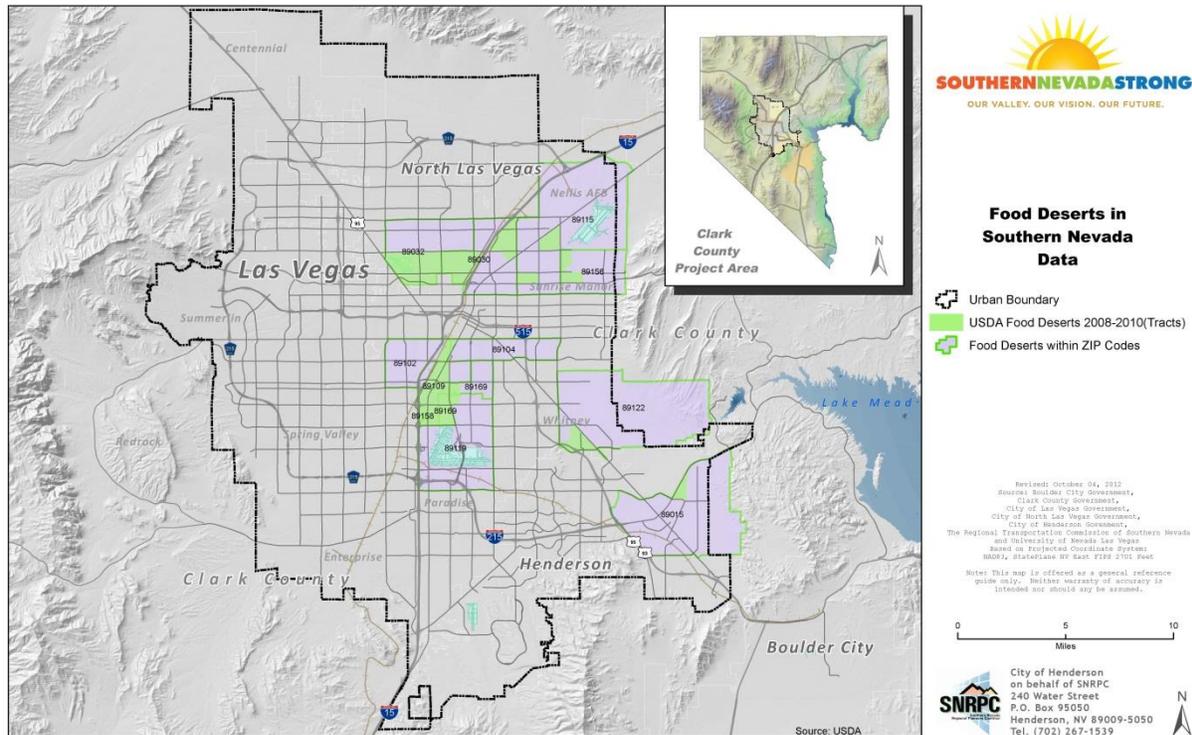
Other Community Assets

Food access

When people have access to grocery stores, they are less likely to be overweight, but when they have better access to convenience stores they are more likely to be overweight.⁴⁴ There are 16 food deserts in Clark County, as shown in Figure 57. The USDA qualifies a food desert as a census tract in which at least 33 percent of the population, or a minimum of 500 people, live more than one mile from a supermarket or large grocery store. Lack of access to healthy food contributes to a poor diet, obesity, and other related chronic diseases such as heart disease and diabetes.⁴⁵

Convenience and fast food outlets are more accessible than grocery stores in several locations throughout the Region. Of all restaurants in Clark County, 59 percent are classified as fast food by the North American Industrial Classification System. This is much higher than the national benchmark of 25 percent but similar to other counties in the Mountain West.⁴⁶

Figure 57 Food Deserts in Southern Nevada



In Figure 57, a large concentration of food deserts arise in the southeastern sections of North Las Vegas and the eastern section of Las Vegas, in the areas already noted with high minority concentrations. These are areas of low opportunities, with low educational attainment, high unemployment, low median incomes and low housing values. As seen throughout this report, these neighborhoods are exactly those that see fewer opportunities in other areas – economic vitality, good neighborhood schools and access to healthcare. Another area of food desert concentration is along the Las Vegas strip, which is exactly the same area where very few residents own a vehicle. Although these residents may be able to easily get to work, they are very limited in access to supermarkets or food stores. There is another area to the southeast from unincorporated Clark County down to Henderson, along Boulder Highway. This is an area we have seen to lack access to other opportunities, although it is low in minority status.

Safe access to recreational opportunities

The Las Vegas Valley has one of the lowest parks-per-capita ratios in the country: 2.6 park acres per 1,000 residents, compared to the nationally recommended ratio of 10 park acres per 1,000 residents. Compared to other Mountain West metropolitan areas, Clark County had the highest rate of diabetes and of people reporting fair or poor health. Table 66 shows the prevalence rates of diabetes and obesity for the counties that include Las Vegas, NV, Phoenix, AZ, Denver, CO, and Salt Lake City, UT. It also includes the national rates of each disease.

The prevalence of diabetes in Clark County exceeds that of the other Mountain West counties shown here and that of the nation. It also has a relatively high rate of obesity. Those reporting fair or poor health had about seven more annual medical provider visits than those reporting good health and about eight more visits than those reporting very good or excellent health.⁴⁷ Residents were less likely to exercise than residents of other Mountain West communities.

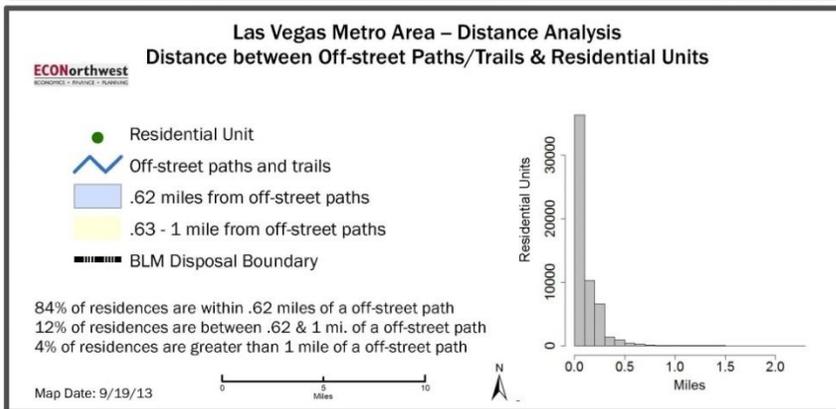
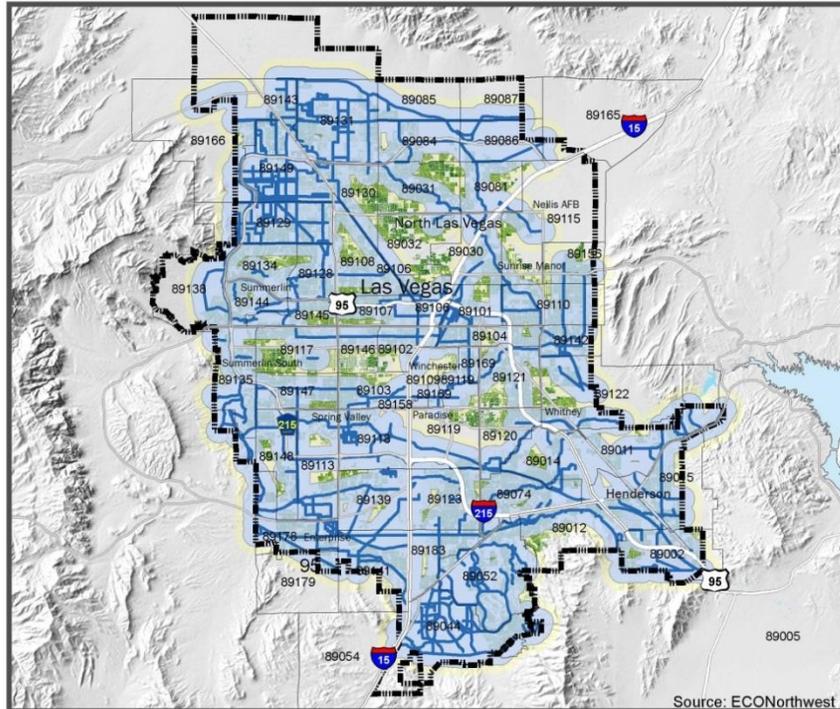
Table 66 Prevalence of Diabetes and Obesity, 2010

	Prevalence of Diabetes	Prevalence of Obesity
Clark County, NV	8.5%	21%
Maricopa County, AZ	8.0%	19%
Denver County, CO	5.9%	14%
Salt Lake County, UT	5.3%	21%
Nation	8.3%	35%

Source: CDC, 2010

Figure 58 shows the distance between walking paths and residences for Southern Nevada. Most of the Valley is well covered for walking paths with a few exceptions in mostly industrial areas. There is a whole near the Clark County airport, a large industrial area of North Las Vegas and Nellis Air Force Base. It does not appear that any residential neighborhoods are lacking for walking paths.

Figure 58 Distance between walking paths and residences



Neighborhood safety and health

The way our built environment is designed can influence public health. The transportation system provides opportunities for exercise, influences our exposure to air pollution, addresses physical safety and more. The public sector has the ability to protect environmental quality; create complete neighborhoods with housing for all ages; reduce the community’s exposure to environmental hazards; create public spaces that promote physical activity and social cohesion; support educational and occupational opportunities; and encourage healthy foods and services that are physically, economically and culturally accessible. Southern Nevada has key risk factors related to public health including substance abuse, mental health issues, crime, and environmental health issues like brownfields.

Substance abuse and mental health

The region has higher than average rates of drug and alcohol use than national averages, as shown in Figure 59. In the 2012 national survey, about 17 percent of Southern Nevada residents had used illicit drugs in the past year. Between 2005-2010, about 10 percent of persons ages 12 or older were classified as having a substance abuse disorder in the region, as compared to 9 percent nationwide.⁴⁸

Figure 59 Drug Use in Southern Nevada Compared with US

	Las Vegas MSA	US
Any illicit drug (past year)	16.8%	14.7%
Binge alcohol (past year)	25.6%	23.2%
Unprescribed Prescription-type pain relievers (past year)	6.7%	4.9%
Cigarettes (past month)	24.1%	23.2%

Source: National Survey on Drug Use and Health – Las Vegas-Paradise MSA. Substance Abuse and Mental Health Services Administration. <http://www.samhsa.gov/data/NSDUHMetroBriefReports/NSDUH-Metro-Las-Vegas.pdf>

Between 2005 and 2010, about 8 percent of persons ages 18 or older were classified as having a major depressive episode, as compared to 6.6 percent nationwide.⁴⁹

Crime

Crime can impact neighborhoods by creating a sense of insecurity and can lead to disinvestment. The region’s violent crime rate was 80 percent higher than the national rate at 697 crimes per 100,000 people (compared with 387 per 100,000 people nationally). Property crimes are slightly above average at 2,966 per 100,000 people in the Southern Nevada region (compared with 2,859 per 100,000 people nationally).⁵⁰

The Southern Nevada region is unique relative to crime rates, due to the influx of tourists to the Las Vegas strip. This creates a higher crime rate centered around the Las Vegas strip. Crime rates also increase in the before mentioned African American enclave of the “westside” area as well as the largely Hispanic neighborhoods in the northeast. This would not be unexpected when coupled with the lower economic and educational opportunity rates in these areas.

Healthcare Access

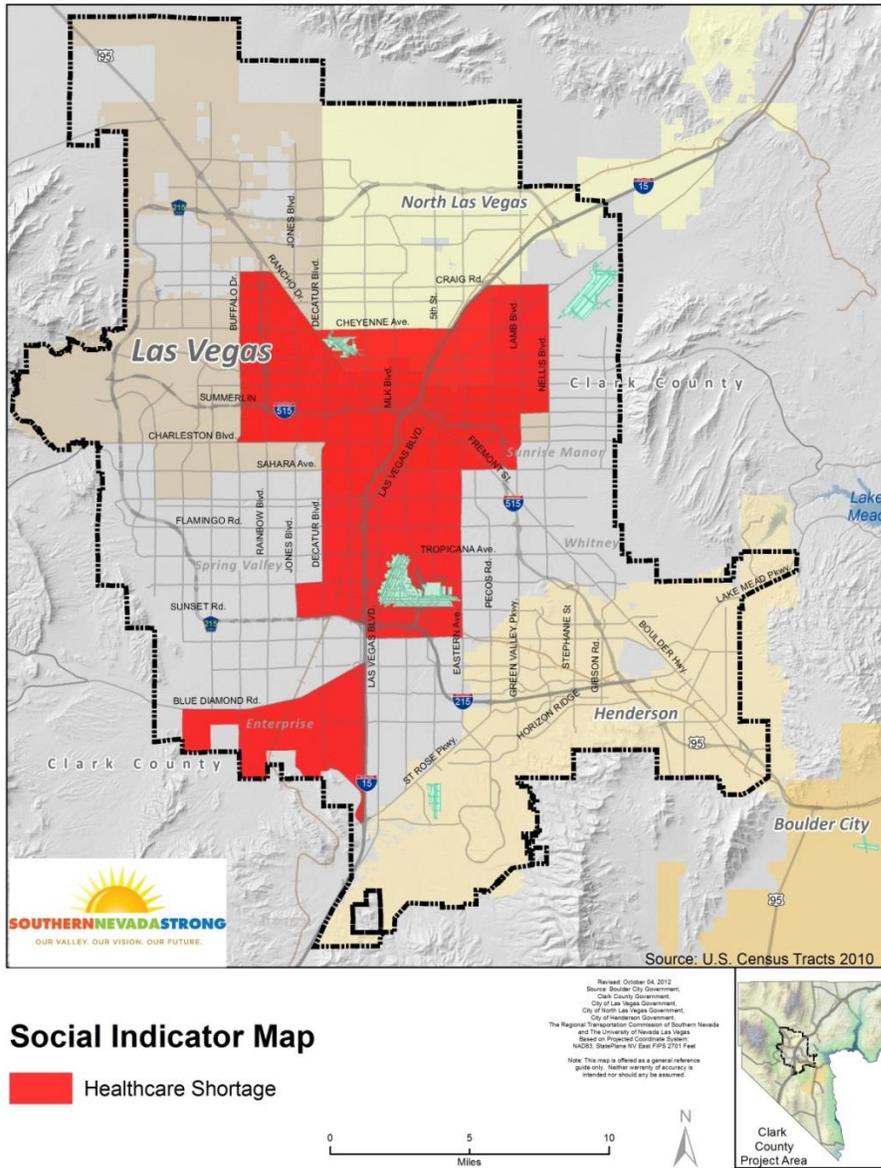
Regular healthcare access improves the individual’s chances of living a longer and healthier life.⁵¹ Regular health exams can help find problems before they start or find problems early when treatment is often most effective. Clark County has a low physician-to-population ratio compared to other counties in Nevada and compared to the national average (1:1,244, while the national benchmark for this ratio is 1:631.) The consequence of this to the community is delayed care to residents. In addition, it may force some residents to access medical care through the emergency department instead of through a primary care physician who is better equipped to serve the patient long-term.⁵²

Clark County has both Medically Underserved Areas and Medically Underserved Populations and significant sections of the county are formally designated as Health Professions Shortage Areas, shown in Figure 60. Most of the underserved areas are centered around the urban core, with many hospitals and medical clinics being sited in the outer suburban neighborhoods. The Las Vegas Strip as well as the neighborhoods surrounding it to all sides are affected by this shortage, with the exception of the large medical community around Charleston Blvd and Alta Drive, west of I-15.

The underserved area would also include the Hispanic enclave to the northeast, the historically African American enclaves to the north of the I-15 and US – 95 interchange and the areas to the south along the Las Vegas Strip which include the areas previously mentioned as low in vehicle ownership. All of these neighborhoods would suffer in particular by a shortage of healthcare access because they also have less access to transportation to outlying areas.

There is one more shortage area to the southwest side of unincorporated Clark County, which is one of the newest established areas. This area is not high in minority residents or low-income and the shortage is probably due to the age of the area and the fact that it is still sparsely populated in sections.

Figure 60 Healthcare Shortage Areas



Exposure to Neighborhood Decline

The percent of vacant units in Southern Nevada is higher than the United States as a whole. In 2012, 17 percent of housing units were vacant, compared with 13 percent nationally in 2010. The majority of vacant units were condominiums (18 percent), followed by apartments (13 percent), townhouses (12 percent), and single-family units (11 percent). The substantial number of vacant units is concerning, as vacant units become vandalized or dilapidated, attract crime, contribute to neighborhood decline, and pose a threat to public safety.⁵³ Additionally, the cost burden of inspecting vacant units and mitigating unsafe conditions falls on local governments, which are already overburdened. Data from UNLV identifies nine zip codes in metropolitan Clark County that are at critically high risk for housing-related health hazards. Most of these fall under already identified vulnerable areas.

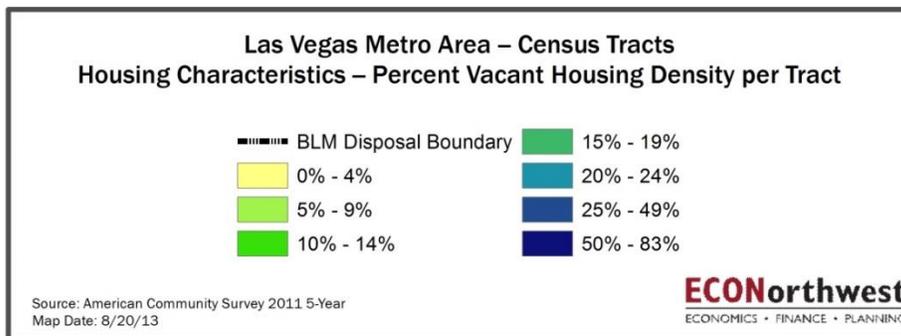
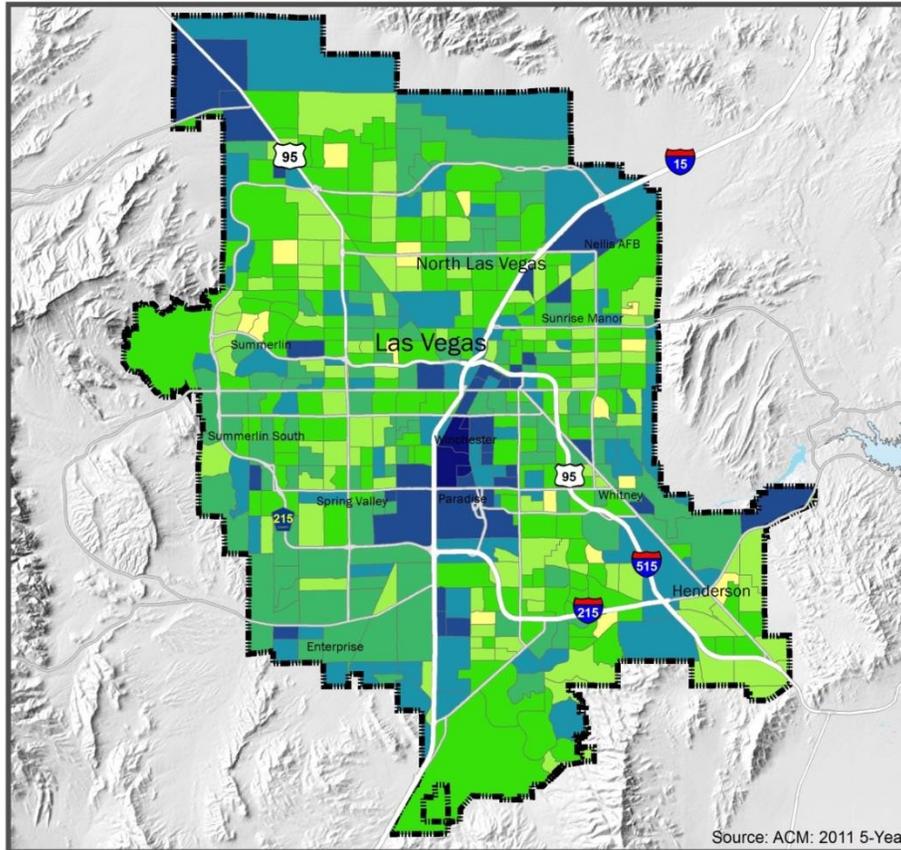
Neighborhood stability remains a pressing concern. Most home buying is taking place on the edges of the Las Vegas Valley, while investors are buying up properties in the core. As more and more homes in the downtown area are owned by absentee landlords, the threat of urban decay is ever present. The key to stopping this is for landlords to make long-term investments in their properties, and for local governments to step up code enforcement to keep these neighborhoods viable.^{54,55}

Some neighborhoods experienced decades of disinvestment even before the Great Recession began, but Southern Nevada had disproportionately high foreclosure rates and one of the largest decreases in housing values related to the foreclosure crisis. The Southern Nevada region is characterized by regional inequalities, with community risk heavily concentrated in some neighborhoods. In addition, the region has higher than average rates of crime and substance abuse, which can have negative effects on neighborhoods.

Figure 61 shows where the largest concentration of vacant housing exists. Most of these neighborhoods are south of US 95 and appear on both sides immediately off the Las Vegas Strip. These are not particularly high minority areas nor low income areas. A few of the neighborhoods are ones that experienced a large increase in home prices during the housing boom in 2006 and may be vacant due to current prices. They are also in areas which may not have large residential populations and therefore having some vacant homes may increase the percentage dramatically.

The other areas with large concentrations of vacant housing appear in the outlying newest suburban areas. These are not large minority areas, however they are some of the areas with a high percentage of female headed households. These vacancies are most likely due to the real estate fluctuations and are either foreclosures or homes where no one is living but are on the market.

Figure 61 Vacant Housing Densities

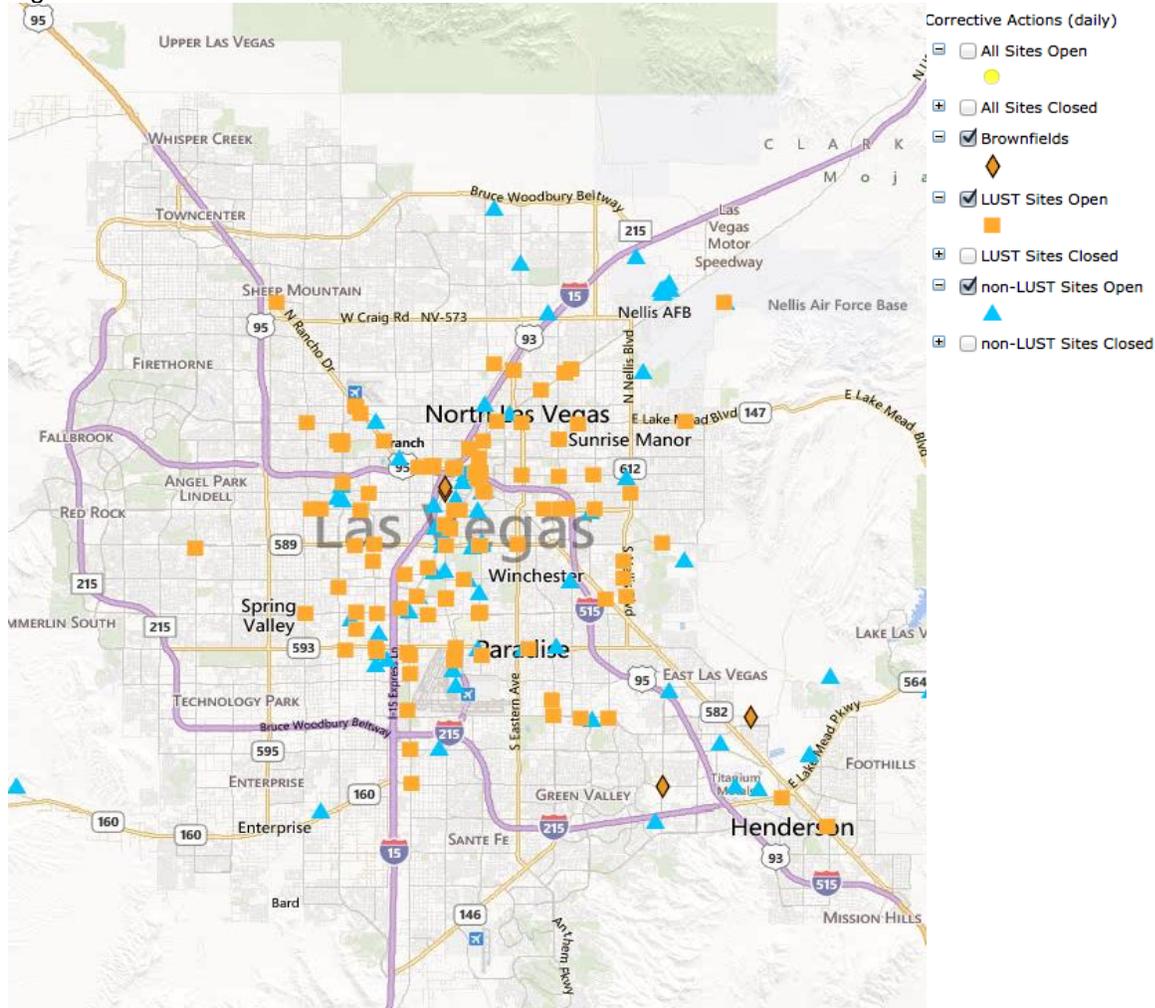


Brownfields

The region has a number of brownfields, which can impact public health at the site level. A brownfield site is any real property, the redevelopment or reuse of which may be complicated by the presence or potential presence of a contaminant, such as hazardous waste and/or petroleum. As shown in Figure 62, the region has approximately 165 brownfield sites, of which many are Leaking Underground Storage Tank (LUST) sites.^{56,57}

The sites are located throughout the urban core, especially along the highway lines and intersection of US 95 and I-15. These neighborhoods are once again some of the most vulnerable with many episodes of low opportunities. The areas surrounding the intersection, along with the areas to the south and east are high minority and low income areas.

Figure 62 Brownfields in Southern Nevada



Source: Nevada Department of Environmental Protection.

- ³² “Healthy Communities Atlas, San Diego Region, California” (2012). Prepared for the San Diego Association of Governments (SANDAG) by Urban Design 4 Health, Inc.
http://www.sandag.org/uploads/projectid/projectid_381_14233.pdf
- ³³ “Public High School Four-Year On-Time Graduation Rates and Event Dropout Rates: Schools Years 2010-2011 and 2011-2012.” (2014). National Center for Education Statistics. Retrieved on July 3, 2013 from
<http://nces.ed.gov/pubs2014/2014391.pdf>.
- ³⁴ The poverty threshold varies by size of family and number of related children. According to the U.S. Census Bureau, the poverty threshold for a single person under the age of 65 was \$12,119, for a family unit of two with one related child the threshold was \$16,057, and for a family unit of three with one related child the threshold was \$18,751.
- ³⁵ Ladd, H. (2012). Education and Poverty: Confronting the Evidence. *Journal of Policy Analysis and Management*, vol. 31, issue 2, pages 203-227. Retrieved on November 11, 2013 from
http://econpapers.repec.org/article/wlyjpmgt/v_3a31_3ay_3a2012_3ai_3a2_3ap_3a203-227.htm
- ³⁶ Planning/Communications, *Clark County, Nevada Analysis of Impediments to Fair Housing Choices 2011*, River Forest, IL: (April 2011) p. 40.
- ³⁷ Alemayehu Bishaw, “Poverty 2000 to 2012 American Community Survey Briefs,” (September, 2013), p.1. U.S. Department of Commerce. Available online as a PDF file at <http://www.census.gov/prod/2013pubs/acsbr12-01.pdf>
- ³⁸ Southern Nevada Strong Existing Conditions Report. (2013).
- ³⁹ Southern Nevada Strong Existing Conditions Report. (2013).
- ⁴⁰ According to the RTC and the FTA’s National Transit Database, Clark County’s transit system was 1st in the nation on cost per trip.
- ⁴¹ “Selected Housing Characteristics,” DP04, *American Community Survey 1-year Estimates 2010 and 2012*
- ⁴² Southern Nevada Strong Existing Conditions Report. (2013).
- ⁴³ Southern Nevada Strong Existing Conditions Report. (2013).
- ⁴⁴ Southern Nevada Strong Existing Conditions Report. (2013).
- ⁴⁵ Southern Nevada Strong Existing Conditions Report. (2013).
- ⁴⁶ Southern Nevada Strong Existing Conditions Report. (2013).
- ⁴⁷ <https://www.census.gov/prod/2012pubs/p70-133rv.pdf>
- ⁴⁸ Substance Abuse and Mental Health Services Administration
- ⁴⁹ Substance Abuse and Mental Health Services Administration
- ⁵⁰ Crime data in the U.S. <http://www.fbi.gov/about-us/cjis/ucr/crime-in-the-u.s/2012/crime-in-the-u.s.-2012/tables/6tabledatadecpdf/table-6>
- ⁵¹ Center for Disease Control. Regular Check-Ups are Important. Retrieved on November 11, 2013 from <http://www.cdc.gov/family/checkup/>.
- ⁵² Lowery, A., Pear, R. (2012). Doctor shortage to worsen with health law. *The New York Times*. Retrieved on November 11, 2013 from http://www.nytimes.com/2012/07/29/health/policy/too-few-doctors-in-many-us-communities.html?_r=0
- ⁵³ GAO, 2011.
- ⁵⁴ Nexus 8: The Las Vegas housing market. (2011). Black Mountain Lectures Event. Retrieved on November 11, 2013 from http://digitalscholarship.unlv.edu/blackmountain_lectures_events/86/
- ⁵⁵ Federal Reserve. Patterns of Post-Foreclosure Neighborhood Investment. Retrieved on November 11, 2013 from <http://www.federalreserve.gov/newsevents/conferences/Feb-26-Panel-1.pdf>
- ⁵⁶ Southern Nevada Strong Existing Conditions Report. (2013).
- ⁵⁷ <http://ndep-emap.nv.gov/eMap/>

6. FAIR HOUSING STATUS

Fair Housing Compliance and Infrastructure

The federal Fair Housing Act prohibits discrimination in housing based on one's race, color, national origin, religion, sex, family status (presence of children under the age of 18), and disability. In addition, persons with disabilities have the right to request reasonable accommodations and reasonable modifications that will allow them to enjoy the full benefit of their housing.

The Fair Housing Act provides that a person who experiences housing discrimination has the right to file a housing discrimination claim with the U.S. Department of Housing and Urban Development (HUD) or to pursue legal action. The law provides up to a year from the last incident of discrimination to file a complaint with HUD and up to two years to file litigation in federal court. Residents of Clark County who believe they have experienced discrimination may report their complaints to HUD's Office of Fair Housing and Opportunity (FHEO) or Silver State Fair Housing Council, who will provide assistance with filing complaints with HUD.

Table 67 Fair Housing Complaints for Clark County, NV 2010-2013 as reported by HUD

	Total Number	Based on Race or National Origin	Based on Disability Status	Based on Familial Status
Complaints filed for Clark County, NV (all jurisdictions)	142	39	91	12

As Tables 67 and 68 show, the majority of complaints in Clark County from 2010 - 2013 were based on disability status, although a significant amount of complaints were also filed based on race, national origin, and familial status. When broken down by jurisdiction, there does not appear to be a pattern of issues, but rather, the more populated areas have more complaints than the less populated areas. The two jurisdictions with the least amount of minority population, Henderson and Boulder City, have no complaints based on race, but it is unknown if that is simply due to the smaller overall numbers of minority residents.

Table 68 Fair housing complaints by Jurisdiction, 2010-2013, as reported by Silver State Fair Housing Council

Basis of Complaint	Unincorporated Clark County	Boulder City	City of Henderson	City of Las Vegas	City of North Las Vegas
Race	8	0	0	7	2
Color	0	0	0	0	0
Religion	0	0	0	2	0
Sex	3	0	1	1	0
National Origin	1	0	1	2	0
Familial Status	0	0	0	2	0
Disability	15	1	4	18	1
Ancestry	0	0	0	0	0
Sexual Orientation	0	0	0	0	0
Gender Identity/Expression	0	0	0	0	0
Other (Age)	1	0	0	0	0
Total	28	1	6	32	3

Silver State Fair Housing Council (SSFHC) is a private nonprofit agency that advocates for equal housing opportunity in Nevada. SSFHC provides fair housing information and assistance to housing consumers and providers. SSFHC does not have an attorney on staff to provide legal advice, but is able to provide general information, referrals, and assistance in filing housing discrimination claims with the U.S. Department of Housing & Urban Development (HUD).

Silver State Fair Housing Council also offers training and educational opportunities to the public and housing providers on fair housing. Social Service providers and community groups often work individually with clients who may encounter housing problems and training can help them identify when an individual or family may need to be referred to a fair housing agency. SSFHC has also begun a public awareness campaign to create an understanding of what constitutes fair housing issues and where residents can go for assistance if they feel they have been discriminated against. SSFHC is using billboards and posters in areas that are served by the protected classes, such as neighborhoods, transit stops, and community buildings.

Additionally, SSFHC provides training for public and private housing providers designed for real estate professionals, property managers, homeowners associations, and public housing resource professionals. Topics include basic fair housing information, families with children, advertising, and fair housing protections for persons with disabilities. These topics are also offered in a Spanish class.

SSFHC's "Fair Housing Act Accessibility Guidelines Training" is a comprehensive overview of the seven design requirements of the Fair Housing Act's accessibility guidelines. The course is instructed by a licensed architect and is targeted to architects, developers, real estate professionals, attorneys and advocates.

SSFHC also conducts periodic testing of the housing market to determine the nature and extent of discriminatory treatment accorded to home seekers. Two individuals, alike in every aspect except the variable being tested, are sent to the rental or sales office. These testers play the role of home seekers and make objective reports of what transpires. Any differences in treatment may form the basis for successful resolution of a housing discrimination complaint.

The Financial Guidance Center (FGC) is a HUD approved, non-profit NFCC member United Way Agency that provides financial counseling and education services to the public. They serve Southern and Northern Nevada as well as Utah. SSFHC has worked with FGC on fair housing lending education activities.

The state of Nevada does have its own state housing discrimination law that includes the federal classes, but also includes sexual orientation and gender identity or expression. However, this portion of the Nevada Equal Rights Commission is not allotted any funding under Nevada State Law for housing discrimination complaints, so all complaints are sent to HUD for filing under the federal law. In addition, Nevada State Law also includes protections based on ancestry, sexual orientation and gender identity or expression, for which SSFHC also provides assistance.

Several of the jurisdictions provided funding to support fair housing enforcement and education during the current Consolidated Plan cycle. Clark County has a \$125,000 annual contract with Silver State Fair Housing Council for employee training, public outreach, fair housing complaints, and fair housing testing for the unincorporated areas as well as the cities of Boulder City and Mesquite. The City of Henderson committed \$55,000 of CDBG funds to also contract with Silver State Fair Housing Council to assist the City to support fair housing education, including City staff training, community outreach events, a bus ad campaign and a fair housing hotline where residents can report fair housing complaints. The City of Las Vegas has not allocated funds toward fair housing specifically; however, they do intend to contract with a fair housing provider to ensure implementation of activities to further fair housing in Las Vegas consistent with the recommendations of this Regional AI. North Las Vegas and Boulder City have not allocated funds toward fair housing enforcement or education; however, North Las Vegas employees and CDBG recipients have participated in fair housing education and training sessions with SSFHC.

A sampling of fair housing complaints received by the SFHCC from January 1, 2010 through December 31, 2013, involving properties in unincorporated Clark County, Boulder City, Henderson, Las Vegas and North Las Vegas, include:

- A single African American male with disabilities living in an apartment alleged that he was the subject of intimidation and harassment by the property manager because of his religion and his disabilities. In his fair housing complaint, forwarded to the Region IX Office of Fair Housing and Equal Opportunity at the U.S. Department of Housing and Urban Development (HUD) with the assistance of Silver State Fair Housing Council, the tenant alleged that the property manager made negative comments about his religion, and tried on multiple occasions to steer him out of his handicap-accessible unit. He further alleged that his refusal to move to another unit resulted in a 30-day no-cause

eviction notice. The tenant successfully contested the eviction notice and his complaint was conciliated by HUD.

(FHOI11004)

- Silver State Fair Housing Council (SSFHC) received a complaint from a married Hispanic woman who alleged that the management at her apartment complex continually cited her for breaking rules, having unauthorized people in her apartment, and charged her for fees she already paid. The tenant denied breaking the rules and stated that the “unauthorized people” are her two teen-age sons. The tenant further alleged that most of the tenants at the complex were Caucasian, but all of the tenants in her building, save one, were Hispanic or African American. Several appointments were made by SSFHC to assist the tenant in filing a housing discrimination complaint, based on her belief that she was being harassed based on her national origin and familial status. The tenant failed to follow through with a complaint.
(PEI08054)
- An 81 year-old homeowner with multiple disabilities requested that a homeowner association allow him to make reasonable modifications to his townhouse to alleviate the outcomes of his disabilities. Specifically, he requested that he be allowed to install larger windows to allow more light into the unit and a sliding door in place of a traditional hung door to limit a tendency to wander. The request was initially approved by the homeowner association, but approval was later withdrawn, despite the homeowner providing copies of modification plans and a note from the homeowner’s doctor regarding the benefit of the modifications. Silver State Fair Housing Council sent a follow-up request to the homeowner association, seeking to facilitate a resolution. No reply was received. The homeowner and his son, who also resided at the townhouse, filed a complaint with the Region IX Office of Fair Housing and Equal Opportunity at the U.S. Department of Housing and Urban Development (HUD). After approximately 18 months, the complaint was closed by HUD with a determination of No Reasonable Cause.
(PEI08076)
- To alleviate the outcomes of her disability, a Native American female veteran was prescribed a companion/service dog by her doctor. When she moved into a new apartment prior to receiving her dog, the tenant informed management that she would be getting the trained dog, requested that a “no pets” policy be waived as a reasonable accommodation, and provided a note from her doctor verifying her need for the animal. The tenant alleged that she was told by management that the housing was “federally funded; we don’t have to follow those laws.” When the tenant received her dog and attempted to return to her apartment, management refused to allow her in until police were called. Under threat of eviction, the tenant removed the dog from the property the next day. A housing discrimination complaint filed with the Region IX Office of Fair Housing and Equal Opportunity at the U.S. Department of Housing and Urban Development (HUD) was closed with a determination of No Reasonable Cause.
(PEI08125)
- Silver State Fair Housing Council (SSFHC) received a referral from legal services regarding a single White female with disabilities living in transitional housing. The tenant was prescribed a hospital bed by her doctor to address some of the outcomes of her disabilities. Management was informed that she needed the bed and raised no issues until the bed was to be delivered. The tenant alleged that she was informed by

management that she would be considered a liability because of the risk of her falling out of the bed and was given a verbal 60-day notice to move. Fearing that her chance for permanent housing would be affected by the threatened eviction, the tenant requested that SSFHC write a follow-up request to be allowed to have the bed and rescind the verbal eviction. When the request was still not granted, SSFHC referred the tenant to a SSFHC cooperating attorney, who was able to get the tenant her bed and negotiate a time frame for moving her to permanent housing.

(FHOI11002)

- A single White female with a disability had difficulty walking long distances and needed a parking space closer to her apartment. After periodically requesting unsuccessfully that management reasonably accommodate her disability by assigning a closer parking space, the tenant appealed to Silver State Fair Housing Council (SSFHC) for assistance. A follow-up request was sent to management by SSFHC, seeking to facilitate a resolution. Within one week, the tenant was assigned a parking space closer to her unit than the space she originally requested. The tenant stated to SSFHC staff, “What I couldn’t do in a year, you guys helped me do in 24 hours.”
(FHOI11005)
- A Public Housing Authority (PHA) notified a Section 8 voucher recipient that her voucher for a two-bedroom unit would be rescinded and replaced with a voucher for a one-bedroom unit. The voucher holder, a single African American female with disabilities, stated that she needed the second bedroom for medical equipment related to her disability. After receiving a follow-up request for reasonable accommodation from Silver State Fair Housing Council, the PHA reinstated the two-bedroom voucher.
(FHOI11010)
- A family renting a single family home in a development governed by a homeowner association requested that the association provide a reasonable accommodation by waiving its ban on “commercial” vehicles parked in a residential zone to allow them to park their privately owned ambulance at their home. The ambulance was needed to transport their son, who, due to his disability, can only be transported in a prone position. After the request was denied, the family filed a complaint with the Region IX Office of Fair Housing and Equal Opportunity at the U.S. Department of Housing and Urban Development (HUD). They also contacted Silver State Fair Housing Council (SSFHC) regarding a referral to a SSFHC cooperating attorney. Represented by counsel in the complaint process, the family’s case was conciliated by HUD for \$65,000.
(PEI11064)
- Silver State Fair Housing Council assisted a single bi-racial woman to file a complaint of discrimination based on sex with the Region IX Office of Fair Housing and Equal Opportunity at the U.S. Department of Housing and Urban Development (HUD). The tenant alleged that she was harassed by the owners of the single family home she was renting after she informed them that her male roommate had moved out. She alleged that a male property owner entered the home several times without prior notice and that he commented to her that he does not like renting to women due to his belief that women are unable to maintain or repair property. The case was successfully conciliated by HUD.
(FHOI11041)
- A single African American male alleged that he and his girlfriend were being treated differently from other tenants at an apartment complex because of their race. His

complaint, filed with the Region IX Office of Fair Housing and Equal Opportunity at the U.S. Department of Housing and Urban Development (HUD), alleged that the tenant had a series of disputes with neighbors regarding alleged noise violations. After he complained to management about the incidents, the tenant received an eviction notice. He alleged that one of the neighbors, who is not African American, made similar complaints but was not evicted. Also cited in the complaint was an allegation by the tenant that the property owner went to his girlfriend's place of employment and berated her about the situation, using at least one racial slur. HUD did not open an investigation, citing Lack of Jurisdiction.

(FHOI11044)

- A group of homeowners in a development governed by a homeowner association opposed the opening of a group home for persons with disabilities in the neighborhood. The operator of the group home received a "cease and desist" letter from an attorney stating that the group home was a business and that Codes, Covenants & Restrictions forbid operation of a business. The letter also requested production of numerous documents that the operator felt was burdensome and heavy-handed. Subsequently, a group of neighborhood homeowners filed complaints with the County, trying to stop the group home from opening. With assistance from Silver State Fair Housing Council and one of its cooperating attorneys, the group home operator was able to educate County staff about the fair housing rights of group homes, and was allowed to open. A complaint was filed with the Region IX Office of Fair Housing and Equal Opportunity at the U.S. Department of Housing and Urban Development (HUD) regarding alleged ongoing harassment by some of the neighbors.
(Clark12005)
- A single White male with a disability was served with an eviction notice by his landlord after he refused to allow housing inspectors access to his apartment for a follow-up inspection. The tenant alleged that he had made a verbal request for reasonable accommodation to be allowed to have inspections scheduled in the afternoon, due to the outcomes of his disability that limit his ability to make morning appointments. After receiving a follow-up request for reasonable accommodation from Silver State Fair Housing Council, management granted the tenant's request and rescinded the eviction.
(Clark12008)
- After his request to be allowed to install a chair lift to allow him access to his second floor unit was put on hold by his homeowner association, a homeowner with disabilities contacted Silver State Fair Housing Council (SSFHC) regarding his immediate need for the proposed modification. The agency sent a follow-up letter to the homeowner association and its management company. An email response indicated that the request would be approved, provided that the homeowner sign an insurance waiver. Believing that this would be an overly burdensome requirement, and unnecessary, the homeowner consulted with a SSFHC cooperating attorney, who was able to get the condition removed.
(Clark12010)
- A single Hispanic female alleged that she was sexually harassed by a maintenance worker at her apartment complex. She reported the behavior, including inappropriate language, touching and offers of favors in return for sex, to management. Nothing was done. Assisted by Silver State Fair Housing Council, the tenant filed a complaint of sex discrimination with the Region IX Office of Fair Housing and Equal Opportunity at the

U.S. Department of Housing and Urban Development (HUD). She later withdrew her claim.

(Clark12016)

- Silver State Fair Housing Council received a complaint from an African American male, alleging that he was steered to an inferior unit when he moved into his apartment complex. Believing that he was steered based on his race, and alleging that management has become defensive toward him since he raised the issue, he filed a complaint with the Region IX Office of Fair Housing and Equal Opportunity at the U.S. Department of Housing and Urban Development (HUD).

(Clark12018)

Based on the interviews and complaints files, it appears there is still an issue with private management companies and homeowner associations understanding the fair housing law especially as it relates to disabled residents and the requirement to make reasonable accommodation. SSFHC has begun training for these fields as well as public service advertising to help make more people aware, and they should continue in this endeavor. It is unclear if there is any systemic problem in racial/ethnic steering and further testing should be completed.

SUGGESTIONS FOR FURTHERING FAIR HOUSING:

- ❖ *The region should attempt to make changes to the funding structure for the Nevada Equal Rights Commission to secure some amount of funding for authority over the State Fair Housing law.*
- ❖ *Silver State Fair Housing Council has expanded in recent years in jurisdictional coverage as well as their ability to help clients pursue legal remedies, provide training and mediation, and testing where necessary. Funding should be expanded to allow SSFHC to continue these services and expand as necessary.*
- ❖ *The region should secure funding (possibly in conjunction with SSFHC) to more comprehensively study the subject of steering in the Region.*
- ❖ *There is little understanding of how domestic violence victims are discriminated against and this should be studied closer in the future.*

Lending Analysis

Conventional home mortgages

The results of applications for conventional home mortgages during the years 2011-2012 were analyzed for the purposes of this study for each jurisdiction. The full application results can be found in Appendix A, however the number of total applications, number of loans issued and denied, and percentage of loans issued and denied are found in the tables below for each jurisdiction. The tables below do not add up to 100% because the withdrawn and incomplete applications were not included but can be found in the Appendix A tables.

Table 69 shows the results for unincorporated Clark County. The results show that the percentage issued and denied based on race and ethnicity are not much different in 2012 at 67.7% Caucasian, 63% African American, and 65.6% Hispanic. However, in 2011, the percentage issued for African American fell to 44.0%, which may be due to the much lower number of applications that year (25 applications for African Americans in 2011 versus 119 applications in 2012). This may be due to the overall slowdown in the economy that year. The differences between the Hispanics and Caucasians for 2011 were small at 63.5% and 64.8% respectively. The differences between the genders do not differ much in Clark County for either year.

Table 69 Unincorporated Clark County: Results of Applications for Conventional Home Mortgages, 2011–2012					
Reporting Year: 2012					
Race/Ethnicity	Total Applications	Number Issued	Number Denied	Percent Issued	Percent Denied
Hispanic of Any Race	384	252	87	65.6%	22.7%
American Indian or Alaskan Eskimo	12	8	3	66.7%	25.0%
Asian	729	478	133	65.6%	18.2%
Black or African American	119	75	26	63.0%	21.8%
Native Hawaiian / Pacific Islander	63	41	15	65.1%	23.8%
White (non-Hispanic)	1,979	1,340	344	67.7%	17.4%

Race Unknown	316	182	60	57.6%	19.0%
All Men	2,235	1,504	397	67.3%	17.8%
All Women	1,172	785	225	67.0%	19.2%
Total (Does Not Include Gender Rows)	3,602	4,665	1,290	129.5%	35.8%
Reporting Year: 2011					
Race/Ethnicity	Total Applications	Number Issued	Number Denied	Percent Issued	Percent Denied
Hispanic of Any Race	197	125	40	63.5%	20.3%
American Indian or Alaskan	6	0	2	0.0%	33.3%
Asian	189	124	29	65.6%	15.3%
African American or African American	25	11	6	44.0%	24.0%
Native Hawaiian / Pacific Islander	11	7	1	63.6%	9.1%
White (non-Hispanic)	554	359	91	64.8%	16.4%
Race Unknown	72	41	14	56.9%	19.4%
All Men	644	412	111	64.0%	17.2%
All Woman	364	231	62	63.5%	17.0%
Total (Does Not Include Gender Rows)	1,054	667	183	63.3%	17.4%

Source: Home Mortgage Disclosure Act Table 4-2 for Unincorporated Clark County, Nevada. Data provided by Reinvestment Partners.

North Las Vegas experienced a similar dichotomy as shown in Table 70. For 2012, the differences in loan issuance rates are fairly steady across the Hispanic, African American, and Caucasian population, although it should be noted that the denial rate was much lower in the Caucasian category (12.5% versus 18.4% and 21.0%). In 2011 however, the applications were much lower in number and had a much greater difference between the races for issuance rates. The Caucasian category was issued loans at a 74.2% rate, while African Americans were at 50% and Hispanics at 55.2%. The differences between the genders was again little, if any for either year.

Table 70 North Las Vegas: Results of Applications for Conventional Home Mortgages, 2011-2012					
Reporting Year: 2012					
Race/ Ethnicity	Total Applications	Number Issued	Percent Issued	Number Denied	Percent Denied
Hispanic of Any Race	163	114	69.9%	30	18.4%
American Indian or Alaskan Eskimo	1	1	100.0%	0	0.0%
Asian	40	28	70.0%	8	20.0%
Black or African American	62	45	72.6%	13	21.0%
Native Hawaiian / Pacific Islander	20	17	85.0%	3	15.0%
White (non-Hispanic)	345	253	73.3%	43	12.5%
Race Unknown	37	28	75.7%	7	18.9%
All Men	397	278	70.0%	68	17.1%
All Women	248	192	77.4%	30	12.1%
Total (Does Not Include Gender Rows)	668	486	72.8%	104	15.6%

Reporting Year: 2011					
Race/ Ethnicity	Total Applications	Number Issued	Percent Issued	Percent Denied	Number Denied
Hispanic of Any Race	29	16	55.2%	17.2%	5
American Indian or Alaskan	0	0	0.0%	0.0%	0
Asian	4	4	100.0%	0.0%	0
Black or African American	4	2	50.0%	25.0%	1
Native Hawaiian / Pacific Islander	4	3	75.0%	25.0%	1
White (non-Hispanic)	31	23	74.2%	3.2%	1
Race Unknown	9	7	77.8%	0.0%	0
All Men	47	32	68.1%	10.6%	5
All Woman	27	18	66.7%	11.1%	3
Total (Does Not Include Gender Rows)	81	55	67.9%	9.9%	8

Source: Home Mortgage Disclosure Act Table 4-2 for North Las Vegas, Nevada. Data provided by Reinvestment Partners.

In the City of Las Vegas, for 2012, the African American and Hispanic loan issuance rates are noticeably lower than the Caucasian rate at 63.6% and 59.2% versus 69.9% for Caucasians. The denial rates for Hispanics are noticeably higher at 23.1% versus 14.5% for Caucasians and 13.6% for African Americans.

In 2011, the Hispanic loan issuance rate is lower than the Caucasian at 57.0% versus 66.0% and the denial rates higher at 23.4% versus 14.8% for Caucasians. As we have seen in the other jurisdictions, 2011 had a much smaller number of applicants and only 21 total applications were for African Americans.

Table 71 Las Vegas, Results of Applications for Conventional Home Mortgages, 2011-2012

Reporting Year: 2012					
Race/Ethnicity	Total Applications	Number Issued	Percent Issued	Number Denied	Percent Denied
Hispanic of Any Race	260	154	59.2%	60	23.1%
American Indian or Alaskan Eskimo	8	3	37.5%	2	25.0%
Asian	214	127	59.3%	46	21.5%
Black or African American	88	56	63.6%	12	13.6%
Native Hawaiian / Pacific Islander	19	14	73.7%	3	15.8%
Caucasian (non-Hispanic)	1,682	1,176	69.9%	244	14.5%
Race Unknown	205	107	52.2%	51	24.9%
All Men	1,547	1,046	67.6%	254	16.4%
All Women	799	528	66.1%	132	16.5%
Total (Does Not Include Gender Rows)	2,476	1,637	66.1%	418	16.9%
Reporting Year: 2011					
Race/Ethnicity	Total Applications	Number Issued	Percent Issued	Number Denied	Percent Denied
Hispanic of Any Race	107	61	57.0%	25	23.4%
American Indian or Alaskan	6	3	50.0%	2	33.3%
Asian	92	60	65.2%	12	13.0%

Black or African American	21	13	61.9%	2	9.5%
Native Hawaiian / Pacific Islander	12	9	75.0%	2	16.7%
Caucasian (non-Hispanic)	648	428	66.0%	96	14.8%
Race Unknown	70	40	57.1%	21	30.0%
All Men	582	382	65.6%	91	15.6%
All Woman	343	215	62.7%	61	17.8%
Total (Does Not Include Gender Rows)	956	614	64.2%	160	16.7%

Source: Home Mortgage Disclosure Act Table 4–2 for Las Vegas, Nevada. Data provided by Reinvestment Partners.

Table 72 below, shows that the numbers of applications in Boulder City for any race other than Caucasian is so low, that we cannot make any assumptions based on loan denial or acceptance rates. It is interesting, though to note the low numbers and wonder why there are not more applications to live in Boulder City from other races and ethnicities. There may be issues as to why other races do not choose to move to Boulder City and these issues are explored in other areas of this report.

Table 72 Boulder City, Results of Applications for Conventional Home Mortgages, 2011-2012					
Reporting Year: 2012					
Race/Ethnicity	Total Applications	Number Issued	Percent Issued	Number Denied	Percent Denied
Hispanic of Any Race	3	3	100.0%	0	0.0%
American Indian or Alaskan Eskimo	1	0	0.0%	0	0.0%
Asian	0	0	0.0%	0	0.0%
Black or African American	0	0	0.0%	0	0.0%

Native Hawaiian / Pacific Islander	0	0	0.0%	0	0.0%
Caucasian (non-Hispanic)	43	26	60.5%	8	18.6%
Race Unknown	2	2	100.0%	0	0.0%
All Men	35	21	60.0%	7	20.0%
All Women	12	8	66.7%	1	8.3%
Total (Does Not Include Gender Rows)	49	31	63.3%	8	16.3%
Reporting Year: 2011					
Race/Ethnicity	Total Applications	Number Issued	Percent Issued	Number Denied	Percent Denied
Hispanic of Any Race	2	1	50.0%	0	0.0%
American Indian or Alaskan Eskimo	1	1	100.0%	0	0.0%
Asian	0	0	0.0%	0	0.0%
Black or African American	0	0	0.0%	0	0.0%
Native Hawaiian / Pacific Islander	0		0.0%	0	0.0%
Caucasian (non-Hispanic)	38	29	76.3%	3	7.9%
Race Unknown	4	1	25.0%	0	0.0%
All Men	34	25	73.5%	1	2.9%
All Woman	10	7	70.0%	2	20.0%
Total (Does Not Include Gender Rows)	45	32	71.1%	3	6.7%

Source: Home Mortgage Disclosure Act Table 4-2 for Boulder City, NV. Data provided by Reinvestment Partners.

The City of Henderson had noticeably different results for loans issued based on race/ethnicity as well as number of total applications. There were 1,450 total applications for Caucasians in 2012 versus 122 for Hispanics and only 24 for African Americans. The loan issuance rates were 72.7% for Caucasians, 59.0% for Hispanics, and 54.2% for African Americans. The denial rates were 13.9% for Caucasians, 16.7% for African Americans, and 23.8% for Hispanics.

The 2011 percentage results were vastly different (89% loan issuance rates for African Americans versus 70.2% for Caucasians), however, we again see that the total number of loan applications were very low, especially in the minority categories (9 total applications for African Americans).

Table 73 Henderson: Results of Applications for Conventional Home Mortgages, 2011-2012					
Reporting Year: 2012					
Race/Ethnicity	Total Applications	Number Issued	Percent Issued	Number Denied	Percent Denied
Hispanic of Any Race	122	72	59.0%	29	23.8%
American Indian or Alaskan Eskimo	7	2	28.6%	3	42.9%
Asian	154	108	70.1%	20	13.0%
Black or African American	24	13	54.2%	4	16.7%
Native Hawaiian / Pacific Islander	17	11	64.7%	3	17.6%
Caucasian (non-Hispanic)	1,450	1,054	72.7%	202	13.9%
Race Unknown	173	111	64.2%	29	16.8%
All Men	1,337	953	71.3%	198	14.8%
All Women	502	348	69.3%	68	13.5%
Total (Does Not Include Gender)	1,947	1,371	70.4%	290	14.9%

Reporting Year: 2011					
Race/Ethnicity	Total Applications	Number Issued	Percent Issued	Number Denied	Percent Denied
Hispanic of Any Race	47	30	63.8%	11	23.4%
American Indian or Alaskan	3	1	33.3%		0.0%
Asian	48	32	66.7%	10	20.8%
Black or African American	9	8	88.9%	0	0.0%
Native Hawaiian / Pacific Islander	8	3	37.5%	2	25.0%
Caucasian (non-Hispanic)	396	278	70.2%	51	12.9%
Race Unknown	50	37	74.0%	7	14.0%
All Men	330	221	67.0%	50	15.2%
All Woman	194	141	72.7%	26	13.4%
Total (Does Not Include Gender Rows)	561	389	69.3%	81	14.4%
Source: Home Mortgage Disclosure Act Table 4-2 for Henderson, Nevada. Data provided by Reinvestment Partners.					

It is important to note, that regionally, it appears that Caucasians had a higher percentage of Conventional Loans issued in 2012 compared to African Americans and Hispanics as well as a fewer number actually denied. It is important to compare both numbers because some that are not denied but considered incomplete or withdrawn may come back to be either approved or denied in subsequent years. It is not clear however, why these rates are this way. There could be issues of unfair loan application processes, but it could also be many other socio-economic issues causing these such as lower incomes for minorities and higher unemployment that are explored throughout this document. Furthermore, the economic downturn that was still affecting the marketplace in 2011 makes the 2011 data very unreliable. It seems to speak mostly to the fact that there were very few loan applications that year overall, but it is interesting to note the extremely small numbers seen by minority loan applicants which may indicate the recession and home price crises was felt more by minority home owners.

***SUGGESTION:** A further complete and statistically significant study should be completed looking at the loan approval rates based on minority status to see if there are significant differences that could be attributed to unfair lending practices.*

FHA home mortgages

FHA, FSA/RHS, and VA Home Mortgages are loans that are federally insured and tend to be more easily issued in lower income or lower credit score situations. In Clark County, for 2012, loans for Caucasians were issued at 69.4%, African Americans at 66.6% and Hispanics at 63.4%, indicating a slightly higher loan issuance rates for Caucasians. The denial rates were only slightly lower for Caucasians at 16.0% versus 18.3% for African Americans and 18.7% for Hispanics. There was no discernable gender difference in either the loan issuance rate or the denial rate.

In 2011, there were more applications submitted than in the Conventional Loan category and there was an even smaller difference in issuance rates at 72.4% for Caucasians, 68.4% for African Americans and 66.7% for Hispanics. The denial rates were 12.5% for Caucasians, 15.4% for African American, and 14.7% for Hispanics.

Table 74 Unincorporated Clark County: Results of Applications for FHA, FSA/RHS, and VA Home Mortgages Home Mortgages, 2011–2012					
Reporting Year: 2012					
Race/Ethnicity	Total Applications	Number Issued	Number Denied	Percent Issued	Percent Denied
Hispanic of Any Race	1,709	1,084	320	63.4%	18.7%
American Indian or Alaskan Eskimo	17	10	6	58.8%	35.3%
Asian	934	620	174	66.4%	18.6%
Black or African American	377	251	69	66.6%	18.3%
Native Hawaiian / Pacific Islander	167	119	27	71.3%	16.2%
Caucasian (non-Hispanic)	3,260	2,264	520	69.4%	16.0%
Race Unknown	510	314	116	61.6%	22.7%
All Men	4,242	2,908	711	68.6%	16.8%
All Women	2,457	1,626	439	66.2%	17.9%

Total (Does Not Include Gender Rows)	6,974	4,662	1,232	66.8%	17.7%
Race/Ethnicity	Total Applications	Number Issued	Number Denied	Percent Issued	Percent Denied
Hispanic of Any Race	1,042	695	153	66.7%	14.7%
American Indian or Alaskan	9	5	1	55.6%	11.1%
Asian	221	140	42	63.3%	19.0%
Black or African American	117	80	18	68.4%	15.4%
Native Hawaiian / Pacific Islander	47	33	5	70.2%	10.6%
Caucasian (non-Hispanic)	1,114	807	139	72.4%	12.5%
Race Unknown	136	71	38	52.2%	27.9%
All Men	1,577	1,074	233	68.1%	14.8%
All Woman	1,026	711	141	69.3%	13.7%
Total (Does Not Include Gender Rows)	2,686	1,831	396	68.2%	14.7%

Source: Home Mortgage Disclosure Act Table 4-1 for Unincorporated Clark County, Nevada. Data provided by Reinvestment Partners.

Table 75 shows the results for FHA Mortgages for North Las Vegas for 2012. The Caucasian issuance rate was 73.0%, which fell to 67.1% for Hispanics and 64.3% for African Americans. The percentage denied was 14.4% for Caucasians, 18.7% for Hispanics, and 23.6% for African Americans. The issuance rates for 2011 were higher at 74.6% for Caucasians, 71.2% for Hispanics, and 70.5% for African Americans. The denial rates differed more at 12.0% for Caucasians, 14.1% for Hispanics, and 18.2% for African Americans. As we have throughout, there is no significant difference in either year between the genders

Table 75 North Las Vegas: Results of Applications for FHA, FSA/RHS, and VA Home Mortgages Home Mortgages, 2011–2012

Reporting Year: 2012

Race/Ethnicity	Total Applications	Number Issued	Percent Issued	Number Denied	Percent Denied
Hispanic of Any Race	715	480	67.1%	134	18.7%
American Indian or Alaskan Eskimo	6	4	66.7%	2	33.3%
Asian	139	100	71.9%	21	15.1%
Black or African American	373	240	64.3%	88	23.6%
Native Hawaiian / Pacific Islander	43	31	72.1%	8	18.6%
Caucasian (non-Hispanic)	1,051	767	73.0%	151	14.4%
Race Unknown	195	123	63.1%	39	20.0%
All Men	1,582	1,098	69.4%	278	17.6%
All Women	819	573	70.0%	142	17.3%
Total (Does Not Include Gender Rows)	2,522	1,745	69.2%	443	17.6%
Reporting Year: 2011					
Race/Ethnicity	Total Applications	Number Issued	Percent Issued	Number Denied	Percent Denied
Hispanic of Any Race	163	116	71.2%	23	14.1%
American Indian or Alaskan	1	1	100.0%		0.0%
Asian	22	16	72.7%	3	13.6%
Black or African American	44	31	70.5%	8	18.2%
Native Hawaiian / Pacific Islander	6	5	83.3%	0	0.0%

Caucasian (non-Hispanic)	142	106	74.6%	17	12.0%
Race Unknown	34	20	58.8%	9	26.5%
All Men	233	169	72.5%	37	15.9%
All Woman	162	118	72.8%	18	11.1%
Total (Does Not Include Gender Rows)	412	295	71.6%	60	14.6%

Source: Home Mortgage Disclosure Act Table 4-1 for North Las Vegas, Nevada. Data provided by Reinvestment Partners.

In the City of Las Vegas for 2012, the loan issuance rate for FHA, FSA/RHS and VA Home Mortgages were 71.7% for Caucasians, 60.4% for African Americans, and 64.6% for Hispanics. The percent denied were 14.9% for Caucasians, 16.9% for Hispanics and 23.8% for African Americans, almost a full 10 percentage points higher than for Caucasians. In 2011, the loan issuance rate differs less between the races, but the denial rate is still significantly different. Loans for Caucasians were issued at 68.9%, Hispanics at 66.1%, and African Americans at 64.4%. The denial rates were 13.3% for Caucasians, 15.7% for Hispanics, and 22.2% for African Americans.

Table 76 Las Vegas: Results of Applications for FHA, FSA/RHS, and VA Home Mortgages Home Mortgages, 2011–2012

Reporting Year: 2012					
Race/Ethnicity	Total Applications	Number Issued	Percent Issued	Number Denied	Percent Denied
Hispanic of Any Race	869	561	64.6%	147	16.9%
American Indian or Alaskan Eskimo	20	13	65.0%	5	25.0%
Asian	247	159	64.4%	54	21.9%
Black or African American	265	160	60.4%	63	23.8%
Native Hawaiian / Pacific Islander	54	34	63.0%	7	13.0%
Caucasian (non-Hispanic)	2,442	1,751	71.7%	365	14.9%
Race Unknown	370	222	60.0%	87	23.5%
All Men	2,727	1,873	68.7%	449	16.5%
All Women	1,346	920	68.4%	231	17.2%
Total (Does Not Include Gender Rows)	4,267	2,900	68.0%	728	17.1%
Reporting Year: 2011					
Race/Ethnicity	Total Applications	Number Issued	Percent Issued	Number Denied	Percent Denied
Hispanic of Any Race	460	304	66.1%	72	15.7%
American Indian or Alaskan	3	2	66.7%	1	33.3%
Asian	101	65	64.4%	16	15.8%
Black or African American	90	58	64.4%	20	22.2%

Native Hawaiian / Pacific Islander	20	14	70.0%	1	5.0%
Caucasian (non-Hispanic)	915	630	68.9%	122	13.3%
Race Unknown	117	69	59.0%	18	15.4%
All Men	1,046	720	68.8%	148	14.1%
All Woman	588	374	63.6%	95	16.2%
Total (Does Not Include Gender Rows)	1,706	1,142	66.9%	250	14.7%

Source: Home Mortgage Disclosure Act Table 4-1 for Las Vegas, Nevada. Data provided by Reinvestment Partners.

In Henderson for 2012, the FHA loan issuance rate was very similar across the races. The rate was 71.4% for Caucasians, 70.0% for Hispanics, and 69.9% for African Americans. The denial rates were also similar at 14.7% for Caucasians, 15.4% for African Americans, and 17.9% for Hispanics. The 2011 rates showed a slightly higher variation in issuance rate, but still a small difference in denial percentages. Caucasians were issued loans at 73.9%, Hispanics at 70.6%, and 67.6% for African Americans. The denial rates were 11.7% for Caucasians, 11.8% for Hispanics, and 10.8% for African Americans.

It is interesting to note how different these numbers are than from the numbers for Conventional Loans, which did have contrasts between the races on issuance and denial rates. This could be due to the income differences which are taken into account for the FHA loan status.

Table 77 Henderson: Results of Applications for FHA, FSA/RHS, and VA Home Mortgages Home Mortgages, 2011-2012					
Reporting Year: 2012					
Race/Ethnicity	Total Applications	Number Issued	Percent Issued	Number Denied	Percent Denied
Hispanic of Any Race	257	180	70.0%	46	17.9%
American Indian or Alaskan Eskimo	4	2	50.0%	2	50.0%
Asian	135	94	69.6%	22	16.3%
Black or African American	123	86	69.9%	19	15.4%

Native Hawaiian / Pacific Islander	35	21	60.0%	7	20.0%
Caucasian (non-Hispanic)	1,781	1,272	71.4%	261	14.7%
Race Unknown	218	123	56.4%	54	24.8%
All Men	1,754	1,247	71.1%	266	15.2%
All Women	655	454	69.3%	104	15.9%
Total (Does Not Include Gender Rows)	2,553	1,778	69.6%	411	16.1%
Reporting Year: 2011					
Race/Ethnicity	Total Applications	Number Issued	Percent Issued	Number Denied	Percent Denied
Hispanic of Any Race	170	120	70.6%	20	11.8%
American Indian or Alaskan	3	2	66.7%	1	33.3%
Asian	49	35	71.4%	9	18.4%
Black or African American	37	25	67.6%	4	10.8%
Native Hawaiian / Pacific Islander	15	8	53.3%	2	13.3%
Caucasian (non-Hispanic)	920	680	73.9%	108	11.7%
Race Unknown	96	65	67.7%	15	15.6%
All Men	828	605	73.1%	104	12.6%
All Woman	425	305	71.8%	52	12.2%
Total (Does Not Include Gender Rows)	1,290	935	72.5%	159	12.3%

Source: Home Mortgage Disclosure Act Table 4-1 for Henderson, Nevada. Data provided by Reinvestment Partners.

For all of 2012 and 2011, Boulder City only had 11 applications that were not considered of Caucasian race. For that reason, there will be no analysis based on issue and denial rates. It is an interesting statistic on its own however, that much like the Conventional Loans, there are not many applications for home loans under either category for anyone other than Caucasians. This may be due to many factors including Boulder City's history, its remote location, and its current racial and economic makeup.

Table 78 Boulder City: Results of Applications for FHA, FSA/RHS, and VA Home Mortgages Home Mortgages, 2011–2012					
Reporting Year: 2012					
Race/Ethnicity	Total Applications	Number Issued	Percent Issued	Number Denied	Percent Denied
Hispanic of Any Race	2	2	100.0%	0	0.0%
American Indian or Alaskan Eskimo	0	0	0.0%	0	0.0%
Asian	0	0	0.0%	0	0.0%
African American	0	0	0.0%	0	0.0%
Native Hawaiian / Pacific Islander	0	0	0.0%	0	0.0%
Caucasian (non-Hispanic)	59	39	66.1%	10	16.9%
Race Unknown	3	3	100.0%	0	0.0%
All Men	48	34	70.8%	7	14.6%
All Women	13	8	61.5%	3	23.1%
Total (Does Not Include Gender Rows)	64	44	68.8%	10	15.6%
Reporting Year: 2011					
Race/Ethnicity	Total Applications	Number Issued	Percent Issued	Number Denied	Percent Denied
Hispanic of Any Race	0	0	0.0%	0	0.0%
American Indian or Alaskan	1	1	100.0%	0	0.0%

Asian	0	0	0.0%	0	0.0%
Black or African American	0	0	0.0%	0	0.0%
Native Hawaiian / Pacific Islander	0	0	0.0%	0	0.0%
Caucasian (non-Hispanic)	50	41	82.0%	2	4.0%
Race Unknown	5	2	40.0%	1	20.0%
All Men	33	29	87.9%	2	6.1%
All Woman	16	12	75.0%	1	6.3%
Total (Does Not Include Gender Rows)	56	44	78.6%	3	5.4%

Source: Home Mortgage Disclosure Act Table 4-1 for Boulder City, Nevada. Data provided by Reinvestment Partners.

Incidents of Reported Hate Crimes

Table 79, below, shows the number of reported hate crimes that occurred in Las Vegas and Clark County for the years 2010 – 2012. The largest number of those occurred against African Americans, people of Jewish religion, sexual orientation issues, and people with Hispanic ancestry.

Table 79 Las Vegas and Unincorporated Clark County Reported Hate Crimes: 2010–2012							
Year	Number of Incidents Per Bias Motive and Nature of Victim						
	Race		Religion		Sexual Orientation	Ethnicity / National Origin	
2012	Black	25	Jewish	11	22	Hispanic	16
	Caucasian	5	Muslim			Multiple Ethnicities	
	Asian	1		1			
	Multiple Races	1					
2011	Black	23	Jewish	6	10	Hispanic	4
	Caucasian	3	Multiple Religions			Multiple Ethnicities	
	Asian	2	Other	2			1
	Multiple Races	1					
2010	Black	18	Jewish	12	13	Hispanic	8
	Caucasian	1	Muslim				
			Multiple Religions	2			
			Other	1			
				1			

The Las Vegas Metropolitan Police Department serves both the City of Las Vegas and unincorporated Clark County. Hate crimes are reported for the entire jurisdiction and cannot be divided into those that took place in Las Vegas and those that occurred outside the city. Details on each hate crime are available from Southern Nevada Strong in the PDF file "Hate Crimes in Nevada 2010-2012.pdf."

Source: Nevada Department of Public Safety, *Crime and Justice in Nevada*, 2010, 2011, and 2012 editions. Available online at http://www.nvrepository.state.nv.us/ucr_nav.shtml.

Tables 80 and 81, below, show the numbers of reported hate crimes that occurred in North Las Vegas and Henderson during the same time period. There were very few incidents that were reported in either jurisdiction. Additionally, Boulder City data was collected; however, there were no reports of hate crimes during 2010 – 2012.

Table 80 North Las Vegas Reported Hate Crimes: 2010–2012							
Year	Number of Incidents Per Bias Motive and Nature of Victim						
	Race	Religion	Sexual Orientation	Ethnicity / National Origin			
2012	Black	4	Jewish	1	2	Hispanic	4
	Multiple Races	1					
2011		0		0	0		0
2010		0	Other	1	1	Hispanic	1

Details on each hate crime are available from Southern Nevada Strong in the PDF file "Hate Crimes in Nevada 2010-2012.pdf." Source: Nevada Department of Public Safety, *Crime and Justice in Nevada*, 2010, 2011, and 2012 editions. Available online at http://www.nvrepository.state.nv.us/ucr_nav.shtml.

Table 81 Henderson Reported Hate Crimes: 2010–2012							
Year	Number of Incidents Per Bias Motive and Nature of Victim						
	Race	Religion	Sexual Orientation	Ethnicity / National Origin			
2012	Black	3		0	0		0
	Caucasian	1					
2011	Black	2		0	1		0
2010	Caucasian	1	Jewish	1	1	Hispanic	1
			Other Religion (not specified)	2			

Details on each hate crime are available from Southern Nevada Strong in the PDF file "Hate Crimes in Nevada 2010-2012.pdf." Source: Nevada Department of Public Safety, *Crime and Justice in Nevada*, 2010, 2011, and 2012 editions. Available online at http://www.nvrepository.state.nv.us/ucr_nav.shtml.

Table 82 Hate crimes by jurisdiction, 2013

Agency name	Number of incidents per bias motivation							Population
	Race	Religion	Sexual orientation	Ethnicity	Disability	Gender	Gender Identity	
Houston	4	0	5	4	0	0	0	2,180,606
Phoenix	40	12	14	14	1	0	0	1,502,139
San Diego	18	12	12	1	0	0	0	1,349,306
Henderson	1	0	0	0	0	0	0	268,237
LVMPD	27	9	23	6	0	0	0	1,500,455
North Las Vegas	0	0	1	1	0	0	0	225,632
Southern Nevada	28	9	24	7	0	0	0	1,994,324

Source: Federal Bureau of Investigation's 2013 Hate Crime Statistics by jurisdiction. Available online at http://www.fbi.gov/about-us/cjis/ucr/hate_crime/2013/tables/13tabledataadecpdf/table_13_hate_crime_incidents_per_bias_motivation_and_quarter_by_state_and_agency_2013.xls/view.

Table 82 provides a comparison for hate crimes reported in Southern Nevada compared with Houston, Phoenix and San Diego. These cities were used for comparison because of their similar population numbers, similar demographics and shared western location. Southern Nevada seems to fall in the middle with regards to numbers of incidents of race, religion and ethnicity. The sexual orientation incidents are higher for Southern Nevada than the other areas which might be somewhat caused by the large entertainment industry on the Las Vegas Strip.

Community Support for Affordable Housing

Public participation provided the foundation for the Southern Nevada Strong (SNS) Regional Policy Plan. Outreach efforts for the Policy Plan touched over 70,000 Southern Nevadans and included large public events, stakeholder interviews, focus groups, telephone town halls and multiple surveys conducted on multiple platforms (online, in person, telephone, and self-service kiosks). A general theme heard throughout the public feedback was support for the development types needed to better integrate housing, transportation and jobs and still be affordable to all Southern Nevadans. There is no doubt that every jurisdiction in Southern Nevada has experienced local community opposition to a specific affordable housing project in the past. However, when asked to think about the needs of their community, Southern Nevadans voiced support for more affordable and diverse housing options for low and middle income families, people with disabilities and seniors.

The private homebuilders were active stakeholders in the SNS planning process. The Southern Nevada Home Builders Association (SNHBA) voiced a commitment to pursuing reasonable and market-driven strategies to achieve the vision of the SNS plan, including building inclusive communities with access to housing, healthcare and vital services. However, SNHBA identified extra costs derived from neighborhood opposition (additional meetings, notices and plan revisions) that can provide barriers to building affordable, mixed income housing. They also identified rising insurance costs and lawsuits associated with Nevada's construction defect laws as a barrier to the development of single-family homes, townhomes and condominiums.

7. PUBLIC SECTOR COMPLIANCE ISSUES

Land-Use Controls of Housing for People with Disabilities

All of the jurisdictions studied in this Regional Analysis of Impediments except Boulder City have a slightly smaller percentage of people with disabilities than the nation as a whole, as Table 83 indicates. Taking into account margins of error, the percentage of people with disabilities among the different demographic groups are fairly similar to national figures. Overall, Clark County jurisdictions have a smaller proportion of elderly residents than the nation as a whole and a smaller percentage of elderly who have difficulty living independently.

Nearly 199,000 non-institutionalized Clark County residents have a disability, with 65,364 in Las Vegas, 25,621 in Henderson, 17,948 in North Las Vegas, and 2,187 in Boulder City. The percentage of residents whose disability makes living independently difficult hovers around 3 percent in each Clark County jurisdiction. However, the percentage leaps to 12.5 to 14.8 percent among people 65 years and older.⁵⁸ Given the aging Baby Boomer population throughout the nation and Clark County, it is extremely likely that the actual number of older people in every Clark County jurisdiction who will have difficulty living independently will continue to grow and create a need for more supportive living arrangements including community residences for the frail elderly.

All people with disabilities are protected from housing discrimination under both federal and Nevada law. Discrimination on the basis of disability is the most common basis of fair housing complaints filed across the nation as well as in every Clark County jurisdiction. The disabilities of the vast majority of Clark County residents are not so severe that they are unable to live with family or on their own, with or without supportive services. For many others with more severe disabilities, the family-like, supportive living arrangement of a community residence is the only way they can live in the community that is not a more restrictive and often inappropriate institutional setting.

Table 83 Disabilities by Clark County Jurisdiction and Nationally: 2008–2012

Population Group	Percentage of Population With a Disability					
	Clark County	Las Vegas	Henderson	North Las Vegas	Boulder City	United States
Total civilian noninstitutionalized population	10.3%	11.3%	10.0%	8.5%	14.3%	12.0%
Difficulty living independently: All Ages	3.0%	2.9%	3.4%	2.9%	3.0%	2.6%
Difficulty living independently: 18 to 64 years old	3.0%	3.5%	2.4%	3.0%	1.9%	3.5%
Difficulty living independently: 65 years and older	14.3%	14.6%	12.6%	12.5%	14.8%	16.4%
Under 5 years old	0.8%	0.4%	1.3%	0.3%	—	0.7%
5 to 17 years old	4.2%	4.6%	3.4%	4.4%	3.5%	0.9%
18 to 64 years old	8.8%	9.8%	7.5%	8.3%	8.4%	10.1%
65 years and older	34.3%	35.2%	31.4%	34.3%	35.7%	37.4%
African American	11.4%	13.8%	8.9%	11.4%	—	13.7%
American Indian and Alaska Native	16.7%	14.2%	—	14.2%	17.7%	16.3%
Asian	7.0%	8.4%	6.2%	7.4%	13.5%	6.6%
Caucasian (not Hispanic)	13.1%	14.0%	11.1%	11.8%	15.0%	12.9%
Native Hawaiian and Other Pacific Islander	8.4%	11.1%	13.9%	—	—	9.7%
Some other race	7.0%	8.0%	6.9%	4.6%	—	7.8%
Two or more races	8.5%	9.8%	6.3%	6.6%	3.5%	11.3%
Hispanic of any race	6.5%	7.1%	7.1%	4.9%	6.6%	8.3%

— = Sample is too small to be reliable. Percentages for the State of Nevada not included because they are virtually identical to those for Clark County.
Sources: Table S1810: Disability Characteristics, 2012 American Community Survey 5–Year Estimate; United States: 2009 American Community Survey 1–Year Estimate.

⁵⁸ 2012 American Community Survey 5–Year Estimate, Table S1810: Disability Characteristics.

Community residences for people with disabilities

Twenty-six years ago the Fair Housing Amendments Act of 1988 (FHAA) added people with disabilities to the classes protected by the nation's Fair Housing Act (FHA). The amendments recognized that many people with disabilities need a community residence (group home, halfway house, recovery community) in order to live in the community in a family-like environment rather than being forced into an inappropriate institution. The FHAA's legislative history stated that:

The Act is intended to prohibit the application of special requirements through land-use regulations, restrictive covenants, and conditional or special use permits that have the effect of limiting the ability of such individuals to live in the residence of their choice within the community.⁵⁹

While some suggest the FHAA prohibits all zoning regulation of community residences, the FHAA's legislative history suggests otherwise:

Another method of making housing unavailable has been the application or enforcement of otherwise neutral rules and regulations on health, safety, and land-use in a manner which discriminates against people with disabilities. Such discrimination often results from false or over-protective assumptions about the needs of handicapped people, as well as unfounded fears of difficulties about the problems that their tenancies may pose. These and similar practices would be prohibited.⁶⁰

Many states, counties, and cities across the nation continue to base their zoning regulations for community residences on these "unfounded fears." The 1988 amendments require all levels of government to make a *reasonable accommodation* in their zoning rules and regulations to enable community residences for people with disabilities to locate in the same residential districts as any other residential use.⁶¹

It is well settled that a community residence is a residential land use, not a business or commercial land use. The Fair Housing Amendments Act of 1988 specifically invalidates restrictive covenants that would exclude community residences from residential areas. The Fair Housing Act renders these covenants unenforceable against community residences for people with disabilities.⁶²

Typically, a county's or city's zoning ordinance places a cap on the maximum number of unrelated people allowed to live together in a single dwelling unit.⁶³ If a proposed community residence complies with the cap in a zoning code's definition of "family," any community residence that abides with that cap must be allowed as of right as a permitted use.⁶⁴ The courts have made it abundantly clear that imposing any additional zoning requirements on a community residence that complies with the cap in the definition of "family" would clearly constitute illegal discrimination under the Fair Housing Act.

When a definition of "family" places no limit on the number of unrelated individuals who can dwell together, then *all* community residences must be allowed as of right in *all* residential districts.⁶⁵ No additional regulations can be imposed under these circumstances.

When a proposed community residence would house more unrelated people than the definition of "family" allows, jurisdictions must make the "reasonable accommodation" that the Fair

Housing Act requires to allow such community residences for people with disabilities to locate in residential districts.⁶⁶ However, different types of community residences have dissimilar characteristics that warrant varying zoning treatment depending on the type of tenancy.

Community residences that offer a relatively permanent living arrangement in which there is no limit to how long somebody can live there (group homes and recovery communities) should be permitted uses allowed as of right in all residential districts. The debate in legal circles on whether a rationally-based spacing distance or a license is considered legal is still active.

On the other hand, community residences such as a halfway house that sets a limit on length of residency are more akin to multifamily housing and may be subject to a special use permit in single-family districts, although this too is subject to debate in legal circles. There is little doubt that they should be allowed as of right in multifamily districts although there is debate over whether a spacing distance from other community residences or a license can be required.

While a jurisdiction can certainly exclude transitional homes for people *without* disabilities from the residential districts of its choosing, the Fair Housing Act prohibits this kind of zoning treatment for halfway houses and recovery communities that house people with disabilities.⁶⁷ The key distinction between halfway houses and recovery communities is that tenancy in the former is temporary. Halfway houses impose a limit on how long residents can live there. Tenancy is measured in months.

Alternatively, residency in a recovery community is relatively permanent, like a group home. There is no limit to how long a recovering alcoholic or drug addict who is not currently using illegal substances can live there. Tenancy is measured in years just as it is for conventional rental and ownership housing. Consequently, it is rational for zoning to treat recovery communities like group homes which also offer relatively permanent living arrangements and to treat halfway houses more like multifamily rental housing. Halfway houses should be allowed as of right in multi-family districts. In single-family districts, the heightened scrutiny of a special use permit is warranted for a halfway house.

These principles do not apply to community residences for people *without* disabilities or to people with disabilities “whose tenancy would pose a direct threat to the health or safety of other individuals.... there must be objective evidence from the person’s prior behavior that the person has committed overt acts which caused harm or which directly threatened harm.”⁶⁸

In 2013, the State of Nevada repealed its statutory provisions regarding community residences for people with disabilities.⁶⁹ Any local zoning provisions that rely on the state statutes to define a type of community residence no longer have a reference point.

The following review of each jurisdiction’s zoning treatment of community residences begins with its zoning definition of “family” or “household.”

Clark County

Clark County substantially revised its land–use regulations for community residences in 2006.⁷⁰ The zoning regulations were subsequently tweaked in the 2008 settlement of the *Nevada Fair Housing Center, Inc. v. Clark County* lawsuit.⁷¹

Before explaining the zoning treatment of community residences in Clark County, it is important to note that the county defines “conditional uses” and “special uses” differently. Usually these terms are interchangeable. Under Clark County’s *Unified Development Code*, a conditional use is a land use that is permitted as of right as long as specified conditions are met. The jurisdiction’s professional staff administratively reviews a proposed conditional use. A public hearing is not required.

A special use, however, is a land use allowed in a zoning district subject to the heightened scrutiny of a public hearing and vote by the local zoning board of appeals or planning commission. The recommendation of the zoning board or planning commission goes to the local governing body — city council, county commission — for a final vote. The burden is on the applicant to show that their proposal complies with the zoning ordinance’s standards for issuing the special use permit.

Clark County’s definition of “family” caps the number of unrelated people allowed to live together as a single housekeeping unit at four. Any community residence that houses four or fewer people is allowed as of right under this definition.⁷²

Clark County’s zoning makes the requisite reasonable accommodation for community residences for people with disabilities that house more than four people by allowing them as *conditional uses* in all residential zoning districts. The definition of “community residence” clearly states that a “community residence shall be considered a residential use of property for purposes of all zoning and building codes.” The definition of “dwelling” specifically includes “community residences.”

The county’s definition of “community residence” limits their size to no more than ten residents in accord with limitations in the state statutes that govern different types of community residences. While this limitation may make sense for those community residences established under a state license that limits them to ten residents, it is probably not legally justifiable when applied to community residences not subject to state licensing. Some community residences such as the Oxford House recovery communities that need to house eight to twelve residents for both therapeutic and financial reasons are *not* subject to state licensing. A proposed Oxford House for more than ten residents would not be allowed as a conditional use like smaller community residences would be. No legal basis exists for this differential treatment. The number of residents permitted in a community residence should be determined by the county’s building code just like it is for other residential uses.

For community residences allowed as of right, Clark County imposes a rationally–based spacing distance to prevent the clustering and segregation that interferes with the fundamental purposes of community residences: normalization and community integration. To be allowed as of right, a community residence must be at least 660 feet from an existing community residence as “measured door–to–door along the nearest pedestrian or vehicular route, whichever is shorter.” This distance is reduced to 100 feet door–to–door when there is a street, freeway, or

drainage channel at least 100 feet wide between the proposed community residence and an existing one. The spacing distance is waived for community residences such as those for victims of domestic abuse that need to keep their location confidential to function successfully.

A community residence proposed to be located within the spacing distances requires the heightened scrutiny of a special use permit to determine:

- Whether the building in which the community residence would be located is consistent with the scale and architectural character of the neighborhood
- Whether the proposed community residence in combination with any existing community residences “would alter the residential character of the neighborhood by creating an institutional atmosphere due to the concentration of community residences on a block or adjoining blocks”
- Whether the proposed community residence complies “with all public health and safety requirements including building and fire code requirements for the dwelling type in question”
- Whether the proposed community residence has obtained any license or certification required by the State of Nevada
- Whether a “transitional community residence” for people in recovery from alcohol or drug addiction requires residents to participate in a rehabilitation program like Alcoholics Anonymous and prohibits drug and alcohol use by residents
- Whether the community residence is allowed in a mixed use development in a C–1 or C–2 district.
- Whether the community residence prohibits occupancy by people “whose tenancy would constitute a direct threat to the health and safety of other individuals or whose tenancy would result in substantial physical damage to the property of others.”

The county’s zoning also states:

If a special use permit application is submitted, the Approval Authority shall not deny a special use permit on any basis that discriminates against people with disabilities. If it deems it appropriate, the Approval Authority may continue the hearing to another date in order for Staff to consult with, or to obtain an opinion from, a person or entity with expertise in fair housing law regarding whether an approval or denial of the application is justified under State and Federal law. Except for a Community Residence, no more than four unrelated individuals may reside together in a dwelling unit.

Since adoption of these revisions in 2006 and 2008, Clark County has not denied a proposed community residence.

Las Vegas

In Las Vegas, the city's *Unified Development Code* defines "family" as:

With respect to the occupancy of a dwelling unit:

One or more individuals related by blood, marriage, adoption, guardianship or legal custody; or

No more than four unrelated individuals living together as a single housekeeping unit.⁷³

Consequently, the city allows all community residences housing four or fewer people as a permitted use in all residential districts like any other family. The city correctly does *not* include these when calculating spacing distances between a proposed community residence and existing community residences.⁷⁴

The code defines "community residence" as:

A residential family-like living arrangement for five to ten unrelated individuals with disabilities who are in need of the mutual support furnished by other residents, as well as the support services, if any, provided by the operator of the Community Residence. Residents may be self-governing or supervised by a sponsoring entity or its staff which furnishes habilitative or rehabilitative services related to the needs of the residents. Interrelationships among residents are an essential component of a Community Residence. A Community Residence shall be considered a residential use of property for purposes of all zoning and building codes. However, the Fire Marshal, pursuant to and consistent with the City's Fire Code, may require enhanced fire protection, including the installation of fire sprinklers and other mitigating measures, where one or more residents has a lessened ability to ambulate adequately. The use includes a Family Community Residence and a Transitional Community Residence, but does not include any of the following.⁷⁵

The city correctly excludes 14 uses that certainly are not community residences (senior citizen apartments, nursing homes, boarding houses, detoxification centers, etc.).

The code divides community residences into two subcategories:

Family Community Residence: A Community Residence other than a Transitional Community Residence.

Transitional Community Residence: A Community Residence that provides housing and a living environment for recovering alcohol and drug abusers and is operated to facilitate their reintegration into the community, but does not provide any treatment for alcohol or drug abuse.⁷⁶

However, both types of community residences are allowed as a "conditional use" in all residential districts as well as the C-1, C-2, and C-PB commercial districts. The city also has a number of special or overlay districts in which community residences are treated the same as they are in the residential zoning districts.⁷⁷

In Las Vegas, a “conditional use” is a land use that is approved administratively if the specified minimum conditions are met. Among the conditions required for both types of community residences are:

The proposed community residence must be at least 660 feet from any existing community residence measured from property line to property line.

However there are two exceptions to this standard:

“When there is a street, freeway or drainage channel at least 100 feet wide between the proposed Community Residence and an existing Community Residence, the minimum separation requirement is reduced to 100 feet from property line to property line.”

“When the population of proposed Community Residence is of such a nature that its location must be kept confidential for it to function successfully, such as a Community Residence for victims of domestic abuse, the minimum separation requirements set forth in Regulations 1 and 2 above shall not apply.”⁷⁸

Both of these exceptions strongly suggest that the City of Las Vegas understands the rationale for community residences including those for victims of domestic abuse. The city — and Clark County — should be commended for including these exceptions.

The first exception allows these homes to be located as little as 100 feet apart when separated by a barrier that effectively discourages interaction between the residents of the two community residences, thus encouraging integration into the larger community and normalization via greater social contact with conventional neighbors who are supposed to serve as role models for the occupants of the community residences. These exceptions help advance these purposes of a community residence which are among the key reasons they need to locate in residential districts to begin with.

The second exception advances the absolutely critical need to keep the location of community residences for people victims of domestic abuse strictly confidential so that the perpetrators of the abuse cannot locate their victims again. Las Vegas and Clark County are two of the few jurisdictions in the nation with this extremely prudent and rational provision

In addition to these exceptions, the operator of a proposed community residence that would be located less than 660 feet from an existing community residence can seek a special use permit as a reasonable accommodation. The ordinance provides that the special use permit application *must be approved* unless one or more of these three standards is not met:

- The building to be occupied as a Community Residence would be established or modified in a manner that would make it inconsistent with the scale and architectural character of the neighborhood;
- The proposed Community Residence, together with existing Community Residences, would alter the residential character of the neighborhood by creating an institutional atmosphere due to the concentration of the Community Residences on a block or adjoining blocks; or

- The application or Community Residence does not or would not comply with Regulations 5 through 10 above.⁷⁹

The second and third requirements are reasonable and pose no barriers to fair housing choice. However, the first standard addressing architecture *may* be of questionable legality. In our experience it arises out of a concern that the operator would establish an institutional or commercial appearance to the community residence. There certainly would be no housing discrimination against people with disabilities if the city's zoning requires *all* residences to be "consistent with the scale and architectural character of the neighborhood." But Las Vegas mandates this requirement *only* for community residences.

City staff reports that the city imposed this requirement because community residences with a physical commercial or institutional character compromise the integration of occupants into the community.⁸⁰ However, there could be a housing discrimination issue because *this requirement is imposed only on community residences but not on any other residential use*. It might be possible to justify this requirement if the city can document that a significant number of community residences have been opened in Nevada with an institutional or commercial appearance.

Legitimate community residence operators understand that it is essential that a community residence blend into the neighborhood and look like other homes on the block. It is *unlikely* that this questionable requirement can be justified.

Regulations five through ten are the other conditions that must be met for a community residence to be established:

- Condition five is redundant because it requires compliance with all public health and safety requirements including all building and fire codes for the type of dwelling (single-family detached, duplex, triplex, townhouse, etc.) that houses the community residence. There is no need for this provision except to reassure neighbors.
- Condition six requires that any license or certification required by federal or state law be in place before the community residence begins operations. This provision still allows Oxford Houses as a conditional use since no federal or state law requires them to be licensed or certified.
- Condition seven requires that a community residence in the commercial O, C-1, and C-2 zoning districts must be part of a mixed-use development. This provision makes good sense because it assures that the community residence will be in a development that includes residential uses rather than inappropriately isolated in a commercial development.
- Condition eight helps assure that transitional community residences are genuine by mandating that the operator require residents to participate in an offsite support program such as Alcoholics Anonymous and that the operator prohibit residents from using alcohol and illegal drugs. It requires the operator, "upon request and with reasonable notice," to "produce satisfactory evidence" to

- the city that residents are in compliance. Our experience has found that there are charlatans operating so-called transitional community residences. This provision reduces the chance the charlatans can slip by.
- Condition nine excludes individuals from community residences “whose tenancy would constitute a direct threat to the health and safety of individuals or would result in substantial physical damage to the property of others.” However, actual evidence of this threat is required. Simply being sentenced or referred to a transitional community residence does not constitute evidence. This condition takes into account the exception for dangerous persons that the Fair Housing Act carves out. *However, there is no rational reason why it should not apply to all community residences rather than just transitional community residences.*
- The tenth condition requires that the community residence be “consistent with the scale and architectural character of the neighborhood.” The concerns expressed above about the same requirement for a special use permit apply to this condition.

The ordinance makes another reasonable accommodation by allowing up to two staff to live in the community residence without being counted toward the ten-resident limit. Any additional live-in staff, count toward the ten-resident limit.

Overall, Las Vegas’ zoning provisions for community residences for people with disabilities are most “reasonably accommodating.” While they do not appear to impose any barriers to fair housing choice, the city should fine tune its zoning provisions to mitigate their few weaknesses:

SUGGESTIONS TO FURTHER FAIR HOUSING:

- ❖ *Las Vegas should amend its Unified Development Code to either eliminate the condition imposed solely on community residences for consistency with the scale and architectural character of the neighborhood or require the consistency for all residences in residential zoning districts. As discussed above, applying this mandate just to community residences could violate the Fair Housing Act.*
- ❖ *Las Vegas should remove from its Unified Development Code condition five that requires community residences to comply with all public health and safety requirements including all building and fire codes for the type of dwelling. As noted above, this requirement is redundant since all structures must comply with these codes. Singling out community residences like this is not justifiable.*
- ❖ *Las Vegas should amend its Unified Development Code to make it clear that transitional community residences are not limited to people in recovery from drug or alcohol addiction. While the city’s staff reports that in practice, transitional community residences can house people with mental illness, the ordinance should reflect this practice. In addition, condition eight should be amended to make it clear that transitional community residences for people with mental illness, but not in recovery from drug or alcohol addiction, do not have to enroll their residents in drug or alcohol addiction programs.*

In 2010, the city received just two proposals to establish a community residence through the administrative conditional use process. The next year there were 19 proposals; 31 in 2012; and 44 in 2013. During this same period, just four applications were submitted for a special use permit to establish a community residence within the spacing distance of an existing community residence. One was approved; two were denied; and the applicant withdrew the fourth.

Henderson

Henderson's zoning code allows up to six unrelated people to constitute a "family unit:"

A family unit is defined as a person living alone or any of the following groups living together as a stable single housekeeping unit and sharing common living, sleeping, cooking, and eating facilities:

- any number of related people and no more than two unrelated persons;
- six unrelated people; or
- two unrelated people and any minor children related to either of them.

A family unit does not include any society, club, fraternity, sorority, lodge, organization, or group where people come and go on a transient basis or where the relationship is merely based on a commercial basis; rather, the composition of a family unit must be sufficiently stable and permanent and of a demonstrable bond characteristic of a cohesive family unit. The size of a family unit is subject to the maximum dwelling unit occupancy set forth in Section 19.5.3.A.1. For purposes of this section, "related" means by blood, marriage, adoption, guardianship, or other duly and legally authorized custodial relationship.⁸¹

As discussed below, the city's interpretation of this definition of "family unit" as practiced, appears to exclude community residences for people with disabilities from its definition of family, a practice that is not in accord with the majority opinion of the nation's judicial interpretation of the Fair Housing Act. As noted earlier, except for small halfway houses, community residences for people with disabilities constitute a relatively permanent living arrangement that emulates a family — and such residences appear to fit within the city's definition of "family unit" in terms of stability, permanency, and "a demonstrable bond characteristic of a cohesive family unit."

Consequently, any community residence for six or fewer people with disabilities — including recovery communities — should be allowed as of right in zoning districts where residential uses are allowed. But in no case does the city allow any type of community residence for six or fewer people with disabilities as a permitted use in any residential district even though the city's definition of "family unit" allows up to six unrelated individuals to live together as a single housekeeping unit.

The city treats community residences for six or fewer people with disabilities as a business rather than as a "family unit"⁸² ignoring the court's decision in *Nevada Fair Housing Center, Inc. v. Clark County*⁸³ and well-established fair housing law.

Community residences for people with disabilities that fall within the six person cap on unrelated individuals should, by law, be allowed as of right in all residential districts like any other family unit and should not be subject to any additional requirements like a spacing distance, licensing requirement, or parking requirements more demanding than imposed on other housing of the same type structure (single-family, multi-family, etc.). In addition, a spacing distance cannot be calculated from homes that fit within the definition of “family unit.”⁸⁴ City staff report that the city based its zoning on state statutes.⁸⁵ Given that the state statute on which the zoning is said to be based required that community residences for up to ten individuals with disabilities be treated as a single-family residence, it is challenging to explain how the city’s zoning provisions could be characterized as being based on state statutes. Henderson staff could not identify any studies on which the city based its zoning provisions for community residences for people with disabilities.⁸⁶

Henderson’s development code divides community residences for people with disabilities into several classifications:

- Residential facility for groups (§19.5.3.G.)
- Home for individual residential care (§19.5.3.E.)
- Halfway house for recovering alcohol and drug abusers (§19.5.3.D.)
- Group Living — Assisted (§19.5.4.L.3.)

Residential facility for groups

The city defines a “residential facility for groups” as: An establishment in a dwelling of residential character that furnishes food, shelter, assistance, and limited supervision to ten or fewer persons who are aged, infirmed, mentally retarded, or handicapped. This dwelling unit shall be considered a residential use of property for purposes of all zoning and building codes.⁸⁷

The definition explicitly excludes five scenarios including “halfway houses for recovering alcohol and drug abusers” and any “facility funded by a division or program of the State Department of Human Services.” The halfway houses are a different category in the zoning code — which makes sense since they are a temporary living arrangement, different than the relatively permanent living arrangement of a “residential facility for groups.” It is unclear on what basis “facilities” funded by a state agency would be excluded given that it is axiomatic that zoning regulates the use of land, not its form of ownership, nor source of funding.

The city properly allows, subject to standards, residential facilities for groups in all residential and mixed use districts except the RMH and DP district from which they are excluded altogether. It imposes a 660 foot spacing distance from an existing residential facility for groups, halfway house for recovering alcohol and drug abusers, and homes for individual residential care where up to two “aged, infirmed, mentally retarded, or handicapped” unrelated individuals may live.⁸⁸

As discussed earlier in this chapter, this spacing distance is an appropriate standard for allowing community residences for people with disabilities as a permitted use in residential districts. As discussed earlier in this chapter, it is almost certainly a violation of the Fair Housing Act to impose a spacing distance when a community residence — homes for individual residential care — fits within the cap on the number of unrelated persons that constitute a “family unit.” This concern will be examined in more depth below in the analysis of the zoning provisions for homes for individual residential care.

The Henderson code properly provides for residential facilities for groups to locate within the 660 foot spacing distance through the heightened scrutiny of a conditional use permit. However, there appear to be no rational, nor legal justifications for several of the conditions. To receive a conditional use permit to locate within the 660 foot spacing distance, the ordinance requires that the proposed residential facility for groups be located on a parcel with a minimum lot size of 6,500 square feet and that there be at least 25 square feet of indoor common area per resident.⁸⁹ *Note that these standards apply to residential facilities for groups seeking to locate within 660 feet of an existing community residence, but not to those allowed as of right.* City staff reports that they “wanted to ensure they were located in a zoning district which could accommodate the use and a house that could provide adequate room for the number of people. This was also a number that other jurisdictions were using.” City staff reports that the city was trying to be consistent. The 25 square foot requirement was adopted because it “ensures the home will be of adequate size for the residents.”⁹⁰

We can find no rational or legal justification for these conditional use standards in the case law, legislative history, or literature on zoning for community residences.

The ordinance allows the Planning Commission or City Council to grant a conditional use permit to allow a residential facility for groups to locate within the 660 foot spacing distance if an “adequate barrier” exists between the proposed home and other community residences for people with disabilities or a Facility for Transitional Living for Released Offenders.⁹¹ An adequate barrier is defined as including, but not being limited to, such items as an improved drainage channel, freeway, constructed roadway with a minimum width of one hundred feet, or a topographical feature that prevents vehicular and pedestrian access.⁹²

While the language, likely derived from Clark County’s zoning provisions, focuses on barriers, other factors can also be considered. The ordinance properly establishes that the decision to grant a conditional use permit should focus on the impact of the proposed residential facility for groups on the residents of the existing community residence, including whether the proposed home would inhibit community integration.

The ordinance also imposes a condition that there “be no more than two live-in facility staff.”⁹³ We can find no rational or legal justification for these conditional use standards in the case law, legislative history, or literature on zoning for community residences.

The ordinance also imposes a condition, which the city can waive, establishing occupancy standards for this use. This requirement clearly flies in the face of the U.S. Supreme Court’s *Edmonds* decision where the high court ruled that occupancy standards must apply to *all* residential uses. Community residences for people with disabilities cannot be singled out for different occupancy standards than other residential uses.⁹⁴

The only occupancy standard that should be applied to any type of community residence for people with disabilities is Henderson’s zoning code’s maximum dwelling unit occupancy standard:

Occupancy by persons living as a single housekeeping unit in a dwelling unit shall be limited to the following: compliance with the definition for a “family unit”; and a dwelling unit with a minimum of 150 square feet of gross floor area for each of the first ten occupants and 300 square feet for each additional occupant, to a maximum of 20 occupants. In no case shall a dwelling unit be occupied by more than 20 persons or as limited by the “family unit” definition. A conditional use permit shall be required for occupancy of a dwelling unit by more than ten persons 18 years or older.⁹⁵

As long as this maximum dwelling unit occupancy standard applies to *all* residential uses, it is permissible under the Fair Housing Act.⁹⁶ As long as the final sentence requiring a conditional use permit when more than ten adults 18 or older occupy a dwelling unit applies to all residences, including single-family homes occupied by a biological family, it is an occupancy standard that passes mustard under the U.S. Supreme Court’s *Edmonds* decision. But if it does not, then it likely runs counter to the nation’s Fair Housing Act.

The last set of conditions allow off-street parking requirements to be waived to be based on the number of residents capable of operating a motor vehicle and the number of vehicles staff members are expected to operate.⁹⁷ This provision represents the sort of “reasonable accommodation” in land-use regulations that the Fair Housing Act envisions and ought to be applied to all types of community residences for people with disabilities in Henderson, including those allowed as of right when complying with code standards. It should replace the off-street parking requirement of at least one space per five residents.⁹⁸

It is unclear what justifications there are for the ordinance to impose many of these standards to receive a conditional use permit — standards that do not apply to residential facilities for groups located more than 660 feet from an existing community residence.

Home for individual residential care (§19.5.3.E.)

Homes for individual residential care are allowed as of right subject to a 660 foot spacing requirement in all residential and downtown residential districts except the RMH and DP districts as well as the three mixed-use districts.

Henderson’s ordinance defines them as:

A dwelling unit of a residential character in which a natural person furnishes food, shelter, assistance, and limited supervision, for compensation, to not more than two persons who are aged, infirmed, mentally retarded, or handicapped, unless the persons receiving those services are related within the third degree of consanguinity or affinity to the person providing the services. This dwelling unit shall be considered a residential use of property for purposes of all zoning and building codes.⁹⁹

The definition places a limit of two disabled individuals not “related within the third degree of consanguinity or affinity to the person providing the services.” As long as no more than six unrelated people occupy the dwelling unit, this use must be treated the same as any other family unit as explained earlier. Consequently, the city cannot impose a spacing distance between homes for individual residential care and any other community residence and cannot require a conditional use permit. In addition parking requirements for the type of residential structure must apply. Because the zoning code must treat this use the same as any other “family unit,” there is no need to analyze the conditions to receive a conditional use permit when such homes are proposed to be located within the invalid spacing distance.

Halfway house for recovering alcohol and drug abusers

“Halfway houses for recovery alcohol and drug abusers” are allowed as of right subject to a 660 foot spacing requirement in all residential and downtown residential districts except the RMH and DP districts as well as the three mixed–use districts.

The Henderson zoning defines them as:

A dwelling unit of a residential character that provides housing and a living environment for up to six recovering alcohol and drug abusers and is operated to facilitate their reintegration into the community, but does not provide treatment for alcohol or drug abuse. The term does not include a facility for the treatment of abuse of alcohol or drugs as defined in NRS 449.00455. The term does not include a facility for transitional living for released offenders. This dwelling unit shall be considered a residential use of property for purposes of all zoning and building codes.¹⁰⁰

The definition properly excludes treatment centers because they are not a residential use and facilities for transitional living for released offenders, a class that the Fair Housing Act does not cover.

Before analyzing Henderson’s provisions, it is important to note that community residences for people in recovery from drug and/or alcohol addiction or abuse fall into two distinct categories:

- Halfway houses with a limit length of residency
- Recovery communities with no limit on length of residency.

Halfway houses establish a time limit on how long somebody can live there, usually 30, 60, 90, or 180 days. Their concept is to be temporary living arrangement for people in recovery between an institution or detox program and a less restrictive and more permanent setting such as a recovery community or independent living. Consequently, halfway houses constitute a temporary living arrangement and lack the stability of a cohesive family unit, and fall outside Henderson’s definition of “family unit.”

There are halfway houses that serve people with other types of disabilities besides those in recovery from drug or alcohol addiction. They are part of the continuum of housing options for people with mental illness as well as people with physical injuries such as brain damage. City staff report that they would treat a halfway house for people with these other disabilities as either an individual residence or residential facility for groups — neither of which would be appropriate. The ordinance needs to be amended to explicitly provide halfway houses for people with disabilities other than drug or alcohol abuse.¹⁰¹

Unlike halfway houses, recovery communities impose no limit on length of residency. Many people in the industry refer to them as “three-quarter houses” to reflect their place in the housing continuum between halfway houses and fully independent living. They constitute a relatively permanent living arrangement where, as the case law notes, residents can live for years. Consequently, recovery communities constitute the sort of permanent and stable living arrangement that emulates a cohesive family unit, and falls within Henderson’s definition of “family unit.”

Henderson’s zoning code needs to distinguish between halfway houses and recovery communities. By limiting the number of residents in a halfway house to six, the ordinance’s definition fails to make the reasonable accommodation required under the Fair Housing Act. Six residents is the same number of unrelated individuals that constitute a “family unit” — and because of this, the city’s provisions for halfway houses run counter to the Fair Housing Act as explained earlier in this document.

Complicating the picture is fact that halfway houses and recovery communities need to house eight to twelve individuals for both therapeutic and financial reasons.¹⁰² Consequently, Henderson needs to change the number of people who can occupy a halfway house, as well as the definitions of the different types of community residences to include people with mental illness or physical disabilities such as brain damage.

If a halfway house is proposed to be located within the 660 foot spacing distance from another halfway house for recovering alcohol and drug abusers, a residential facility for groups, or a home for individual residential care, Henderson’s ordinance allows the operator to seek a conditional use permit. If the proposed halfway house is actually a recovery community for no more than six individuals, then the city cannot impose a spacing distance or any other zoning requirement that is not applicable to all family units. See the analysis above of homes for individual residential care.

However, if the halfway house has a limit on length of tenancy, then it is actually a halfway house. Since it does not offer the permanency or stability of a family unit, the conditions can be applied. However, once again there does not appear to be any rational basis for some of the conditions including the 6,500 minimum lot size, minimum requirement of 25 square feet of common space per resident, and the requirement that the halfway house “must be located on a parcel that is within 1,500 feet of an existing bus stop served by a regional bus system.”¹⁰³ City staff report that the bus stop requirement was established on the belief that most halfway house residents “do not have vehicles, or may not have vehicles, we want the facility to have easy access to public transit.” We have not seen any data in the literature about halfway houses — or recovery communities that suggests that most of their residents do not have a motor vehicle.

Henderson uses some of the same improper criteria to waive the spacing distance between halfway houses as it does for “residential facilities for groups” such as the limit of two live-in staff and the bedroom occupancy limits. To receive a conditional use permit, a halfway house must provide at least one off-street space for every two residents. It is difficult to fathom the basis for this requirement given the staff’s explanation of the requirement to locate halfway houses within 1,500 feet of a regional bus stop.

It is unclear what justifications there may be for the ordinance to impose many of these standards to receive a conditional use permit — standards that do *not* apply to halfway houses more than 660 feet from an existing community residence.

Group Living — Assisted (§19.5.4.L.3.)

Henderson’s zoning categorizes “group living – assisted” as a public/institutional use rather than a residential use. This use is allowed only as a conditional use in the ten residential districts, two of the five downtown residential districts, the CN commercial district, and in the PS district, and as a permitted use subject to standards in the three mixed-use zones.

The code defines this use as:

A residential care facility with private or shared sleeping rooms designed primarily for seven or more occupants with no serious health problems, but who may have chronic or debilitating conditions requiring assistance with daily activities. Permitted services include, but are not limited to, staff-supervised meals, housekeeping, personal care, medication supervision, and social activities.¹⁰⁴

As best we can determine from conversations with city staff, this definition refers to nursing home type institutional facilities, not residential homes. Yet one of the standards states that this use shall be considered a residential use for the purpose of compliance with open space standards.

It would be prudent for the city to refine the definition of “group living – assisted” to be more explicit as to its nature.¹⁰⁵

SUGGESTION FOR FURTHERING FAIR HOUSING:

- ❖ *There are a number of typographical errors in the city’s Development Code’s “Summary Table of Allowable Uses.” The table shows that residential facilities for groups and halfway houses for recovering alcohol and drug abusers both need a conditional use permit to locate in residential districts.¹⁰⁶ But the text of the code makes them both “permitted subject to standards.”¹⁰⁷ The table shows homes for individual residential care as permitted uses in single-family, downtown residential, and mixed use districts and as allowed subject to standards in multiple-family districts. But the text states that they are allowed as of right subject to standards in all of these districts.¹⁰⁸ The city can easily correct these typographical errors.*
- ❖ *Our correspondence and interviews with Henderson staff make it clear that the city likely had only the best intentions when drafting its zoning provisions for community residences for people with disabilities. However, the zoning provisions and practices for*

community residences for people with disabilities, needs to be brought into compliance with the Fair Housing Act. The City should research and make necessary changes to its code for community residences for people with disabilities.

North Las Vegas

In spring 2011, North Las Vegas adopted a new zoning code that went into effect October 1, 2011. The city later amended its provisions governing community residences for people with disabilities on May 16, 2012.

North Las Vegas' new definition of "family," shown below, is nearly identical to its previous definition:

Family

Includes the following if living together as a single housekeeping unit within a dwelling unit:

An individual living alone;

Two or more persons related by blood or marriage, adoption or legal guardianship;

One or more handicapped persons together with caretakers or house parents;

A group of not more than six unrelated individuals.¹⁰⁹

As the 2011 Analysis of Impediments noted, that by including "one or more handicapped persons together with caretakers or house parents" in the zoning definition of "family," North Las Vegas must allow community residences for people with disabilities in all residential districts where any other family can live. The nation's Fair Housing Act clearly prohibits imposing *any* additional requirements on such community residences when the definition of "family" encompasses them. Imposing any additional requirements on groups that include one or more handicapped persons will be difficult with the above definition.

Overall, the new zoning provisions are an improvement over those that they replaced. The zoning ordinance no longer imposes occupancy standards just for community residences for people with disabilities. It appears that the same standards that apply to all residential uses apply to community residences for people with disabilities. The requirement of at least 15 square feet of indoor common area per resident appears to have been repealed. Off-street parking requirements are less arbitrary than before.

Within this use category, the ordinance establishes several forms of community residences for people with disabilities:

Residential facility for groups

Pursuant to NRS 449.017, “an establishment that furnishes food, shelter, assistance and limited supervision to a person with mental retardation or with a disability or a person who is aged or infirm. The term includes, without limitation, an assisted living facility, as described in NRS 449.0302. The term does not include: an establishment which provides care only during the day; a natural person who provides care for no more than two persons in his or her own home; a natural person who provides care for one or more persons related to him or her within the third degree of consanguinity or affinity; a halfway house for recovering alcohol and drug abusers; or a facility funded by a division or program of the department of health and human services.”

Halfway house

Pursuant to NRS 449.008, “a residence that provides housing and a living environment for recovering alcohol and drug abusers and is operated to facilitate their reintegration into the community, but does not provide any treatment for alcohol or drug abuse. The term does not include a facility for transitional living for released offenders.”

Residential health care facility

“A residential facility, for more than ten people, that provides medical and personal services to individuals in need of assistance to deal with essential daily activities.”

The City relies on the State Statutes for definitions. These definitions appear to exclude halfway houses for people with mental illness. It is difficult to imagine the rationale for excluding “a facility funded by a division or program of the department of health and human services” from the definition of “residential facility for groups.” And as with Henderson, the use of the term “facility” is inappropriate for this residential land use.

“Residential facilities for groups” are a permitted use in all residential districts except O–L; business district C–2; redevelopment districts R–A/R2, R–A/R–3, and R–A/R–4; and special purpose districts PUD/PID, PCD, MUD–N, MUD–C, MUD–E. They are prohibited in the other two redevelopment districts and the other business districts.

Halfway houses for recovering alcohol and drug abusers are allowed in the same districts as of right as residential facilities for groups except for the three mixed use districts where they are prohibited.

Residential health care facilities which tend to be more institutional in nature than residential are allowed as of right only in special purpose districts PUD/PID, PCD. They are allowed by special use permit in the R–2, R–3, R–4 residential districts; business district C–2; redevelopment districts R–A/R–2, R–A/R–3, R–A/R–4; and special purpose districts for mixed uses MUD–N, MUD–C, MUD–E.

We can discern no reason for this zoning scheme and the city would be well advised to reconsider it. It is difficult to imagine the justification for excluding “residential facilities for groups” and

“halfway houses for recovering alcohol and drug abusers” from the O–L residential district as well as any other district in which residential uses are permitted such as the mixed use districts.

The ordinance imposes a number of “use–specific standards” for each of these three “group living” arrangements under the rubric “Public and Institutional Uses.” Both residential facilities for groups and halfway houses for recovering alcohol and drug abusers “must comply on a continuing basis with all governmental licensing requirements.” In addition, “any facility for more than ten residents must obtain a special use permit...”¹¹⁰ No identifying signage is allowed.¹¹¹ Both requirements are certainly reasonable. However, it is not clear how the city would treat a use like Oxford House for which no license is required.

The ordinance establishes a 660–foot spacing distance from an existing to another residential facility for groups, facility for transitional living for released offenders or a halfway house for recovering alcohol and drug abusers. The ordinance does allow the city to waive this spacing distance via special use permit when there is an “adequate barrier” between the proposed group living arrangement and an existing one. The ordinance defines an “adequate barrier” as “as an improved drainage facility, Clark County Interstate 215, U.S. Interstate 15, or other rights-of-way with a minimum width of one hundred (100) feet. The boundary limits of these streets, freeways, and freeway crossovers are as defined by the official North Las Vegas, Nevada Department of Transportation and Clark County right-of-way maps for such roadways, respectively.”¹¹²

These provisions appear to be adapted from Clark County’s zoning for community residences and suggest a lack of understanding of the basis for spacing distances. As noted in the earlier discussion of the Clark County ordinance, the Clark County spacing distance can be waived under a number of additional circumstances including the key factor of whether the proposed community residence in combination with any existing community residences “would alter the residential character of the neighborhood by creating an institutional atmosphere due to the concentration of community residences on a block or adjoining blocks.” North Las Vegas makes no such provision. The new zoning repealed the city’s special use standard that allowed the spacing distance to be waived when the proposed home “will not inhibit the integration of disabled persons into the community or neighborhood.”

The North Las Vegas ordinance also requires that residents of a halfway house for recovering alcohol and drug abusers must be enrolled in a substance abuse or rehabilitation program and that the home must adopt and enforce a policy that prohibits the use of drugs or alcohol. It also requires that the home be consistent with scale and architectural character of the neighborhood.¹¹³ These requirements are reasonable.

On the surface, the definition of “residential care facility” suggests that it refers to community residences for more than ten occupants. However, the ordinance divides residential health care facilities into two sub classifications.¹¹⁴ The first, “specialized care facilities” such as nursing or convalescent homes are institutional land uses, not residential uses. Unlike community residences for people with disabilities, these do not seek to emulate a family and there is no therapeutic reason for them to be located in residential zoning districts.

The second, “minimal care facilities” are defined as “uses similar to apartments but providing services such as central dining, transportation service, and limited medical assistance.”¹¹⁵ While these are residential and not institutional uses, they do not appear to be community residences.

A group care facility or halfway houses for recovering alcohol and drug abusers is required to have the same number of off–street spaces as the type of dwelling it is (single–family, townhouse, three–family triplex, etc.) plus one space for every two residents. This requirement may still be excessive, particularly since few, if any, residents of a group care facility have a motor vehicle. However, residents of a halfway house for recovering alcohol and drug abusers are much more likely to own a car. The formula also ignores the number of staff present at any time.

In practice, North Las Vegas has been very receptive to both group care facilities and halfway houses for people recovering from drug and/or alcohol addiction. Staff reports that the city approved every conditional use permit and special use permit for these uses during 2004–2010. City records identify 86 community residences. However, the city’s map of community residences shows 104 community residences as of March 16, 2010: 89 group care homes, one halfway house, and 14 transitional living facilities. More current information is not available.

In many cities across the nation, community residences have been concentrated and segregated in predominantly minority neighborhoods. Using 2000 census data, that does *not* appear to be case in North Las Vegas. Mapping licensed community residences reveals clustering of 12 community residences in the area bounded by Carey on the north, Lake Mead on the south, Clayton on the west and North Martin L. King Boulevard on the east — in census tract 36.17 (formerly 36.02 in the 2000 census) which was 52.2 percent African American in 2010 (60.3 percent in 2000) and 32.9 percent Hispanic in 2010 (17.7 percent in 2000). However, the other major concentration of 13 community residences is in a predominantly Caucasian census tract. Concentrations of community residences occur in at least four other predominantly Caucasian neighborhoods as of 2000 in central and western North Las Vegas.

SUGGESTION FOR FURTHERING FAIR HOUSING:

- ❖ *North Las Vegas should amend its zoning ordinance to refine its off–street parking requirements for each type of community residence to more accurately reflect actual off–street parking needs. The city would be prudent to survey a statistically valid sample of existing community residences to identify the actual parking needs of the different types of community residences.*
- ❖ *As written, North Las Vegas’ zoning treatment of community residences may be vulnerable to a legal challenge. But as practiced, it has not constituted a barrier to fair housing. To impose requirements on community residences for people with disabilities, North Las Vegas needs to amend “one or more handicapped persons together with caretakers or house parents” within its definition of “family.” If the city does not amend this phrase, all of its regulations for community residences for people with disabilities may be vulnerable to judicial challenge.*

- ❖ *Even after North Las Vegas deletes the above mentioned language, the city still needs to determine how it would treat a recovery community like Oxford House which is recognized by Congress and for which no license is required. It also needs to provide for halfway houses for people with mental illness. The ordinance cannot continue to rely on the state statutes to define different types of community residences because the state statutes can, and have, changed. The city also needs to reconsider the districts in which the different types of community residences for people with disabilities are allowed and how they are allowed. There needs to be a rational basis for the zoning scheme.*

Boulder City

Staff report that no community residences licensed by the State of Nevada are located in Boulder City which could be due to the fact that the city's zoning did not provide for community residences.

Prior to 2010, Boulder City's zoning code did not provide for community residences for people with disabilities. The city corrected that oversight in November 2010 when the city council unanimously amended the zoning code to provide for community residences for people with disabilities in accordance with the principles discussed earlier in this chapter. The zoning amendments were drafted after a thorough study was conducted that provided the foundation for the zoning amendments and factual justification for the adopted provisions.¹¹⁶

Boulder City's definition of "family" still allows up to five unrelated people to live together as a single housekeeping unit.¹¹⁷ The zoning code now makes a reasonable accommodation that allows "family community residences" for people with disabilities in all residential districts as a permitted use as long as they are located more than 660 feet from an existing community residence as measured from front door to front door, and "the operator or applicant is licensed or certified by the State of Nevada..., has certification from an appropriate national accrediting agency, or has been recognized or sanctioned by Congress to operate the proposed type of community residence."

Similarly, "transitional community residences" are allowed as a permitted use in the city's R3 "Multiple Family Residential Zone." Transitional community residences are a conditional use in the city's single- and two-family zoning districts as well as in the MP "Mobile Home Park Zone" and ME "Mobile Home Estate Zone." Any proposed community residence that would be located within 660 feet of an existing community residence or that does not meet the licensing or certification requirement stated earlier in this paragraph must obtain a conditional use permit. If a proposed community residence has been denied a required license or certification, it cannot receive zoning approval.¹¹⁸

The ordinance distinguishes between family and transitional community residences on the basis of length of tenancy, a defining characteristic of the two types of community residences. In a family community residence the length of tenancy is one year or more. Tenancy in a transitional community residence is for less than a year. City staff and officials understand that the rules of a proposed community residence determine which type of community residence it is. If a community residence imposes a limit on residency measured in months like halfway houses do, it is a transitional community residence.

Community residences that do not impose any limitation on how long people with disabilities can live in them, group homes and recovery communities, for example, are family community residences.

The amendments also state “A community residence shall be considered a residential use of property for purposes of all zoning and building codes.” This provision should provide guidance to building inspectors so they apply residential, not institutional codes to community residences.

City staff is unaware of any community residences that have been established since adoption of these amendments, especially of homes for five or fewer residents since they comply with the definition of “family” and, like any family, are not subject to any additional zoning regulation.

With these amendments, Boulder City makes the reasonable accommodation for community residences for people with disabilities that the Fair Housing Amendments Act of 1988 requires.

SUGGESTION FOR FURTHERING FAIR HOUSING:

- ❖ *In order to implement spacing distances between community residences for people with disabilities, all of the Clark County jurisdictions need to maintain an up-to-date map of where the existing community residences exist. This map should show only those community residences that do not fit within the jurisdiction’s definition of “family” or “household.” The case law makes it clear that zoning must treat community residences for people with disabilities that fit within a jurisdiction’s definition of “family” the same as any other family or household and they cannot be used for determining spacing distances between community residences.*

Zoning and Availability of Affordable Residential Development

Land-use controls such as zoning can interfere with affirmatively furthering fair housing by imposing regulations and/or procedures that effectively prevent the new construction of for sale and rental housing that households with modest incomes can afford—especially when the median household income is much lower for minority households than for Caucasian, non-Hispanic and African American households who face this situation throughout Clark County’s urban core as discussed earlier.

Apart from housing prices, land use controls can affect racial and ethnic segregation. In a leading article, Pendall, in a survey of the 25 largest metropolitan areas and covering the period 1980-1990, found that low-density zoning, which restricted residential densities to fewer than eight dwelling units per acre, consistently reduced rental housing, which in turn limited the number of Black and Hispanic residents in communities.¹¹⁹

Drawing on census data for 1990 and 2000 for the 25 largest metropolitan statistical areas (MSAs) and local regulatory indicators compiled by Pendall, Rothwell and Massey found that anti-density zoning increased African American segregation by reducing the quantity of affordable housing in Caucasian jurisdictions.¹²⁰ In a subsequent article, Rothwell, using two datasets on land regulation for the 25 largest MSAs found in a statistical analysis that “anti-density regulations are responsible for a large share of the observed patterns in segregation between 1990 and 2000. Minority groups are more segregated from Caucasians in metropolitan areas with prevalent exclusionary zoning no matter what their relative incomes and population sizes.” He added: “The estimated effects are large enough that a hypothetical switch in zoning regimes from the most exclusionary to the most liberal would reduce the gap between the most and least segregated MSAs by at least 35% for the ordinary least squares (OLS) estimates.”¹²¹

Land Use Control Techniques That Potentially Affect Affordability

A number of land use controls can impose, apart from market considerations, extraordinarily additional costs for new housing:

- (1) Zoning extensive areas of a community for large lots (above ½ acre) without providing sufficient lands for zoned for smaller lots;
- (2) Excluding multiple-family dwellings totally or greatly restricting the zoned land available for them;
- (3) Imposing restrictions on the number of bedrooms in multiple-family dwellings to discourage families with children (i.e., requiring that a substantial number of units are one-bedroom units);
- (4) Prohibiting or severely limiting mobile homes or manufactured housing;
- (5) Imposing large lot width requirements, which drive up development costs because they require additional street, curb, gutters, and sidewalk length (this is connected with (4) above); and
- (6) Requiring minimum building sizes for residential construction, which, in effect, mandates large residences, where smaller ones would suffice.¹²²

Other zoning practices can affect housing affordability as well. These include: lengthy review and approval times for new developments, with numerous or sequential public hearings, which add to the carrying costs of the development,¹²³ and development standards that are not

rationally related to the nature of the land use, such as requiring three parking spaces for a one-bedroom apartment.¹²⁴

(NAHB) Research Center conducted a statistical study of subdivision requirements in 469 communities from a nationwide sample on single-family homes. The purpose of this study was to establish a methodology to determine when exceeding particular benchmarks created a regulatory cost barrier in a community, but the benchmarks applied only to single-family homes in the densest single-family district. The study focused on a number of variables: lot size, floor space requirements, lot width, pavement width, sidewalk requirements, curb and gutter drainage, front yard setbacks, and off-street parking requirements. The study found that excessive lot size, lot width, and floor area requirements accounted for the largest percentage of total costs. While only 8 percent of the jurisdictions had excessive floor area requirements, the regulatory cost barriers for floor area in those jurisdictions accounted for 17 percent of the total regulatory cost barriers for all land development variables for all jurisdictions in the study. Finally, the study found that the average cost of excessive regulation from subdivision standards was about five percent of the average cost of a new single-family home.¹²⁵

Quigley and Rosenthal conducted an extensive review of the empirical literature on the effects of land use regulation on the price of housing. “When local regulators effectively withdraw land from buildable supplies—where under the rubric of ‘zoning,’ ‘growth management,’ or other regulation—” they wrote, “the land factor and the finished product can become pricier. Caps on development, restrictive zoning limits on allowable densities, urban growth boundaries, and long permit processing delays have all been associated with increased housing price.”¹²⁶

Clark County Unified Development Code

Clark County’s land-use controls pose no direct barriers to affirmatively furthering fair housing. However, under the zoning for undeveloped land four out of five new housing units would be for single-family detached housing which tends to be significantly more expensive than attached and multiple-family new construction.

Table 84 Unincorporated Clark County Land Zoned for Residential Use

Unincorporated Clark County Land Zoned for Residential Use As of February 2014					
Zoning Districts That Allow Residential Uses		Minimum Lot Area in Square Feet	Total Acres	Land Available to Develop in Acres	Percentage of Land Available to Develop
R-1	Single-Family Residential	5,200	10,912	340.9	3.1%
R-2	Medium Density Residential	3,300	13,686	1,445.1	10.6%
R-3	Multiple-Family Residential	7,000	4,715	414.8	8.8%
R-4	Multiple-Family Residential (High Density)	7,000	2,177	135.3	6.2%
R-5	Apartment Residential	7,000	375	34.7	9.2%
R-A	Residential Agriculture	40,000	545	142.6	26.1%
R-D	Suburban Estates Residential	10,000	1,196	192.1	16.1%
R-E	Rural Estates Residential	20,000	29,748	16,901.7	56.8%
R-T	Manufactured Home Residential	5,200; Manufactured home: 2,800; 4,000 doublewide unit	2,173	117.3	5.4%
R-U	Rural Open Land (includes BLM land)	80,000	9,664	752.0	7.8%
RUD	Residential Urban Density	2,000	980	199.6	20.4%
Total Acres of Land Zoned for Residential Use			76,172	20,676	27.1%

Prepared by Anthony Azua, GISP, Senior GIS Analyst, Clark County Comprehensive Planning, February 2014 using GILIS13 population estimate data.

However, this disparity results mainly from 52 percent of the residentially-developable land being zoned R-E. This land is land in a ring around the Las Vegas Valley that the Bureau of Land Management has been auctioning off. Clark County has zoned nearly all of the Disposal Boundary land as R-E as sort of a “holding zone” until development proposals are offered.

The County itself has reserved 1,200 acres of this “Disposal Boundary” land for development as affordable housing, usually multi-family dwellings. While several affordable developments on this land have been built so far, the county does “pre-zone” to enable development of affordable housing. The county needs to remain vigilant to use as much of the Disposal Boundary land for affordable housing.

Site development standards in Table 30.56-2 of Chapter 30.56.110 require that within Single-Family Residential Development “any manufactured home not located within R-U, R-T, or R-A if within Community District 5, shall contain a minimum of 1,200 square feet of habitable area...”. (Community District 5 is described in the Unified Development Code Chapter 30.12.060 as “those portions of unincorporated Clark County towns and communities as shown within the South, Northeast and Northwest Land Use Plans including but not limited to: Indian Springs, Mt. Charleston, Searchlight, Bunkerville, Glendale, Moapa, Moapa Valley, Goodsprings Cal-Nev-Ari, Blue Diamond, Mountain Springs, and Sandy Valley”).

There is no apparent explanation in the County’s Unified Development Code regarding why manufactured housing is subject to minimum habitable area criteria in certain single-family areas of Community District 5. No similar minimum standard of habitable area applies to other types of dwellings in Community District 5, and the only minimum standard related to size that

applies other types of dwellings anywhere is “Dwellings shall have a minimum width and depth of twenty (20) feet” (Table 30-56-2), which amounts to only 400 square feet. This raises a question (and only a question) about whether the habitable area standard being applied to manufactured housing in Community District 5 may be a fair housing issue. (For example, is it an attempt to make it difficult for members of a minority group to locate there?). *It should be recommended that the habitable area standard of Table 30.56-2 be carefully considered through an examination of its history and any effects its application may be having in Community District 5 to determine if it is a fair housing issue.*

Las Vegas Unified Development Code

The residential districts appear in Las Vegas Unified Development Code, 19.06 (Residential Districts—Purpose and Development and Design Standards) and as special districts and overlays in LVMC 19.10 (Special and Overlay Districts—Purpose and Development and Design Standards). There has not been much experience implementing the code since it was adopted March 5, 2014. There are 17 residential districts in the code. In addition, LVMC 19.10.170 is a live/work overlay that allows, on a case-by-case base, owners and operators of businesses to occupy joint living and work quarters in commercial and industrial areas where other types of residential uses are inappropriate. Such live/work units must meet criteria contained in the code, much like a special or conditional use permit. Development in these districts is described in both text and extensive use of graphics for each district.

The lowest density districts are the U Undeveloped District and R-E Residence Estate District, with minimum 20,000 square foot lots, for single-family homes. The highest density residential district that is not a special district or overlay is the R-4 High Density Residential District, with a 7,000 square foot minimum lot size. Here, there is no maximum number of dwelling units per acre; rather, the underlying general plan designation determines the maximum number dwelling units.

The following districts allow multiple-family dwellings at various densities either by definition or as part of a proposed use in a planned district or special district. Land in the T-C Town Center District is governed by a Town Center Development Standards manual, which is a separate adopted document that is referenced in the Unified Development Code.

- R-3 Medium Density Residential
- R-4 High Density Residential
- PD Planned Development
- R-PD Residential Planned Development
- ML-TC Medium Low Density Residential Town Center.
- MLA-TC Medium Low Attached Density Residential Town Center
- M-TC Medium Density Residential Town Center
- T-D Traditional Development

There are no restrictions on the number of bedrooms in multiple-family units.

The Unified Development Code permits mobile/manufactured homes in the R-MH District, with a minimum lot size per unit of 5,550 square feet, which is a net density (excluding streets and other public improvements) of 7.92 dwelling units per net acre. In addition, manufactured home parks are allowed in the ML-TC Medium Low Density Town Center District.

The range of minimum lot width requirements in the residential districts is reasonable. For example, in the U Undeveloped District and the R-E Residence Estate District, the lot width is 100 feet. In the R-CL Single Family Compact Lot District, the lot width drops to 35 feet. In the R-TH Single Family Attached District, the lot width requirement is 20 feet. In the R-3 and R-4 Districts, both of which permit multifamily dwellings, there is no minimum lot width requirement.

Parking requirements in the residence districts are reasonable as well. In all of the single-family districts there is a requirement of two unimpeded parking spaces. In the R-3 and R-4 Districts, parking requirements differ based on the nature of the multifamily dwelling. For example, these are the parking requirements in the R-3 District, LVMC 19.06.110.E, Table 6:

- 1.25 spaces per studio or one bedroom unit
- 1.75 spaces per two bedroom unit
- 2.0 spaces per three or more bedroom unit
- plus one guest parking space per six units

The R-4 District, LVMC 19.16.120.E, Table 6, has identical requirements for multifamily dwellings.

The Unified Development Code does not contain minimum square footage requirements for residential units.

The LVMC allows accessory dwelling units, known as an “accessory structure (Class I),” as a special permit in the U, R-E, R-D, and R-1 Districts, provided that: (a) the size of the lot or parcel must exceed 6500 square feet; and (b) unless the principal dwelling is owner-occupied, a Class I accessory structure may not be offered or occupied as a rental unit. (LVMC 19.12.070).

Table 85 Las Vegas Land Zoned for Residential Use

Land Zoned for Residential Use in Las Vegas As Of March 2014					
Zoning Districts That Allow Residential Uses		Minimum Lot Area in Square Feet	Total Acres	Land Available to Develop in Acres	Percentage of Land Available to Develop
U	Undeveloped	20,000	166	114	69.1%
R-E	Residence Estates	20,000	4,532	1,755	38.7%
R-D	Single Family Residential-Restricted	10,000	355	86	24.3%
R-1	Single Family Residential	6,500	7,320	115	1.6%
R-CL	Single Family Compact Lot	3,000	3,201	698	21.8%
R-TH	Single Family Attached	1,600; one attached unit allowed per lot	0	0	—
R-2	Medium-Low Density Residential	5,500; five to 12 single-family detached and duplex units allowed per acre	313	31	9.8%
R-3	Medium Density Residential	5,500; 13 to 50 duplexes, townhouses, and medium-density apartments per acre	1,520	71	4.7%
R-4	High Density Residential	7,000; while there is no limit on number of dwelling units per acre, the underlying general plan designation determines the maximum number of dwelling units per acre	347	43	12.4%
R-MH	Mobile/Manufactured Home Residential	5,500; one dwelling unit per lot	379	1	0.3%
PC	Planned Community	3,000 acre minimum site area (a combination of lots and parcels that may be in separate ownership); the approved Planned Community Program establishes the maximum number of dwelling units per gross acre for each residential category, as well as for the entire property. The number of dwelling units permitted per gross acre on any parcel in the P-C District is determined at the time the Development Plan is approved.	15,570	8,500	54.6%
PD	Planned Development	40 acre minimum site area; no maximum density; each parcel within the PD District must identify the proposed density	2,525	671	26.6%
R-PD	Residential Planned Development	4 dwelling units per gross acre; single-family and multi-family residential uses allowed	10,267	181	1.8%
L-TC	Low Density Residential Town Center	3.5 to 5.5 dwelling units per gross acre; thje L-TC district appears in a separate Town Center Development Standards manual, not in the Unified Development Code	208	30	14.3%
ML-TC	Medium Low Density Residential Town Center	5.6 to 8 dwelling units per gross acre	236	39	16.4%
MLA-TC	Medium Low Attached Density Residential Town Center	8.1 to 12 dwelling units per gross acre	67	15	22.1%
M-TC	Medium Density Residential Town Center	12 to 25 dwelling units per gross acre	135	6	4.2%
T-D	Traditional Development	40 acre minimum site area; Las Vegas' <i>Development Standards and Design Guidelines</i> sets the maximum density in dwelling units per gross acre, but doesn't actually identify densities	7,560	7,560	100.0%
Total Land Zoned for Residential Use			54,536	19,801	36.3%

No land has been mapped to the RH-T district.

Figures include land under the jurisdiction of the nation's Bureau of Land Management (BLM). The 7,000 acres north of Moccasin Road comprise the majority of the BLM owned land.

The Unified Development Code does not contain a definition of “affordable housing” or have any specific requirements for inclusionary zoning, such as a requirement that a certain proportion of all new rental or for-sale development be affordable to low- and moderate-income households in exchange for an increase in density. However, it does deal with affordable housing in UDC 19.06.040(l), “residential adjacency standards,” which address the relationship of multi-family and nonresidential development that is adjacent to properties in the R-E, R-1, R-D, and R-CL Districts. The residential adjacency standards contain a set of building height and setback restrictions to ensure compatibility between commercial, multifamily development and property

zoned or used for single-family residential. However, the Unified Development Code allows a waiver from these standards for:

Any multi-family residential project that is intended to meet the affordable housing objectives of the General Plan if the City Council determines that the waiver is critical to the viability of the project and that the intent of this Paragraph (2) can be achieved.¹²⁷ [UDC 19.06.040.I.2.e.i.]

The City of Las Vegas Unified Development Code does not appear to contain provisions that unduly increase the cost of housing beyond the means of households with modest incomes. The code contains residential zoning requirements that are reasonable and allow for a diverse range of housing types at various densities. Two changes to the code will better facilitate the development of affordable housing throughout the city:

- *Define “affordable housing” since that term is used in the Code.*
- *Amend the Code to incorporate mandatory inclusionary zoning to require that new market-rate residential projects contain a certain proportion of affordable housing. There are a variety of approaches that this can take, and the City of Las Vegas needs to undertake a study to evaluate them. One is the Model Affordable Housing Density Bonus Ordinance that appears in Marya Morris, Gen. Editor, Smart Codes: Model-Land Development Regulations, Planning Advisory Service Report No. 556 (Chicago: American Planning Association, 2009), Chapter 4.4. The model ordinance uses U.S. Department of Housing and Urban Development definitions of low- and moderate-income to establish eligibility criteria for purchase or rental of affordable units. This model draws on provisions for other inclusionary ordinances throughout the U.S., which are identified in the commentary.¹²⁸ [See Better Schools - Is Inclusionary Zoning Inclusionary Guide to Practitioners.pdf]*

City of Henderson Development Code

This review examined the Henderson Development Code, which appears as Title 19 of the Henderson Municipal Code and is available in a single downloadable PDF file or a series of downloadable chapters on the City of Henderson website.¹²⁹ The Development Code was revised on October 18, 2011. The residential districts appear in Chapter 19.2 (Residential Zoning Districts)¹³⁰ and Chapter 19.3 (Nonresidential, Mixed Use, and Special Purpose Zoning Districts).¹³¹ Together there are 19 districts that allow residential uses.

(1) Minimum lot size or square feet per dwelling unit. The Development Code’s requirements for minimum square feet per dwelling unit range from 40,000 square feet in the RS-1, Low-Density Single-Family Residential-1 District to 2,000 square feet in the DRM Downtown Medium-Density Residential District, with a minimum site area of 12,000 square feet. However, a number of districts do not identify a specific lot size, but rather establish either maximum densities, expressed in dwelling units per gross acre (the MN Neighborhood Mixed Use and the MR Regional Mixed Use Districts), have no maximum density (e.g., the DRH Downtown High-Density Residential and the MC

Corridor/Community Mixed Use Districts),¹³² or allow the developer to specify, or possibly negotiate, the density as part of a Master Plan (MP) Overlay District or an approved development agreement, as permitted in the PC Planned Community District.

In some cases, the Development Code requires that the zoning district itself be minimum size or site area (a combination of lots and parcels that may be in single ownership). The use of dwelling units per gross acre is apparently used in areas where streets and other public improvements will be part of the district, as opposed to the use of dwelling units per net acre, where streets and other public improvements are excluded from the density calculation.

(2) Availability of multiple-family dwellings. Multiple-family dwellings are permitted as of right in the following districts:

- RM-10 Medium-Density Residential 16 District
- RM-16 Medium-Density Residential 16 District
- RH-24 High-Density Multifamily Residential 24 District
- RH-36 High-Density Multifamily Residential 36 District
- MC-Corridor/Community Mixed-Use District
- MN-Neighborhood Mixed-Use District
- MR-Regional Mixed-Use District.

Multiple-family dwellings are permitted only by conditional use permit in the CT Tourism Commercial District and subject to standards in the DCC Downtown Core Commercial and the DHC Downtown Highway Commercial District.

(3) Restrictions on the number of bedrooms in multiple-family units. There are no restrictions on the number of bedrooms in multiple-family units.

(4) Regulations affecting mobile or manufactured homes. The Development Code allows mobile homes in the RMH Mobile Home Residential District, with a minimum district size of 10 acres.

(5) Minimum lot width requirements. Minimum lot width requirements range from 100 feet in the DH, RS-1, and R-2 Districts to 20 feet in the DRM District. In some districts, the lot widths are variable, based on standards in the individual district regulations, and some districts have no width requirements at all, including the RM District. Dimensional requirements for the residential districts are summarized in Table 19.2.20-1.

(6) Minimum parking requirements. Minimum parking requirements appear reasonable. Single-family detached and attached homes are required to have two parking spaces per

dwelling unit. Sec. 19.5.3.B.3 (c) sets forth parking standards for multiple-family units in both residential and non-residential districts as follows:

(1) Residential and nonresidential districts

- i. 1.5 spaces per 1-bedroom unit¹³³
- ii. 2 spaces per 2-bedroom unit
- iii. 2.5 spaces per 3-bedroom unit
- iv. 3 spaces per 4-bedroom unit
- v. Plus additional 0.25 space per unit for guest parking

(2) Downtown districts, except DCC district: 1.5 parking spaces minimum per dwelling unit.

(3) DCC district: 1 space (minimum), 1.5 spaces (maximum) per dwelling unit.

(7) Minimum dwelling unit size requirements. Three districts have minimum dwelling unit size requirements: The RS-1 and RS 2 Single Family Residential Districts (1,200 square feet) and the DRH Downtown High Density Residential District (700 square feet).

(8) Accessory dwelling units. The Development Code defines an accessory dwelling unit as a “[a] dwelling unit either attached to a single-family principal dwelling or located on the same lot and having an independent means of access.” The code allows accessory dwelling units as conditional uses in the RS-1, RS-2, RS-4, and RS-6 Residential Districts and in the DRL and the DRM Downtown Residential Districts under Sec. 19.5.3.B.7, which sets forth criteria for approval that are in addition to the more general approval criteria for conditional use permits in Sec. 19.6.6.A.

(9) Unusual provisions. In the course of this review, there was noted an unusual provision at odds with conventional practice and it deals with the definition of a “multifamily dwelling” at Sec. 15.5.3.B.3 (a) as:

A building containing seven or more dwelling units, each of which includes a separate household.

This is unusual because multiple-family dwellings are usually defined as a building containing more three or more dwelling units.¹³⁴ In response to a question about this, a city staff member explained that this definition was employed because Henderson “has varying product types within the development code. We wanted to be more creative in the types of products we get in Henderson” and its consultants proposed this definition during the last major code update.¹³⁵

(10) Affordable housing. The City of Henderson Code provides voluntary density bonuses for multifamily development in Sec. 19.7.6.C.13 as follows:

An increase in the maximum density allowed in a multifamily zoning district may be requested if the proposed development is considered affordable (units affordable to households earning less than 120 percent of the Clark County Area Median Income) and/or an age-restricted senior multifamily development, pursuant to the following:

- (a) Up to 20% density bonus: Amount of affordable housing provided must be equal to or greater than the density bonus requested.
- (b) Above 20% up to 35% density bonus: Amount of affordable housing provided must be equal to or greater than the density bonus requested. Additionally, a minimum of 5 locational criteria from this Section must be met, and a minimum of 3 on-site amenities from this Section must be provided.
- (c) Above 35% up to 50% density bonus: Amount of affordable housing provided must be equal to or greater than the density bonus requested. Additionally, a minimum of 7 locational criteria from this Section must be met, a minimum of 5 on-site amenities from this Section must be provided, and approval of a Conditional Use Permit is required.
- (d) Up to 20% density bonus for senior housing may be granted with no income or affordability restrictions. Additional density may be approved through a Conditional Use Permit up to a maximum bonus of 50%.

(1) Locational Criteria

Projects requesting an increase in density shall be located within a ¼-mile walk for affordable developments, or a 1/8-mile walk for senior housing developments, of the following:

- i. Transit corridor/mass transit stop
- ii. Grocery store
- iii. Other daily-need retail uses
- iv. Restaurants
- v. Libraries
- vi. Movie theaters
- vii. Laundry services
- viii. Banks
- ix. Medical offices
- x. Professional offices

- xi. Hospitals
- xii. Accommodations (hotel/motel)
- xiii. Recreational uses (bowling alleys, etc.)
- xiv. Fitness centers/athletic clubs
- xv. Public parks
- xvi. Other locational criteria as approved

(2) On-Site Amenities

Projects requesting an increase in density shall provide a minimum number of the following on-site amenities:

- i. Fitness center/athletic club
- ii. Fitness instruction
- iii. Instructional classes
- iv. Garden/pool
- v. Bocce ball court
- vi. Shuffleboard
- vii. Media room/theater
- viii. Card room
- ix. Provide transport to medical appointments, grocery stores, casinos, etc.
- x. LEED certification (suggest trade for increase in height, parking, open space, etc.)
- xi. Courtyards with amenities such as game tables, group seating, individual meditation spaces, yoga yards, pool, barbeque, community gardens, walking paths, and dog runs
- xii. Other on-site amenities as approved

(3) Developer Incentives

The following items may be used as a compensating benefit for waiver requests. These items are developer incentives provided to the City and shall be located within ¼ mile of project.

- i. Improvements to nearby parks
- ii. Investment in libraries or other public facilities/services
- iii. Donations to local charities that provide services to low-income/seniors
- iv. Improvements to public facilities
- v. Rehabilitate other building(s) nearby
- vi. Develop in low-income areas in exchange for density bonus
- vii. Develop open space and trails
- viii. Other developer incentives as proposed/approved

The basic bonus, 20 percent, means that one among five units in a multifamily development will be an “affordable” unit. But the density bonus authorized by this section is not for low-and moderate-income households (i.e., units affordable to households with a gross family income that does not exceed 80 percent of the gross family income of the same size within the relevant housing region, determined by the U.S. Department of Housing and Urban Development), but rather housing that extends into middle-income ranges (81 to 120 percent of the Clark County median household income). By contrast, the Development Code itself defines “affordable housing” in Sec. 12.12.4 (Defined Terms) as “Housing affordable for a family with a total gross income that does not exceed 80 percent of the median gross income for Clark County, based upon the estimates of the United States Department of Housing and Urban Development of the most current median gross family income for Clark County.” *Consequently, the definition of “affordable housing” in Sec. 19.7.6.C.13, the density bonus provisions, conflicts with the definition in Sec. 12.12.4, Defined Terms.*¹³⁶

There is no specific description of how the requirement that the affordable units will remain affordable, such as through deed restrictions on for-sale units that prevent windfalls to homebuyers who would otherwise buy the unit at the “affordable” price and sell it later at a market price, or by independent annual income qualifications for renters to make certain that the household income doesn’t climb above the “affordable” threshold. The income qualification requirement would also be part of the deed restriction. Further, there is no specified duration of how long the units are to remain affordable.

The City of Henderson staff explained that typically the property would be deed restricted, “though the city does have a development agreement with a senior housing project in downtown Henderson. When the developer requests funds to assist with the development of the project, at that time we determine how many units will be set aside. . . Renters are assessed annually by

the property manager with a new lease agreement and the city will monitor annually to ensure they are in compliance in compliance. The affordability period varies with each agreement, [and] could be 20 years to 50 years that the units must remain affordable.”¹³⁷

According to the City of Henderson staff, there has only been one project approved with a density bonus, a 252-unit affordable senior complex with 101 affordable units, but it has not been constructed.¹³⁸

State definition of Affordable Housing:

NRS 278.0105 “Affordable housing” defined. “Affordable housing” means housing affordable for a family with a total gross income that does not exceed 80 percent of the median gross income for the county concerned based upon the estimates of the United States Department of Housing and Urban Development of the most current median gross family income for the county.

Table 86 City of Henderson Land Zoned for Residential Use

Land Zoned for Residential Use in Henderson As of February 2014					
Zoning Districts That Allow Residential Uses		Minimum Lot Area in Square Feet	Total Acres	Land Available to Develop in Acres	Percentage of Land Available to Develop
RS-1	Low-Density Single-Family Residential 1	40,000	2,282	1,206	52.8%
RS-2	Low-Density Single-Family Residential 2	20,000	2,219	1,215	54.8%
RS-4	Low-Density Single-Family Residential 4	10,000	628	252	40.1%
RS-6	Low-Density Single-Family Residential 6	6,000	13,936	1,043	7.5%
RS-8	Low-Density Single-Family Residential 8	Single-family detached (street-loaded) — 4,000 square feet; single-family detached (alley-loaded) — 3,000 square feet; single-family attached — 2,000 square feet per lot, plus an additional 1,000 square feet per unit; mixed-use and non-residential — 15,000 square foot maximum	182	126	69.2%
RM-10	Medium-Density Residential 10	3,000	1,894	392	20.7%
RM-16	Medium-Density Residential 16	16 dwelling units per gross acre; minimum district size of 10 acres	1,050	126	12.0%
RH-24	High-Density Multifamily Residential 24	24 dwelling units per gross acre; minimum district size of 10 acres	645	139	21.6%
RH-36	High-Density Multifamily Residential 36	36 dwelling units per gross acre	185	17	9.2%
DRL	Downtown Low-Density Residential	5,000	124	1	0.8%
DRM	Downtown Medium-Density Residential	2,000. Minimum site area of 12,000 (a combination of lots and parcels that may be in different ownership)	36	4	11.1%
DRH	Downtown High-Density Residential	No maximum density. Minimum site area of 40,000 square feet	21	4	19.0%
RMH	Mobile Home Residential District	2,800. Minimum district size of 10 acres	231	6	2.6%
DH	Development Holding	40,000	5,956	4,078	68.5%
MC	Corridor/Community Mixed Use	No maximum density. Minimum district size of 15 acres	1,004	323	32.2%
MN	Neighborhood Mixed-Use	16 dwelling units per gross acre maximum. Maximum district size of 10 acres	0	0	0.0%
MR	Regional Mixed-Use	30 dwelling units per gross acre minimum. Minimum district size of 50 acres	647	644	99.5%
PC	Planned Community	Numbers of dwelling units per gross acre are to be identified in a master development plan as part of a Master Plan (MP) Overlay District or an approved development agreement. A MP Overlay District must be at least 50 acres	4,198	3,749	89.3%
Total Land Zoned for Residential Use			35,238	13,325	37.8%

Source: City of Henderson, Nevada

The City of Henderson Development Code does not appear to contain provisions that unduly increase the cost of housing beyond the means of households with lower incomes. The code contains residential zoning requirements that are reasonable and allow for a diverse range of housing types at various densities. On the basis of this review, the following are recommendations:

The requirement of minimum house sizes contained in three zoning districts should be eliminated, or at least seriously reconsidered as to their true regulatory purpose. As noted the RS-1 and RS-2 Single Family Residential Districts both require 1,200 square feet and the DRH Downtown High Density Residential District requires 700 square feet. These are the *only* districts that have such provisions. Minimum house size requirements establish a minimum cost for a house and, as such, may constitute a barrier to affordable housing. Other than that, they serve no regulatory purpose particularly because they are unrelated to the number of occupants in the unit.

The City of Henderson should revise the density bonus provisions in Sec. 19.7.6.C.13 for affordable housing to make them mandatory, to eliminate the definition of affordable housing there so that the definition in Sec. 12.12.4 (Defined Terms) is the controlling definition for the entire development code, and to set forth provisions that would identify, among other things, the contents of a development agreement between the city and a developer regarding the production of affordable housing.

It is important to make an affordable housing requirement mandatory for market-rate developments because, without such a mandate, affordable housing will not be built at all or not built in sufficient quantities to make the program worth administering (see footnote).¹³⁹ The Henderson density bonus ordinance does not include the details of how the density bonus system would actually work (again, typically through a development agreement), such as responsibility for income qualifying buyers of affordable housing units, annual income qualification of renters, duration of affordability of dwelling units, annual reporting requirements, deed restrictions for affordable units, and other details. This would clarify through the Development Code how housing bonuses are to be handled uniformly, rather than employing an *ad hoc* procedure that could vary from project to project.

There are a variety of approaches that a revision of the density bonus provisions can take, and the City of Henderson needs to undertake a study to evaluate them. One is the Model Affordable Housing Density Bonus Ordinance that appears in Marya Morris, Gen. Editor, Smart Codes: Model-Land Development Regulations, Planning Advisory Service Report No. 556 (Chicago: American Planning Association, 2009), Chapter 4.4. The model ordinance uses U.S. Department of Housing and Urban Development definitions of low- and moderate-income to establish eligibility criteria for purchase or rental of affordable units. This model draws on provisions for other inclusionary ordinances throughout the U.S., which are identified in the commentary.¹⁴⁰ {See: D:\Documents\1- AIs\AI Templates and General Material\Housing\Location Matters for Upward Mobility\Better Schools - Is Inclusionary Zoning Inclusionary Guide to Practitioners.pdf}

City of North Las Vegas Zoning Ordinance

This review examined the zoning ordinance of the City of North Las Vegas, as it existed on February 5, 2014. The zoning ordinance appears as Title 17 of the City of North Las Vegas Code of Ordinances. The zoning ordinance can be downloaded from the Municode website as part of the Code of Ordinances.¹⁴¹ Both residential and nonresidential districts are described in Chapter 17.16. Collectively, there are 16 districts that permit residential uses, including formally titled residential zone districts, the redevelopment district and its three subdistricts, special purpose zone districts, and one “obsolete” district, the R-CL Single-Family Compact Lot Residential District.¹⁴²

(1) Minimum lot size or square feet per dwelling unit. The lowest density districts are the O-L Open Land District, which requires a lot size of two acres or 87,120, and the R-E Ranch Estate District, which requires a lot size of 20,000 square feet. The highest density district that is not a redevelopment district or a special purpose zoning district is the R-4 High Density Residential District, which requires 450 square feet per dwelling unit, or approximately 96 dwelling units per net acre.

(2) Availability of multiple-family dwellings. The following eleven districts allow multiple-family dwellings as of right or as part of a proposed use in a redevelopment or special purpose district. Included in this list are districts that permit three-family, four-family, and multiple-family dwellings, which the zoning ordinance defines as any building containing three or more dwelling units.¹⁴³

- R-2 Single-Family Medium Density District
- R-3 Multi-Family Residential District
- R-4 High Density Residential District
- R-A/R-2 Medium Density Subdistrict (Redevelopment Area)
- R-A/R-3 High Density Residential Subdistrict (Redevelopment Area)
- R-A/R-4 Downtown Core Subdistrict (Redevelopment Area)
- PUD/PID Planned Unit Development District (PUD)/Planned Infill Development District (Special Purpose Zone District)
- PCD Planned Community District (Special Purpose Zone District)
- MUD-N Mixed Use Development Neighborhood District (Special Purpose Zone District)
- MUD-C Mixed Use Development Commercial District (Special Purpose Zone District)

- MUD-E Mixed Use Employment District (Special Purpose Zone District)

Studio or efficiency apartments are permitted, but are treated as one-bedroom units.¹⁴⁴

(3) Restrictions on the number of bedrooms in multiple-family units. There are no restrictions on the number of bedrooms in multiple-family units.

(4) Regulations affecting mobile or manufactured homes. Mobile homes and mobile home subdivisions are permitted as of right in PUD/PID and PCD districts.

Table 87 North Las Vegas Land Zoned for Residential Use

Land Zoned for Residential Use in North Las Vegas As of January 2014					
Zoning Districts That Allow Residential Uses		Minimum Lot Area in Square Feet	Total Acres	Land Available to Develop in Acres	Percentage of Land Available to Develop
O-L	Open Land District	87,120 (2 acres)	18,842	18,123	96.2%
R-E	Ranch Estates District	20,000	974	418	42.9%
R-EL	Ranch Estates Limited District	10,000	57	13	23.2%
R-1	Single-Family Low Density District	6,000	5,728	791	13.8%
R-2	Single-Family Medium Density District	Single-family dwelling: 4,000. Two-family, three-family, and four-family units, and townhouse cluster: 3,000 per dwelling unit.	198	57	28.6%
R-3	Multi-Family Residential District	Single-family dwelling: 6,000. Two-family, three-family, and four-family units, and townhouse cluster: 1,700 per dwelling unit.	606	201	33.1%
R-4	High Density Residential District	Three-family, four-family, multi-family buildings, townhouse cluster, and two-family dwellings: 875 per dwelling unit.	142	52	36.8%
R-CL	Single-Family Compact Lot Residential District	4,500	332	134	40.5%
R-A/R-2	Medium-Density Residential Subdistrict	Single-family dwelling: 4,751. Two-family, three-family, and four-family dwellings: 3,000 per dwelling unit.	78	17	21.3%
R-A/R-3	Medium-High Density Resident Subdistrict	Multiple-family dwelling and townhouse cluster: 1,700 per dwelling unit.	36	1	1.6%
R-A/R-4	High Density Residential Subdistrict	Two-family and multiple-family dwellings and townhouse cluster: 450 per dwelling unit.	0	0	0.0%
R-A/DC	Downtown Core Subdistrict	Vertical mixed-use with residential dwelling units: 450 per dwelling unit.	301	96	32.0%
PUD/PID	Planned United Development District (PUD)/Planned Infill Development District (PID)	Density depends on relationship to City of North Las Vegas Comprehensive Plan	4,652	1,722	37.0%
PCD	Planned Community District	Density depends on relationship to City of North Las Vegas Comprehensive Plan	1,722	1,722	100.0%
MUD-N	Mixed-Use Neighborhood District	Maximum of 18 dwelling units per acre. Maximum density of 25 dwelling units per acre within 1/4 mile of bus rapid transit or light rail transit facility.	0	0	0.0%
MUD-C	Mixed-Use Commercial District	Maximum of 25 dwelling units per acre. Maximum density of 50 dwelling units per acre within 1/4 mile of bus rapid transit or light rail transit facility.	39	20	50.5%
MUD-E	Mixed-Use Employment District	Maximum of 50 dwelling units per acre. Same maximum density applies to developments within 1/4 mile of bus rapid transit or light rail transit facility.	128	110	86.3%
Total Land Zoned for Residential Use			33,836	23,477	69.4%

Source: City of North Las Vegas, Nevada

(5) Minimum lot width requirements. As set forth in Table 17.24.010-1, minimum lot width requirements range from 150 feet in the OL District (which has a minimum lot area requirement of two acres) to 60 feet for the remaining residential districts, with the exception of the lot width requirements for single-family dwellings in the RCL Residential Compact Lot District (an “obsolete district”—see above) and in the R-2 Single Family Medium Density District, which are 45 and 40 feet, respectively. While a uniform lot width of 60 feet may seem problematic for duplex, townhouse cluster, and multi-family projects, Table 17.24.010-1, in footnote 4, clarifies the application of the width requirements for these structures:

These dimensions apply to the initial lot size per structure. Initial lots may be divided to accommodate individual ownership of the structures' dwelling units.

We interpreted this to mean that, after the structure is completed, the lot would then be subdivided into smaller lots to allow for individual ownership.

(6) Minimum parking requirements. Table 17.24-040-4 sets forth the parking requirements for all uses. Single-family dwellings and duplexes must have two parking spaces per dwelling unit. Three-family, four-family, and multiple-family dwellings must satisfy the following requirements:

- 1.5 per 1-bedroom unit
- 2.0 per 2-bedroom unit
- 2.5 per 3 or more bedroom unit

All multiple-family dwellings shall also include 0.25 per unit for guest parking.

These ratios seem reasonable.

(7) Accessory dwelling units. According to Table 17.20.3-3, accessory dwelling units are allowed via special permit in the O-L, R-E, R-EL, and R-1 districts, and as a permitted use in the R-A/DC, PUD/PID, and MUD districts. The Zoning Ordinance contains development standards for all of these use districts at Sec. 17.20.030.F.2. One of the development standards requires that, in order to establish an accessory dwelling unit in any of the residential districts, the minimum lot area must be 6,000 square feet (Sec. 17.20.030.F.2.c.i). According to city staff, this minimum lot size is to ensure that a small lot detached home in a planned unit development does not have a second dwelling, which “could create parking standards concerns for the neighborhood.”¹⁴⁵

(8) Affordable housing. The North Las Vegas Zoning Ordinance contains no provisions to generate the development of for-sale or rental housing affordable to households with lower incomes via inclusionary zoning. [See: D:\Documents\1- AIs\AI Templates and General Material\Housing\Location Matters for Upward Mobility\Better Schools - Is Inclusionary Zoning Inclusionary Guide to Practitioners.pdf]

The City of North Las Vegas Zoning Ordinance does not appear to contain provisions that unduly increase the cost of housing beyond the means of households with lower incomes. The

ordinance contains residential zoning requirements that are reasonable and allow for a diverse range of housing types at various densities.

However, the lack of any special provisions encouraging or requiring affordable housing is noteworthy. It is recommended that the City of North Las Vegas amend its Zoning Ordinance to incorporate mandatory inclusionary zoning to require new market-rate residential projects contain a certain proportion of affordable housing. There are a variety of approaches that this can take, and the City of Las Vegas needs to undertake a study to evaluate them. One is the Model Affordable Housing Density Bonus Ordinance that appears in Marya Morris, Gen. Editor, *Smart Codes: Model-Land Development Regulations, Planning Advisory Service Report No. 556* (Chicago: American Planning Association, 2009), Chapter 4.4. The model ordinance uses U.S. Department of Housing and Urban Development definitions of low- and moderate-income to establish eligibility criteria for purchase or rental of affordable units. This model draws on provisions for other inclusionary ordinances throughout the U.S., which are identified in the commentary.¹⁴⁶

Boulder City Zoning Code

Regulations that require minimum dwelling size to be more than what is necessary for health and safety make housing more expensive to build, maintain, and supply with energy for heating and cooling. Boulder City's regulation of minimum dwelling unit size (in sections 11-3-5, 11-4-7, 11-5-7) varies among zoning districts.

- In single-family districts, minimum dwelling unit size varies from 1,000 square feet to 1,500 square feet;
- In two-family districts minimum dwelling unit size is 800 square feet, and the multiple-family districts dwelling unit minimum is 600 square feet.

Minimum dwelling unit size can be set to a single size related to health and safety, e.g., 600 square feet, and apply in all residential districts. This would allow construction of smaller dwellings in most districts, subject to market demand.

The residential construction tax (section 11-42-3) provides funds for improvement and expansion of public parks, playgrounds, and recreational facilities by a levy on building valuation of 1% or \$1,000 whichever is less. The \$1,000 limitation means that a small house or apartment valued at \$100,000 would pay the same residential construction tax as a much larger and more expensive house. This formula may place a disproportionate burden on occupants of small houses and apartments. Alternatives can be considered to reduce the tax on smaller and low-income dwellings and make up for lost revenue by removing the cap that applies to houses valued at more than \$100,000.

This residential construction-tax could have an exclusionary impact and places as noted above a disproportionate burden on occupants of small homes and apartments. The cap should be removed in the interest of fairness.

Boulder City has seen a less drastic decline in the amount of new residential construction than the rest of the county, in large part due to its “Controlled Growth Management Plan” which was adopted by a voter referendum in 1979. The plan seeks to maintain the city’s “small–town atmosphere and character.” As an intentionally small town, no more than 75 new residential units were built in Boulder City in any one year in recent years. But while all new residential construction has sharply declined during this recession, no new multi–family housing has been built since 2006 (there are some duplex townhomes under construction as of late 2014). This comes as no surprise given that as of March 2014 just 2.43 acres of vacant land were zoned multi–family (R2 and R3 districts). Another 29.93 acres were available in the Senior Housing Zone (SH) where multi–family, albeit limited to senior housing, can be built.

One of the specified means of implementing the city’s “Controlled Growth Management Plan” is “maintaining a balance and mix of housing and building types and values and thus providing a range of prices and rents in order to accommodate a variety of housing needs.”

The “Controlled Growth Management Plan” sets a limit of 120 new dwellings per year. However, during any five–year period, it does not count toward this 120 annual limit up to 50 low–income or senior dwellings, about 8 percent of the annual total. City staff report there is very little growth in Boulder City due to a scarcity of privately–owned land and the voter referendum that prohibits selling more than a single acre of city–owned land without voter approval. These factors have contributed to a general scarcity of developable land and have resulted in no requests to build low–income housing.

Only very small amounts of land are available for development in the single family residential zones that require less than 15,000 square foot minimum lot sizes. The R1–7 district (7,000 square foot minimum lot size) has just 3.45 acres available. The R1–8 district (8,000 square foot minimum lot size) has 36.32 acres free for new construction. The R1–10 district (10,000 square foot minimum lot size) has 38.61 available. There are 186.81 acres available in districts requiring at least 15,000 square foot lots. Fewer than 12 acres are available for mobile homes.

It is highly likely that the city’s “Controlled Growth Management Plan,” its requirement for voter approval to sell more than one acre of city–owned land, and the very small amount of land available for development produce a cumulative impact that tends to exclude the construction of all housing, including housing affordable to households with modest incomes.

Table 88 Boulder City Land Zoned for Residential Use

Boulder City Land Zoned for Residential Use As of March, 2014					
Zoning Districts That Allow Residential Uses		Minimum Lot Area in Square Feet	Total Acres	Land Available to Develop in Acres	Percentage of Land Available to Develop
R1-7	Single-Family Residential Zone	7,000	469	3.45	0.7%
R1-8	Single-Family Residential Zone	8,000	180	36.32	20.2%
R1-10	Single-Family Residential Zone	10,000	232	38.61	16.7%
R1-15	Single-Family Residential Zone	15,000	174	107.45	61.7%
R1-20	Single-Family Residential Zone	20,000	98	31.79	32.5%
R1-40	Single-Family Residential Zone	40,000	0	0.00	0.0%
R1-80	Single-Family Residential Zone	80,000	99	47.57	48.0%
R2	Two-Family Residential Zone	4,000/unit	8	0.11	1.3%
R3	Multiple-Family Residential Zone	2,500/unit	98	2.32	2.4%
MP	Mobile Home Park Zone	6,000	68	3.56	5.2%
ME	Mobile Home Estate Zone	6,000	103	8.07	7.8%
SH	Senior Housing Zone	3,960/unit	30	29.93	100.0%
Total Land Zoned for Residential Use			1,559	309	19.8%

Source: Boulder City Development Department

There are at least two actions that Boulder City might consider taking to reduce this impact:

- *Use the exception permitted in Section 141 of the city’s charter to sell or lease land to bona fide charitable, religious, educational, and governmental organizations or corporations if the land includes a substantial number of dwellings for households with low incomes.*
- *Submitting for voter approval more sales of city–owned land that include affordable housing. A small number of other provisions in Boulder City’s zoning code can also unnecessarily increase the cost of new home construction and generate an impact that can exclude housing affordable to households of modest means.*

Excessive off–street parking requirements can artificially increase the cost of housing by adding to the cost of land and construction. The greater the number of bedrooms in a dwelling, the greater the number of cars it is likely to generate. However, except for senior housing which is required to have one off–street space per dwelling unit, Boulder City unnecessarily increases the cost of dwelling units with fewer bedrooms by requiring them to have the same number of off–street spaces as dwellings with more bedrooms.

Regardless of the number of bedrooms in a dwelling, Boulder City requires three off–street parking spaces for single–family, two–family, and mobile home estate dwellings. All multiple–family and condominium dwellings must have two off–street spaces “plus an additional 20% for such parking spaces to be developed and set aside for the parking and storage of recreational

vehicles and boat trailers; such additional spaces to have a width of not less than 10 feet and a length of not less than 24 feet.”

Under the current zoning, both a two-bedroom and four-bedroom house must have three off-street parking spaces. Both a studio apartment and a three-bedroom condominium must have two spaces. These requirements are unrelated to the number of vehicles these different residential uses generate and can artificially and unnecessarily increase the cost of residential construction.

Boulder City should revise its off-street parking requirements so that they better match the number of vehicles actually generated per dwelling based on the number of bedrooms.

⁵⁹ H.R. Report No. 711, 100th Cong., 2d Sess. 311 (1988), reprinted in 1988 U.S.C.C.A.N. 2173.

⁶⁰ *Ibid.*

⁶¹ 42 U.S.C. §3604(f)(B) (1988).

⁶² H.R. Report No. 711, 100th Cong., 2d Sess. 311 (1988), reprinted in 1988 U.S.C.C.A.N. 2173, 2184.

⁶³ The U.S. Supreme Court sanctioned this type of restriction in *Village of Belle Terre v. Borass*, 416 U.S. 1 (1974) and later modified its ruling in *Moore v. City of East Cleveland, Ohio*, 431 U.S. 494 (1977).

⁶⁴ Some jurisdictions use the term “household” instead of “family.” For the sake of brevity, this discussion employs only the term “family” even though it applies equally to the use of the term “household.”

⁶⁵ This principle is most clearly articulated in *United States v. City of Chicago Heights*, 161 F.Supp.2d 819 (N.D.Ill. 2001). Also see *Marbrunak, Inc. v. City of Stow, Ohio*, 974 F.2d 43 (6th Cir. 1992). If a jurisdiction does not define “family” or “household,” the legal effect is the same as when a jurisdiction’s definition of “family” allows any number of unrelated individuals to dwell together as a single housekeeping unit.

⁶⁶ The vast majority of community residences for people with disabilities house more than four people. While the trend for people with developmental disabilities is towards smaller group home households, valid therapeutic and financial reasons result in community residences for people with mental illness and for people in recovery from drug and/or alcohol addiction housing eight to 12 residents.

⁶⁷ It is extremely well-settled that people with drug and/or alcohol addictions who are not currently using an illicit drug are people with disabilities under the *Fair Housing Act* and the *Americans With Disabilities Act*. See 42 U.S.C. 3602(h) and 24 C.F.R. 100.201(a)(2). See, also, *City of Edmonds v. Washington State Building Code Council*, 115 S. Ct. 1776 (1995).

⁶⁸ H.R. Report No. 711, 100th Cong., 2d Sess. 311 (1988), reprinted in 1988 U.S.C.C.A.N. 2173, 2189–2190..

⁶⁹ SB 233 repealed NRS 278.0238, 278.02381, 278.02382, 278.02383, 278.02384, 278.02385, 278.02386, 278.02387, 278.02388. Nearly all of these provisions were invalidated by the federal court in *Nevada Fair Housing Center, Inc. v. Clark County*, 565 F. Supp. 2d 1178 (D. Nev. 2008). For reasons unknown to us, the legislature chose to also repeal provisions of state law that the court did not find to be discriminatory.

⁷⁰ Ordinance Number 3423. Full disclosure: The lead author of this Regional Analysis of Impediments served as a consultant to Clark County. In this capacity, he conducted a study of community residences that provided the rational basis for the zoning revisions for community residences that he drafted for the county in collaboration with county planning staff.

⁷¹ *Nevada Fair Housing Center, Inc. v. Clark County*, 565 F. Supp. 2d 1178, 1183 (D. Nev. 2008).

⁷² The provisions examined here are in Title 30, Chapter 30.08 (Definitions), Section 30.08.300 of the Clark County Code as well as Chapter 30.44 (Uses), Table 30.44–1

⁷³ *Unified Development Code Title 19 The City of Las Vegas*, Adopted March 16, 2011, Amended through Dec. 4, 2013, §19.18.020.

⁷⁴ Email from Andy Reed, Planning Supervisor, City of Las Vegas Department of Planner, to Daniel Lauber, Planning/Communications (May 22, 2014, 11:56 a.m. CST).

⁷⁵ *Unified Development Code Title 19 The City of Las Vegas*, §19.18.020

⁷⁶ *Ibid.*

⁷⁷ Email from Andy Reed, Planning Supervisor, City of Las Vegas Department of Planner, to Daniel Lauber, Planning/Communications (May 22, 2014, 10:41 a.m. CST).

⁷⁸ *Unified Development Code Title 19 The City of Las Vegas*, §19.12.070.

⁷⁹ *Ibid.*

- ⁸⁰ Email from Andy Reed, Planning Supervisor, City of Las Vegas Department of Planner, to Daniel Lauber, Planning/Communications (May 22, 2014, 11:56 a.m. CST).
- ⁸¹ *Henderson, Nevada Development Code*, Adopted Jan 19, 2010, Amended through Dec. 17, 2013, §19.12.4.
- ⁸² *Ibid.*
- ⁸³ 565 F. Supp. 2d 1178, 1183 (D. Nev. 2008).
- ⁸⁴ The clearest articulation of this principle is in *United States v. City of Chicago Heights*, 161 F.Supp.2d 819 (N.D.Ill. 2001).
- ⁸⁵ Email from Sean Robertson, Principal Planner, City of Henderson Community Development Department, to Daniel Lauber, Planning/Communications (May 27, 2014, 12:04 p.m. CST).
- ⁸⁶ Email from Sean Robertson, Principal Planner, City of Henderson Community Development Department, to Daniel Lauber, Planning/Communications (May 27, 2014, 12:04 p.m. CST).
- ⁸⁷ *Henderson, Nevada Development Code*, §19.5.3.G.1.
- ⁸⁸ *Ibid.* §19.5.3.E.1. Homes for individual residential care are also a permitted use subject to standards in the same districts as residential facilities for groups and have the same 660 foot spacing requirement.
- ⁸⁹ *Ibid.* §19.5.3.G.2(b)(2) and (3).
- ⁹⁰ Email from Sean Robertson, Principal Planner, City of Henderson Community Development Department, to Daniel Lauber, Planning/Communications (May 27, 2014, 12:04 p.m. CST).
- ⁹¹ *Henderson, Nevada Development Code*, §19.5.3.G.2.(b)(6). This report does not analyze the city's zoning provisions for a Facility for Transitional Living for Released Offenders because those are not covered by the nation's Fair Housing Act and are unrelated to affirmatively furthering fair housing.
- ⁹² *Ibid.*
- ⁹³ *Ibid.* §19.5.3.G.(b)(7).
- ⁹⁴ *City of Edmonds v. Washington State Building Code Council*, 115 S. Ct. 1776 (1995).
- ⁹⁵ *Henderson, Nevada Development Code*, §19.5.3.A.1
- ⁹⁶ *City of Edmonds v. Washington State Building Code Council*, 115 S. Ct. 1776 (1995).
- ⁹⁷ *Henderson, Nevada Development Code*, §19.5.3.G.(b)(9)(i.).
- ⁹⁸ *Ibid.* §19.5.3.G.3.
- ⁹⁹ *Ibid.* §19.5.3.E.1.
- ¹⁰⁰ *Ibid.* §19.5.3.
- ¹⁰¹ Email from Sean Robertson, Principal Planner, City of Henderson Community Development Department, to Daniel Lauber, Planning/Communications (May 27, 2014, 12:04 p.m. CST).
- ¹⁰² See Daniel Lauber, *A Real LULU: Zoning for Group Homes and Halfway Houses Under the Fair Housing Amendments Act of 1988*, 29 John Marshall Law Review 369, 379–380 fn. 37. (Winter 1996). The law review article states ten to 15 residents, but during the past 18 years, it has become increasingly apparent that eight to 12 residents is a more accurate range and more likely to emulate a biological family.
- ¹⁰³ *Henderson, Nevada Development Code*, §19.5.3.D.2.(b)(3), (4), and (5).
- ¹⁰⁴ *Ibid.* §19.5.3.G, 19.5.3.19.5.D.
- ¹⁰⁵ We brought up “group living – assisted” only because other readers of the zoning code might be as confused as we were and we trust that the city will refine the zoning code’s language to avoid any ambiguities.
- ¹⁰⁶ *Henderson, Nevada Development Code*, Appendix A: Summary Table of Allowable Uses
- ¹⁰⁷ *Ibid.* §19.5.3.G, 19.5.3.19.5.D
- ¹⁰⁸ *Ibid.* §19.5.3.E.
- ¹⁰⁹ Definitions appear in §17.32.030 of the *North Las Vegas Zoning Ordinance*. District regulations regarding community residences appear in Table 17.20–1 and in Chapter 17.20.020 B. [*Emphasis added*].
- ¹¹⁰ *Ibid.* §17.20.020 B.4.a. and B.5.a.
- ¹¹¹ *Ibid.* §17.20.020 B.4.c. and B.5.d.
- ¹¹² *Ibid.* §17.20.020 B.4.d, e. and B.5.e, f. These spacing distances are a major improvement over the unjustifiable 1,500-foot spacing distance in the city’s previous zoning ordinance.
- ¹¹³ *Ibid.* §17.20.020 B.5.c.
- ¹¹⁴ *Ibid.* §17.20.020 B.7.a.
- ¹¹⁵ *Ibid.*
- ¹¹⁶ In the interest of full disclosure, the primary author of this Analysis of Impediments prepared the study for Boulder City, provided expert testimony, and collaborated with city staff to draft the zoning amendments that were adopted.
- ¹¹⁷ *Boulder City Municipal Code*, Title 11: Zoning and Subdivisions, Chapter 1.
- ¹¹⁸ Bill No. 1625, an Ordinance of the City of Boulder City, Nevada to amend portions of Title 11 of the City Code, Chapters 1, 3, 4, 5, 6 and 7, adopted November 9, 2010.
- ¹¹⁹ Rolf Pendall, “Local Land Use Regulation and the Chain of Exclusion,” *Journal of the American Planning Association* (66) (2) (2000): 124-142.

¹²⁰ Jonathan Rothwell and Douglas S. Massey, "The Effect of Density Zoning on Racial Segregation in U.S. Urban Areas," *Urban Affairs Review* (14) (6) (2009): 779-806.

¹²¹ Jonathan Rothwell, "Racial Enclaves and Density Zoning: The Institutionalized Segregation of Racial Minorities in the United States," *American Law and Economics Review* (13) (1) (2011): 290-358, 291.

¹²² See generally, Norman Williams, Jr. and Thomas Norman, "Exclusionary Land Use Controls: The Case of Northeastern New Jersey," 22 *Syracuse L. Rev.* 475, 481, 484-97 (1971). For a contemporaneous discussion of these devices on housing costs, see Lynn Sagalyn and George Sternlieb, *Zoning and Housing Costs: The Impact of Land-Use Controls on Housing Price* (New Brunswick, NJ: Center for Urban Policy Research, 1973), 16-19, 48-58.

¹²³ It is difficult to evaluate the impact of processing times on developments without analyses of sample residential projects of varying housing types, sizes, and densities, and this review does not attempt to do so.

¹²⁴ For a survey of parking standards used by local governments, see Michael Davidson and Fay Dolnik, *Parking Standards*, Planning Advisory Service Report No. 510/511 (Chicago: American Planning Association, November 2002).

¹²⁵ NAHB Research Center, *Study of Subdivision Requirements as a Regulatory Barrier*, prepared for the U.S. Department of Housing and Urban Development, Office of Policy Development and Research (OPDR) (Washington, D.C.: OPDR), November 2007, 1-3.

¹²⁶ John M. Quigley and Larry A. Rosenthal, "The Effect of Land Use Regulation on the Price of Housing. What Do We Know? What Can We Learn?" *Cityscape* (8) (1) (2005): 69-110, at 69.

¹²⁷ See City of Las Vegas, *Master Plan 2020: Housing Element* (approved by City Council, July 18, 2001), website: http://www.lasvegasnevada.gov/files/Housing_Element.pdf (accessed March 22, 2014). It should be noted that the data contained in this housing element are now approximately 14 years old and housing markets have changed across the nation. Perhaps this element should be revisited.

¹²⁸ For a discussion of how to calculate an optimal percentage of affordable housing in any project in an inclusionary zoning program, see Robert W. Burchell and Sahar Mukjeri, "Comment," in Anthony Downs, ed., *Growth Management and Affordable Housing* (Washington, D.C.: Brookings Institution Press, 2004), 106-116.

¹²⁹ City of Henderson, Nevada, Development Code, website: http://www.cityofhenderson.com/community_development/dev_code_overview.php (accessed March 22, 2014).

¹³⁰ *Id.*, http://www.cityofhenderson.com/community_development/docs/devcode/Revised%2011-5-13/19.2_Residential_Zoning_Districts.pdf (accessed March 22, 2014).

¹³¹ *Id.*, http://www.cityofhenderson.com/community_development/docs/devcode/Revised%2011-5-13/19.3_Nonresidential-MixedUse-Special_Purpose.pdf (accessed March 22, 2014).

¹³² Indeed, in the MC District, which requires mixed-use activity centers, the minimum density must be 30 units per gross acre. City of Henderson Development Code Table 19.3.16-1.

¹³³ Studio or efficiency apartments, while not explicitly mentioned in the Development Code, are permitted as a dwelling unit and this parking standard for a 1-bedroom unit applies. Email from Sean Robertson, City of Henderson, to Stuart Meck, Rutgers University, April 30, 2014.

¹³⁴ See definitions of multifamily dwellings in Michael Davidson and Fay Dolnick, eds., *A Planners Dictionary*, Planning Advisory Report No. 521/522 (Chicago: American Planning Association, 2004), 153.

¹³⁵ Stacy DiNicola, City of Henderson, email to Stuart Meck, Rutgers University, March 27, 2014.

¹³⁶ The City of Henderson staff acknowledges this conflict. "We do not have a zoning code update planned at this time. We will seek direction as to whether this is something that should be addressed immediately or can be done the next time we do an overall code update." Stacy DiNicola, City of Henderson, email to Stuart Meck, Rutgers University, April 2, 2014.

¹³⁷ Stacy DiNicola, City of Henderson, email to Stuart Meck, Rutgers University, March 27, 2014.

¹³⁸ Stacy DiNicola, City of Henderson, email to Stuart Meck, Rutgers University, April 2, 2014. DiNicola wrote: "The 101 units are affordable senior apartments. The total number of units in the project, including the bonus, was 252. That project has not yet been built, we do not yet know when that might be."

¹³⁹ For a discussion of the experience with mandatory vs. voluntary affordable housing programs, see Nicholas J. Brunick, "The Inclusionary Housing Debate: The Effectiveness of Mandatory Programs Over Voluntary Programs," *Zoning Practice*, September 2004, 2-7; California Coalition for Rural Housing and the Non-Profit Housing Association of Northern California, "Inclusionary Housing in California: 30 Years of Innovation," in National Housing Conference, *NHC Affordable Housing Policy Review* (3)(1) (February 2004): 9-31.

¹⁴⁰ For a discussion of how to calculate an optimal percentage of affordable housing in any project in an inclusionary zoning program, see Robert W. Burchell and Sahar Mukjeri, "Comment," in Anthony Downs, ed., *Growth Management and Affordable Housing* (Washington, D.C.: Brookings Institution Press, 2004), 106-116.

¹⁴¹ City of North Las Vegas Code of Ordinances, website: <http://library.municode.com/index.aspx?clientId=16023> (accessed April 5, 2014).

¹⁴² *Id.*, Table 17.16-1: Base Zone Districts. According to city staff, obsolete districts are “essentially categories that an applicant cannot request for their property. The obsolete district was created instead of rezoning the properties. The land that is in the district still is governed by the code, [but] there will not be any more land added to it.” Robert Eastman, City of North Las Vegas, email to Stuart Meck, Rutgers University, April 17, 2014.

¹⁴³ *Id.*, Sec.17.32.030, Definition of Terms.

¹⁴⁴ Email from Robert Eastman, City of North Las Vegas, to Stuart Meck, Rutgers University, April 17, 2014.

¹⁴⁵ *Id.*

¹⁴⁶ For a discussion of how to calculate an optimal percentage of affordable housing in any project in an inclusionary zoning program, see Robert W. Burchell and Sahan Mukjeri, “Comment,” in Anthony Downs, ed., *Growth Management and Affordable Housing* (Washington, D.C.: Brookings Institution Press, 2004), 106-116.

8. FOCUS GROUPS

During June 2014, Southern Nevada Strong staff and contracted facilitators hosted eight Focus Groups representing protected classes under analysis in the RAI process, including:

- Minority and low-income minority households, including an Asian Pacific Islander and Alaskan Native group, Low income African American, and two Low income Hispanic groups
- Limited English Proficient residents (LEP) conducted in Spanish
- People with disabilities
- Families with children
- Single female headed householders

Participants were recruited using a variety of methods, including online Craig's list recruitment, and help from partners with direct access to the protected class, including Goodwill of Southern Nevada for the group with people with disabilities, the Southern Nevada Regional Housing Authority for several of the low income minority groups, and Mi Familia Vota to recruit Hispanic and LEP participants, among others. Participants were compensated \$40 each to participate in an hour and a half focus group. Approximately 8-15 residents participated in each group.

The findings from the eight groups demonstrate some general themes, described below supplemented by direct quotes from participants:

- **Lack of housing choice for people living in public housing and a general dissatisfaction for housing authority properties and neighborhoods.**
 - Participants shared that they don't get a choice for where they live when they are on Southern Nevada Regional Housing Authority subsidized housing, and if they don't take their first or second options, they are no longer eligible for housing assistance.
 - Housing Choice Voucher holders shared that desirable properties often don't advertise. One resident described: "They don't want you to come find them. They'd rather recruit the residents they want. But I found them."
 - Participants clearly preferred being able to choose through a program like Housing Choice Voucher; however, they lamented it is very difficult to get on Housing Choice Voucher lists. Some residents described being on a waiting list for six and eight years.
 - Some residents are forced to live in less desirable locations in order to have more reliable maintenance support: "My last housing was horrible, my new place is better. I was willing to pay more, and it's farther from my job, but it's better because if you call someone to fix something, someone actually comes."
 - Participants on public housing shared that housing authority properties are in neighborhoods that have problems with crime and drugs, saying: "How do you want us to be more productive in society when you keep putting us back in the same environment?"

- **Selection criteria for where people live is varied, with affordability and safety ranking highest, but personal circumstances and relationships also determine housing decisions.**
 - Many participants cited specific circumstances leading to housing choices, such as:
 - “I moved into my brother-in-law’s house after my brother-in-law moved out; I’m trying to buy a new home but I can’t get a loan because I have no credit history.”
 - “I had to leave my first home because it was foreclosed upon; I’m moving out of my current home because the landlord threatened me.”
 - “I found a home through an ad in newspaper and went through an Hispanic realtor; I saw only one home; chose it immediately and moved in the next day; very, very easy”
 - In our previous home, my husband knew a cousin’s friend who was moving out and wanted to leave someone they knew at the home; we moved into our current home because our friends wanted to sublease to someone they knew.”
 - Other participants cited safety, affordability, proximity to clients, place of work, shopping and proximity to a particular school or athletic or academic program as all factors they considered to choose where they live. Responses were varied and diverse across groups.
- **Landlord harassment of low income people has implications for Housing Choice Voucher holders.**
 - One resident shared a story where she notified her landlord that she planned to move and gave her 30 days’ notice. During that period, the landlord accused her of drug dealing and began harassing her and eventually evicted her which caused her to lose her Housing Choice Voucher which was devastating because she had waited eight years to get a Housing Choice Voucher. She didn’t want to live in public housing, so she decided to pay more rent and live elsewhere. This was a unique case, however, landlord intimidation and neglect was mentioned by other participants across groups.
- **Finding the place where residents live can be a difficult process and is cost prohibitive for low income renters.**
 - Participants shared that expensive application processes for apartment rentals impose a barrier. Some properties seem to have no intention of approving applicants and will find a reason to reject applicants, but accept their application fees which becomes cost prohibitive for low income people. A fee is required for each adult that will live in the unit, in some cases costing hundreds of dollars just to apply and find out that you are rejected.
 - Some residents feel property management companies accept application fees knowing they won’t accept you, and find an excuse to reject you, saying: “They

screen you out” using credit scores, income or any number of reasons to reject applicants.

- Another challenge identified by participants is that although deposits are said to be refundable, they are never refunded. “We never get deposits back. They say refundable, but that deposit is never going to come back. I try to get it waived but a lot of the property management companies won’t work with you.”
 - One resident suggested: “It would be nice to have a central application fee and process, where you have a background check and credit check, check the eviction notice and they can give the information to all the companies. Then they tell you, these 5 houses will accept you and these others don’t want you.” This participant shared “We were rejected from three places for poor credit, and in one place for insufficient income. *“Fuimos rechazados por credito malo. No suficiente ingreso en un lugar.”*”
- **Discrimination against families with children, especially young children or the presence of multiple children seemed common.**
 - Multiple participants in the Families with Children group explained that all properties ask if you have kids and pets. “I’ve been turned down several times for having kids.”
 - Another resident cited that she has four kids and some properties turned her down for having more than 1 or 2.
 - In many cases, higher deposits or other fees are required for families with small children. “They asked: how old are your children? They had a higher deposit than what they advertised because they said small kids destroy stuff.”
 - **Personal safety and pedestrian/bicyclist safety are major concerns.**
 - Safety is one of the top priorities in selecting where residents live.
 - Residents shared that in public housing, the tenants all have background checks, but other people who frequent the neighborhood don’t saying despite the required background check, crime in and around public housing properties is rampant.
 - “The police come by but they harass the wrong people. I call the police to come by and they harass me and my guests. The police harass the residents, not the people causing the problems.”
 - “It’s not the place, it’s the people. You can have a perfect neighborhood but you have the wrong people, it doesn’t matter how nice the neighborhood. “
 - Several of the focus group participants talked about basic improvements that would make neighborhoods safer, such as cleaning up trash, enhanced lighting, pedestrian crosswalks, cleaning up parks where homeless people stay are all critical and were cited continuously in all focus groups.
 - One resident who lives close to the Strip explained her neighborhood is frequently affected by crime: “I work at Sands Expo at Swenson and Twain. My neighborhood is full of prostitutes, but we have a lot of police right there. The walking distance coming from the Strip and all that. The cops patrol that area because I’m right down the street from the Strip. There is still a lot of crime; there were stabbings at the corner store. The upside to the crime is that we have a steady police presence.”

- My neighborhood isn't safe. Someone tried to break into my house and broke the window. SNRHA has yet to replace it. There's this little latch and you can pop the window open. I'm glad I work nights [so I'm not home when they break in]."
 - One resident shared a story where her son was seriously injured and hospitalized recently: "My son was robbed and 2 grown men jumped him and broke his back."
 - In terms of pedestrian safety, residents do not feel safe walking and biking to nearby destinations. "I walk to school to save gas. The speed limit at the school is 15 mph. You can tell it used to be a walkway for kids, but they tarred over it. Cars zoom right past kids, we wait until traffic is completely clear. Cars go too fast even in school zones."
 - Development patterns also contribute to inconvenience and unsafe conditions for pedestrians due to long blocks and wide lanes. One resident shared: "I have to cross in the middle of the street because the crosswalk is a mile away. The police stopped me for jaywalking. The blocks are really long; there is no place to cross. If there is a bus stop on the other side of the street, what are you supposed to do?"
 - One LEP participant shared that there are problems with car accidents at nearby intersections and he stood outside with a sign asking people to stop on red and stop texting while driving.
 - "Pedestrians are getting hit and killed because cars are zooming by and not respecting crosswalks."
 - A desire to accommodate bicycles was also supported from several LEP respondents. One participant said "We should be more like China, full of bicycles."
 - LEP respondents identified several desired improvements including: pedestrian safety, reducing crime and drug use and prostitution around Fremont Street.
- **Access to good schools is a priority but with limited choices for where low income families can live, parents are forced to keep their kids in low performing schools.**
 - Some residents chose their neighborhood based on school performance. Not having access to a quality school is devastating for many parents who live in SNRHA properties who participated in the focus groups.
 - Some participants mentioned that they moved here due to Hurricane Katrina several years ago. One mother recently sent her teenage son back to Louisiana to live with her brother because he was getting in trouble and she couldn't keep him in school and away from the negative influences in the neighborhood.
 - **Improvements are not being prioritized in areas that need it most, especially the westside and eastside, which are considered less desirable, but home to SNRHA properties and other less expensive housing options.**
 - Residents consistently associate undesirable neighborhoods with the valley's urban neighborhoods. "I'd rather be anywhere else. My brother lives 2 doors down and walks around with a lot of drug dealers, it's nasty. I'd prefer to live in

the outskirts of Vegas. I don't like to live in the urban inside area; I'd like to live out."

- I'd rather live in Summerlin or Green Valley.
- One resident felt the historic Westside needs to be prioritized, a traditionally African American neighborhood. "Clean up the Westside, stop taking the taxpayer money and spending it elsewhere."
- **Transportation services are inconvenient and unreliable.**
 - Some residents who live on principle transportation corridors and travel to the Strip or other central locations for work were satisfied with transit service. However the majority cited complaints, including unreliable service, infrequent service, too many transfers, not enough direct service.
 - The cost of some routes was also said to be higher and a disproportionate burden for workers on the Strip. "It's \$8 for a 24 hour pass on the Strip, but everywhere else is \$5. I worked on the Strip and had to pay more to get to work."
 - Safety for bicyclists and pedestrians was reiterated during the transportation discussion. "I get on a bicycle. I use the sidewalk. Drivers are super unsafe. Even when there are bike lanes? Yes, I've been hit and it's not safe to be on the street. Drivers don't follow the rules."
 - LEP participants voiced a need for more bike access: "I would like to see more bike lanes; they've already started adding some in my neighborhood but they should add them all over Las Vegas; I walk everywhere."
 - Support for more transportation choices and access in general, including more taxis, more bus routes and more frequent bus service along major streets.
 - Participants with disabilities also voiced dissatisfaction with bus service, saying that bus drivers are lazy and not paying attention to people waiting, they are often late or change the time without notifying riders or updating schedules.
- **Lack of healthy food options exist in urban core neighborhoods**
 - Residents cited that although there are some grocery stores in their neighborhood, "the quality of the meat isn't good, they don't have fresh food. Meat doesn't look good. I've bought chicken that is spoiled and the prices are high."
 - Grocery stores in urban neighborhoods close earlier, due to potential safety issues or perceptions of safety issues, limiting options. "No grocery store close to me. I have to drive to Charleston and Rancho or MLK and Lake Mead to Mario's or Dollar General and both of those close at 9 or 10." (Many grocery stores in Las Vegas are open 24 hours).
 - The majority of LEP respondents said they have access to fresh produce and healthy food near where they live. One respondent who lives in the suburbs mentioned wanting to have more Latin supermarkets in the suburbs.

- **Amenities exist but may not be maintained, or aren't inviting, safe places for families.**
 - Although there is access to parks, libraries and other services in many areas in the urban core, the quality and cleanliness and overall maintenance inhibit their use. "I'd like to see a clean park, no homeless people; there are grown men on children's swings, smoking, doing drugs."
 - One of the blind participants said there were no braille books at the libraries, so she doesn't frequent them, but there are libraries near her.
 - Residents also talked about availability of events and summer camps for kids but that there is a need for more free programs, activities and amenities. Some activities are also removed from urban neighborhoods and residents don't have cars and can't get public transportation to some venues.
 - Daycare and preschool were also discussed. More convenient daycare locations and free or less expensive daycare options were desired.

- **Participants shared some undertones of racial discrimination, but in isolated cases.**
 - One Hispanic participant talked about tension in his neighborhood and feeling targeted by Caucasian residents for parking his car in front of someone else's house. Neighborhoods called the HOA and he got tickets due to their complaints.
 - Another participant talked about having more events for specific groups in saying: "If you go to a park and you are a black person, you want to be around your own people, have a party. Not just 2 or 3 people. There aren't sufficient events here for black people. In California there were jazz festivals, concerts. We don't have that here."
 - An LEP participant shared: "I think everything is okay sometimes, but then the police allow themselves to be guided by racial biases and they don't trust our community; just because of a few bad ones, they don't trust us; there's a lot of discrimination." This group also talked about a concern regarding police corruption.

- **Living in a predominantly Hispanic neighborhood is important for immigrants, but not for first generation Americans.**
 - Although Hispanic participants noted having access to Latino groceries and cultural events was important, all groups stated it was not important for them to live near people of their ethnicity or race, except for more recent immigrants. Other factors were more important such as, family friendly environment, amenities, safety and price. "Yes, it is important to live close to other Latinos due to the language barrier. It was more comfortable [for me] to live near other Latinos when I first arrived here. I had to change my mentality and I've been here 9 years now."
"Si es importante [vivir proximo a otros latinos] por la cuestión de llegar aquí sin hablar inglés. Fue un poco mas cómodo, la cuestión cultural y ha sido importante vivir entre gente latina. Tuve que cambiar mi mentalidad [cuando llegué aquí en los EUA], y ya estoy aquí 9 años."

- The LEP Hispanic group respondents shared several examples of finding housing options through family members, Hispanic realtors and friends but also through advertising in a local Hispanic paper. One participant specifically said living in the Hispanic part of town and near Hispanic commercial offerings was part of his decision to live where he does.
- For younger Hispanic generation who was born in the US, this is less important, citing safety and proximity to other conveniences as more important than being near other Hispanics.
- **Young Hispanic adults seem to be living with parents and grandparents and sharing costs into early adulthood.**
 - Many participants in the Hispanic focus group were young adults who did not select their housing choice because they live with other family members who chose where they live. Results were somewhat limited based on this issue.
- **Asian participants voiced the need for housing options for extended family and to accommodate cultural traditions.**
 - Participants in the APIAN focus group described the need for more options to accommodate extended family, but not having to live together. “We need more options to accommodate extended Asian family. It’s not a house with 5 bedrooms and 5 bathrooms. We need cottages, triplex, 4 plex, you can’t buy those; they are only for rent and you can’t control who lives next to you.”
- **Access to and quality of local medical services were not a concern for most focus groups, although the LEP group shared more concerns.**
 - Several participants said they do not have medical services or a hospital nearby.
 - One participant shared “I live near Guadalupe Clinic and its good-for-nothing, so there’s really nothing nearby; for emergencies I don’t have a close place to go.”
 - Another LEP participant shared: “Health care is too expensive and health services are like a third-world country.”
 - Some participants seemed concerned about their ability to access services possibly due to undocumented status based on comments such as: “I feel like I won’t get served at the hospital nearest me” and “I don’t know which hospital has to serve me by law.” These comments could indicate the respondent wasn’t sure if they could get service based on income status, legal status or other discrimination.
 - One respondent shared a positive experience at the local County hospital and said Sunrise Hospital wouldn’t serve her because she was undocumented but then she applied for emergency Medicaid at UMC. She said “everything depends on the doctors and not the hospital itself.”

- **Community pride and sense of neighborhood identity are present, even in areas with a stigma, although people with disabilities feel less so.**
 - One LEP participant shared “My neighborhood has a bad reputation; a taxi wouldn’t drop off my sister once; I don’t feel like it’s a scary neighborhood.”
 - Most focus group participants were happy with their current living situation, except for Housing Authority residents.
 - People with disabilities shared that they get stared at and that people are curious and nosey about their disabilities.

- **Participants with disabilities mentioned some inconveniences, but voiced similar concerns to other focus group participants.**
 - One blind participant did say safety was a concern in terms of feeling comfortable accessing parks and rec areas. Getting to them was also challenging.
 - Another participant with a disability explained that getting in and out of the shower and doorways in her current unit was difficult.

9. IMPEDIMENTS & ACTIONS TO FURTHER FAIR HOUSING

- **Lack of fair housing enforcement in Nevada.** Nevada is one of the few states in the country that has no statewide enforcement agency for fair housing violations. Violations are reported to Silver State Fair Housing Agency, a non-profit organization, but then are forwarded to HUD. In others states, an additional regulatory presence at the state level is dedicated to enforcement issues which increases emphasis and prioritizes fair housing at the state and local level.

Action: *Advocate for statewide fair housing enforcement to support localities and regions to proactively advocate for fair housing and raise awareness about its importance.*

Action: *Identify funding sources for fair housing non-profits, government agencies and other fair housing organizations, to enhance enforcement of fair housing laws and fair housing advocacy, including funding for the Nevada Equal Rights Commission.*

Action: *Build support for Nevada’s Attorney General Office to prosecute fair housing violations cases.*

Action: *Conduct testing to determine if there is steering of Hispanic households in the City of Henderson, Asians in the City of North Las Vegas, and minorities in Boulder City and the nearby areas of Clark County to particular neighborhoods as referenced in Chapter 4.*

- **Lack of awareness and understanding of social equity and policies that affect inequality.** Through the Sustainable Communities Initiative-funded Southern Nevada Strong regional planning project, many stakeholders were introduced for the first time to the concept of social equity—ensuring that all members of a community have access to opportunities to succeed socially, economically and physically.

The Southern Nevada Strong Public Engagement & Equity Task Group identified a variety of strategies to improve public engagement with marginalized groups as the first step in considering the needs of these populations to include them in public policy decisions and connect them to resources.

The project also connected the region to national speakers on the importance of social equity to growing the region’s economy, however understanding of this subject and attitudes surrounding the topic are still forming and there are not clear advocates at this time to continue the momentum to emphasize social equity in public sector decision making.

Action: *Analyze policy decisions and capital improvements for their potential to disproportionately impact people of color and other protected classes.*

Action: *Commit to the range of public outreach techniques suggested through the Southern Nevada Strong Regional Plan to ensure participating in public sector decision making is designed to include vulnerable populations.*

Action: *Continue to invite local, state-wide and nationally recognized speakers and leaders that have developed Equity Atlases and other tools to directly and proactively address social equity.*

- **Lack of housing choice for people living in public housing and a general dissatisfaction of quality, safety and locations of some public housing properties and neighborhoods.** Participants shared that they don't get a choice for where they live when they are on subsidized housing, and if they don't take the first or second option provided by the Housing Authority, they are no longer eligible for housing assistance. Participants clearly preferred being able to choose through a program like the voucher program; however, it is very difficult to achieve eligibility status and some residents described being on a waiting list for six or eight years.

Public housing properties are many times concentrated in racially and ethnically-concentrated areas of poverty and experience higher crime rates, lower school test scores and are underserved in terms of amenities and services. Through the focus groups, residents in public housing properties raised startling concerns over the conditions of properties, maintenance and quality of life.

Action: *Continue to encourage the Southern Nevada Housing Authority, non-profit affordable housing developers, and local governments to advocate for and locate affordable housing in areas of high opportunity to deconcentrate poverty and connect low income people to great schools, parks and other amenities.*

Action: *Support funding initiatives to provide improvements to current Southern Nevada Housing Authority properties, through partnerships with non-profits and other public/private partnerships to provide prompt responses to property management issues.*

Action: *Promote, encourage and expand self-sufficiency programs to Southern Nevada Housing Authority residents.*

Action: *Support the Housing Authority's programs and efforts to expand funding and public-private partnership opportunities.*

- **Lack of diversity in leadership positions at all levels of government.** Expanding minority representation in public forums can enhance decisions to reflect the needs of a diverse population. A minority middle class is especially important as it tends

to provide employment opportunities and leadership opportunities for other minorities, who often have experienced exclusion themselves and as a result have a stronger commitment to equity (Benner, Pastor 156-157).

Action: *Support minority leadership through the Urban Chamber, Latin Chamber and Asian Chamber.*

Action: *Cultivate minority leadership in high schools, higher education, local governments and private companies with strong diversity programs.*

Action: *Encourage local government, city councils and the County Commission to consider representative leadership in appointments they make to boards, councils and committees, and to consider creative ways to advertise and recruit for these appointments.*

- **A lack of regional governance.** Southern Nevada has limited funding for regional planning for a population of 2 million residents. The region has no Council of Governments or Regional Council to address regional priorities. Nevada is not a Home Rule state, limiting its ability to create additional structures or funding sources to address regional priorities and dedicate staffing to ongoing, regional scale collaboration (Southern Nevada Strong Regional Plan). Working regionally is important to reduce inequity and promote social justice because drivers of urban poverty, and solutions to reduce it, are not confined to the neighborhoods where urban distress is experienced. As Orfield (2009) describes:

Regional governance intuitions can be engines of smart growth, capable of distributing benefits of growth more equitably by streamlining land use, transportation, housing and economic development policies at the regional scale. Regional institutions can ameliorate the harmful effects of political fragmentation, producing much better outcomes for sprawl, racial segregation, job growth and fiscal equity.

Action: *Encourage leaders of urban and low income areas to collaborate with regional leaders in the public and private sectors to develop shared priorities for economic growth and prosperity for all Southern Nevadans.*

Action: *Support and enhance regional governance structures through implementation efforts of Southern Nevada Strong as the Regional Transportation Commission of Southern Nevada transitions as core administrator of the Regional Plan.*

Action: *Promote the Regional Housing Authority Governance Board as a regional body on issues of housing.*

- **Lower usage of Housing Choice Vouchers in areas of high opportunity.**

Although Housing Choice Voucher usage is distributed throughout the region, there are areas of high opportunity with very low usage of vouchers, or very low usage among certain racial and ethnic groups. During focus groups conducted to gather input to develop this Regional Analysis of Impediments, some Housing Choice Voucher holders cited difficulty in finding apartments in ‘Caucasian’ neighborhoods in saying they purposefully do not advertise widely. Residents had to drive around suburban neighborhoods to get phone numbers to call to check availability and eligibility.

Action: *Encourage participating property owners to advertise Housing Choice Voucher eligible properties in ethnic and racial papers (such as the Urban Voice, El Tiempo, El Mundo-Las Vegas Newspaper) and radio stations (such as KCEP/Power 88, KISF/La Neuva 103.5, and KRRN/Super Estrella).*

Action: *Encourage the Southern Nevada Housing Authority and other fair housing advocates to assist residents to research housing options in a variety of neighborhoods throughout the region.*

Action: *Support the Regional Transportation Commission to secure funding for the expansion, operation and maintenance of transit systems and routes (from the Southern Nevada Strong Regional Plan) in order to allow transit-dependent residents more flexibility in housing choice.*

Action: *Consider partnerships between the RTC and private developers to create Park & Ride facilities in outlying areas that could provide access to express transit services and reduce travel time (from the Southern Nevada Strong Regional Plan).*

Action: *Promote the use of NVHousingSearch.org to potential residents, landlords, and property managers as a comprehensive tool for locating and advertising affordable homes.*

Action: *Encourage the purchase of “scattered site” properties in higher opportunity areas. “Scattered site” refers to residences owned by the Housing Authority which are not part of a larger project site, but rather are located within existing neighborhoods.*

Action: *Provide more education for landlords and rental complex managers to learn the benefits of accepting Housing Choice Vouchers.*

- **Poor quality schools near lower income areas.** During focus group sessions with protected class residents, participants shared that they chose their neighborhood based on school performance. Not having access to a quality school is devastating for many parents who participated. Access to good schools is a priority and with limited

choices for where low income families can live, parents are forced to keep their kids in low performing schools.

Action: *Ensure a wide range of housing options, including affordable housing options, are available near the best performing private and public schools throughout the region. Enlist the business community, fair housing advocates, local governments, educators and parents to counteract NIMBYism.*

Action: *Work with the Clark County School District to increase school transfer mobility by expanding school transfer and school choice programs.*

Action: *Work closely with the Clark County School District Real Property Management Division, local governments and developers to develop thoughtful school and service siting criteria.*

- **Discrimination against all protected classes, including minority races and ethnicities, people with disabilities, and families with children, especially young children or teens.** Multiple participants in the focus group of families with children explained that all rental properties ask if you have kids and pets. One participant shared: “I’ve been turned down several times for having kids.” Another resident cited that she has four kids and some properties turned her down for having more than 1 or 2. In many cases, higher deposits or other fees are required for families with small children. “They [property management companies/landlords] asked: how old are your children?” The property would then require a higher deposit than what they had advertised because they said “small kids destroy stuff.”

Action: *Conduct trainings and presentations directed to property management companies, local governments, landlords, real estate associations and publications to address discrimination.*

Action: *Enforce regulations to protect from discrimination.*

Action: *Expand the existing ad campaign to include rental magazines and related publications and online sources to educate prospective renters of fair housing violations and direct them to Silver State Fair Housing Agency for complaints.*

- **Inconvenient and unreliable transportation services.** Some residents who live on principle transportation corridors and travel to the Strip or other central locations for work were satisfied with transit service. However the majority cited complaints, including unreliable service, infrequent service, too many transfers, not enough direct service.

Action: *Locate affordable and senior housing near existing and future transit corridors.*

- **Lack of personal safety and pedestrian/bicyclist safety in racially and ethnically concentrated areas of poverty.** Safety was cited by focus group participants as one of the top priorities in selecting where residents live. Development patterns also contribute to inconvenience and unsafe conditions for pedestrians due to long blocks and wide lanes. Several of the focus group participants talked about basic improvements that would make neighborhoods safer, such as cleaning up trash, enhanced lighting, pedestrian crosswalks, cleaning up parks where homeless people stay are all critical and were cited continuously in all focus groups.

Action: *Pursue the objectives in the Southern Nevada Strong Regional Plan in the Increasing Transportation Choice element, such as:*

- *Improve the rider experience by locating stops away from adjacent travel lanes, offering robust lighting, and making other site considerations that maximize visibility and safety.*
- *Update design standards to create wider sidewalks with street trees, benches, trash receptacles, streetlighting, and other streetscape amenities along key transportation corridors to make walking to transit stops more welcoming for riders and to shield them from heat during extreme temperatures.*
- *Work with the RTC to implement a regional system of fully multi-modal interconnected arterial and local streets, pathways and bikeways that are integrated with public transit in order to increase mode share.*
- *Enhance safety for marginalized groups, taking into consideration the particular needs of vulnerable populations, such as the homeless, unemployed, underemployed and other marginalized groups.*
- *Ensure that information about transportation options is available and distributed in creative ways to promote and educate Southern Nevada's most vulnerable populations, such as homeless, unemployed, underemployed and other marginalized groups.*
- *Pursue a pedestrian safety study to identify priority locations with high pedestrian-vehicle conflicts to focus retrofit plans, conduct an incident management analysis, and define crash hot spots.*
- *Develop a regionally-shared traffic safety database.*
- *Work with local bike groups and transportation advocates to update the RTC's multi-modal transportation plan and identify strategies to increase safety and make walking and bicycling more viable as primary transportation modes.*
- *Establish an off-street bicycle parking policy, which considers security, placement, quality of facilities, and provision of signs directing bicyclists to the parking facilities.*

- *Promote educational opportunities to the local engineering and planning community on the role of design and land use in pedestrian safety, such as an educational event about how to repurpose right-of-way, and design streets and streetscapes as amenities.*
 - *Revise and adopt regional and local design standards to include multi-modal street design, safety and improved access management.*
 - *Pursue a regional policy change to require roadways to be designed for target speeds as recommended in the Complete Streets Design Guidelines for Livable Communities, based on the context of the corridor and overall safety and comfort of all users, including pedestrians and bicyclists, and require justification for all target design speeds and speed limits.*
 - *Develop a road diet/retrofit plan for road networks in Southern Nevada to improve connectivity and access for multiple modes, starting with areas identified through the pedestrian safety study.*
- **Public reinvestment needs to be prioritized in lower-income areas.**
Residents consistently associate undesirable neighborhoods with the valley’s urban neighborhoods.
 - Action:** *Implement the Southern Nevada Strong Preferred Land Use Vision to emphasize redevelopment of the region’s downtowns, prioritizing existing neighborhoods and infill development.*
 - Action:** *Prioritize maintenance of public facilities in low and moderate income neighborhoods to ensure they are inviting, safe places for families and remain relevant as changing demographics and demand shift.*
 - Action:** *Support the Southern Nevada Strong Regional Plan Goal to Stabilize and strengthen existing neighborhoods through placemaking improvements.*
 - **Lack of options for extended family and cultural traditions.** Hispanic and Asian focus group participants cited different needs in housing options to accommodate socioeconomic and cultural needs. Some families reported housing multiple generations in one unit; others cited the need for conjoined but separate living quarters. Additionally, Hispanics with LED lack access to information on housing opportunities. This input supports the Southern Nevada Strong Regional Plan policies to ensure a wide variety of housing options are availability for all incomes and stages of life.
 - Action:** *Support the Southern Nevada Strong Regional Plan Invest in Complete Communities goals, objectives and strategies.*

Action: *Coordinate with Spanish LED support services to promote the dissemination of information on homeownership and rental opportunities for the Spanish LED community.*

Action: *Develop new lines of communication across jurisdictions with residents to inform them of their rights and how they can deal with housing challenges.*

- **Shortage of knowledge and available research in all areas related to fair housing.** There is a critical lack of understanding on the importance of fair housing and its effects on our region as a whole. Additionally, data does not exist in certain areas related to fair housing practices that make it difficult to understand whether these areas are affecting fair housing choice in our region. These include a more thorough understanding of unfair loan practices and real estate steering by race or ethnicity, disability or family composition.

Action: *Continue to expand the role of non-profits and academic institutions in testing and researching these areas to find out if impediments do exist and to suggest further action items to remedy the situation.*

Action: *Expand training by HUD and fair housing experts, to educate elected officials, local government employees who influence fair housing (planners, building inspectors, neighborhood services and housing workers), real estate professionals, and property managers.*

Action: *Partner with UNLV and other academic researchers to provide necessary research and data for fair housing.*

Action: *Increase information sharing capabilities for the SNRHA and all local agencies that provide public housing assistance in order to more effectively understand our region's needs.*

- **Few affordable housing options for residents who do not qualify for public assistance but still fall into protected groups.** There are many residents in the region who are looking for private housing – whether to rent or own – who are not able to find affordable options in high opportunity areas. To affirmatively further fair housing, minority households of modest incomes need access to the higher opportunities in these higher opportunity tracts if they are to attain upward mobility.

Action: *The jurisdictions need to research the recommendations given in Chapter 6, which would increase the affordable housing options across Southern Nevada and take the necessary steps to amend their Zoning Codes and Comprehensive Plans to support these changes.*

Action: *Support the Southern Nevada Strong Regional Plan Goal to encourage an adequate supply of housing with a range of price, income, density, ownership and building types.*

Action: *Encourage state and local government agencies to utilize the Southern Nevada Public Lands Management Act, Section 7(b), Affordable Housing Disposals, to locate affordable housing developments on land that has been identified as suitable for disposal by BLM.*

- **Outdated zoning code regulations.** Most of the jurisdictions contain outdated language in reference to community residences for the disabled. Many of these are simply code language changes that are necessary to make sure the region is furthering fair housing for these groups. Additionally, the jurisdictions could require inclusionary zoning for affordable units, especially for very low-income residents.

Action: *The jurisdictions should research and revise their Community Residence zoning sections to comply with recent court opinions. Chapter 6 identifies language that should be reviewed for modification.*

Action: *The jurisdictions should analyze their affordability status and their density regulations in order to ensure they aren't unintentionally limiting housing choice.*

APPENDIX

A. NV HMDA CONVENTIONAL AND FHA COMPLETE LOAN TABLES 2011-2012, ALL JURISDICTIONS

Unincorporated Clark County: Results of Applications for Conventional Home Mortgages, 2011–2012										
Reporting Year: 2012										
Race/Ethnicity	Total Applications	Number Issued	Approved Not Accepted	Number Denied	Withdrawn	Closed Incomplete	Percent Issued	Percent Denied	Percent Withdrawn	Percent Incomplete
Hispanic of Any Race	384	252	13	87	26	6	65.6%	22.7%	6.8%	1.6%
American Indian or Alaskan Eskimo	12	8	1	3	0	0	66.7%	25.0%	0.0%	0.0%
Asian	729	478	30	133	71	17	65.6%	18.2%	9.7%	2.3%
Black or African American	119	75	3	26	14	1	63.0%	21.8%	11.8%	0.8%
Native Hawaiian / Pacific Islander	63	41	4	15	2	1	65.1%	23.8%	3.2%	1.6%
White (non-Hispanic)	1,979	1,340	110	344	157	28	67.7%	17.4%	7.9%	1.4%
Race Unknown	316	182	24	60	37	13	57.6%	19.0%	11.7%	4.1%
All Men	2,235	1,504	112	397	194	28	67.3%	17.8%	8.7%	1.3%
All Women	1,172	785	50	225	87	25	67.0%	19.2%	7.4%	2.1%
Total (Does Not Include Gender Rows)	3,602	4,665	347	1,290	588	119	129.5%	35.8%	16.3%	3.3%
Reporting Year: 2011										
Race/Ethnicity	Total Applications	Number Issued	Approved Not Accepted	Number Denied	Withdrawn	Closed Incomplete	Percent Issued	Percent Denied	Percent Withdrawn	Percent Incomplete
Hispanic of Any Race	197	125	11	40	15	6	63.5%	20.3%	7.6%	3.0%
American Indian or Alaskan	6	0	4	2			0.0%	33.3%	0.0%	0.0%
Asian	189	124	13	29	18	5	65.6%	15.3%	9.5%	2.6%
Black or African American	25	11	3	6	4	1	44.0%	24.0%	16.0%	4.0%
Native Hawaiian / Pacific Islander	11	7	2	1	1		63.6%	9.1%	9.1%	0.0%
White (non-Hispanic)	554	359	37	91	56	11	64.8%	16.4%	10.1%	2.0%
Race Unknown	72	41	6	14	7	4	56.9%	19.4%	9.7%	5.6%
All Men	644	412	49	111	58	14	64.0%	17.2%	9.0%	2.2%
All Woman	364	231	22	62	40	9	63.5%	17.0%	11.0%	2.5%
Total (Does Not Include Gender Rows)	1,054	667	76	183	101	27	63.3%	17.4%	9.6%	2.6%

Source: Home Mortgage Disclosure Act Table 4–2 for Unincorporated Clark County, Nevada. Data provided by Reinvestment Partners.

Unincorporated Clark County: Results of Applications for FHA, FSA/RHS, and VA Home Mortgages Home Mortgages, 2011–2012
Reporting Year: 2012

Race/Ethnicity	Total Applications	Number Issued	Approved Not Accepted	Number Denied	Withdrawn	Closed Incomplete	Percent Issued	Percent Denied	Percent Withdrawn	Percent Incomplete
Hispanic of Any Race	1,709	1,084	51	320	233	21	63.4%	18.7%	13.6%	1.2%
American Indian or Alaskan Eskimo	17	10	1	6	0	0	58.8%	35.3%	0.0%	0.0%
Asian	934	620	39	174	84	17	66.4%	18.6%	9.0%	1.8%
Black or African American	377	251	6	69	44	7	66.6%	18.3%	11.7%	1.9%
Native Hawaiian / Pacific Islander	167	119	7	27	13	1	71.3%	16.2%	7.8%	0.6%
White (non-Hispanic)	3,260	2,264	128	520	307	41	69.4%	16.0%	9.4%	1.3%
Race Unknown	510	314	27	116	46	7	61.6%	22.7%	9.0%	1.4%
All Men	4,242	2,908	152	711	417	54	68.6%	16.8%	9.8%	1.3%
All Women	2,457	1,626	82	439	275	35	66.2%	17.9%	11.2%	1.4%
Total (Does Not Include Gender Rows)	6,974	4,662	259	1,232	727	94	66.8%	17.7%	10.4%	1.3%

Reporting Year: 2011

Race/Ethnicity	Total Applications	Number Issued	Approved Not Accepted	Number Denied	Withdrawn	Closed Incomplete	Percent Issued	Percent Denied	Percent Withdrawn	Percent Incomplete
Hispanic of Any Race	1,042	695	58	153	109	27	66.7%	14.7%	10.5%	2.6%
American Indian or Alaskan	9	5	1	1	2	0	55.6%	11.1%	22.2%	0.0%
Asian	221	140	11	42	21	7	63.3%	19.0%	9.5%	3.2%
Black or African American	117	80	7	18	12	0	68.4%	15.4%	10.3%	0.0%
Native Hawaiian / Pacific Islander	47	33	3	5	5	1	70.2%	10.6%	10.6%	2.1%
White (non-Hispanic)	1,114	807	41	139	112	15	72.4%	12.5%	10.1%	1.3%
Race Unknown	136	71	9	38	17	1	52.2%	27.9%	12.5%	0.7%
All Men	1,577	1,074	77	233	161	32	68.1%	14.8%	10.2%	2.0%
All Woman	1,026	711	49	141	107	18	69.3%	13.7%	10.4%	1.8%
Total (Does Not Include Gender Rows)	2,686	1,831	130	396	278	101	68.2%	14.7%	10.3%	3.8%

Source: Home Mortgage Disclosure Act Table 4–1 for Unincorporated Clark County, Nevada. Data provided by Reinvestment Partners.

Las Vegas: Results of Applications for Conventional Home Mortgages, 2011–2012										
Reporting Year: 2012										
Race/Ethnicity	Total Applications	Number Issued	Percent Issued	Approved Not Accepted	Number Denied	Percent Denied	Withdrawn	Percent Withdrawn	Closed Incomplete	Percent Incomplete
Hispanic of Any Race	260	154	59.2%	8	60	23.1%	36	13.8%	2	0.8%
American Indian or Alaskan Eskimo	8	3	37.5%	2	2	25.0%	1	12.5%	0	0.0%
Asian	214	127	59.3%	11	46	21.5%	23	10.7%	7	3.3%
Black or African American	88	56	63.6%	7	12	13.6%	10	11.4%	3	3.4%
Native Hawaiian / Pacific Islander	19	14	73.7%	0	3	15.8%	2	10.5%	0	0.0%
White (non-Hispanic)	1,682	1,176	69.9%	105	244	14.5%	132	7.8%	25	1.5%
Race Unknown	205	107	52.2%	12	51	24.9%	25	12.2%	10	4.9%
All Men	1,547	1,046	67.6%	84	254	16.4%	139	9.0%	24	1.6%
All Women	799	528	66.1%	53	132	16.5%	71	8.9%	15	1.9%
Total (Does Not Include Gender Rows)	2,476	1,637	66.1%	145	418	16.9%	229	9.2%	47	1.9%
Reporting Year: 2011										
Race/Ethnicity	Total Applications	Number Issued	Percent Issued	Approved Not Accepted	Number Denied	Percent Denied	Withdrawn	Percent Withdrawn	Closed Incomplete	Percent Incomplete
Hispanic of Any Race	107	61	57.0%	4	25	23.4%	14	13.1%	3	2.8%
American Indian or Alaskan	6	3	50.0%	0	2	33.3%	1	16.7%		0.0%
Asian	92	60	65.2%	6	12	13.0%	11	12.0%	3	3.3%
Black or African American	21	13	61.9%	2	2	9.5%	4	19.0%	0	0.0%
Native Hawaiian / Pacific Islander	12	9	75.0%	0	2	16.7%	1	8.3%	0	0.0%
White (non-Hispanic)	648	428	66.0%	52	96	14.8%	56	8.6%	16	2.5%
Race Unknown	70	40	57.1%	3	21	30.0%	5	7.1%	1	1.4%
All Men	582	382	65.6%	43	91	15.6%	54	9.3%	12	2.1%
All Woman	343	215	62.7%	23	61	17.8%	34	9.9%	10	2.9%
Total (Does Not Include Gender Rows)	956	614	64.2%	67	160	16.7%	92	9.6%	23	2.4%

Source: Home Mortgage Disclosure Act Table 4–2 for Las Vegas, Nevada. Data provided by Reinvestment Partners.

Las Vegas: Results of Applications for FHA, FSA/RHS, and VA Home Mortgages Home Mortgages, 2011–2012										
Reporting Year: 2012										
Race/Ethnicity	Total Applications	Number Issued	Percent Issued	Approved Not Accepted	Number Denied	Percent Denied	Withdrawn	Percent Withdrawn	Closed Incomplete	Percent Incomplete
Hispanic of Any Race	869	561	64.6%	20	147	16.9%	127	14.6%	14	1.6%
American Indian or Alaskan Eskimo	20	13	65.0%	0	5	25.0%	2	10.0%	0	0.0%
Asian	247	159	64.4%	5	54	21.9%	27	10.9%	2	0.8%
Black or African American	265	160	60.4%	20	63	23.8%	18	6.8%	4	1.5%
Native Hawaiian / Pacific Islander	54	34	63.0%	2	7	13.0%	10	18.5%	1	1.9%
White (non-Hispanic)	2,442	1,751	71.7%	89	365	14.9%	215	8.8%	22	0.9%
Race Unknown	370	222	60.0%	12	87	23.5%	44	11.9%	5	1.4%
All Men	2,727	1,873	68.7%	91	449	16.5%	280	10.3%	34	1.2%
All Women	1,346	920	68.4%	44	231	17.2%	140	10.4%	11	0.8%
Total (Does Not Include Gender Rows)	4,267	2,900	68.0%	148	728	17.1%	443	10.4%	48	1.1%
Reporting Year: 2011										
Race/Ethnicity	Total Applications	Number Issued	Percent Issued	Approved Not Accepted	Number Denied	Percent Denied	Withdrawn	Percent Withdrawn	Closed Incomplete	Percent Incomplete
Hispanic of Any Race	460	304	66.1%	21	72	15.7%	53	11.5%	10	2.2%
American Indian or Alaskan	3	2	66.7%		1	33.3%	0	0.0%	0	0.0%
Asian	101	65	64.4%	10	16	15.8%	9	8.9%	1	1.0%
Black or African American	90	58	64.4%	6	20	22.2%	4	4.4%	2	2.2%
Native Hawaiian / Pacific Islander	20	14	70.0%	3	1	5.0%	2	10.0%	0	0.0%
White (non-Hispanic)	915	630	68.9%	45	122	13.3%	104	11.4%	14	1.5%
Race Unknown	117	69	59.0%	6	18	15.4%	21	#REF!	3	2.6%
All Men	1,046	720	68.8%	50	148	14.1%	108	10.3%	20	1.9%
All Woman	588	374	63.6%	37	95	16.2%	74	12.6%	8	1.4%
Total (Does Not Include Gender Rows)	1,706	1,142	66.9%	91	250	14.7%	193	11.3%	30	1.8%

Source: Home Mortgage Disclosure Act Table 4–1 for Las Vegas, Nevada. Data provided by Reinvestment Partners.

Henderson: Results of Applications for Conventional Home Mortgages, 2011–2012										
Reporting Year: 2012										
Race/Ethnicity	Total Applications	Number Issued	Percent Issued	Approved Not Accepted	Number Denied	Percent Denied	Withdrawn	Percent Withdrawn	Closed Incomplete	Percent Incomplete
Hispanic of Any Race	122	72	59.0%	6	29	23.8%	14	11.5%	1	0.8%
American Indian or Alaskan Eskimo	7	2	28.6%	0	3	42.9%	1	14.3%	1	14.3%
Asian	154	108	70.1%	4	20	13.0%	18	11.7%	4	2.6%
Black or African American	24	13	54.2%	2	4	16.7%	5	20.8%		0.0%
Native Hawaiian / Pacific Islander	17	11	64.7%	0	3	17.6%	3	17.6%	0	0.0%
White (non-Hispanic)	1,450	1,054	72.7%	58	202	13.9%	110	7.6%	26	1.8%
Race Unknown	173	111	64.2%	1	29	16.8%	25	14.5%	7	4.0%
All Men	1,337	953	71.3%	55	198	14.8%	107	8.0%	24	1.8%
All Women	502	348	69.3%	15	68	13.5%	60	12.0%	11	2.2%
Total (Does Not Include Gender Rows)	1,947	1,371	70.4%	71	290	14.9%	176	9.0%	39	2.0%
Reporting Year: 2011										
Race/Ethnicity	Total Applications	Number Issued	Percent Issued	Approved Not Accepted	Number Denied	Percent Denied	Withdrawn	Percent Withdrawn	Closed Incomplete	Percent Incomplete
Hispanic of Any Race	47	30	63.8%	1	11	23.4%	4	8.5%	1	2.1%
American Indian or Alaskan	3	1	33.3%	1		0.0%	1	33.3%		0.0%
Asian	48	32	66.7%		10	20.8%	4	8.3%	2	4.2%
Black or African American	9	8	88.9%	0	0	0.0%	1	11.1%	0	0.0%
Native Hawaiian / Pacific Islander	8	3	37.5%	1	2	25.0%	2	25.0%	0	0.0%
White (non-Hispanic)	396	278	70.2%	27	51	12.9%	33	8.3%	7	1.8%
Race Unknown	50	37	74.0%	3	7	14.0%	2	4.0%	1	2.0%
All Men	330	221	67.0%	22	50	15.2%	32	9.7%	5	1.5%
All Woman	194	141	72.7%	10	26	13.4%	13	6.7%	4	2.1%
Total (Does Not Include Gender Rows)	561	389	69.3%	33	81	14.4%	47	8.4%	11	2.0%

Source: Home Mortgage Disclosure Act Table 4–2 for Henderson, Nevada. Data provided by Reinvestment Partners.

Henderson: Results of Applications for FHA, FSA/RHS, and VA Home Mortgages Home Mortgages, 2011–2012

Reporting Year: 2012

Race/Ethnicity	Total Applications	Number Issued	Percent Issued	Approved Not Accepted	Number Denied	Percent Denied	Withdrawn	Percent Withdrawn	Closed Incomplete	Percent Incomplete
Hispanic of Any Race	257	180	70.0%	7	46	17.9%	23	8.9%	1	0.4%
American Indian or Alaskan Eskimo	4	2	50.0%	0	2	50.0%	0	0.0%	0	0.0%
Asian	135	94	69.6%	4	22	16.3%	12	8.9%	3	2.2%
Black or African American	123	86	69.9%	4	19	15.4%	14	11.4%	0	0.0%
Native Hawaiian / Pacific Islander	35	21	60.0%	1	7	20.0%	5	14.3%	1	2.9%
White (non-Hispanic)	1,781	1,272	71.4%	65	261	14.7%	167	9.4%	16	0.9%
Race Unknown	218	123	56.4%	15	54	24.8%	20	9.2%	6	2.8%
All Men	1,754	1,247	71.1%	61	266	15.2%	160	9.1%	20	1.1%
All Women	655	454	69.3%	26	104	15.9%	66	10.1%	5	0.8%
Total (Does Not Include Gender Rows)	2,553	1,778	69.6%	96	411	16.1%	241	9.4%	27	1.1%

Reporting Year: 2011

Race/Ethnicity	Total Applications	Number Issued	Percent Issued	Approved Not Accepted	Number Denied	Percent Denied	Withdrawn	Percent Withdrawn	Closed Incomplete	Percent Incomplete
Hispanic of Any Race	170	120	70.6%	11	20	11.8%	16	9.4%	3	1.8%
American Indian or Alaskan	3	2	66.7%		1	33.3%		0.0%		0.0%
Asian	49	35	71.4%	2	9	18.4%	1	2.0%	2	4.1%
Black or African American	37	25	67.6%	3	4	10.8%	4	10.8%	1	2.7%
Native Hawaiian / Pacific Islander	15	8	53.3%	1	2	13.3%	3	20.0%	1	6.7%
White (non-Hispanic)	920	680	73.9%	40	108	11.7%	76	8.3%	16	1.7%
Race Unknown	96	65	67.7%	4	15	15.6%	10	10.4%	2	2.1%
All Men	828	605	73.1%	36	104	12.6%	68	8.2%	15	1.8%
All Woman	425	305	71.8%	23	52	12.2%	36	8.5%	9	2.1%
Total (Does Not Include Gender Rows)	1,290	935	72.5%	61	159	12.3%	110	8.5%	25	1.9%

Source: Home Mortgage Disclosure Act Table 4–1 for Henderson, Nevada. Data provided by Reinvestment Partners.

North Las Vegas: Results of Applications for Conventional Home Mortgages, 2011–2012										
Reporting Year: 2012										
Race/Ethnicity	Total Applications	Number Issued	Percent Issued	Approved Not Accepted	Number Denied	Percent Denied	Withdrawn	Percent Withdrawn	Closed Incomplete	Percent Incomplete
Hispanic of Any Race	163	114	69.9%	3	30	18.4%	15	9.2%	1	0.6%
American Indian or Alaskan Eskimo	1	1	100.0%	0	0	0.0%	0	0.0%	0	0.0%
Asian	40	28	70.0%	1	8	20.0%	3	7.5%		0.0%
Black or African American	62	45	72.6%	1	13	21.0%	2	3.2%	1	1.6%
Native Hawaiian / Pacific Islander	20	17	85.0%	0	3	15.0%	0	0.0%	0	0.0%
White (non-Hispanic)	345	253	73.3%	19	43	12.5%	26	7.5%	4	1.2%
Race Unknown	37	28	75.7%	1	7	18.9%	1	2.7%	0	0.0%
All Men	397	278	70.0%	21	68	17.1%	27	6.8%	3	0.8%
All Women	248	192	77.4%	4	30	12.1%	19	7.7%	3	1.2%
Total (Does Not Include Gender Rows)	668	486	72.8%	25	104	15.6%	47	7.0%	6	0.9%
Reporting Year: 2011										
Race/Ethnicity	Total Applications	Number Issued	Percent Issued	Approved Not Accepted	Percent Denied	Number Denied	Withdrawn	Percent Withdrawn	Closed Incomplete	Percent Incomplete
Hispanic of Any Race	29	16	55.2%	2	17.2%	5	6	20.7%	0	0.0%
American Indian or Alaskan	0	0	0.0%	0	0.0%	0	0	0.0%	0	0.0%
Asian	4	4	100.0%	0	0.0%	0	0	0.0%	0	0.0%
Black or African American	4	2	50.0%	1	25.0%	1	0	0.0%	0	0.0%
Native Hawaiian / Pacific Islander	4	3	75.0%	0	25.0%	1	0	0.0%	0	0.0%
White (non-Hispanic)	31	23	74.2%	3	3.2%	1	3	9.7%	1	3.2%
Race Unknown	9	7	77.8%	0	0.0%	0	2	22.2%		0.0%
All Men	47	32	68.1%	5	10.6%	5	4	8.5%	1	2.1%
All Woman	27	18	66.7%	1	11.1%	3	5	18.5%		0.0%
Total (Does Not Include Gender Rows)	81	55	67.9%	6	9.9%	8	11	13.6%	1	1.2%

Source: Home Mortgage Disclosure Act Table 4-2 for North Las Vegas, Nevada. Data provided by Reinvestment Partners.

North Las Vegas: Results of Applications for FHA, FSA/RHS, and VA Home Mortgages Home Mortgages, 2011–2012
Reporting Year: 2012

Race/Ethnicity	Total Applications	Number Issued	Percent Issued	Approved Not Accepted	Number Denied	Percent Denied	Withdrawn	Percent Withdrawn	Closed Incomplete	Percent Incomplete
Hispanic of Any Race	715	480	67.1%	13	134	18.7%	81	11.3%	7	1.0%
American Indian or Alaskan Eskimo	6	4	66.7%	0	2	33.3%	0	0.0%	0	0.0%
Asian	139	100	71.9%	6	21	15.1%	12	8.6%		0.0%
Black or African American	373	240	64.3%	11	88	23.6%	32	8.6%	2	0.5%
Native Hawaiian / Pacific Islander	43	31	72.1%	0	8	18.6%	3	7.0%	1	2.3%
White (non-Hispanic)	1,051	767	73.0%	38	151	14.4%	86	8.2%	9	0.9%
Race Unknown	195	123	63.1%	9	39	20.0%	19	9.7%	5	2.6%
All Men	1,582	1,098	69.4%	38	278	17.6%	153	9.7%	15	0.9%
All Women	819	573	70.0%	29	142	17.3%	68	8.3%	7	0.9%
Total (Does Not Include Gender Rows)	2,522	1,745	69.2%	77	443	17.6%	233	9.2%	24	1.0%

Reporting Year: 2011

Race/Ethnicity	Total Applications	Number Issued	Percent Issued	Approved Not Accepted	Number Denied	Percent Denied	Withdrawn	Percent Withdrawn	Closed Incomplete	Percent Incomplete
Hispanic of Any Race	163	116	71.2%	6	23	14.1%	16	9.8%	2	1.2%
American Indian or Alaskan	1	1	100.0%	0		0.0%	0	0.0%	0	0.0%
Asian	22	16	72.7%	1	3	13.6%	2	9.1%	0	0.0%
Black or African American	44	31	70.5%	1	8	18.2%	3	6.8%	1	2.3%
Native Hawaiian / Pacific Islander	6	5	83.3%	0	0	0.0%	0	0.0%	1	16.7%
White (non-Hispanic)	142	106	74.6%	7	17	12.0%	11	7.7%	1	0.7%
Race Unknown	34	20	58.8%	2	9	26.5%	2	5.9%	1	2.9%
All Men	233	169	72.5%	9	37	15.9%	18	7.7%		0.0%
All Woman	162	118	72.8%	7	18	11.1%	14	8.6%	5	3.1%
Total (Does Not Include Gender Rows)	412	295	71.6%	17	60	14.6%	34	8.3%	6	1.5%

Source: Home Mortgage Disclosure Act Table 4–1 for North Las Vegas, Nevada. Data provided by Reinvestment Partners.

Boulder City: Results of Applications for Conventional Home Mortgages, 2011–2012										
Reporting Year: 2012										
Race/Ethnicity	Total Applications	Number Issued	Percent Issued	Approved Not Accepted	Number Denied	Percent Denied	Withdrawn	Percent Withdrawn	Closed Incomplete	Percent Incomplete
Hispanic of Any Race	3	3	100.0%	0	0	0.0%	0	0.0%	0	0.0%
American Indian or Alaskan Eskimo	1	0	0.0%	0	0	0.0%	0	0.0%	1	100.0%
Asian	0	0	0.0%	0	0	0.0%	0	0.0%	0	0.0%
Black or African American	0	0	0.0%	0	0	0.0%	0	0.0%	0	0.0%
Native Hawaiian / Pacific Islander	0	0	0.0%	0	0	0.0%	0	0.0%	0	0.0%
White (non-Hispanic)	43	26	60.5%	3	8	18.6%	6	14.0%	0	0.0%
Race Unknown	2	2	100.0%	0	0	0.0%	0	0.0%	0	0.0%
All Men	35	21	60.0%	2	7	20.0%	4	11.4%	1	2.9%
All Women	12	8	66.7%	1	1	8.3%	2	16.7%	0	0.0%
Total (Does Not Include Gender Rows)	49	31	63.3%	3	8	16.3%	6	12.2%	1	2.0%
Reporting Year: 2011										
Race/Ethnicity	Total Applications	Number Issued	Percent Issued	Approved Not Accepted	Number Denied	Percent Denied	Withdrawn	Percent Withdrawn	Closed Incomplete	Percent Incomplete
Hispanic of Any Race	2	1	50.0%	1	0	0.0%	0	0.0%	0	0.0%
American Indian or Alaskan Eskimo	1	1	100.0%	0	0	0.0%	0	0.0%	0	0.0%
Asian	0	0	0.0%	0	0	0.0%	0	0.0%	0	0.0%
Black or African American	0	0	0.0%	0	0	0.0%	0	0.0%	0	0.0%
Native Hawaiian / Pacific Islander	0		0.0%	0	0	0.0%	0	0.0%	0	0.0%
White (non-Hispanic)	38	29	76.3%	1	3	7.9%	3	7.9%	2	5.3%
Race Unknown	4	1	25.0%	0	0	0.0%	2	50.0%	1	25.0%
All Men	34	25	73.5%	2	1	2.9%	3	8.8%	3	8.8%
All Woman	10	7	70.0%	0	2	20.0%	1	10.0%	0	0.0%
Total (Does Not Include Gender Rows)	45	32	71.1%	2	3	6.7%	5	11.1%	3	6.7%

Source: Home Mortgage Disclosure Act Table 4-2 for Boulder City, NV. Data provided by Reinvestment Partners.

Boulder City: Results of Applications for FHA, FSA/RHS, and VA Home Mortgages Home Mortgages, 2011–2012										
Reporting Year: 2012										
Race/Ethnicity	Total Applications	Number Issued	Percent Issued	Approved Not Accepted	Number Denied	Percent Denied	Withdrawn	Percent Withdrawn	Closed Incomplete	Percent Incomplete
Hispanic of Any Race	2	2	100.0%	0	0	0.0%	0	0.0%	0	0.0%
American Indian or Alaskan Eskimo	0	0	0.0%	0	0	0.0%	0	0.0%	0	0.0%
Asian	0	0	0.0%	0	0	0.0%	0	0.0%	0	0.0%
African American	0	0	0.0%	0	0	0.0%	0	0.0%	0	0.0%
Native Hawaiian / Pacific Islander	0	0	0.0%	0	0	0.0%	0	0.0%	0	0.0%
White (non-Hispanic)	59	39	66.1%	5	10	16.9%	4	6.8%	1	1.7%
Race Unknown	3	3	100.0%	0	0	0.0%	0	0.0%	0	0.0%
All Men	48	34	70.8%	4	7	14.6%	3	6.3%	1	2.1%
All Women	13	8	61.5%	1	3	23.1%	1	7.7%	0	0.0%
Total (Does Not Include Gender Rows)	64	44	68.8%	5	10	15.6%	4	6.3%	1	1.6%
Reporting Year: 2011										
Race/Ethnicity	Total Applications	Number Issued	Percent Issued	Approved Not Accepted	Number Denied	Percent Denied	Withdrawn	Percent Withdrawn	Closed Incomplete	Percent Incomplete
Hispanic of Any Race	0	0	0.0%	0	0	0.0%	0	0.0%	0	0.0%
American Indian or Alaskan	1	1	100.0%	0	0	0.0%	0	0.0%	0	0.0%
Asian	0	0	0.0%	0	0	0.0%	0	0.0%	0	0.0%
Black or African American	0	0	0.0%	0	0	0.0%	0	0.0%	0	0.0%
Native Hawaiian / Pacific Islander	0	0	0.0%	0	0	0.0%	0	0.0%	0	0.0%
White (non-Hispanic)	50	41	82.0%	2	2	4.0%	5	10.0%	0	0.0%
Race Unknown	5	2	40.0%	1	1	20.0%	0	0.0%	1	20.0%
All Men	33	29	87.9%	1	2	6.1%	1	3.0%	0	0.0%
All Woman	16	12	75.0%	1	1	6.3%	2	12.5%	0	0.0%
Total (Does Not Include Gender Rows)	56	44	78.6%	3	3	5.4%	5	8.9%	1	1.8%

Source: Home Mortgage Disclosure Act Table 4-1 for Boulder City, Nevada. Data provided by Reinvestment Partners.

B. FREE MARKET ANALYSIS TABLES BY PLANNING COMMUNICATIONS

City of Las Vegas Racial and Hispanic Household Composition and Opportunity Index by Census Tract

Las Vegas Racial and Hispanic Household Composition and Opportunity Index: 2000–2012									
Area	2008–2012				2000				Overall Opportunity Index
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race	
Las Vegas Citywide									
HHs Actual proportions	73.7%	11.8%	5.9%	22.1%	75.2%	10.5%	4.1%	15.5%	Not applicable
HHs Free market	72.7%	10.8%	7.7%	20.9%	76.7%	9.0%	4.5%	14.8%	
HHs Difference	1.1%	1.0%	-1.9%	1.1%	-1.5%	1.5%	-0.4%	0.7%	
Census Tract 1.01									
HHs Actual proportions	63.1%	11.6%	2.1%	39.8%	72.1%	14.4%	1.6%	23.4%	Moderate
HHs Free market	72.3%	11.0%	7.5%	22.0%	77.2%	8.5%	4.5%	14.9%	
HHs Difference	-9.2%	0.6%	-5.4%	17.9%	-5.1%	5.9%	-2.9%	8.5%	
Census Tract 1.03									
HHs Actual proportions	64.5%	6.7%	4.7%	50.6%	70.9%	6.8%	2.5%	20.9%	Low
HHs Free market	71.7%	11.7%	7.4%	23.1%	75.4%	9.8%	4.4%	16.1%	
HHs Difference	-7.2%	-5.0%	-2.7%	27.5%	-4.5%	-3.0%	-1.9%	4.8%	
Census Tract 1.05									
HHs Actual proportions	81.0%	5.2%	3.2%	43.3%	81.8%	1.1%	3.2%	18.5%	Low
HHs Free market	72.4%	10.9%	7.5%	22.5%	76.3%	9.1%	4.5%	15.4%	
HHs Difference	8.6%	-5.7%	-4.4%	20.9%	5.5%	-8.0%	-1.3%	3.1%	
Census Tract 1.06 Census Tract 1.06 consists of parts of 2000 Census Tracts 1.02 and 1.04									
HHs Actual proportions	76.0%	9.8%	4.8%	24.9%	79.3%	7.0%	2.3%	15.9%	Low
HHs Free market	70.8%	12.6%	7.2%	23.1%	75.4%	9.9%	4.4%	15.7%	
HHs Difference	5.3%	-2.8%	-2.5%	1.8%	3.9%	-2.9%	-2.1%	0.2%	
Census Tract 1.07 Census Tract 1.04									
HHs Actual proportions	71.6%	10.1%	8.2%	29.4%	81.2%	7.5%	2.5%	13.0%	High
HHs Free market	71.2%	12.2%	7.4%	22.7%	75.1%	10.2%	4.4%	15.7%	
HHs Difference	0.4%	-2.1%	0.8%	6.7%	6.1%	-2.7%	-1.9%	-2.8%	
Census Tract 1.08 Census Tract 1.02									
HHs Actual proportions	72.5%	3.5%	0.0%	51.8%	76.7%	6.3%	2.1%	19.9%	Low
HHs Free market	71.4%	12.1%	7.3%	23.5%	75.9%	9.4%	4.4%	15.6%	
HHs Difference	1.2%	-8.6%	-7.3%	28.3%	0.8%	-3.2%	-2.4%	4.3%	

Las Vegas Racial and Hispanic Household Composition and Opportunity Index: 2000–2012									
Area	2008–2012				2000				Overall Opportunity Index
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race	
Census Tract 1.09					Census Tract 1.02				
HHs Actual proportions	71.6%	5.3%	2.9%	29.1%	76.7%	6.3%	2.1%	19.9%	Low
HHs Free market	72.6%	10.7%	7.7%	21.2%	75.9%	9.4%	4.4%	15.6%	
HHs Difference	-1.0%	-5.4%	-4.8%	7.9%	0.8%	-3.2%	-2.4%	4.3%	
Census Tract 2.01									
HHs Actual proportions	48.1%	35.7%	5.6%	37.8%	46.8%	42.9%	0.4%	28.0%	Low
HHs Free market	71.4%	12.1%	7.2%	22.4%	75.0%	10.3%	4.5%	15.7%	
HHs Difference	-23.3%	23.6%	-1.7%	15.4%	-28.1%	32.6%	-4.1%	12.3%	
Census Tract 2.03									
HHs Actual proportions	64.0%	24.2%	3.3%	25.0%	62.9%	20.9%	6.1%	18.4%	Moderate
HHs Free market	71.0%	12.6%	7.2%	22.5%	75.1%	10.0%	4.4%	16.1%	
HHs Difference	-6.9%	11.5%	-3.9%	2.5%	-12.1%	10.8%	1.7%	2.4%	
Census Tract 2.04									
HHs Actual proportions	77.1%	9.3%	1.1%	14.4%	93.5%	1.2%	1.2%	6.2%	Low
HHs Free market	73.6%	9.9%	8.1%	20.0%	76.6%	9.1%	4.4%	14.9%	
HHs Difference	3.5%	-0.7%	-7.0%	-5.6%	16.8%	-7.9%	-3.2%	-8.8%	
Census Tract 3.01									
HHs Actual proportions	23.7%	65.9%	0.6%	23.4%	11.1%	79.1%	1.5%	14.5%	Very Low
HHs Free market	69.4%	14.0%	6.9%	24.1%	73.1%	11.8%	4.4%	16.4%	
HHs Difference	-45.8%	51.9%	-6.3%	-0.7%	-62.1%	67.3%	-2.9%	-1.9%	
Census Tract 3.02									
HHs Actual proportions	15.7%	71.9%	1.9%	22.0%	15.7%	73.7%	1.4%	11.4%	Very Low
HHs Free market	69.0%	14.7%	6.8%	23.7%	73.0%	12.0%	4.4%	16.0%	
HHs Difference	-53.3%	57.2%	-4.9%	-1.7%	-57.4%	61.7%	-3.0%	-4.6%	
Census Tract 4.01					Census Tract 4.00				
HHs Actual proportions	55.6%	29.3%	8.8%	21.1%	56.3%	13.2%	7.5%	36.0%	Very Low
HHs Free market	69.1%	14.3%	7.1%	23.3%	73.3%	11.6%	4.4%	16.4%	
HHs Difference	-13.4%	15.0%	1.7%	-2.2%	-17.0%	1.6%	3.1%	19.6%	

Las Vegas Racial and Hispanic Household Composition and Opportunity Index: 2000–2012									
Area	2008–2012				2000				Overall Opportunity Index
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race	
Census Tract 4.02					Census Tract 4.00				
HHs Actual proportions	57.3%	19.8%	5.3%	51.0%	56.3%	13.2%	7.5%	36.0%	Very Low
HHs Free market	69.6%	13.9%	6.9%	23.8%	73.3%	11.6%	4.4%	16.4%	
HHs Difference	-12.3%	5.9%	-1.7%	27.3%	-17.0%	1.6%	3.1%	19.6%	
Census Tract 4.03					Census Tract 4.00				
HHs Actual proportions	54.1%	23.6%	4.7%	35.1%	56.3%	13.2%	7.5%	36.0%	Very Low
HHs Free market	68.8%	15.0%	6.6%	23.4%	73.3%	11.6%	4.4%	16.4%	
HHs Difference	-14.7%	8.6%	-2.0%	11.6%	-17.0%	1.6%	3.1%	19.6%	
Census Tract 5.10									
HHs Actual proportions	68.9%	9.2%	0.6%	71.9%	51.5%	16.3%	1.2%	59.1%	Low
HHs Free market	71.4%	11.8%	7.4%	22.8%	75.1%	10.0%	4.4%	16.0%	
HHs Difference	-2.5%	-2.6%	-6.9%	49.2%	-23.7%	6.3%	-3.2%	43.1%	
Census Tract 5.13									
HHs Actual proportions	76.7%	9.5%	3.3%	45.5%	76.1%	9.4%	3.1%	23.6%	Low
HHs Free market	71.6%	11.6%	7.3%	23.0%	75.4%	9.7%	4.4%	16.0%	
HHs Difference	5.0%	-2.1%	-4.0%	22.6%	0.7%	-0.2%	-1.4%	7.6%	
Census Tract 5.14									
HHs Actual proportions	59.9%	15.6%	3.0%	49.0%	54.5%	23.6%	3.5%	36.6%	Low
HHs Free market	70.9%	12.6%	7.0%	23.5%	74.7%	10.4%	4.4%	16.2%	
HHs Difference	-11.0%	2.9%	-4.1%	25.5%	-20.1%	13.2%	-0.9%	20.5%	
Census Tract 5.15									
HHs Actual proportions	67.6%	8.7%	8.6%	59.7%	70.8%	13.5%	4.9%	27.8%	Very Low
HHs Free market	71.5%	11.8%	7.3%	23.2%	75.8%	9.5%	4.5%	15.7%	
HHs Difference	-3.9%	-3.2%	1.3%	36.5%	-5.0%	4.0%	0.4%	12.1%	
Census Tract 5.16									
HHs Actual proportions	74.0%	8.7%	3.2%	53.5%	65.4%	12.5%	5.4%	35.7%	Very Low
HHs Free market	70.9%	12.5%	7.2%	23.5%	75.3%	9.9%	4.4%	15.9%	
HHs Difference	3.1%	-3.8%	-4.0%	30.0%	-9.9%	2.6%	1.0%	19.9%	

Las Vegas Racial and Hispanic Household Composition and Opportunity Index: 2000–2012									
Area	2008–2012				2000				Overall Opportunity Index
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race	
Census Tract 5.17									
HHs Actual proportions	68.2%	10.1%	7.0%	63.5%	59.0%	13.5%	7.2%	32.2%	Very Low
HHs Free market	70.9%	12.3%	7.4%	23.3%	75.7%	9.5%	4.4%	15.8%	
HHs Difference	-2.7%	-2.2%	-0.5%	40.1%	-16.7%	3.9%	2.7%	16.4%	
Census Tract 5.18									
HHs Actual proportions	65.6%	19.9%	3.1%	47.6%	65.1%	12.9%	4.5%	30.7%	Low
HHs Free market	71.4%	11.9%	7.3%	23.1%	75.5%	9.8%	4.4%	15.9%	
HHs Difference	-5.8%	8.0%	-4.1%	24.5%	-10.4%	3.1%	0.0%	14.8%	
Census Tract 5.19									
HHs Actual proportions	68.8%	5.6%	5.6%	58.5%	49.9%	8.4%	5.2%	43.3%	Very Low
HHs Free market	71.7%	11.7%	7.5%	22.0%	76.4%	8.9%	4.5%	15.6%	
HHs Difference	-3.0%	-6.1%	-1.9%	36.5%	-26.4%	-0.6%	0.7%	27.7%	
Census Tract 5.20									
HHs Actual proportions	82.3%	0.0%	4.1%	73.3%	59.4%	6.6%	5.9%	50.3%	Very Low
HHs Free market	71.7%	12.1%	6.7%	23.9%	74.1%	11.0%	4.3%	16.3%	
HHs Difference	10.7%	-12.1%	-2.6%	49.4%	-14.7%	-4.3%	1.6%	34.0%	
Census Tract 5.21									
HHs Actual proportions	71.1%	13.8%	1.3%	60.0%	59.4%	6.6%	5.9%	50.3%	Very Low
HHs Free market	69.7%	14.1%	6.9%	23.8%	74.1%	11.0%	4.3%	16.3%	
HHs Difference	1.4%	-0.3%	-5.5%	36.2%	-14.7%	-4.3%	1.6%	34.0%	
Census Tract 5.22									
HHs Actual proportions	64.8%	17.3%	5.5%	64.0%	55.2%	12.6%	2.1%	51.1%	Very Low
HHs Free market	69.3%	14.4%	6.8%	23.6%	73.6%	11.4%	4.3%	16.6%	
HHs Difference	-4.5%	2.9%	-1.3%	40.4%	-18.5%	1.2%	-2.1%	34.5%	
Census Tract 5.23									
HHs Actual proportions	66.5%	29.8%	1.6%	40.7%	55.2%	12.6%	2.1%	51.1%	Very Low
HHs Free market	69.2%	14.6%	6.5%	24.6%	73.6%	11.4%	4.3%	16.6%	
HHs Difference	-2.7%	15.2%	-4.9%	16.0%	-18.5%	1.2%	-2.1%	34.5%	

Las Vegas Racial and Hispanic Household Composition and Opportunity Index: 2000–2012									
Area	2008–2012				2000				Overall Opportunity Index
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race	
Census Tract 5.24					Census Tract 5.11				
HHs Actual proportions	68.0%	20.2%	3.2%	39.4%	47.0%	22.6%	1.3%	43.8%	Very Low
HHs Free market	69.1%	14.4%	6.9%	23.9%	73.9%	11.3%	4.4%	15.9%	
HHs Difference	-1.0%	5.8%	-3.7%	15.5%	-26.8%	11.3%	-3.1%	27.9%	
Census Tract 5.25					Census Tract 5.11				
HHs Actual proportions	55.6%	23.2%	0.0%	59.4%	47.0%	22.6%	1.3%	43.8%	Low
HHs Free market	71.2%	12.2%	7.0%	23.3%	73.9%	11.3%	4.4%	15.9%	
HHs Difference	-15.6%	11.0%	-7.0%	36.2%	-26.8%	11.3%	-3.1%	27.9%	
Census Tract 5.26					Census Tract 5.12				
HHs Actual proportions	73.8%	7.4%	2.6%	76.4%	59.1%	13.8%	3.2%	44.3%	Low
HHs Free market	71.5%	11.6%	7.5%	22.9%	75.6%	9.5%	4.4%	16.0%	
HHs Difference	2.2%	-4.2%	-4.9%	53.4%	-16.5%	4.3%	-1.2%	28.3%	
Census Tract 5.27					Census Tract 5.12				
HHs Actual proportions	70.9%	9.7%	0.0%	77.5%	59.1%	13.8%	3.2%	44.3%	Very Low
HHs Free market	71.9%	11.4%	7.4%	22.4%	75.6%	9.5%	4.4%	16.0%	
HHs Difference	-1.0%	-1.7%	-7.4%	55.1%	-16.5%	4.3%	-1.2%	28.3%	
Census Tract 5.28					Census Tract 5.12				
HHs Actual proportions	54.5%	25.8%	3.4%	63.6%	59.1%	13.8%	3.2%	44.3%	Very Low
HHs Free market	70.7%	12.6%	7.2%	22.9%	75.6%	9.5%	4.4%	16.0%	
HHs Difference	-16.3%	13.2%	-3.8%	40.7%	-16.5%	4.3%	-1.2%	28.3%	
Census Tract 6.00									
HHs Actual proportions	62.1%	26.2%	3.0%	20.7%	64.4%	16.0%	2.1%	21.4%	Very Low
HHs Free market	69.5%	14.0%	7.0%	24.0%	73.4%	11.7%	4.4%	16.0%	
HHs Difference	-7.4%	12.2%	-3.9%	-3.2%	-9.0%	4.3%	-2.3%	5.4%	
Census Tract 7.00									
HHs Actual proportions	70.1%	22.4%	4.5%	5.2%	72.3%	13.2%	6.5%	11.4%	Very Low
HHs Free market	68.7%	15.0%	6.8%	23.7%	71.6%	13.1%	4.3%	16.9%	
HHs Difference	1.5%	7.3%	-2.3%	-18.5%	0.7%	0.1%	2.2%	-5.4%	

Las Vegas Racial and Hispanic Household Composition and Opportunity Index: 2000–2012									
Area	2008–2012				2000				Overall Opportunity Index
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race	
Census Tract 8.00									
HHs Actual proportions	63.1%	21.2%	7.4%	27.5%	69.0%	9.4%	11.1%	19.4%	Low
HHs Free market	68.7%	15.1%	6.7%	23.7%	73.2%	11.5%	4.4%	17.1%	
HHs Difference	-5.6%	6.1%	0.8%	3.8%	-4.2%	-2.1%	6.8%	2.3%	
Census Tract 9.00									
HHs Actual proportions	70.7%	9.5%	14.9%	11.8%	62.9%	17.2%	8.8%	9.4%	Very Low
HHs Free market	69.9%	13.8%	7.2%	22.3%	71.9%	13.1%	4.4%	16.4%	
HHs Difference	0.8%	-4.3%	7.8%	-10.6%	-9.0%	4.2%	4.4%	-7.0%	
Census Tract 10.03									
HHs Actual proportions	74.1%	12.4%	2.9%	30.3%	79.6%	6.4%	4.4%	12.3%	High
HHs Free market	72.3%	10.9%	7.8%	21.8%	77.4%	8.6%	4.5%	14.4%	
HHs Difference	1.8%	1.5%	-5.0%	8.5%	2.2%	-2.3%	-0.1%	-2.2%	
Census Tract 10.04									
HHs Actual proportions	78.3%	6.0%	6.9%	26.7%	81.7%	5.7%	2.8%	11.8%	Moderate
HHs Free market	71.5%	12.0%	7.3%	22.7%	76.0%	9.4%	4.4%	15.6%	
HHs Difference	6.9%	-6.0%	-0.4%	4.0%	5.7%	-3.7%	-1.6%	-3.8%	
Census Tract 10.05									
HHs Actual proportions	87.6%	6.9%	5.5%	3.3%	88.8%	3.2%	5.4%	3.5%	High
HHs Free market	76.7%	7.9%	8.6%	14.8%	80.3%	7.1%	4.6%	11.9%	
HHs Difference	11.0%	-1.0%	-3.1%	-11.4%	8.5%	-3.9%	0.8%	-8.4%	
Census Tract 10.06									
HHs Actual proportions	83.8%	5.2%	3.4%	17.2%	87.8%	3.8%	2.0%	9.1%	High
HHs Free market	73.7%	9.8%	8.0%	19.4%	78.4%	7.9%	4.6%	13.7%	
HHs Difference	10.1%	-4.7%	-4.6%	-2.2%	9.4%	-4.1%	-2.6%	-4.6%	
Census Tract 11.00									
HHs Actual proportions	59.0%	13.8%	15.7%	39.3%	54.3%	9.6%	9.5%	39.6%	Very Low
HHs Free market	69.2%	14.6%	7.0%	22.5%	72.4%	12.2%	4.4%	17.0%	
HHs Difference	-10.1%	-0.8%	8.8%	16.9%	-18.1%	-2.6%	5.1%	22.6%	

Las Vegas Racial and Hispanic Household Composition and Opportunity Index: 2000–2012									
Area	2008–2012				2000				Overall Opportunity Index
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race	
Census Tract 12.00									
HHs Actual proportions	74.0%	10.8%	9.4%	23.8%	73.1%	5.2%	8.6%	23.3%	Low
HHs Free market	72.0%	11.5%	7.4%	22.4%	75.5%	9.8%	4.4%	15.7%	
HHs Difference	2.0%	-0.7%	2.1%	1.4%	-2.5%	-4.7%	4.2%	7.6%	
Census Tract 13.00									
HHs Actual proportions	85.0%	3.6%	4.9%	45.5%	78.9%	3.3%	2.7%	29.7%	Moderate
HHs Free market	72.4%	11.2%	7.5%	21.8%	76.3%	9.2%	4.4%	15.4%	
HHs Difference	12.6%	-7.6%	-2.6%	23.8%	2.6%	-5.9%	-1.7%	14.4%	
Census Tract 14.01					Census Tract 14.00				
HHs Actual proportions	86.0%	2.9%	3.7%	45.1%	75.1%	3.9%	4.5%	25.4%	Low
HHs Free market	70.8%	13.1%	7.0%	23.4%	75.1%	10.3%	4.3%	15.7%	
HHs Difference	15.2%	-10.2%	-3.3%	21.7%	0.0%	-6.4%	0.1%	9.6%	
Census Tract 14.02					Census Tract 14.00				
HHs Actual proportions	85.6%	0.0%	3.6%	58.6%	75.1%	3.9%	4.5%	25.4%	Low
HHs Free market	72.1%	11.4%	7.6%	21.6%	75.1%	10.3%	4.3%	15.7%	
HHs Difference	13.5%	-11.4%	-4.0%	37.0%	0.0%	-6.4%	0.1%	9.6%	
Census Tract 22.01									
HHs Actual proportions	76.1%	8.2%	10.4%	22.6%	76.3%	7.1%	5.7%	11.5%	Moderate
HHs Free market	70.3%	13.4%	6.9%	23.9%	73.4%	11.8%	4.3%	16.1%	
HHs Difference	5.8%	-5.2%	3.5%	-1.3%	2.9%	-4.6%	1.4%	-4.6%	
Census Tract 22.03									
HHs Actual proportions	68.4%	8.3%	9.3%	53.5%	61.2%	10.6%	6.4%	29.9%	Moderate
HHs Free market	71.3%	11.9%	7.4%	22.9%	76.1%	9.4%	4.4%	15.5%	
HHs Difference	-2.9%	-3.6%	1.9%	30.7%	-14.9%	1.2%	2.0%	14.4%	
Census Tract 22.04									
HHs Actual proportions	75.9%	7.8%	4.9%	56.7%	57.9%	8.4%	3.3%	58.7%	Low
HHs Free market	71.1%	12.2%	7.2%	23.9%	74.3%	10.5%	4.2%	17.1%	
HHs Difference	4.9%	-4.4%	-2.3%	32.8%	-16.5%	-2.1%	-0.9%	41.6%	

Las Vegas Racial and Hispanic Household Composition and Opportunity Index: 2000–2012									
Area	2008–2012				2000				Overall Opportunity Index
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race	
Census Tract 29.05									
HHs Actual proportions	66.6%	14.6%	12.5%	17.0%	75.9%	11.3%	5.1%	10.5%	High
HHs Free market	71.8%	11.5%	7.3%	22.7%	75.9%	9.5%	4.5%	15.4%	
HHs Difference	-5.2%	3.1%	5.2%	-5.7%	0.0%	1.8%	0.6%	-4.9%	
Census Tract 29.15									
HHs Actual proportions	70.1%	18.6%	8.4%	12.6%	83.4%	7.5%	3.6%	8.1%	High
HHs Free market	73.1%	10.5%	8.0%	20.2%	77.7%	8.3%	4.5%	14.4%	
HHs Difference	-3.0%	8.1%	0.5%	-7.5%	5.7%	-0.8%	-0.9%	-6.2%	
Census Tract 29.16									
HHs Actual proportions	78.1%	7.9%	10.0%	13.5%	86.1%	1.5%	5.4%	7.2%	High
HHs Free market	74.1%	9.8%	8.0%	18.9%	77.9%	8.4%	4.6%	13.8%	
HHs Difference	4.0%	-1.9%	2.0%	-5.4%	8.3%	-6.9%	0.8%	-6.7%	
Census Tract 30.01									
HHs Actual proportions	78.8%	5.3%	3.3%	29.6%	88.0%	2.0%	2.3%	13.8%	Moderate
HHs Free market	73.2%	10.2%	7.8%	20.7%	77.4%	8.3%	4.5%	14.7%	
HHs Difference	5.5%	-4.8%	-4.5%	8.9%	10.7%	-6.4%	-2.3%	-0.9%	
Census Tract 30.03 Census Tract 30.03 consists of parts of 2000 Census Tracts 30.03, 30.04 and 31.02									
HHs Actual proportions	74.3%	10.2%	6.4%	18.2%	79.4%	8.3%	3.8%	10.9%	High
HHs Free market	73.2%	10.1%	7.9%	21.2%	76.5%	8.9%	4.5%	15.4%	
HHs Difference	1.1%	0.1%	-1.5%	-2.9%	2.9%	-0.6%	-0.7%	-4.5%	
Census Tract 30.04 Census Tract 30.04 consists of parts of 2000 Census Tracts 30.04 and 30.05									
HHs Actual proportions	74.7%	10.4%	8.7%	20.2%	83.3%	6.1%	3.3%	8.2%	Low
HHs Free market	70.4%	12.8%	7.2%	23.6%	76.6%	8.8%	4.5%	15.4%	
HHs Difference	4.3%	-2.4%	1.5%	-3.4%	6.7%	-2.7%	-1.2%	-7.2%	
Census Tract 30.05									
HHs Actual proportions	76.1%	7.1%	8.0%	17.7%	85.4%	5.4%	1.6%	10.5%	Low
HHs Free market	72.9%	10.2%	8.0%	21.2%	78.0%	7.9%	4.6%	14.3%	
HHs Difference	3.2%	-3.0%	0.0%	-3.4%	7.4%	-2.5%	-3.0%	-3.7%	

Las Vegas Racial and Hispanic Household Composition and Opportunity Index: 2000–2012									
Area	2008–2012				2000				Overall Opportunity Index
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race	
Census Tract 30.06									
HHs Actual proportions	82.1%	3.9%	2.0%	20.2%	82.8%	4.5%	2.7%	11.5%	Low
HHs Free market	73.8%	9.8%	7.9%	20.2%	77.7%	8.3%	4.5%	14.3%	
HHs Difference	8.3%	-5.8%	-5.9%	0.0%	5.1%	-3.8%	-1.9%	-2.8%	
Census Tract 31.02 Census Tract 31.02 consists of parts of 2000 Census Tracts 30.04 and 31.02									
HHs Actual proportions	70.3%	7.2%	4.0%	40.9%	80.2%	7.6%	3.6%	11.5%	Low
HHs Free market	71.6%	11.7%	7.4%	22.6%	75.9%	9.3%	4.5%	15.9%	
HHs Difference	-1.3%	-4.5%	-3.5%	18.3%	4.3%	-1.7%	-0.9%	-4.4%	
Census Tract 31.03 Census Tract 31.01									
HHs Actual proportions	63.4%	10.7%	6.4%	39.3%	72.3%	12.7%	5.2%	12.4%	Low
HHs Free market	72.8%	10.3%	7.8%	21.8%	76.7%	8.9%	4.5%	15.1%	
HHs Difference	-9.3%	0.4%	-1.5%	17.6%	-4.4%	3.8%	0.7%	-2.7%	
Census Tract 31.04 Census Tract 31.01									
HHs Actual proportions	75.6%	6.5%	3.8%	31.5%	72.3%	12.7%	5.2%	12.4%	Low
HHs Free market	71.0%	12.5%	7.2%	22.7%	76.7%	8.9%	4.5%	15.1%	
HHs Difference	4.7%	-6.0%	-3.4%	8.8%	-4.4%	3.8%	0.7%	-2.7%	
Census Tract 32.04									
HHs Actual proportions	86.1%	7.3%	3.3%	9.2%	91.2%	3.5%	2.6%	4.2%	High
HHs Free market	73.9%	9.8%	8.1%	18.7%	79.4%	7.4%	4.6%	12.7%	
HHs Difference	12.2%	-2.5%	-4.9%	-9.6%	11.8%	-3.9%	-2.0%	-8.6%	
Census Tract 32.10									
HHs Actual proportions	95.9%	2.3%	1.7%	3.0%	96.6%	0.0%	2.7%	0.8%	Moderate
HHs Free market	72.8%	10.5%	7.9%	20.5%	77.1%	8.7%	4.5%	14.7%	
HHs Difference	23.1%	-8.1%	-6.2%	-17.5%	19.5%	-8.7%	-1.8%	-14.0%	
Census Tract 32.11									
HHs Actual proportions	91.7%	3.3%	2.0%	2.2%	95.4%	2.1%	2.5%	1.4%	Very High
HHs Free market	72.1%	11.2%	7.4%	22.9%	77.2%	8.7%	4.5%	14.7%	
HHs Difference	19.6%	-7.9%	-5.5%	-20.7%	18.2%	-6.6%	-1.9%	-13.3%	

Las Vegas Racial and Hispanic Household Composition and Opportunity Index: 2000–2012									
Area	2008–2012				2000				Overall Opportunity Index
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race	
Census Tract 32.13									
HHs Actual proportions	93.8%	2.6%	3.7%	1.0%	93.4%	1.0%	4.6%	1.0%	High
HHs Free market	73.1%	10.2%	7.7%	21.5%	77.3%	8.6%	4.4%	14.7%	
HHs Difference	20.6%	-7.7%	-4.1%	-20.5%	16.1%	-7.6%	0.1%	-13.7%	
Census Tract 32.14									
HHs Actual proportions	94.1%	3.6%	2.3%	0.6%	95.5%	2.3%	0.0%	2.7%	Very High
HHs Free market	72.8%	10.6%	7.6%	22.2%	75.7%	9.8%	4.4%	15.4%	
HHs Difference	21.3%	-7.1%	-5.2%	-21.6%	19.8%	-7.5%	-4.4%	-12.7%	
Census Tract 32.15									
HHs Actual proportions	76.2%	7.7%	6.4%	14.8%	81.7%	8.4%	6.5%	6.5%	Very High
HHs Free market	74.1%	9.7%	8.1%	18.6%	78.4%	7.9%	4.6%	13.6%	
HHs Difference	2.1%	-2.0%	-1.7%	-3.8%	3.3%	0.5%	2.0%	-7.1%	
Census Tract 32.18									
HHs Actual proportions	78.7%	7.1%	9.3%	7.4%	90.4%	2.2%	4.0%	4.9%	Very High
HHs Free market	76.3%	8.1%	8.6%	15.0%	81.2%	6.5%	4.6%	11.2%	
HHs Difference	2.4%	-1.0%	0.6%	-7.6%	9.1%	-4.3%	-0.6%	-6.3%	
Census Tract 32.19									
HHs Actual proportions	78.9%	10.7%	5.6%	15.6%	84.3%	4.7%	7.3%	6.2%	Very High
HHs Free market	73.2%	10.3%	7.9%	20.3%	79.1%	7.4%	4.6%	13.2%	
HHs Difference	5.7%	0.4%	-2.3%	-4.8%	5.2%	-2.7%	2.8%	-7.0%	
Census Tract 32.20									
HHs Actual proportions	72.9%	13.2%	3.2%	20.0%	80.8%	9.2%	2.2%	7.1%	High
HHs Free market	71.9%	11.3%	7.5%	22.6%	77.2%	8.5%	4.5%	14.8%	
HHs Difference	1.1%	1.9%	-4.4%	-2.7%	3.7%	0.7%	-2.3%	-7.7%	
Census Tract 32.22									
HHs Actual proportions	74.5%	11.1%	9.1%	10.9%	80.3%	7.5%	7.5%	2.7%	Very High
HHs Free market	74.1%	9.4%	8.2%	19.3%	78.9%	7.5%	4.6%	13.3%	
HHs Difference	0.3%	1.7%	0.9%	-8.4%	1.4%	0.1%	2.9%	-10.5%	

Las Vegas Racial and Hispanic Household Composition and Opportunity Index: 2000–2012									
Area	2008–2012				2000				Overall Opportunity Index
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race	
Census Tract 32.23									
HHs Actual proportions	74.7%	4.4%	17.0%	1.7%	86.5%	3.1%	5.4%	6.6%	Very High
HHs Free market	75.5%	8.6%	8.5%	16.4%	81.2%	6.4%	4.6%	11.6%	
HHs Difference	-0.8%	-4.2%	8.5%	-14.7%	5.3%	-3.2%	0.8%	-5.0%	
Census Tract 32.26									
HHs Actual proportions	84.8%	1.3%	11.1%	5.3%	88.5%	0.0%	9.0%	5.1%	Very High
HHs Free market	75.9%	8.5%	8.4%	15.8%	84.5%	4.7%	4.7%	8.7%	
HHs Difference	8.9%	-7.2%	2.7%	-10.5%	4.0%	-4.7%	4.3%	-3.6%	
Census Tract 32.27									
HHs Actual proportions	81.6%	8.0%	9.1%	3.7%	85.6%	3.0%	8.7%	5.1%	Very High
HHs Free market	74.7%	9.1%	8.4%	17.2%	81.4%	6.1%	4.6%	11.1%	
HHs Difference	6.9%	-1.0%	0.7%	-13.5%	4.2%	-3.1%	4.0%	-6.0%	
Census Tract 32.28					Census Tract 32.03				
HHs Actual proportions	77.4%	12.0%	7.5%	13.6%	91.0%	2.8%	2.7%	4.8%	Low
HHs Free market	73.6%	9.7%	8.0%	20.6%	79.6%	7.3%	4.6%	12.5%	
HHs Difference	3.8%	2.3%	-0.4%	-7.0%	11.4%	-4.5%	-1.9%	-7.7%	
Census Tract 32.29					Census Tract 32.03				
HHs Actual proportions	75.7%	8.3%	7.9%	14.2%	91.0%	2.8%	2.7%	4.8%	Moderate
HHs Free market	73.3%	10.0%	7.8%	21.0%	79.6%	7.3%	4.6%	12.5%	
HHs Difference	2.4%	-1.7%	0.2%	-6.8%	11.4%	-4.5%	-1.9%	-7.7%	
Census Tract 32.30					Census Tract 32.03				
HHs Actual proportions	76.2%	12.3%	8.4%	12.7%	91.0%	2.8%	2.7%	4.8%	High
HHs Free market	74.4%	8.9%	8.4%	18.7%	79.6%	7.3%	4.6%	12.5%	
HHs Difference	1.8%	3.3%	0.0%	-6.0%	11.4%	-4.5%	-1.9%	-7.7%	
Census Tract 32.31					Census Tract 32.03				
HHs Actual proportions	83.0%	1.4%	9.4%	16.9%	91.0%	2.8%	2.7%	4.8%	Low
HHs Free market	73.3%	10.0%	7.8%	21.0%	79.6%	7.3%	4.6%	12.5%	
HHs Difference	9.7%	-8.6%	1.6%	-4.1%	11.4%	-4.5%	-1.9%	-7.7%	

Las Vegas Racial and Hispanic Household Composition and Opportunity Index: 2000–2012									
Area	2008–2012				2000				Overall Opportunity Index
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race	
Census Tract 32.33	Census Tract 32.03								
HHs Actual proportions	67.6%	15.3%	11.3%	13.0%	91.0%	2.8%	2.7%	4.8%	Very High
HHs Free market	75.4%	8.2%	8.7%	16.7%	79.6%	7.3%	4.6%	12.5%	
HHs Difference	-7.8%	7.1%	2.6%	-3.8%	11.4%	-4.5%	-1.9%	-7.7%	
Census Tract 32.34	Census Tract 32.03								
HHs Actual proportions	73.1%	9.3%	4.4%	13.5%	91.0%	2.8%	2.7%	4.8%	Moderate
HHs Free market	72.7%	10.4%	7.9%	21.1%	79.6%	7.3%	4.6%	12.5%	
HHs Difference	0.3%	-1.1%	-3.5%	-7.6%	11.4%	-4.5%	-1.9%	-7.7%	
Census Tract 32.35	Census Tract 32.35 consists of parts of 2000 Census Tracts 32.03 and 33.01								
HHs Actual proportions	62.4%	27.0%	6.7%	11.5%	88.4%	3.8%	2.7%	6.9%	Moderate
HHs Free market	73.7%	9.6%	7.9%	20.3%	78.9%	7.4%	4.6%	13.4%	
HHs Difference	-11.3%	17.4%	-1.3%	-8.8%	9.4%	-3.6%	-1.9%	-6.5%	
Census Tract 32.36	Census Tract 32.03								
HHs Actual proportions	78.1%	6.3%	5.3%	5.3%	91.0%	2.8%	2.7%	4.8%	Very High
HHs Free market	73.5%	9.7%	7.9%	21.2%	79.6%	7.3%	4.6%	12.5%	
HHs Difference	4.6%	-3.5%	-2.6%	-15.9%	11.4%	-4.5%	-1.9%	-7.7%	
Census Tract 32.37	Census Tract 32.05								
HHs Actual proportions	80.8%	4.2%	9.3%	10.0%	93.3%	6.7%	0.0%	11.4%	Moderate
HHs Free market	73.9%	9.4%	8.3%	19.5%	80.5%	6.6%	4.7%	11.8%	
HHs Difference	6.9%	-5.2%	1.1%	-9.5%	12.9%	0.1%	-4.7%	-0.4%	
Census Tract 32.38	Census Tract 32.38 consists of parts of 2000 Census Tracts 32.05 and 32.06								
HHs Actual proportions	69.6%	16.5%	8.0%	12.2%	84.9%	7.8%	3.6%	7.5%	Moderate
HHs Free market	73.0%	10.2%	7.9%	20.8%	79.0%	7.3%	4.6%	13.3%	
HHs Difference	-3.4%	6.3%	0.1%	-8.6%	5.9%	0.5%	-1.1%	-5.9%	
Census Tract 32.39	Census Tract 32.05								
HHs Actual proportions	84.5%	7.0%	5.5%	5.7%	93.3%	6.7%	0.0%	11.4%	High
HHs Free market	73.7%	9.8%	7.9%	20.2%	80.5%	6.6%	4.7%	11.8%	
HHs Difference	10.8%	-2.9%	-2.5%	-14.5%	12.9%	0.1%	-4.7%	-0.4%	

Las Vegas Racial and Hispanic Household Composition and Opportunity Index: 2000–2012									
Area	2008–2012				2000				Overall Opportunity Index
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race	
Census Tract 32.40					Census Tract 32.06				
HHs Actual proportions	82.6%	3.4%	7.5%	12.0%	83.7%	8.0%	4.1%	6.9%	Very High
HHs Free market	74.3%	9.2%	8.3%	18.9%	78.8%	7.4%	4.6%	13.6%	
HHs Difference	8.3%	-5.8%	-0.8%	-6.9%	4.9%	0.6%	-0.5%	-6.7%	
Census Tract 32.41					Census Tract 32.06				
HHs Actual proportions	86.2%	3.6%	2.3%	10.5%	83.7%	8.0%	4.1%	6.9%	High
HHs Free market	72.9%	10.4%	7.9%	21.1%	78.8%	7.4%	4.6%	13.6%	
HHs Difference	13.3%	-6.7%	-5.5%	-10.5%	4.9%	0.6%	-0.5%	-6.7%	
Census Tract 32.43					Census Tract 32.07				
HHs Actual proportions	68.7%	11.6%	12.6%	9.3%	81.9%	7.2%	4.8%	6.1%	High
HHs Free market	74.7%	9.1%	8.2%	18.3%	79.7%	7.0%	4.6%	12.7%	
HHs Difference	-6.0%	2.5%	4.4%	-9.0%	2.2%	0.2%	0.2%	-6.5%	
Census Tract 32.44					Census Tract 32.07				
HHs Actual proportions	73.3%	9.1%	13.2%	6.5%	81.9%	7.2%	4.8%	6.1%	Very High
HHs Free market	72.8%	10.3%	7.9%	21.3%	79.7%	7.0%	4.6%	12.7%	
HHs Difference	0.5%	-1.2%	5.3%	-14.8%	2.2%	0.2%	0.2%	-6.5%	
Census Tract 32.45					Census Tract 32.09				
HHs Actual proportions	81.6%	6.4%	2.8%	20.9%	79.9%	8.7%	5.4%	5.7%	High
HHs Free market	73.7%	9.7%	8.2%	19.0%	78.7%	7.6%	4.6%	13.6%	
HHs Difference	7.9%	-3.3%	-5.4%	2.0%	1.2%	1.1%	0.8%	-7.9%	
Census Tract 32.46					Census Tract 32.09				
HHs Actual proportions	69.4%	11.3%	12.5%	10.9%	79.9%	8.7%	5.4%	5.7%	Very High
HHs Free market	73.1%	10.0%	8.1%	20.5%	78.7%	7.6%	4.6%	13.6%	
HHs Difference	-3.8%	1.3%	4.5%	-9.6%	1.2%	1.1%	0.8%	-7.9%	
Census Tract 32.47					Census Tract 32.12				
HHs Actual proportions	90.3%	3.7%	1.0%	9.6%	84.7%	7.2%	4.0%	6.0%	High
HHs Free market	73.9%	9.9%	8.0%	19.1%	79.0%	7.5%	4.6%	13.2%	
HHs Difference	16.4%	-6.3%	-6.9%	-9.5%	5.7%	-0.3%	-0.6%	-7.2%	

Las Vegas Racial and Hispanic Household Composition and Opportunity Index: 2000–2012									
Area	2008–2012				2000				Overall Opportunity Index
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race	
Census Tract 32.48					Census Tract 32.12				
HHs Actual proportions	73.8%	16.9%	7.9%	7.8%	84.7%	7.2%	4.0%	6.0%	Moderate
HHs Free market	74.3%	9.6%	7.9%	18.9%	79.0%	7.5%	4.6%	13.2%	
HHs Difference	-0.5%	7.3%	0.0%	-11.2%	5.7%	-0.3%	-0.6%	-7.2%	
Census Tract 32.49					Census Tract 32.21				
HHs Actual proportions	75.4%	2.3%	17.0%	15.7%	83.4%	4.7%	5.0%	7.5%	Very High
HHs Free market	73.7%	9.8%	8.2%	18.4%	79.4%	7.2%	4.6%	13.0%	
HHs Difference	1.7%	-7.5%	8.8%	-2.7%	4.0%	-2.5%	0.3%	-5.5%	
Census Tract 32.50					Census Tract 32.21				
HHs Actual proportions	70.9%	8.4%	12.7%	9.6%	83.4%	4.7%	5.0%	7.5%	Very High
HHs Free market	74.1%	9.5%	8.2%	19.4%	79.4%	7.2%	4.6%	13.0%	
HHs Difference	-3.2%	-1.1%	4.5%	-9.8%	4.0%	-2.5%	0.3%	-5.5%	
Census Tract 32.51					Census Tract 32.17				
HHs Actual proportions	90.3%	1.2%	3.8%	10.3%	86.5%	4.0%	7.2%	3.9%	Very High
HHs Free market	75.7%	8.6%	8.6%	15.3%	80.6%	6.7%	4.6%	12.0%	
HHs Difference	14.6%	-7.4%	-4.8%	-5.0%	5.9%	-2.7%	2.5%	-8.1%	
Census Tract 32.52					Census Tract 32.17				
HHs Actual proportions	85.8%	5.6%	6.5%	10.1%	86.5%	4.0%	7.2%	3.9%	Very High
HHs Free market	74.2%	9.2%	8.4%	18.6%	80.6%	6.7%	4.6%	12.0%	
HHs Difference	11.6%	-3.6%	-1.9%	-8.6%	5.9%	-2.7%	2.5%	-8.1%	
Census Tract 32.53					Census Tract 32.24				
HHs Actual proportions	68.5%	7.8%	9.7%	12.4%	84.4%	4.0%	7.1%	8.2%	High
HHs Free market	73.2%	10.3%	8.0%	20.2%	78.1%	7.9%	4.5%	14.1%	
HHs Difference	-4.6%	-2.4%	1.8%	-7.8%	6.3%	-4.0%	2.5%	-5.9%	
Census Tract 32.54					Census Tract 32.24				
HHs Actual proportions	79.5%	11.8%	0.7%	11.6%	84.4%	4.0%	7.1%	8.2%	Moderate
HHs Free market	72.7%	10.8%	7.7%	21.3%	78.1%	7.9%	4.5%	14.1%	
HHs Difference	6.8%	1.0%	-7.0%	-9.7%	6.3%	-4.0%	2.5%	-5.9%	

Las Vegas Racial and Hispanic Household Composition and Opportunity Index: 2000–2012									
Area	2008–2012				2000				Overall Opportunity Index
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race	
Census Tract 32.60					Census Tract 32.25				
HHs Actual proportions	76.4%	10.0%	6.3%	12.7%	81.0%	7.4%	5.1%	7.0%	High
HHs Free market	72.1%	11.1%	7.5%	22.5%	77.0%	8.6%	4.5%	15.1%	
HHs Difference	4.3%	-1.1%	-1.2%	-9.7%	4.0%	-1.2%	0.6%	-8.0%	
Census Tract 32.61					Census Tract 32.25				
HHs Actual proportions	84.2%	0.9%	3.2%	18.8%	81.0%	7.4%	5.1%	7.0%	High
HHs Free market	72.9%	10.6%	7.7%	21.1%	77.0%	8.6%	4.5%	15.1%	
HHs Difference	11.4%	-9.7%	-4.5%	-2.3%	4.0%	-1.2%	0.6%	-8.0%	
Census Tract 32.62 consists of parts of 2000 Census Tracts 32.10, 32.16 and 32.21									
HHs Actual proportions	94.3%	1.7%	3.6%	1.2%	90.8%	2.3%	3.5%	3.6%	High
HHs Free market	73.1%	10.4%	7.9%	20.6%	78.3%	7.9%	4.6%	13.9%	
HHs Difference	21.2%	-8.7%	-4.3%	-19.4%	12.5%	-5.6%	-1.0%	-10.3%	
Census Tract 33.03									
HHs Actual proportions	66.8%	12.0%	4.5%	24.5%	82.9%	8.7%	2.9%	9.7%	Low
HHs Free market	73.1%	10.3%	7.8%	20.8%	77.6%	8.1%	4.5%	14.8%	
HHs Difference	-6.3%	1.7%	-3.3%	3.8%	5.4%	0.7%	-1.6%	-5.1%	
Census Tract 33.05									
HHs Actual proportions	77.3%	11.8%	4.4%	7.2%	88.5%	6.0%	1.9%	7.6%	High
HHs Free market	73.7%	9.9%	8.1%	19.2%	78.2%	7.8%	4.6%	13.9%	
HHs Difference	3.5%	1.9%	-3.7%	-11.9%	10.2%	-1.8%	-2.7%	-6.4%	
Census Tract 33.06									
HHs Actual proportions	86.8%	5.9%	3.5%	6.5%	91.6%	2.4%	1.1%	5.7%	High
HHs Free market	73.4%	10.0%	8.0%	19.9%	78.7%	7.6%	4.6%	13.6%	
HHs Difference	13.4%	-4.1%	-4.5%	-13.4%	12.8%	-5.2%	-3.4%	-7.9%	
Census Tract 33.07					Census Tract 33.04				
HHs Actual proportions	77.8%	14.9%	4.0%	7.5%	77.1%	11.8%	4.2%	8.6%	High
HHs Free market	74.4%	8.9%	8.4%	18.8%	78.3%	7.8%	4.5%	13.9%	
HHs Difference	3.3%	6.0%	-4.3%	-11.3%	-1.2%	4.0%	-0.3%	-5.3%	

Las Vegas Racial and Hispanic Household Composition and Opportunity Index: 2000–2012									
Area	2008–2012				2000				Overall Opportunity Index
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race	
Census Tract 33.08					Census Tract 33.04				
HHs Actual proportions	76.1%	16.9%	3.1%	9.1%	77.1%	11.8%	4.2%	8.6%	Very High
HHs Free market	66.8%	8.9%	7.5%	17.2%	78.3%	7.8%	4.5%	13.9%	
HHs Difference	9.3%	8.0%	-4.4%	-8.1%	-1.2%	4.0%	-0.3%	-5.3%	
Census Tract 33.09					Census Tract 33.02				
HHs Actual proportions	91.9%	2.9%	4.1%	4.9%	90.6%	4.0%	0.6%	5.7%	Moderate
HHs Free market	76.1%	7.7%	8.8%	15.7%	79.4%	7.3%	4.7%	12.8%	
HHs Difference	15.8%	-4.8%	-4.8%	-10.9%	11.2%	-3.2%	-4.0%	-7.1%	
Census Tract 33.11					Census Tract 33.02				
HHs Actual proportions	73.0%	16.7%	0.0%	8.1%	90.6%	4.0%	0.6%	5.7%	Moderate
HHs Free market	73.7%	10.1%	7.9%	18.9%	79.4%	7.3%	4.7%	12.8%	
HHs Difference	-0.7%	6.6%	-7.9%	-10.8%	11.2%	-3.2%	-4.0%	-7.1%	
Census Tract 33.12					Census Tract 33.02				
HHs Actual proportions	78.1%	3.8%	10.8%	13.1%	90.6%	4.0%	0.6%	5.7%	Very High
HHs Free market	76.5%	7.4%	9.0%	15.1%	79.4%	7.3%	4.7%	12.8%	
HHs Difference	1.7%	-3.5%	1.8%	-2.0%	11.2%	-3.2%	-4.0%	-7.1%	
Census Tract 33.13					Census Tract 33.02				
HHs Actual proportions	72.7%	11.0%	12.4%	13.4%	90.6%	4.0%	0.6%	5.7%	Moderate
HHs Free market	74.7%	9.1%	8.3%	18.2%	79.4%	7.3%	4.7%	12.8%	
HHs Difference	-2.0%	1.9%	4.2%	-4.8%	11.2%	-3.2%	-4.0%	-7.1%	
Census Tract 33.14					Census Tract 33.02				
HHs Actual proportions	84.7%	5.8%	6.9%	12.0%	90.6%	4.0%	0.6%	5.7%	High
HHs Free market	74.6%	8.9%	8.4%	17.9%	79.4%	7.3%	4.7%	12.8%	
HHs Difference	10.0%	-3.1%	-1.5%	-5.9%	11.2%	-3.2%	-4.0%	-7.1%	
Census Tract 33.15					Census Tract 33.02				
HHs Actual proportions	85.6%	9.5%	3.1%	9.8%	90.6%	4.0%	0.6%	5.7%	High
HHs Free market	73.6%	9.6%	8.2%	19.8%	79.4%	7.3%	4.7%	12.8%	
HHs Difference	12.0%	-0.1%	-5.1%	-10.1%	11.2%	-3.2%	-4.0%	-7.1%	

Las Vegas Racial and Hispanic Household Composition and Opportunity Index: 2000–2012									
Area	2008–2012				2000				Overall Opportunity Index
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race	
Census Tract 33.16	Census Tract 33.16 consists of parts of 2000 Census Tracts 33.02 and 32.03								
HHs Actual proportions	82.1%	10.8%	5.3%	9.0%	90.8%	3.2%	2.0%	5.1%	Moderate
HHs Free market	75.6%	8.3%	8.5%	16.5%	79.5%	7.3%	4.6%	12.6%	
HHs Difference	6.5%	2.5%	-3.2%	-7.5%	11.3%	-4.0%	-2.6%	-7.5%	
Census Tract 33.17	Census Tract 33.01								
HHs Actual proportions	83.2%	10.4%	1.8%	28.9%	86.6%	4.6%	2.7%	8.3%	High
HHs Free market	74.2%	9.2%	8.3%	19.3%	78.5%	7.5%	4.6%	13.9%	
HHs Difference	9.0%	1.2%	-6.4%	9.6%	8.1%	-3.0%	-1.9%	-5.6%	
Census Tract 33.18	Census Tract 33.01								
HHs Actual proportions	80.2%	9.8%	4.4%	9.0%	86.6%	4.6%	2.7%	8.3%	Very High
HHs Free market	73.6%	9.7%	8.1%	19.5%	78.5%	7.5%	4.6%	13.9%	
HHs Difference	6.6%	0.1%	-3.7%	-10.5%	8.1%	-3.0%	-1.9%	-5.6%	
Census Tract 33.19	Census Tract 33.01								
HHs Actual proportions	71.6%	16.5%	5.8%	18.2%	86.6%	4.6%	2.7%	8.3%	Moderate
HHs Free market	74.3%	9.2%	8.2%	19.4%	78.5%	7.5%	4.6%	13.9%	
HHs Difference	-2.7%	7.4%	-2.4%	-1.2%	8.1%	-3.0%	-1.9%	-5.6%	
Census Tract 33.20	Census Tract 33.20 consists of parts of 2000 Census Tracts 33.01 and 33.03								
HHs Actual proportions	87.6%	6.7%	3.5%	7.5%	85.4%	6.0%	2.7%	8.8%	Very High
HHs Free market	73.7%	9.6%	8.1%	20.3%	78.2%	7.7%	4.6%	14.2%	
HHs Difference	13.9%	-2.9%	-4.6%	-12.8%	7.2%	-1.7%	-1.8%	-5.4%	
Census Tract 33.21	Census Tract 33.01								
HHs Actual proportions	85.1%	5.8%	5.4%	6.6%	86.6%	4.6%	2.7%	8.3%	Very High
HHs Free market	77.0%	7.6%	8.6%	14.6%	78.5%	7.5%	4.6%	13.9%	
HHs Difference	8.1%	-1.8%	-3.1%	-8.1%	8.1%	-3.0%	-1.9%	-5.6%	
Census Tract 34.08									
HHs Actual proportions	77.1%	9.2%	6.1%	15.1%	82.8%	6.2%	5.5%	9.1%	Moderate
HHs Free market	73.7%	9.9%	8.1%	19.3%	78.8%	7.6%	4.6%	13.4%	
HHs Difference	3.4%	-0.6%	-1.9%	-4.2%	3.9%	-1.5%	0.9%	-4.3%	

Las Vegas Racial and Hispanic Household Composition and Opportunity Index: 2000–2012									
Area	2008–2012				2000				Overall Opportunity Index
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race	
Census Tract 34.09									
HHs Actual proportions	80.6%	10.2%	4.0%	23.7%	86.7%	5.4%	1.7%	7.6%	Moderate
HHs Free market	72.5%	11.0%	7.5%	21.9%	77.0%	8.6%	4.6%	14.7%	
HHs Difference	8.2%	-0.8%	-3.6%	1.8%	9.6%	-3.2%	-2.9%	-7.1%	
Census Tract 34.10									
HHs Actual proportions	74.9%	14.9%	5.8%	8.0%	84.8%	8.4%	2.6%	5.1%	Moderate
HHs Free market	73.0%	10.5%	7.9%	20.0%	78.6%	7.7%	4.6%	13.5%	
HHs Difference	1.9%	4.4%	-2.1%	-12.0%	6.2%	0.7%	-2.0%	-8.4%	
Census Tract 34.11									
HHs Actual proportions	77.9%	7.5%	7.0%	11.0%	79.6%	8.7%	5.6%	9.0%	Moderate
HHs Free market	71.8%	11.6%	7.6%	22.0%	77.5%	8.3%	4.5%	14.7%	
HHs Difference	6.2%	-4.1%	-0.5%	-11.0%	2.1%	0.5%	1.1%	-5.8%	
Census Tract 34.12									
HHs Actual proportions	75.1%	10.4%	6.4%	11.8%	88.3%	4.6%	1.2%	7.1%	Moderate
HHs Free market	72.8%	10.6%	7.7%	20.9%	77.8%	8.1%	4.6%	14.3%	
HHs Difference	2.4%	-0.1%	-1.3%	-9.1%	10.5%	-3.5%	-3.4%	-7.1%	
Census Tract 34.13									
HHs Actual proportions	63.3%	16.5%	5.0%	26.1%	77.0%	10.0%	3.1%	15.2%	Moderate
HHs Free market	72.3%	11.2%	7.6%	21.5%	77.5%	8.3%	4.6%	14.6%	
HHs Difference	-9.0%	5.4%	-2.6%	4.7%	-0.5%	1.7%	-1.5%	0.6%	
Census Tract 34.14									
HHs Actual proportions	88.9%	2.1%	0.0%	18.7%	93.4%	1.1%	0.0%	7.0%	Moderate
HHs Free market	74.3%	9.3%	8.1%	19.7%	81.0%	6.3%	4.7%	11.6%	
HHs Difference	14.7%	-7.2%	-8.1%	-1.1%	12.4%	-5.2%	-4.7%	-4.5%	
Census Tract 34.15									
HHs Actual proportions	57.6%	18.8%	6.9%	30.0%	70.0%	13.2%	2.7%	13.2%	Low
HHs Free market	72.3%	10.9%	7.5%	22.5%	76.4%	9.0%	4.5%	15.3%	
HHs Difference	-14.7%	7.9%	-0.6%	7.5%	-6.3%	4.1%	-1.8%	-2.1%	

Las Vegas Racial and Hispanic Household Composition and Opportunity Index: 2000–2012									
Area	2008–2012				2000				Overall Opportunity Index
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race	
Census Tract 34.16									
HHs Actual proportions	79.5%	4.6%	9.0%	22.8%	80.0%	11.3%	4.8%	7.0%	Low
HHs Free market	73.3%	10.2%	8.0%	19.7%	77.4%	8.4%	4.5%	14.6%	
HHs Difference	6.2%	-5.6%	1.0%	3.1%	2.6%	2.9%	0.3%	-7.6%	
Census Tract 34.18									
HHs Actual proportions	67.8%	21.8%	0.7%	30.3%	74.5%	13.0%	2.9%	6.2%	Moderate
HHs Free market	71.6%	11.7%	7.4%	23.3%	75.8%	9.2%	4.5%	16.1%	
HHs Difference	-3.8%	10.1%	-6.6%	6.9%	-1.3%	3.7%	-1.6%	-9.9%	
Census Tract 34.19									
HHs Actual proportions	67.0%	16.1%	2.6%	30.7%	67.7%	15.9%	3.7%	13.6%	Moderate
HHs Free market	71.6%	11.8%	7.5%	22.8%	75.5%	9.7%	4.4%	16.0%	
HHs Difference	-4.6%	4.4%	-4.8%	7.8%	-7.8%	6.2%	-0.8%	-2.5%	
Census Tract 34.20									
HHs Actual proportions	70.4%	13.4%	3.5%	35.9%	77.8%	11.9%	1.5%	14.0%	Low
HHs Free market	71.8%	11.9%	7.2%	23.1%	75.6%	9.5%	4.4%	15.9%	
HHs Difference	-1.3%	1.5%	-3.7%	12.8%	2.2%	2.4%	-2.9%	-1.9%	
Census Tract 34.21									
HHs Actual proportions	76.9%	12.1%	6.0%	13.3%	86.8%	5.1%	2.5%	8.0%	High
HHs Free market	71.8%	11.4%	7.6%	22.2%	77.6%	8.2%	4.6%	14.5%	
HHs Difference	5.0%	0.7%	-1.6%	-8.9%	9.2%	-3.1%	-2.1%	-6.5%	
Census Tract 34.22									
HHs Actual proportions	66.6%	17.9%	3.2%	26.9%	69.7%	17.9%	3.5%	15.4%	Low
HHs Free market	72.0%	11.4%	7.6%	22.6%	76.3%	9.3%	4.5%	15.0%	
HHs Difference	-5.4%	6.5%	-4.3%	4.4%	-6.6%	8.6%	-1.0%	0.4%	
Census Tract 34.23									
HHs Actual proportions	59.5%	19.5%	5.2%	21.9%	70.6%	12.6%	4.1%	22.0%	Very Low
HHs Free market	71.4%	12.1%	7.3%	22.5%	76.3%	9.2%	4.5%	15.2%	
HHs Difference	-11.9%	7.4%	-2.1%	-0.6%	-5.8%	3.4%	-0.4%	6.8%	

Las Vegas Racial and Hispanic Household Composition and Opportunity Index: 2000–2012									
Area	2008–2012				2000				Overall Opportunity Index
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race	
Census Tract 34.26					Census Tract 34.17				
HHs Actual proportions	58.6%	14.7%	2.8%	20.6%	72.2%	13.1%	5.8%	13.0%	Low
HHs Free market	71.8%	11.2%	7.7%	22.5%	76.8%	8.8%	4.5%	14.9%	
HHs Difference	-13.2%	3.5%	-4.9%	-1.9%	-4.6%	4.4%	1.3%	-1.9%	
Census Tract 34.27					Census Tract 34.17				
HHs Actual proportions	71.0%	17.5%	4.2%	27.1%	72.2%	13.1%	5.8%	13.0%	Very Low
HHs Free market	72.0%	11.3%	7.6%	22.5%	76.8%	8.8%	4.5%	14.9%	
HHs Difference	-0.9%	6.1%	-3.4%	4.6%	-4.6%	4.4%	1.3%	-1.9%	
Census Tract 34.28					Census Tract 34.24				
HHs Actual proportions	75.2%	14.7%	0.0%	31.0%	66.9%	16.3%	2.9%	21.3%	Low
HHs Free market	71.2%	12.3%	7.2%	23.5%	75.9%	9.6%	4.4%	15.4%	
HHs Difference	4.0%	2.4%	-7.2%	7.5%	-9.0%	6.7%	-1.5%	5.9%	
Census Tract 34.29					Census Tract 34.24				
HHs Actual proportions	67.4%	19.4%	0.8%	26.5%	66.9%	16.3%	2.9%	21.3%	Very Low
HHs Free market	70.6%	12.8%	7.2%	23.2%	75.9%	9.6%	4.4%	15.4%	
HHs Difference	-3.2%	6.6%	-6.3%	3.3%	-9.0%	6.7%	-1.5%	5.9%	
Census Tract 34.30					Census Tract 34.25				
HHs Actual proportions	39.3%	50.4%	0.2%	23.5%	41.8%	33.5%	3.0%	28.8%	Very Low
HHs Free market	70.4%	13.2%	7.0%	23.3%	74.7%	10.5%	4.4%	16.0%	
HHs Difference	-31.0%	37.2%	-6.8%	0.2%	-32.9%	23.0%	-1.3%	12.8%	
Census Tract 34.31					Census Tract 34.25				
HHs Actual proportions	48.1%	31.3%	3.0%	46.8%	41.8%	33.5%	3.0%	28.8%	Very Low
HHs Free market	70.8%	12.6%	7.0%	24.1%	74.7%	10.5%	4.4%	16.0%	
HHs Difference	-22.7%	18.7%	-4.0%	22.8%	-32.9%	23.0%	-1.3%	12.8%	
Census Tract 35.00									
HHs Actual proportions	17.7%	70.6%	0.8%	18.2%	1.5%	94.2%	0.0%	2.8%	Very Low
HHs Free market	70.4%	13.4%	7.1%	22.6%	74.4%	10.8%	4.4%	16.0%	
HHs Difference	-52.7%	57.2%	-6.4%	-4.4%	-72.9%	83.4%	-4.4%	-13.2%	

Las Vegas Racial and Hispanic Household Composition and Opportunity Index: 2000–2012									
Area	2008–2012				2000				Overall Opportunity Index
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race	
Census Tract 58.03	Census Tract 58.03 consists of parts of 2000 Census Tracts 58.03 and 58.06								
HHs Actual proportions	80.7%	7.7%	8.6%	5.9%	82.6%	7.4%	6.1%	6.2%	High
HHs Free market	73.5%	10.1%	8.0%	19.5%	77.9%	8.2%	4.6%	14.1%	
HHs Difference	7.2%	-2.4%	0.5%	-13.7%	4.7%	-0.8%	1.6%	-7.9%	
Census Tract 58.04									
HHs Actual proportions	74.2%	7.0%	11.3%	8.3%	81.7%	5.8%	7.8%	5.3%	Very High
HHs Free market	73.5%	10.0%	8.0%	19.9%	78.1%	8.0%	4.5%	14.1%	
HHs Difference	0.7%	-3.0%	3.3%	-11.6%	3.6%	-2.2%	3.3%	-8.8%	
Census Tract 58.05									
HHs Actual proportions	92.3%	5.1%	2.1%	8.7%	90.6%	4.0%	3.0%	6.6%	Very High
HHs Free market	74.6%	9.2%	8.3%	17.7%	79.4%	7.4%	4.6%	12.9%	
HHs Difference	17.7%	-4.2%	-6.2%	-8.9%	11.2%	-3.3%	-1.6%	-6.3%	
Census Tract 58.06									
HHs Actual proportions	82.1%	9.5%	6.4%	16.5%	81.0%	8.5%	5.0%	5.9%	Very High
HHs Free market	73.0%	10.6%	7.8%	20.8%	77.8%	8.2%	4.6%	14.1%	
HHs Difference	9.1%	-1.1%	-1.4%	-4.3%	3.2%	0.3%	0.4%	-8.2%	
Census Tract 58.07									
HHs Actual proportions	81.6%	5.9%	8.7%	10.8%	83.6%	7.8%	5.3%	6.4%	Very High
HHs Free market	73.5%	9.9%	8.0%	20.0%	78.3%	7.9%	4.6%	13.9%	
HHs Difference	8.0%	-3.9%	0.7%	-9.3%	5.2%	-0.1%	0.7%	-7.5%	
Census Tract 58.08									
HHs Actual proportions	80.6%	5.8%	6.3%	5.4%	89.2%	6.2%	2.1%	4.7%	Very High
HHs Free market	73.1%	10.3%	7.8%	21.1%	77.1%	8.7%	4.5%	14.7%	
HHs Difference	7.4%	-4.4%	-1.5%	-15.8%	12.1%	-2.6%	-2.4%	-10.0%	
Census Tract 58.09									
HHs Actual proportions	78.8%	7.7%	6.1%	14.1%	81.4%	5.8%	4.0%	9.5%	Very High
HHs Free market	72.0%	11.5%	7.5%	22.0%	76.9%	8.9%	4.5%	14.8%	
HHs Difference	6.8%	-3.8%	-1.4%	-7.9%	4.5%	-3.1%	-0.5%	-5.2%	

Las Vegas Racial and Hispanic Household Composition and Opportunity Index: 2000–2012									
Area	2008–2012				2000				Overall Opportunity Index
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race	
Census Tract 58.22	Census Tract 58.10								
HHs Actual proportions	76.9%	0.0%	19.0%	5.2%	100.0%	0.0%	0.0%	0.0%	Very High
HHs Free market	75.4%	8.7%	8.6%	15.6%	78.7%	7.3%	4.4%	14.0%	
HHs Difference	1.5%	-8.7%	10.3%	-10.4%	21.3%	-7.3%	-4.4%	-14.0%	
Census Tract 58.23	Census Tract 58.23 consists of parts of 2000 Census Tracts 58.10 and 58.17								
HHs Actual proportions	75.3%	6.7%	13.3%	6.7%	97.0%	0.0%	0.0%	1.6%	Very High
HHs Free market	75.3%	8.4%	8.6%	17.4%	79.3%	7.3%	4.6%	12.8%	
HHs Difference	0.1%	-1.7%	4.7%	-10.6%	17.7%	-7.3%	-4.6%	-11.1%	
Census Tract 58.24	Census Tract 58.10								
HHs Actual proportions	86.8%	0.9%	5.1%	17.9%	100.0%	0.0%	0.0%	0.0%	Very High
HHs Free market	75.0%	9.2%	8.3%	16.9%	78.7%	7.3%	4.4%	14.0%	
HHs Difference	11.8%	-8.2%	-3.2%	1.0%	21.3%	-7.3%	-4.4%	-14.0%	

City of Henderson Racial and Hispanic Household Composition and Opportunity Index by Census Tract

Henderson Racial and Hispanic Household Composition and Opportunity Index: 2000–2012									
Area	2008–2012				2000				Overall Opportunity Index
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race	
Henderson Citywide									
HHs Actual proportions	82.7%	5.4%	6.2%	10.3%	87.9%	4.1%	3.0%	7.7%	Not applicable
HHs Free market	73.7%	9.9%	8.1%	19.4%	78.1%	8.0%	4.6%	14.0%	
HHs Difference	9.1%	-4.5%	-1.9%	-9.2%	9.9%	-4.0%	-1.5%	-6.3%	
Census Tract 28.21									
HHs Actual proportions	73.0%	9.8%	6.1%	12.6%	78.8%	6.6%	6.9%	12.1%	High
HHs Free market	71.6%	11.6%	7.4%	22.6%	76.5%	8.8%	4.5%	15.5%	
HHs Difference	1.4%	-1.8%	-1.4%	-10.0%	2.3%	-2.2%	2.4%	-3.4%	
Census Tract 51.01									
HHs Actual proportions	80.7%	5.2%	2.4%	15.0%	80.3%	8.2%	5.4%	8.9%	High
HHs Free market	72.8%	10.6%	7.8%	21.4%	77.7%	8.2%	4.5%	14.4%	
HHs Difference	7.9%	-5.4%	-5.3%	-6.3%	2.6%	0.0%	0.8%	-5.5%	
Census Tract 51.02									
HHs Actual proportions	86.9%	4.2%	4.0%	21.6%	84.1%	8.0%	4.0%	8.5%	Very High
HHs Free market	73.9%	9.9%	8.0%	19.1%	78.3%	7.7%	4.6%	14.2%	
HHs Difference	13.0%	-5.7%	-4.1%	2.5%	5.8%	0.2%	-0.6%	-5.7%	
Census Tract 51.03									
HHs Actual proportions	77.4%	11.5%	2.1%	16.7%	86.4%	4.4%	0.9%	8.8%	Very High
HHs Free market	71.8%	11.4%	7.5%	22.1%	77.5%	8.4%	4.5%	14.5%	
HHs Difference	5.6%	0.1%	-5.4%	-5.5%	9.0%	-4.0%	-3.7%	-5.7%	
Census Tract 51.04									
HHs Actual proportions	74.7%	10.2%	4.5%	12.5%	88.9%	2.6%	5.0%	6.8%	Very High
HHs Free market	73.3%	10.1%	8.0%	20.8%	77.9%	8.1%	4.5%	14.2%	
HHs Difference	1.4%	0.1%	-3.5%	-8.3%	10.9%	-5.4%	0.5%	-7.4%	
Census Tract 51.05									
HHs Actual proportions	78.9%	9.3%	5.2%	18.1%	91.3%	0.0%	1.1%	17.3%	Very Low
HHs Free market	72.6%	10.8%	7.7%	21.5%	76.7%	8.7%	4.5%	15.4%	
HHs Difference	6.4%	-1.5%	-2.5%	-3.4%	14.6%	-8.7%	-3.4%	1.9%	

Henderson Racial and Hispanic Household Composition and Opportunity Index: 2000–2012									
Area	2008–2012				2000				Overall Opportunity Index
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race	
Census Tract 51.06									
HHs Actual proportions	77.9%	7.5%	6.3%	18.7%	85.4%	7.9%	0.6%	6.7%	Very High
HHs Free market	74.0%	9.6%	8.2%	19.3%	78.0%	8.1%	4.5%	14.1%	
HHs Difference	3.9%	-2.0%	-1.9%	-0.6%	7.4%	-0.1%	-3.9%	-7.4%	
Census Tract 51.07									
HHs Actual proportions	84.3%	2.6%	8.3%	13.7%	88.1%	3.8%	2.7%	4.9%	High
HHs Free market	74.1%	9.4%	8.1%	19.3%	78.5%	7.8%	4.5%	13.6%	
HHs Difference	10.2%	-6.8%	0.1%	-5.5%	9.6%	-4.0%	-1.8%	-8.8%	
Census Tract 51.08									
HHs Actual proportions	84.2%	5.9%	6.2%	6.9%	83.8%	4.2%	4.3%	7.3%	High
HHs Free market	73.1%	10.5%	7.8%	20.1%	77.2%	8.5%	4.5%	14.8%	
HHs Difference	11.1%	-4.6%	-1.6%	-13.2%	6.6%	-4.3%	-0.2%	-7.5%	
Census Tract 51.09									
HHs Actual proportions	78.7%	4.5%	8.2%	13.5%	82.9%	4.7%	5.4%	10.8%	Moderate
HHs Free market	73.4%	10.0%	8.0%	20.1%	78.2%	7.9%	4.6%	13.9%	
HHs Difference	5.3%	-5.5%	0.2%	-6.6%	4.8%	-3.2%	0.8%	-3.2%	
Census Tract 52.00									
HHs Actual proportions	91.7%	1.6%	1.8%	11.5%	90.6%	2.1%	1.2%	12.2%	Very Low
HHs Free market	70.7%	12.8%	7.1%	22.7%	74.8%	10.3%	4.4%	16.0%	
HHs Difference	21.0%	-11.2%	-5.3%	-11.2%	15.8%	-8.2%	-3.2%	-3.9%	
Census Tract 53.11									
HHs Actual proportions	84.2%	6.9%	5.5%	17.2%	81.5%	7.5%	6.2%	6.9%	Very High
HHs Free market	73.4%	10.0%	7.8%	20.9%	77.9%	8.2%	4.5%	14.2%	
HHs Difference	10.8%	-3.1%	-2.3%	-3.7%	3.6%	-0.6%	1.6%	-7.4%	
Census Tract 53.12									
HHs Actual proportions	77.0%	9.1%	11.3%	7.0%	89.4%	0.0%	4.6%	7.1%	Very High
HHs Free market	74.3%	9.5%	8.2%	18.5%	79.7%	7.0%	4.7%	12.7%	
HHs Difference	2.7%	-0.4%	3.1%	-11.5%	9.7%	-7.0%	-0.1%	-5.6%	

Henderson Racial and Hispanic Household Composition and Opportunity Index: 2000–2012									
Area	2008–2012				2000				Overall Opportunity Index
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race	
Census Tract 53.13									
HHs Actual proportions	83.5%	5.3%	6.7%	13.8%	88.1%	2.2%	3.8%	7.3%	Very High
HHs Free market	74.4%	9.0%	8.4%	18.5%	79.2%	7.4%	4.6%	13.0%	
HHs Difference	9.1%	-3.7%	-1.7%	-4.7%	8.9%	-5.3%	-0.7%	-5.7%	
Census Tract 53.14									
HHs Actual proportions	91.4%	3.4%	3.6%	12.6%	92.0%	0.7%	2.3%	6.6%	Very High
HHs Free market	74.8%	9.0%	8.4%	17.6%	79.2%	7.3%	4.6%	13.2%	
HHs Difference	16.5%	-5.6%	-4.8%	-5.0%	12.8%	-6.6%	-2.3%	-6.6%	
Census Tract 53.15									
HHs Actual proportions	82.8%	8.1%	4.8%	3.4%	88.3%	4.9%	2.1%	4.3%	Very High
HHs Free market	72.5%	10.9%	7.8%	20.9%	79.1%	7.4%	4.5%	13.3%	
HHs Difference	10.3%	-2.8%	-3.0%	-17.5%	9.2%	-2.5%	-2.5%	-9.0%	
Census Tract 53.16									
HHs Actual proportions	82.1%	8.1%	2.9%	11.0%	87.9%	3.7%	3.6%	9.4%	High
HHs Free market	73.8%	9.5%	8.1%	19.9%	78.6%	7.6%	4.6%	13.7%	
HHs Difference	8.3%	-1.5%	-5.2%	-9.0%	9.3%	-3.9%	-1.0%	-4.3%	
Census Tract 53.17									
HHs Actual proportions	84.4%	3.3%	8.2%	9.7%	86.2%	4.8%	6.3%	5.8%	Very High
HHs Free market	73.2%	10.5%	7.8%	20.2%	77.8%	8.2%	4.5%	14.3%	
HHs Difference	11.2%	-7.2%	0.4%	-10.5%	8.4%	-3.4%	1.8%	-8.5%	
Census Tract 53.18									
HHs Actual proportions	85.3%	1.4%	10.0%	8.2%	92.2%	1.5%	5.0%	2.4%	Very High
HHs Free market	74.3%	9.7%	8.0%	18.5%	79.9%	7.2%	4.6%	12.4%	
HHs Difference	11.1%	-8.2%	2.0%	-10.2%	12.3%	-5.7%	0.3%	-9.9%	
Census Tract 53.20									
HHs Actual proportions	84.6%	8.1%	2.5%	6.4%	87.0%	6.6%	1.2%	7.3%	High
HHs Free market	74.4%	9.2%	8.2%	19.1%	78.3%	8.0%	4.6%	13.6%	
HHs Difference	10.3%	-1.1%	-5.7%	-12.6%	8.7%	-1.4%	-3.4%	-6.3%	

Henderson Racial and Hispanic Household Composition and Opportunity Index: 2000–2012									
Area	2008–2012				2000				Overall Opportunity Index
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race	
Census Tract 53.21									
HHs Actual proportions	78.9%	3.7%	10.6%	10.0%	87.7%	5.3%	4.0%	6.1%	Very High
HHs Free market	75.4%	8.3%	8.6%	16.6%	80.0%	7.0%	4.6%	12.3%	
HHs Difference	3.4%	-4.6%	1.9%	-6.6%	7.7%	-1.6%	-0.7%	-6.2%	
Census Tract 53.22									
HHs Actual proportions	81.9%	1.8%	7.2%	9.2%	98.3%	0.0%	0.0%	1.9%	High
HHs Free market	74.8%	9.0%	8.2%	18.1%	81.1%	6.4%	4.7%	11.4%	
HHs Difference	7.0%	-7.3%	-1.1%	-8.9%	17.3%	-6.4%	-4.7%	-9.5%	
Census Tract 53.33									
HHs Actual proportions	93.6%	1.3%	1.8%	4.0%	91.9%	2.5%	4.1%	4.5%	Very High
HHs Free market	74.8%	9.0%	8.6%	16.9%	79.5%	7.2%	4.6%	12.7%	
HHs Difference	18.8%	-7.7%	-6.8%	-12.9%	12.4%	-4.7%	-0.5%	-8.2%	
Census Tract 53.35									
HHs Actual proportions	91.0%	2.6%	0.0%	13.1%	93.8%	1.9%	0.7%	4.7%	Moderate
HHs Free market	74.6%	9.0%	8.2%	18.5%	79.4%	7.3%	4.6%	13.1%	
HHs Difference	16.4%	-6.4%	-8.2%	-5.5%	14.5%	-5.4%	-3.8%	-8.4%	
Census Tract 53.36									
HHs Actual proportions	84.8%	6.7%	4.6%	8.5%	93.8%	2.1%	1.4%	6.2%	Moderate
HHs Free market	71.7%	11.9%	7.3%	22.9%	76.1%	9.3%	4.4%	15.5%	
HHs Difference	13.1%	-5.2%	-2.7%	-14.4%	17.7%	-7.2%	-3.0%	-9.3%	
Census Tract 53.37									
HHs Actual proportions	91.1%	5.1%	1.0%	1.4%	90.0%	3.6%	4.1%	5.1%	Very High
HHs Free market	75.4%	8.5%	8.6%	16.6%	80.7%	6.5%	4.7%	11.8%	
HHs Difference	15.7%	-3.4%	-7.6%	-15.2%	9.3%	-2.9%	-0.6%	-6.6%	
Census Tract 53.38									
HHs Actual proportions	95.1%	2.9%	1.3%	6.8%	94.9%	1.9%	2.2%	2.0%	Very High
HHs Free market	72.7%	10.8%	7.7%	21.4%	76.5%	9.0%	4.5%	15.1%	
HHs Difference	22.4%	-7.9%	-6.4%	-14.6%	18.4%	-7.1%	-2.2%	-13.1%	

Henderson Racial and Hispanic Household Composition and Opportunity Index: 2000–2012									
Area	2008–2012				2000				Overall Opportunity Index
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race	
Census Tract 53.41									
HHs Actual proportions	87.9%	3.1%	4.2%	13.4%	85.9%	3.4%	2.1%	6.0%	High
HHs Free market	73.5%	9.8%	7.9%	20.9%	78.9%	7.5%	4.6%	13.6%	
HHs Difference	14.4%	-6.7%	-3.8%	-7.5%	7.1%	-4.1%	-2.5%	-7.6%	
Census Tract 53.42									
HHs Actual proportions	91.6%	1.6%	3.2%	12.0%	88.9%	4.6%	1.1%	9.2%	High
HHs Free market	74.1%	9.5%	8.0%	19.8%	77.7%	8.0%	4.6%	14.5%	
HHs Difference	17.5%	-7.9%	-4.8%	-7.9%	11.2%	-3.4%	-3.5%	-5.3%	
Census Tract 53.43									
HHs Actual proportions	95.0%	0.7%	1.1%	11.5%	98.1%	0.0%	0.0%	5.7%	High
HHs Free market	73.2%	10.4%	7.9%	19.9%	78.4%	7.7%	4.6%	13.8%	
HHs Difference	21.8%	-9.7%	-6.8%	-8.4%	19.7%	-7.7%	-4.6%	-8.2%	
Census Tract 53.46 Census Tract 53.31									
HHs Actual proportions	75.9%	9.0%	13.7%	10.7%	87.1%	5.5%	4.7%	6.5%	Very High
HHs Free market	74.1%	9.4%	8.1%	19.1%	79.0%	7.5%	4.6%	13.1%	
HHs Difference	1.8%	-0.5%	5.5%	-8.4%	8.0%	-2.0%	0.0%	-6.5%	
Census Tract 53.47 Census Tract 53.47 consists of parts of 2000 Census Tracts 53.31 and 57.10									
HHs Actual proportions	82.7%	3.5%	10.0%	7.0%	88.6%	4.1%	4.1%	5.4%	Very High
HHs Free market	74.6%	9.3%	8.2%	17.6%	79.4%	7.3%	4.6%	12.8%	
HHs Difference	8.1%	-5.8%	1.8%	-10.7%	9.2%	-3.2%	-0.5%	-7.3%	
Census Tract 53.48 Census Tract 53.31									
HHs Actual proportions	78.5%	2.9%	15.6%	5.8%	87.1%	5.5%	4.7%	6.5%	Very High
HHs Free market	75.4%	8.5%	8.6%	17.0%	79.0%	7.5%	4.6%	13.1%	
HHs Difference	3.1%	-5.5%	7.0%	-11.2%	8.0%	-2.0%	0.0%	-6.5%	
Census Tract 53.49 Census Tract 53.32									
HHs Actual proportions	83.1%	5.2%	6.9%	10.3%	89.3%	3.7%	3.9%	7.4%	Very High
HHs Free market	73.9%	10.0%	8.2%	17.9%	79.1%	7.4%	4.6%	13.1%	
HHs Difference	9.2%	-4.8%	-1.3%	-7.6%	10.2%	-3.7%	-0.7%	-5.6%	

Henderson Racial and Hispanic Household Composition and Opportunity Index: 2000–2012									
Area	2008–2012				2000				Overall Opportunity Index
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race	
Census Tract 53.50					Census Tract 53.32				
HHs Actual proportions	84.3%	4.4%	7.4%	3.8%	89.3%	3.7%	3.9%	7.4%	Very High
HHs Free market	74.3%	9.5%	8.3%	17.7%	79.1%	7.4%	4.6%	13.1%	
HHs Difference	10.0%	-5.1%	-0.9%	-13.9%	10.2%	-3.7%	-0.7%	-5.6%	
Census Tract 53.51					Census Tract 53.32				
HHs Actual proportions	74.7%	3.9%	13.1%	8.9%	89.3%	3.7%	3.9%	7.4%	Very High
HHs Free market	73.5%	9.9%	8.0%	19.9%	79.1%	7.4%	4.6%	13.1%	
HHs Difference	1.2%	-6.0%	5.0%	-11.0%	10.2%	-3.7%	-0.7%	-5.6%	
Census Tract 53.52					Census Tract 53.34				
HHs Actual proportions	79.4%	6.3%	7.8%	2.7%	88.0%	4.6%	3.9%	7.0%	Very High
HHs Free market	74.8%	9.0%	8.5%	16.9%	78.9%	7.5%	4.6%	13.3%	
HHs Difference	4.6%	-2.8%	-0.7%	-14.2%	9.2%	-2.9%	-0.7%	-6.3%	
Census Tract 53.53					Census Tract 53.34				
HHs Actual proportions	81.3%	1.1%	13.6%	13.7%	88.0%	4.6%	3.9%	7.0%	Moderate
HHs Free market	73.8%	9.7%	8.0%	19.7%	78.9%	7.5%	4.6%	13.3%	
HHs Difference	7.5%	-8.6%	5.6%	-6.1%	9.2%	-2.9%	-0.7%	-6.3%	
Census Tract 53.54					Census Tract 53.34				
HHs Actual proportions	76.8%	7.3%	7.8%	9.7%	88.0%	4.6%	3.9%	7.0%	Low
HHs Free market	72.7%	10.5%	8.0%	20.5%	78.9%	7.5%	4.6%	13.3%	
HHs Difference	4.1%	-3.2%	-0.2%	-10.9%	9.2%	-2.9%	-0.7%	-6.3%	
Census Tract 53.55					Census Tract 53.55 consists of parts of 2000 Census Tracts 53.39 and 57.10				
HHs Actual proportions	82.7%	2.9%	7.0%	9.7%	90.2%	4.1%	2.4%	4.8%	Very High
HHs Free market	73.4%	10.1%	8.0%	19.9%	78.8%	7.6%	4.6%	13.5%	
HHs Difference	9.3%	-7.2%	-1.0%	-10.2%	11.4%	-3.5%	-2.1%	-8.7%	
Census Tract 53.56					Census Tract 53.39				
HHs Actual proportions	87.2%	3.0%	3.8%	6.0%	89.7%	5.2%	2.1%	5.3%	Very High
HHs Free market	76.3%	7.8%	8.7%	15.1%	78.2%	7.8%	4.6%	14.1%	
HHs Difference	10.9%	-4.8%	-4.9%	-9.2%	11.5%	-2.6%	-2.5%	-8.7%	

Henderson Racial and Hispanic Household Composition and Opportunity Index: 2000–2012									
Area	2008–2012				2000				Overall Opportunity Index
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race	
Census Tract 53.57	Census Tract 53.57 consists of parts of 2000 Census Tracts 53.34, 53.39, and 57.10								
HHs Actual proportions	77.4%	6.6%	10.7%	2.4%	89.4%	4.3%	2.9%	5.5%	Low
HHs Free market	73.7%	9.8%	8.1%	19.3%	78.8%	7.6%	4.6%	13.4%	
HHs Difference	3.7%	-3.2%	2.6%	-16.9%	10.6%	-3.3%	-1.6%	-7.9%	
Census Tract 53.58	Census Tract 53.58 consists of parts of 2000 Census Tracts 53.39 and 57.10								
HHs Actual proportions	87.2%	0.0%	5.3%	7.0%	90.2%	4.1%	2.4%	4.8%	High
HHs Free market	76.1%	7.8%	8.7%	16.2%	78.8%	7.6%	4.6%	13.5%	
HHs Difference	11.1%	-7.8%	-3.4%	-9.2%	11.4%	-3.5%	-2.1%	-8.7%	
Census Tract 53.59	Census Tract 53.59 consists of parts of 2000 Census Tracts 53.41, 53.42, 53.45, and 57.10								
HHs Actual proportions	87.1%	10.1%	2.4%	7.6%	89.8%	2.8%	2.3%	6.3%	Very High
HHs Free market	79.1%	7.4%	4.6%	13.2%	79.1%	7.4%	4.6%	13.2%	
HHs Difference	8.0%	2.7%	-2.2%	-5.6%	10.7%	-4.6%	-2.3%	-6.8%	
Census Tract 53.60	Census Tract 53.60 consists of parts of 2000 Census Tracts 53.43, 53.45, and 54.31								
HHs Actual proportions	88.9%	2.4%	1.6%	10.1%	92.6%	1.6%	1.6%	6.3%	High
HHs Free market	75.1%	8.6%	8.3%	17.9%	79.2%	7.3%	4.6%	13.1%	
HHs Difference	13.8%	-6.2%	-6.7%	-7.8%	13.4%	-5.7%	-3.1%	-6.8%	
Census Tract 54.21									
HHs Actual proportions	77.7%	17.5%	0.0%	12.3%	88.2%	4.5%	3.6%	8.8%	Very Low
HHs Free market	71.0%	12.4%	7.3%	22.5%	74.8%	10.3%	4.4%	16.2%	
HHs Difference	6.7%	5.1%	-7.3%	-10.2%	13.4%	-5.8%	-0.8%	-7.4%	
Census Tract 54.22									
HHs Actual proportions	78.2%	4.7%	2.5%	24.8%	83.4%	5.3%	0.0%	18.9%	Low
HHs Free market	71.5%	11.8%	7.5%	21.8%	76.4%	9.1%	4.4%	15.3%	
HHs Difference	6.7%	-7.1%	-5.0%	3.0%	7.0%	-3.8%	-4.4%	3.6%	
Census Tract 54.23									
HHs Actual proportions	77.8%	10.0%	4.7%	13.3%	83.9%	7.6%	0.6%	10.9%	Moderate
HHs Free market	72.4%	11.2%	7.6%	21.4%	75.6%	10.1%	4.4%	14.9%	
HHs Difference	5.4%	-1.2%	-2.9%	-8.0%	8.3%	-2.5%	-3.9%	-4.0%	

Henderson Racial and Hispanic Household Composition and Opportunity Index: 2000–2012									
Area	2008–2012				2000				Overall Opportunity Index
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race	
Census Tract 54.33									
HHs Actual proportions	87.2%	1.6%	1.1%	11.4%	90.3%	0.9%	0.6%	7.0%	High
HHs Free market	74.7%	9.0%	8.4%	17.8%	77.7%	8.3%	4.6%	14.2%	
HHs Difference	12.5%	-7.5%	-7.4%	-6.4%	12.6%	-7.4%	-3.9%	-7.2%	
Census Tract 54.34									
Census Tract 54.31									
HHs Actual proportions	90.9%	1.9%	2.7%	18.6%	90.6%	2.2%	1.4%	6.6%	Very High
HHs Free market	73.8%	9.7%	8.2%	19.4%	79.2%	7.2%	4.6%	13.3%	
HHs Difference	17.1%	-7.8%	-5.5%	-0.8%	11.5%	-5.1%	-3.2%	-6.7%	
Census Tract 54.35 consists of parts of 2000 Census Tracts 54.31, 54.33, and 55.01									
HHs Actual proportions	96.1%	2.6%	0.8%	6.5%	92.9%	1.1%	1.3%	4.3%	Moderate
HHs Free market	73.7%	9.8%	8.1%	19.1%	77.8%	8.2%	4.5%	14.1%	
HHs Difference	22.4%	-7.2%	-7.3%	-12.5%	15.0%	-7.1%	-3.2%	-9.8%	
Census Tract 54.36									
Census Tract 54.11									
HHs Actual proportions	78.0%	9.0%	5.1%	10.8%	90.1%	2.8%	3.5%	8.3%	Low
HHs Free market	73.0%	10.1%	8.2%	20.1%	78.1%	7.9%	4.6%	14.1%	
HHs Difference	4.9%	-1.1%	-3.1%	-9.3%	12.0%	-5.1%	-1.1%	-5.8%	
Census Tract 54.37 consists of parts of 2000 Census Tracts 54.11 and 61.01									
HHs Actual proportions	92.9%	1.7%	2.8%	3.3%	90.7%	3.0%	3.4%	8.2%	Very Low
HHs Free market	75.3%	8.6%	8.6%	16.4%	76.8%	7.4%	4.5%	13.3%	
HHs Difference	17.5%	-6.9%	-5.8%	-13.1%	13.9%	-4.4%	-1.1%	-5.1%	
Census Tract 54.38									
Census Tract 54.12									
HHs Actual proportions	73.7%	13.2%	2.8%	14.3%	85.4%	5.8%	1.6%	11.8%	Very Low
HHs Free market	70.4%	12.9%	7.3%	22.9%	75.7%	9.6%	4.4%	15.8%	
HHs Difference	3.3%	0.3%	-4.5%	-8.5%	9.7%	-3.8%	-2.8%	-4.0%	
Census Tract 54.39									
Census Tract 54.12									
HHs Actual proportions	75.9%	9.8%	4.1%	24.9%	85.4%	5.8%	1.6%	11.8%	Very Low
HHs Free market	71.4%	11.9%	7.3%	23.2%	75.7%	9.6%	4.4%	15.8%	
HHs Difference	4.5%	-2.1%	-3.2%	1.7%	9.7%	-3.8%	-2.8%	-4.0%	

Henderson Racial and Hispanic Household Composition and Opportunity Index: 2000–2012									
Area	2008–2012				2000				Overall Opportunity Index
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race	
Census Tract 57.11	Census Tract 57.11 consists of parts of 2000 Census Tracts 53.39 and 57.10								
HHs Actual proportions	86.2%	0.7%	6.1%	3.3%	90.2%	4.1%	2.4%	4.8%	Very High
HHs Free market	76.0%	8.1%	8.6%	15.8%	78.8%	7.6%	4.6%	13.5%	
HHs Difference	10.2%	-7.5%	-2.5%	-12.5%	11.4%	-3.5%	-2.1%	-8.7%	
Census Tract 57.12	Census Tract 57.12 consists of parts of 2000 Census Tracts 28.15, 28.16, 53.31, and 57.10								
HHs Actual proportions	77.3%	5.2%	14.8%	9.7%	85.7%	3.1%	6.9%	7.1%	High
HHs Free market	79.2%	7.4%	4.6%	12.9%	79.4%	7.3%	4.6%	12.8%	
HHs Difference	-1.9%	-2.2%	10.2%	-3.2%	6.3%	-4.2%	2.2%	-5.7%	
Census Tract 57.13	Census Tract 57.10								
HHs Actual proportions	83.7%	2.8%	5.4%	4.7%	91.1%	1.8%	3.2%	3.7%	High
HHs Free market	74.4%	9.3%	8.1%	18.7%	79.9%	7.1%	4.6%	12.3%	
HHs Difference	9.3%	-6.5%	-2.7%	-14.0%	11.1%	-5.3%	-1.4%	-8.6%	
Census Tract 57.14	Census Tract 57.14 consists of parts of 2000 Census Tracts 53.31 and 57.10								
HHs Actual proportions	89.3%	2.7%	6.7%	2.6%	88.6%	4.1%	4.1%	5.4%	Very High
HHs Free market	73.8%	9.8%	8.0%	19.6%	79.4%	7.3%	4.6%	12.8%	
HHs Difference	15.5%	-7.1%	-1.4%	-16.9%	9.2%	-3.2%	-0.5%	-7.3%	
Census Tract 57.15	Census Tract 57.10								
HHs Actual proportions	82.2%	7.9%	8.2%	5.7%	91.1%	1.8%	3.2%	3.7%	Very High
HHs Free market	77.1%	7.6%	9.0%	13.2%	79.9%	7.1%	4.6%	12.3%	
HHs Difference	5.2%	0.3%	-0.8%	-7.5%	11.1%	-5.3%	-1.4%	-8.6%	
Census Tract 57.16	Census Tract 57.10								
HHs Actual proportions	72.0%	6.3%	16.7%	0.9%	91.1%	1.8%	3.2%	3.7%	High
HHs Free market	74.1%	9.5%	8.3%	18.8%	79.9%	7.1%	4.6%	12.3%	
HHs Difference	-2.1%	-3.2%	8.5%	-17.9%	11.1%	-5.3%	-1.4%	-8.6%	

City of North Las Vegas Racial and Hispanic Composition and Opportunity Index by Census Tract

North Las Vegas Racial and Hispanic Household Composition and Opportunity Index: 2000–2012									
Area	2008–2012				2000				Overall Opportunity Index
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race	
North Las Vegas Citywide									
HHs Actual proportions	58.1%	22.0%	5.9%	29.5%	60.6%	20.6%	2.9%	27.7%	Not applicable
HHs Free market	72.8%	10.6%	7.8%	21.0%	76.6%	8.9%	4.5%	15.0%	
HHs Difference	-14.7%	11.5%	-1.9%	8.5%	-16.0%	11.6%	-1.6%	12.7%	
Census Tract 36.07									
HHs Actual proportions	62.4%	13.6%	7.5%	27.2%	74.0%	15.4%	5.8%	12.3%	Moderate
HHs Free market	73.1%	10.2%	8.1%	20.2%	79.4%	7.1%	4.7%	13.0%	
HHs Difference	-10.7%	3.4%	-0.6%	7.1%	-5.3%	8.3%	1.1%	-0.7%	
Census Tract 36.09									
HHs Actual proportions	73.6%	12.5%	0.7%	19.4%	86.5%	3.9%	3.1%	6.2%	Moderate
HHs Free market	73.1%	10.1%	7.9%	21.0%	78.7%	7.5%	4.6%	13.5%	
HHs Difference	0.5%	2.4%	-7.3%	-1.5%	7.8%	-3.6%	-1.5%	-7.3%	
Census Tract 36.10									
HHs Actual proportions	67.0%	13.7%	7.6%	29.4%	76.9%	13.9%	1.4%	12.2%	Low
HHs Free market	73.7%	9.5%	8.0%	20.6%	78.6%	7.6%	4.6%	13.6%	
HHs Difference	-6.7%	4.2%	-0.4%	8.8%	-1.7%	6.2%	-3.1%	-1.4%	
Census Tract 36.12									
HHs Actual proportions	57.5%	23.6%	6.1%	17.1%	72.7%	13.0%	3.5%	12.7%	Very Low
HHs Free market	72.5%	10.9%	7.6%	21.4%	78.2%	7.8%	4.6%	13.9%	
HHs Difference	-15.1%	12.7%	-1.6%	-4.3%	-5.6%	5.2%	-1.1%	-1.2%	
Census Tract 36.13									
HHs Actual proportions	43.7%	22.7%	6.5%	32.6%	67.2%	18.5%	3.6%	15.4%	Low
HHs Free market	72.6%	10.7%	7.9%	20.6%	78.1%	7.9%	4.5%	14.1%	
HHs Difference	-28.9%	12.0%	-1.4%	12.0%	-10.9%	10.6%	-0.9%	1.4%	

North Las Vegas Racial and Hispanic Household Composition and Opportunity Index: 2000–2012									
Area	2008–2012				2000				Overall Opportunity Index
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race	
Census Tract 36.15									
HHs Actual proportions	54.4%	23.3%	2.9%	27.2%	69.2%	22.3%	4.0%	8.1%	Low
HHs Free market	72.5%	10.9%	7.7%	21.5%	77.0%	8.6%	4.6%	14.8%	
HHs Difference	-18.1%	12.4%	-4.8%	5.6%	-7.8%	13.7%	-0.5%	-6.7%	
Census Tract 36.16									
Census Tract 36.02									
HHs Actual proportions	28.3%	47.9%	1.3%	37.0%	20.5%	62.9%	2.4%	18.4%	Low
HHs Free market	71.9%	11.5%	7.4%	22.7%	74.8%	10.3%	4.5%	15.9%	
HHs Difference	-43.6%	36.4%	-6.1%	14.3%	-54.3%	52.6%	-2.1%	2.5%	
Census Tract 36.17									
Census Tract 36.02									
HHs Actual proportions	31.7%	49.2%	9.8%	29.7%	20.5%	62.9%	2.4%	18.4%	Very Low
HHs Free market	71.5%	11.9%	7.7%	21.8%	74.8%	10.3%	4.5%	15.9%	
HHs Difference	-39.8%	37.3%	2.2%	7.9%	-54.3%	52.6%	-2.1%	2.5%	
Census Tract 36.18									
Census Tract 36.03									
HHs Actual proportions	66.4%	16.7%	5.8%	14.9%	100.0%	0.0%	0.0%	0.0%	High
HHs Free market	73.5%	9.9%	8.0%	20.1%	76.1%	8.4%	4.6%	16.8%	
HHs Difference	-7.1%	6.9%	-2.2%	-5.1%	23.9%	-8.4%	-4.6%	-16.8%	
Census Tract 36.19									
Census Tract 36.03									
HHs Actual proportions	60.5%	7.3%	16.5%	19.6%	100.0%	0.0%	0.0%	0.0%	Very High
HHs Free market	77.6%	6.8%	9.1%	13.1%	76.1%	8.4%	4.6%	16.8%	
HHs Difference	-17.2%	0.5%	7.4%	6.6%	23.9%	-8.4%	-4.6%	-16.8%	
Census Tract 36.20									
Census Tract 36.20 consists of parts of 2000 Census Tracts 36.03 and 36.05									
HHs Actual proportions	65.2%	17.1%	11.2%	12.1%	74.6%	14.1%	3.4%	8.5%	Very High
HHs Free market	75.0%	8.5%	8.6%	17.4%	77.8%	8.0%	4.6%	14.6%	
HHs Difference	-9.8%	8.6%	2.7%	-5.3%	-3.2%	6.2%	-1.2%	-6.1%	
Census Tract 36.21									
Census Tract 36.03									
HHs Actual proportions	82.9%	9.5%	5.0%	2.1%	100.0%	0.0%	0.0%	0.0%	Moderate
HHs Free market	73.0%	10.2%	7.8%	21.1%	76.1%	8.4%	4.6%	16.8%	
HHs Difference	9.9%	-0.7%	-2.8%	-19.1%	23.9%	-8.4%	-4.6%	-16.8%	

North Las Vegas Racial and Hispanic Household Composition and Opportunity Index: 2000–2012									
Area	2008–2012				2000				Overall Opportunity Index
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race	
Census Tract 36.22	Census Tract 36.03								Very High
HHs Actual proportions	52.3%	17.9%	19.1%	14.7%	100.0%	0.0%	0.0%	0.0%	
HHs Free market	74.6%	9.1%	8.7%	16.8%	76.1%	8.4%	4.6%	16.8%	
HHs Difference	-22.3%	8.8%	10.4%	-2.2%	23.9%	-8.4%	-4.6%	-16.8%	
Census Tract 36.23	Census Tract 36.03								Moderate
HHs Actual proportions	44.7%	30.0%	7.0%	24.9%	100.0%	0.0%	0.0%	0.0%	
HHs Free market	72.8%	10.5%	7.6%	22.2%	76.1%	8.4%	4.6%	16.8%	
HHs Difference	-28.1%	19.5%	-0.6%	2.7%	23.9%	-8.4%	-4.6%	-16.8%	
Census Tract 36.24	Census Tract 36.24 consists of parts of 2000 Census Tracts 36.03 and 36.08								
HHs Actual proportions	49.6%	36.7%	6.7%	21.6%	79.7%	8.1%	3.5%	15.0%	Moderate
HHs Free market	73.6%	9.9%	7.9%	20.5%	77.9%	7.9%	4.6%	14.5%	
HHs Difference	-24.0%	26.8%	-1.2%	1.0%	1.9%	0.2%	-1.1%	0.6%	
Census Tract 36.25	Census Tract 36.03								Moderate
HHs Actual proportions	61.9%	22.6%	10.6%	16.5%	100.0%	0.0%	0.0%	0.0%	
HHs Free market	73.8%	9.5%	8.3%	19.6%	76.1%	8.4%	4.6%	16.8%	
HHs Difference	-11.9%	13.1%	2.3%	-3.1%	23.9%	-8.4%	-4.6%	-16.8%	
Census Tract 36.26	Census Tract 36.03								Low
HHs Actual proportions	65.1%	15.8%	17.2%	18.3%	100.0%	0.0%	0.0%	0.0%	
HHs Free market	73.7%	9.6%	8.5%	18.2%	76.1%	8.4%	4.6%	16.8%	
HHs Difference	-8.5%	6.2%	8.7%	0.1%	23.9%	-8.4%	-4.6%	-16.8%	
Census Tract 36.27	Census Tract 36.03								Moderate
HHs Actual proportions	51.8%	20.1%	15.9%	22.2%	100.0%	0.0%	0.0%	0.0%	
HHs Free market	73.6%	9.6%	8.0%	20.8%	76.1%	8.4%	4.6%	16.8%	
HHs Difference	-21.8%	10.5%	7.9%	1.4%	23.9%	-8.4%	-4.6%	-16.8%	
Census Tract 36.28	Census Tract 36.28 consists of parts of 2000 Census Tracts 36.03 and 60.00								
HHs Actual proportions	51.9%	23.4%	6.7%	21.2%	71.1%	15.0%	2.6%	11.1%	Very Low
HHs Free market	73.3%	9.9%	7.9%	21.0%	75.1%	9.6%	4.4%	16.7%	
HHs Difference	-21.4%	13.5%	-1.2%	0.2%	-4.1%	5.3%	-1.8%	-5.6%	

**North Las Vegas Racial and Hispanic Household Composition and Opportunity Index:
2000–2012**

Area	2008–2012				2000				Overall Opportunity Index
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race	
Census Tract 36.29	Census Tract 36.04								Moderate
HHs Actual proportions	61.2%	21.5%	5.1%	14.1%	79.9%	11.5%	3.0%	9.5%	
HHs Free market	73.4%	9.7%	8.2%	20.0%	77.9%	8.0%	4.6%	14.3%	
HHs Difference	-12.2%	11.8%	-3.1%	-5.9%	2.0%	3.5%	-1.5%	-4.8%	
Census Tract 36.30	Census Tract 36.04								High
HHs Actual proportions	61.3%	19.4%	10.5%	17.9%	79.9%	11.5%	3.0%	9.5%	
HHs Free market	73.6%	9.7%	8.0%	20.2%	77.9%	8.0%	4.6%	14.3%	
HHs Difference	-12.3%	9.6%	2.5%	-2.2%	2.0%	3.5%	-1.5%	-4.8%	
Census Tract 36.31	Census Tract 36.05								High
HHs Actual proportions	55.1%	23.3%	5.9%	27.4%	73.8%	14.6%	3.5%	8.8%	
HHs Free market	73.7%	9.6%	8.2%	20.0%	77.9%	8.0%	4.6%	14.5%	
HHs Difference	-18.6%	13.7%	-2.3%	7.4%	-4.0%	6.6%	-1.1%	-5.7%	
Census Tract 36.32	Census Tract 36.05								Moderate
HHs Actual proportions	69.1%	12.4%	5.4%	23.6%	73.8%	14.6%	3.5%	8.8%	
HHs Free market	73.3%	9.9%	8.1%	19.9%	77.9%	8.0%	4.6%	14.5%	
HHs Difference	-4.2%	2.5%	-2.7%	3.8%	-4.0%	6.6%	-1.1%	-5.7%	
Census Tract 36.33	Census Tract 36.33 consists of parts of 2000 Census Tracts 36.04, 36.05, and 36.10								Low
HHs Actual proportions	73.0%	17.8%	3.9%	27.4%	76.5%	13.5%	2.8%	9.9%	
HHs Free market	72.9%	10.3%	7.7%	22.0%	78.1%	7.9%	4.6%	14.2%	
HHs Difference	0.1%	7.5%	-3.8%	5.4%	-1.6%	5.6%	-1.8%	-4.2%	
Census Tract 36.34	Census Tract 36.05								High
HHs Actual proportions	60.4%	29.2%	5.3%	16.8%	73.8%	14.6%	3.5%	8.8%	
HHs Free market	73.9%	9.6%	8.1%	19.8%	77.9%	8.0%	4.6%	14.5%	
HHs Difference	-13.5%	19.6%	-2.8%	-3.0%	-4.0%	6.6%	-1.1%	-5.7%	
Census Tract 36.35	Census Tract 36.06								Very High
HHs Actual proportions	62.2%	19.0%	5.3%	17.0%	74.3%	12.6%	8.0%	7.8%	
HHs Free market	73.8%	9.6%	8.1%	19.8%	79.2%	7.1%	4.6%	13.2%	
HHs Difference	-11.6%	9.4%	-2.9%	-2.9%	-4.9%	5.5%	3.4%	-5.5%	

North Las Vegas Racial and Hispanic Household Composition and Opportunity Index: 2000–2012									
Area	2008–2012				2000				Overall Opportunity Index
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race	
Census Tract 36.36					Census Tract 36.06				
HHs Actual proportions	73.5%	17.2%	5.1%	6.4%	74.3%	12.6%	8.0%	7.8%	Very High
HHs Free market	74.8%	8.9%	8.3%	17.8%	79.2%	7.1%	4.6%	13.2%	
HHs Difference	-1.3%	8.3%	-3.2%	-11.4%	-4.9%	5.5%	3.4%	-5.5%	
Census Tract 36.37					Census Tract 36.08				
HHs Actual proportions	66.1%	17.1%	4.8%	23.5%	78.9%	8.5%	3.6%	15.7%	High
HHs Free market	72.9%	10.3%	7.8%	21.2%	77.9%	7.9%	4.6%	14.4%	
HHs Difference	-6.9%	6.8%	-3.0%	2.3%	1.0%	0.6%	-0.9%	1.3%	
Census Tract 36.38					Census Tract 36.08				
HHs Actual proportions	49.2%	26.3%	6.7%	28.6%	78.9%	8.5%	3.6%	15.7%	High
HHs Free market	73.0%	10.3%	7.8%	20.7%	77.9%	7.9%	4.6%	14.4%	
HHs Difference	-23.8%	16.0%	-1.1%	7.9%	1.0%	0.6%	-0.9%	1.3%	
Census Tract 36.39					Census Tract 36.08				
HHs Actual proportions	58.8%	21.2%	5.6%	20.8%	78.9%	8.5%	3.6%	15.7%	Moderate
HHs Free market	72.9%	10.4%	7.9%	20.6%	77.9%	7.9%	4.6%	14.4%	
HHs Difference	-14.0%	10.8%	-2.4%	0.2%	1.0%	0.6%	-0.9%	1.3%	
Census Tract 36.40					Census Tract 36.11				
HHs Actual proportions	65.7%	19.9%	3.8%	29.9%	65.4%	19.2%	4.0%	13.5%	Low
HHs Free market	72.2%	10.8%	7.7%	22.3%	77.4%	8.3%	4.5%	14.7%	
HHs Difference	-6.5%	9.2%	-3.8%	7.6%	-11.9%	10.8%	-0.6%	-1.2%	
Census Tract 36.41					Census Tract 36.11				
HHs Actual proportions	41.7%	40.7%	3.6%	13.1%	65.4%	19.2%	4.0%	13.5%	Low
HHs Free market	73.4%	9.8%	7.8%	21.1%	77.4%	8.3%	4.5%	14.7%	
HHs Difference	-31.7%	30.8%	-4.2%	-8.0%	-11.9%	10.8%	-0.6%	-1.2%	
Census Tract 36.42					Census Tract 36.11				
HHs Actual proportions	42.8%	34.7%	8.2%	28.8%	65.4%	19.2%	4.0%	13.5%	Low
HHs Free market	73.8%	9.6%	8.0%	20.4%	77.4%	8.3%	4.5%	14.7%	
HHs Difference	-31.1%	25.1%	0.2%	8.4%	-11.9%	10.8%	-0.6%	-1.2%	

North Las Vegas Racial and Hispanic Household Composition and Opportunity Index: 2000–2012									
Area	2008–2012				2000				Overall Opportunity Index
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race	
Census Tract 36.43					Census Tract 36.14				
HHs Actual proportions	53.2%	27.1%	4.1%	26.1%	62.0%	26.6%	3.5%	13.3%	Very Low
HHs Free market	72.0%	11.4%	7.7%	21.0%	77.7%	8.0%	4.6%	14.6%	
HHs Difference	-18.8%	15.8%	-3.7%	5.1%	-15.7%	18.6%	-1.1%	-1.2%	
Census Tract 36.44					Census Tract 36.14				
HHs Actual proportions	33.5%	51.0%	2.1%	15.4%	62.0%	26.6%	3.5%	13.3%	Moderate
HHs Free market	72.1%	11.5%	7.6%	21.3%	77.7%	8.0%	4.6%	14.6%	
HHs Difference	-38.5%	39.5%	-5.6%	-5.9%	-15.7%	18.6%	-1.1%	-1.2%	
Census Tract 37.00									
HHs Actual proportions	13.0%	70.7%	0.9%	24.4%	10.4%	83.3%	0.0%	11.4%	Low
HHs Free market	71.1%	12.5%	7.3%	22.7%	74.8%	10.3%	4.4%	16.0%	
HHs Difference	-58.1%	58.2%	-6.4%	1.6%	-64.4%	73.0%	-4.4%	-4.7%	
Census Tract 38.00									
HHs Actual proportions	58.2%	27.2%	0.0%	53.4%	46.6%	25.3%	1.9%	43.4%	Very Low
HHs Free market	69.3%	14.2%	6.8%	24.0%	73.4%	11.7%	4.4%	16.0%	
HHs Difference	-11.1%	13.0%	-6.8%	29.4%	-26.8%	13.6%	-2.5%	27.4%	
Census Tract 40.00									
HHs Actual proportions	65.5%	6.6%	1.4%	81.2%	62.4%	4.4%	1.9%	62.2%	Very Low
HHs Free market	70.9%	12.7%	6.9%	23.7%	75.2%	9.8%	4.4%	16.5%	
HHs Difference	-5.4%	-6.1%	-5.5%	57.5%	-12.8%	-5.4%	-2.5%	45.7%	
Census Tract 41.00									
HHs Actual proportions	71.5%	0.9%	2.4%	75.8%	62.9%	6.1%	1.5%	53.0%	Very Low
HHs Free market	72.0%	11.5%	7.5%	22.5%	76.4%	8.9%	4.5%	15.6%	
HHs Difference	-0.5%	-10.6%	-5.1%	53.3%	-13.5%	-2.8%	-2.9%	37.4%	
Census Tract 42.00									
HHs Actual proportions	70.9%	11.9%	0.9%	68.6%	63.3%	6.1%	2.1%	54.2%	Very Low
HHs Free market	70.8%	12.4%	7.2%	24.1%	75.2%	9.8%	4.4%	16.3%	
HHs Difference	0.1%	-0.5%	-6.3%	44.5%	-12.0%	-3.6%	-2.3%	37.9%	

North Las Vegas Racial and Hispanic Household Composition and Opportunity Index: 2000–2012									
Area	2008–2012				2000				Overall Opportunity Index
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race	
Census Tract 43.01	Census Tract 43.00								
HHs Actual proportions	66.2%	6.7%	0.0%	80.0%	64.0%	5.3%	0.0%	79.3%	Very Low
HHs Free market	69.8%	13.8%	6.7%	24.3%	74.4%	10.6%	4.4%	16.5%	
HHs Difference	-3.6%	-7.2%	-6.7%	55.6%	-10.3%	-5.3%	-4.4%	62.8%	
Census Tract 43.02	Census Tract 43.00								
HHs Actual proportions	67.1%	5.8%	0.0%	86.4%	64.0%	5.3%	0.0%	79.3%	Very Low
HHs Free market	70.1%	13.5%	6.8%	24.3%	74.4%	10.6%	4.4%	16.5%	
HHs Difference	-2.9%	-7.7%	-6.8%	62.1%	-10.3%	-5.3%	-4.4%	62.8%	
Census Tract 44.01	Census Tract 44.01 consists of parts of 2000 Census Tracts 44.00 and 45.00								
HHs Actual proportions	68.3%	8.0%	1.1%	79.1%	44.1%	27.1%	1.6%	48.4%	Very Low
HHs Free market	70.3%	13.1%	7.0%	23.8%	74.9%	10.2%	4.4%	16.2%	
HHs Difference	-2.0%	-5.1%	-6.0%	55.4%	-30.8%	16.9%	-2.8%	32.2%	
Census Tract 44.02	Census Tract 44.00								
HHs Actual proportions	50.0%	19.0%	0.0%	70.5%	43.3%	26.1%	0.8%	52.6%	Very Low
HHs Free market	70.1%	13.4%	7.0%	23.4%	74.3%	10.7%	4.4%	16.4%	
HHs Difference	-20.1%	5.5%	-7.0%	47.2%	-31.0%	15.5%	-3.6%	36.1%	
Census Tract 45.00	Census Tract 45.00								
HHs Actual proportions	62.7%	14.3%	1.3%	66.8%	45.2%	28.6%	2.9%	42.1%	Very Low
HHs Free market	71.7%	11.7%	7.4%	22.5%	75.7%	9.5%	4.5%	15.8%	
HHs Difference	-9.0%	2.6%	-6.1%	44.3%	-30.5%	19.1%	-1.6%	26.3%	
Census Tract 46.01	Census Tract 46.01 consists of parts of 2000 Census Tracts 36.03 and 46.00								
HHs Actual proportions	60.6%	25.2%	0.7%	59.7%	41.2%	25.8%	2.3%	50.1%	Very Low
HHs Free market	70.8%	12.7%	7.0%	23.5%	74.6%	10.4%	4.4%	16.4%	
HHs Difference	-10.2%	12.5%	-6.4%	36.2%	-33.3%	15.4%	-2.1%	33.8%	
Census Tract 46.02	Census Tract 46.00								
HHs Actual proportions	76.7%	14.1%	0.0%	74.0%	39.3%	26.6%	2.4%	51.4%	Very Low
HHs Free market	71.3%	12.2%	6.8%	25.6%	74.5%	10.4%	4.4%	16.4%	
HHs Difference	5.4%	2.0%	-6.8%	48.4%	-35.2%	16.2%	-2.1%	35.0%	
Census Tract 60.01	Census Tract 60.01 consists of parts of 2000 Census Tracts 36.03 and 60.00								
HHs Actual proportions	54.4%	32.1%	7.6%	20.4%	71.1%	15.0%	2.6%	11.1%	Very Low
HHs Free market	72.0%	11.4%	7.3%	23.2%	75.1%	9.6%	4.4%	16.7%	
HHs Difference	-17.6%	20.6%	0.3%	-2.8%	-4.1%	5.3%	-1.8%	-5.6%	

Boulder City Racial and Hispanic Household Composition and Opportunity Index by Census Tract

Boulder City Racial and Hispanic Household Composition and Opportunity Index: 2000–2012									
Area	2008–2012				2000				Overall Opportunity Index
	White	Black	Asian	Hispanic, Any Race	White	Black	Asian	Hispanic, Any Race	
Boulder City Citywide									
HHs Actual proportions	97.3%	0.0%	0.8%	3.3%	96.8%	0.3%	0.8%	2.3%	Not applicable
HHs Free market	73.1%	10.5%	7.9%	19.9%	77.4%	8.6%	4.5%	14.3%	
HHs Difference	24.1%	-10.5%	-7.1%	-16.6%	19.4%	-8.3%	-3.7%	-12.0%	
Census Tract 55.01									
HHs Actual proportions	99.1%	0.0%	0.0%	0.7%	96.7%	0.5%	1.8%	0.4%	High
HHs Free market	73.0%	10.6%	7.9%	20.0%	77.0%	8.9%	4.4%	14.6%	
HHs Difference	26.1%	-10.6%	-7.9%	-19.3%	19.7%	-8.4%	-2.7%	-14.2%	
Census Tract 55.02									
HHs Actual proportions	99.0%	0.0%	0.0%	7.7%	96.7%	0.0%	0.0%	2.3%	Very High
HHs Free market	74.6%	9.1%	8.4%	17.7%	78.5%	7.9%	4.6%	13.5%	
HHs Difference	24.4%	-9.1%	-8.4%	-10.0%	18.2%	-7.9%	-4.6%	-11.2%	
Census Tract 55.03									
HHs Actual proportions	97.4%	0.0%	1.8%	0.8%	96.6%	0.0%	0.9%	3.0%	High
HHs Free market	71.7%	11.9%	7.4%	21.7%	76.3%	9.2%	4.5%	15.2%	
HHs Difference	25.7%	-11.9%	-5.6%	-20.9%	20.3%	-9.2%	-3.5%	-12.2%	
Census Tract 55.04									
HHs Actual proportions	92.2%	0.0%	2.1%	3.6%	97.1%	0.7%	0.0%	4.7%	High
HHs Free market	72.9%	10.5%	7.9%	20.4%	77.9%	8.3%	4.5%	14.0%	
HHs Difference	19.3%	-10.5%	-5.8%	-16.7%	19.2%	-7.6%	-4.5%	-9.3%	