

State of Nevada

2025-2029 Analysis of Impediments to Fair Housing Choice



DRAFT Last Updated: May 27, 2025

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Executive Summary

This **Analysis of Impediments to Fair Housing Choice (AI)**, was prepared by ICF for the State of Nevada. This fair housing plan is designed to meet federal requirements for receiving U.S. Department of Housing and Urban Development (HUD) formula grants. It covers the entire state, including local communities that receive their own entitlement funds directly from HUD. It also informs the Consolidated Plan for the federal formula grant funds Nevada receives from HUD.

The AI assesses whether protected classes in Nevada have equal opportunities to choose and access housing that meets their needs by identifying barriers to fair housing choice and access for Nevadans. To achieve this, the AI uses data, consultations, and surveys to gather information on demographics, economics, housing production, housing access, and the distribution of affordable housing across the state.

This AI identifies 10 key impediments to fair housing choice in Nevada, categorized into the following six areas:

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Availability of Rental Units: Nevada faces a shortage of affordable rental housing, exacerbated by limitations on new rental housing development. Current Nevada Housing Division (NHD) program investments do not fully meet all rental housing needs.



Access to Rental Housing: There are insufficient tenant protections statewide and a lack of enforcement of Fair Housing laws and additional renter protections.

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Availability of Homeownership Units: There is a shortage of affordable homeownership units.



Access to Homeownership: Potential buyers lack access to capital and assistance needed to purchase available housing.



Access to Opportunity: There is a lack of affordable housing opportunities located in neighborhoods where opportunities such as good schools, access to jobs, and transportation are available to support upward mobility.



Programs and Services: Barriers exist that limit access to existing programs and services.

The AI outlines actions for Nevada to implement over the next five years to address these impediments. These goals will guide the strategic use of federal formula grant funds, including the Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), Housing Trust Fund (HTF), and Emergency Solutions Grant (ESG).

Methodology and Approach

As part of the consolidated planning process and to meet the State's statutory obligation to affirmatively further fair housing, the State of Nevada opted to complete an AI. This requirement to affirmatively further fair housing originates with the Fair Housing Act, which prohibits discrimination and mandates that HUD grantees take significant actions to overcome historic segregation, achieve balanced and integrated living patterns, promote fair housing choice, and foster inclusive, discrimination-free communities.

The AI was developed over five months using a combination of qualitative and quantitative data, including:

- **Data review:** Socioeconomic, housing, and economic data from the U.S. Census Bureau, HUD, State of Nevada Annual Housing Reports, the National Zoning Atlas, and other sources.
- **Consultations:** The State of Nevada convened six consultation meetings in February 2025, engaging over 150 participants from more than 35 distinct consultation groups across the state, representing a total of 77 organizations. Additionally, the State held a Public Engagement session and a Public Hearing which engaged an additional 16 participants.
- **Survey:** A survey of housing needs and goals circulated to Nevada residents in January and February 2025. The survey garnered 57 responses, including submissions from 42 organizations and eight individuals. In total, the State of Nevada's Consultation and Public Engagement efforts culminated in over 225 interactions with individuals and organizations statewide.

The AI organizes this data into contributing factors, identifying ten impediments to fair housing choice. Nevada staff reviewed these impediments and set goals and actions to address them. These goals are listed in the AI and will inform the State's Consolidated Plan.

Furthering Fair Housing in Nevada

Assessing Fair Housing

Provisions to affirmatively further fair housing are long-standing components of HUD's housing and community development programs. These provisions stem from Section 808(e)(5) of the Fair Housing Act, which requires the Secretary of HUD to administer federal housing and urban development programs in a manner that affirmatively furthers fair housing.

In 1994, HUD consolidated planning efforts for housing and community development programs into a single process. This action grouped the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Solutions Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) programs into the Consolidated Plan for Housing and Community Development, creating a single application document. As part of this process, states and entitlement communities receiving such funds must certify to HUD that they are affirmatively furthering fair housing (AFFH).

Impediments to fair housing choice include:

- Any actions, omissions, or decisions based on race, color, religion, sex, disability, familial status, or national origin that **restrict housing choices or their availability**.
- Any actions, omissions, or decisions that have the effect of restricting housing choices or their availability based on these same factors.

The AFFH rule has undergone significant revisions in recent years. In 2021, HUD published an interim final rule that restored certain definitions and certifications to ensure grantees had sufficient guidance to meet their statutory obligations under the Fair Housing Act, while leaving the fair housing planning mechanism to each jurisdiction's discretion. In March 2025, HUD published a new interim final rule eliminating the AI requirement and asking grantees to self-certify compliance with the Fair Housing Act, effective April 4, 2025.

This AI was in development prior to the March 2025 rule eliminating the AI requirement. Therefore, Nevada opted to complete and publish this AI. The State of Nevada certifies that it will affirmatively further fair housing by taking appropriate actions to overcome identified impediments and maintaining records of the analysis and actions taken.

Protected Classes in the State of Nevada

The AI focuses on impediments to fair housing choice for protected classes in compliance with the Fair Housing Act. The Act prohibits discrimination based on race, color, national origin, religion, sex, familial status, or disability in various housing and housing-related activities, including the sale, rental, and financing of dwellings, and other discriminatory practices. These groups are federally protected classes. Additionally, states and localities may designate additional protected classes under the Fair Housing Act.

In the State of Nevada, protected classes are listed below:

AI Table 1: Protected Classes in the State of Nevada

Familial Status
Disability
Sexual Orientation
Gender Identity or Expression

Source(s): Nevada Revised Statute § 118.010, Clark County Code of Ordinances, and City of North Las Vegas Municipal Code.

Overview of 2025 Impediments

Through detailed demographic, economic, and housing analysis, along with stakeholder consultations and public feedback, the State of Nevada has identified ten impediments to fair housing choice and contributing factors that create or sustain these issues.

Table 2 summarizes all **impediments to fair housing choice** identified in this AI. Each impediment is supported by **contributing factors** or metrics that measure barriers to housing choice and access for protected classes across the state. Nevada has also set **goals to address these impediments** over the next five years through HUD formula grants and other statewide actions.

Impediment	Contributing Factors	Goal to Address in 2025 - 2029
There is an insufficient supply of affordable rental housing.	Renters in Nevada are more cost burdened than homeowners. Black or African American and Hispanic renters are more likely to face cost burden and severe cost burden than White renters.	Analyze impact of NHD programs and evaluate programs to increase development of affordable rental options, especially at 50% AMI and lower. Explore the expansion of resources for land acquisition for affordable rental projects.
There is an insufficient supply of market-rate rental housing.	 73% of all net housing growth was single family detached from 2010 - 2023. 54% of net multifamily rental growth was 2 bedrooms or less from 2010 - 2023 7 out of 9 of Nevada's largest jurisdictions limit multifamily housing to less than 20% of zoned land area. Significant local barriers identified in consultations include zoning, long entitlement times, and local opposition. 	Continue to track local progress in measures for Housing Plans in the Annual Housing Progress Report. Conduct additional analysis to help jurisdictions understand which local measures result in the most significant increase in housing activity.
There are insufficient protections for tenants statewide.	A substantial number of Nevadans are behind on rent in Clark and Washoe County. Nevada lacks strong protections for renters at risk of eviction. Nevada lacks source of income protection state-wide for rent-assisted households. Nevada lacks age protections for both youth and elderly in rent-assisted households.	Coordinate with organizations to better connect existing resources to tenants in need. Consult with the Rural Nevada Continuum of Care to get their input on increased case management or legal services in rural areas. Consult with legal aid organizations to explore potential collaboration

AI Table 2: Impediments to Fair Housing Choice

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Impediment	Contributing Factors	Goal to Address in 2025 - 2029
		to expand tenant resources statewide.
		Focus on rapid rehousing as a goal within the Emergency Solutions Grant program.
There is an insufficient supply of affordable ownership units.	 55% of new net homeownership units were 4 bedrooms or more between 2010 and 2023. Just 3% of new net homeownership units were 2 bedrooms or less between 2010-2023. 6 out of 9 of Nevada's largest jurisdictions limit small single-family housing to less than 20% of zoned land area. 	Develop affordable starter homes. Target rehabilitation activities to rural communities. Advertise and recruit organizations and contractors willing to develop in rural areas. Collaborate and provide education to local governments on local land use restrictions.
There are barriers to homeownership.	Black or African American and Latino households are less likely to take out home loans than White households. White households have disproportionately taken out loans and refinanced over the 2020s. Rural areas of the state lack HUD- certified housing counseling services.	Expand State's homebuyer programs efforts for rural areas. Evaluate program data to identify disparities in households served. Highlight policies that promote equitable access to housing and finance for all racial groups. Collaborate with Nevada Rural Housing to address the gap in HUD-certified housing counselors.
There is an insufficient supply of housing for older adults & persons with disabilities.	The number of Nevadans with a disability grew by 47% between 2010 and 2023. Stakeholders observe an insufficient supply of accessible homes.	Create evaluation criteria for fair housing (e.g., checklist), including education/oversight of Section 504 marketing requirements. Create evaluation criteria of checklist to ensure investments address gaps. Explore collaboration with LIHTC program administrators to adjust scoring, incentivizing accessible and older adult-friendly units. Partner with organizations to distribute resources on universal design.

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Impediment	Contributing Factors	Goal to Address in 2025 - 2029
NHD	Very few income-restricted units and	Explore changing program
investments do not fully direct housing towards areas of opportunity.	virtually no public or rent assisted units are in very low poverty areas. Very few low-income households live near reliable transit. Half of income restricted units and two thirds of rent-assisted households are in neighborhoods with below median	requirements to better target resources to affordable housing developments in communities near transportation, jobs, good schools, and other amenities. Collaborate with LIHTC program administrators to better target state housing awards to communities with low poverty rates, higher-performing schools, and greater access to transportation.
	performing schools. Half of income restricted units and rent assisted units are in neighborhoods with low or very low access to jobs.	Explore opportunities to incentivize infill development through NHD programs
There is a lack of enforcement capacity of Fair Housing laws across the state.	Nevada does not have a public agency that is solely dedicated to receiving, investigating and remediating fair housing complaints. HUD Region 9 processed the largest number of complaints, which indicates the need for additional capacity for intake. Individuals experience difficulties finding housing due to their identity, financial history or health status.	Collaborate with organizations and share information, especially the impediments and barriers identified in AI process. Develop plan to improve NHD's communication and outreach, especially for beneficiaries of NHD funded housing with evaluation and outcomes tracking
There are barriers to access to existing programs and services.	Direct service providers lack shared infrastructure for collaborative case management. Rural areas lack transportation services and experience gaps in internet access that decrease participation in services. Program funding requirements lack flexibility that would allow direct service providers to help clients eliminate barriers in accessing housing.	Expand and improve Coordinated Entry and HMIS to ensure coordination across systems. Conduct outreach efforts to increase the number of providers participating in Coordinated Entry. Collaborate with other state agencies and housing entities to reduce silos through training and technical assistance. Evaluate NHD's current funding for service-oriented programs, analyze outcomes and limitations, revise program regulations to improve impact

A full description of the contributing factors and the goals to address each impediment are listed in subsequent sections of this analysis.

Progress Remedying Previously Identified Impediments

Impediments Identified in 2020 - 2025 Analysis of Impediments

The Nevada Housing Division identified barriers to fair housing choice in its previous Analysis of Impediments to Fair Housing Choice, which was conducted to guide its HUD Consolidated Plan for 2020-2024. This current analysis builds on those prior impediments, contributing factors, and actions to address fair housing issues for the 2025-2029 cycle. These impediments are below:

Prior Impediment: Lack of Homeownership and Rental Opportunities in High Opportunity Areas:

Contributing Factors:

- There are moderate to high levels of segregation, particularly affecting marginalized groups.
- The lack of affordable housing in various unit sizes limits access to desirable neighborhoods.
- Additionally, there are discriminatory lending patterns that disproportionately affect Black or African American, Pacific Islander, American Indian, and Hispanic households.

Recommended Actions: To address these issues, it was recommended to utilize resources like Community Development Block Grants (CDBG), HOME funding, and Housing Trust Fund (HTF) to continue promoting homeownership and rental opportunities in high-opportunity areas. Specific goals included adding 40 rental units, rehabilitating 50 rental units, and assisting 60 households with down payment assistance over the five year period.

Prior Impediment: Lack of community services in R/ECAPs:

Contributing Factors:

- Racially or ethnically concentrated areas of poverty (R/ECAPs) hinder access to quality education, employment, and other essential services.
- Segregation patterns and a lack of connectivity to key resources amplify these limitations, resulting in fewer opportunities for marginalized communities.

Recommended Actions: To combat this, it was recommended that strategies be developed to create more inclusive communities and improve access to transit and employment opportunities in these areas. Certain demographic groups face higher rates of housing problems, including affordability and quality issues with their housing stock. Economic disparities and lack of access to resources exacerbate housing needs for minority groups. Recommended actions included enhancing affordable housing initiatives, developing new housing units, and rehabilitating existing ones to better serve those facing disproportionate housing needs.

Prior Impediment: Fair Housing Enforcement and Outreach:

Contributing Factors:

- There is a recognized need for improved fair housing enforcement and outreach, as awareness of fair housing rights remains low among many community members.
- Limited resources for fair housing organizations and insufficient outreach efforts contribute to the lack of awareness and understanding of fair housing laws.

Recommended Actions: It was recommended to increase funding for fair housing organizations to enhance their outreach, education, and training related to fair housing laws. Additionally, establishing more robust partnerships with community organizations to disseminate information about fair housing rights and resources to vulnerable populations was recommended.

Lack of Outreach and Education to Consumers and Housing Providers:

Contributing Factors:

- Many individuals face challenges in accessing information related to housing, including available options and services.
- A lack of centralized resources and information dissemination strategies hinders residents' ability to make informed housing choices.

Recommended Actions: To improve this situation, it was suggested to develop and implement centralized information systems that streamline access to housing resources, promote tenant rights, and advocate for more inclusive housing policies.

Actions Taken to Remedy Previously Identified Impediments

This analysis acknowledges the progress made by the state over the past five years in addressing previously identified impediments to fair housing choice.

The State's activities, as detailed in the 2023 Consolidated Annual Performance Evaluation Report (CAPER) submitted to HUD, are as follows:

- During 2023, 41 affordable rental units were constructed, 26 affordable rental units were rehabilitated, and down payment assistance was provided to three households within both the HOME and HTF programs.
- The CDBG program focused on Public Services and Public Facilities and Infrastructure projects, with at least 70% of funds benefiting low-to-moderate income households and/or areas.
- NHD promoted Downpayment Assistance programs to Black or African American and Hispanic communities by recruiting Black or African American lenders, real estate professionals, and title company staff, and using culturally appropriate flyers and advertisements for First Time Homebuyer classes, as well as recruiting at churches and community centers.
- NHD partnered with Silver State Fair Housing Council to conduct outreach to managers of new and existing rental housing complexes.
- NHD worked with home lending professionals and other relevant agencies to discuss findings and address disparities.
- NHD conducted outreach and education for prospective housing consumers on acquiring and maintaining good credit.
- NHD established a requirement for grantees to publicize fair housing rights, responsibilities, and remedies.

While the CAPER tracks progress in the utilization of programs assisted through HUD funds, NHD monitors its yearly progress across all housing programs through the Annual Housing Progress

Reports (AHPR). These reports document statewide actions in the production and rehabilitation of dedicated affordable housing units and the remediation of local barriers to affordable housing. The AHPR includes progress on all housing outcomes, including those supported by NHD HUD programs, Low-Income Housing Tax Credit allocations, and state or local supports.

The State's most recent progress, as reported in its 2023 AHPR, includes:

- Completion of 690 multifamily rent-restricted units and rehabilitation of 762 units, resulting in a 2.0% increase in rent-restricted supply between 2022 and 2023.
- 6,612 additional rent-restricted units in the pipeline for construction or rehabilitation.
- 8 out of 9 of the State's largest jurisdictions implemented at least one measure to reduce barriers to affordable and market-rate production.
- Local jurisdictions collectively employed 42 different measures in 2023, the highest number recorded since 2007.

The next part of this document uses qualitative and quantitative data to examine the existing conditions to determine whether the State's previous actions to remedy impediments have been successful or if the impediments have changed.

Fair Housing Analysis

This section analyzes the contributing factors to the ten identified impediments to fair housing choice. It covers:

- **Demographics:** Examining differences in race and ethnicity, age, income, and employment, which affect housing choice and access.
- Housing Market Dynamics: Understanding the trends and forces shaping the housing market.
- **Barriers to Housing Supply:** Identifying obstacles that limit the availability of housing and how those barriers affect protected classes.
- Barriers to Fair Access: Highlighting issues that prevent equal access to housing.
- Location of New Housing Production: Assessing whether new affordable housing developments are situated in areas that offer opportunities for residents.

It finds significant barriers to housing choice and access for numerous protected classes, Black or African American and Latino or Hispanic households, families, older adults, and persons with disabilities. These barriers include affordability issues, a lack of accessible housing options, unequal access to home loans, and housing discrimination.

Demographic Overview

Nevada has experienced rapid growth due to an influx of people from outside the state, transforming it into a majority-minority state. This increased diversity is especially notable in its two largest metropolitan areas, Las Vegas and Reno. As Nevada has become more diverse, significant differences in median income and poverty rates by race and ethnicity have emerged. Additionally, the state's population has aged, and the share of residents with disabilities has grown. Finally, rural areas have lost residents, contributing to demographic shifts across the state.

Population Overview

Nevada's population grew by over 19%, from 2,633,331 to 3,141,000, between 2010 and 2023, with households increasing by more than 20%.¹ This influx has strained existing housing supply and necessitated new housing development.

AI Table 3: Population, Household, and Median Income Percentage Change, 2010 to 2023

	2010	2023	Percentage Change, 2010 – 2023
Total Population	2,633,331	3,141,000	19.28%
Households	979,621	1,183,393	20.80%
Median Income	\$55,726	\$75,561	35.59%
(inflation-adjusted)			

Source: U.S. Census Bureau, American Community Survey, 5-year estimates, 2010 & 2023

¹ United States Census American Community Survey (ACS), 5 Year Rolling Estimates, 2006-2010 and 2019-2023.

As shown in Table 4, population growth was concentrated in Nevada's three metropolitan areas of Las Vegas, Reno, and Carson City. Non-urban areas saw a 12.5% population decrease during this period.² Median income, adjusted for inflation, increased significantly across the state, with the fastest growth in the Reno region and the slowest in the Las Vegas region.

² ACS 5 Year Rolling Estimates, 2006-2010 and 2019-2023.

Al Table 4: Population, Household, and Median Income Percentage Change, 2010-2023, By Geography

	Population			Households			Median Income		
Geography	2010	2023	Percentage Change, 2010 - 2023	2010	2023	Percentage Change, 2010 – 2023	2010	2023	Percentage Change, 2010 – 2023
Carson City MSA	55,375	58,364	5.40%	21,467	23,652	10.18%	52,067	71,809	37.92%
Las Vegas MSA	1,895,521	2,293,764	21.01%	695,701	847,378	21.80%	56,258	73,845	31.26%
Reno MSA	416,860	556,539	33.51%	162,623	221,022	35.91%	55,724	84,684	51.97%
Remainder of State	265,575	232,333	-12.52%	99,830	91,341	-8.50%	52,783	74,773	41.66%

Source: U.S. Census Bureau, American Community Survey, 5-year estimates, 2010 & 2023

As Nevada's population has grown, especially in metropolitan areas, it has become significantly more racially and ethnically diverse. Since 2010, Nevada has become a "majority-minority" state, with the White population now slightly less than 50% and more than half of the population being a racial or ethnic minority.³ The share of the population identifying as White has decreased by about 10% since 2010.⁴ Nearly 30% of Nevada residents identified as Hispanic or Latino in 2023, making them the largest non-White group.⁵

	Base Year: 2010	Most recent Year: 2023	Percentage Change, 2010 - 2023
Race (Non-Hispanic)			
White	1,466,994	1,443,407	-1.61%
Black or African American	201,013	284,276	41.42%
American Indian and Alaska Native	23,771	19,877	-16.38%
Asian	181,429	268,095	47.77%
Native Hawaiian and Other Pacific Islander	14,513	20,812	43.40%
Some other race	5,566	16,975	204.98%
Multiple races	66,148	170,501	157.76%
Ethnicity (Hispanic or non-Hispanic)			
Hispanic or Latino (of any race)	673,897	917,057	36.08%

AI Table 5: Population Change by Race, 2010-2023

Source: U.S. Census Bureau, American Community Survey, 5-year estimates, 2010 & 2023

Racial and ethnic groups are not distributed evenly across the state, as Maps 1-5 indicate. While Black or African American and Asian residents tend to be located within the two largest metropolitan areas, Hispanic and Latino and White residents live in both rural and urban areas. Members of tribal communities are most likely to live in rural areas.

³ ACS 5 Year Rolling Estimates, 2006-2010 and 2019-2023.

⁴ ACS 5 Year Rolling Estimates, 2006-2010 and 2019-2023.

⁵ ACS 5 Year Rolling Estimates, 2006-2010 and 2019-2023.

In 2023, over 1.4 million Nevadans identified as White.⁶ The majority of these individuals reside in Clark County and Washoe County. However, the highest percentages of White residents are found in the rural, centrally located counties of Lincoln, Storey, and Eureka, with 84.7%, 84.5%, and 83.3% respectively.

In 2023, 284,276 Nevadans identified as Black or African American, marking a significant growth of 41% since 2010.⁷ The majority of these residents are concentrated in Clark County, where Black or African Americans made up 11.7% of the population in 2023.

268,095 Nevadans identified as Asian, reflecting a significant growth of nearly 48% between 2010 and 2023.⁸ The majority of these residents live in Clark County, where Asian or Pacific Islander individuals made up 10.2% of the population.⁹ Additionally, Washoe County is home to a notable portion of the AAPI community, comprising 5.4% of its population.¹⁰

In 2023, 917,057 Nevadans identified as Latino or Hispanic, a demographic that can include individuals of any race. This group experienced a growth of 36% since 2010.¹¹ While the majority of Latino or Hispanic residents are concentrated in the state's two largest metropolitan areas, Las Vegas and Reno, they are also present in numerous rural counties across Nevada. Clark County had the highest proportion of Latino or Hispanic residents at 31%.¹² Additionally, several other counties, including Carson, Elko, Esmeralda, Humboldt, and Washoe, had populations where over a quarter of the residents identified as Latino or Hispanic.¹³

In 2023, just under 20,000 Nevadans identified with a tribal community.¹⁴ This population is experiencing a decline and is primarily concentrated in rural areas. Mineral County, home to the Walker River Paiute Tribe, had the highest proportion of tribal residents at 15.9%.¹⁵

Nevada's population is aging, but the youth population is also stable. Table 6 shows each age group in 2010 and 2023, their share of the total in 2023, and their growth over time. Between 2010 and 2023, the 65-75 age group grew by 76%, and those over 75 grew by 67%. Individuals over 65 accounted for 43% of Nevada's net population growth.¹⁶ However, those under 19 still make up 24% of the population, indicating a significant share of families.¹⁷ It will be crucial to address the housing needs of both older adults and families with children.

⁶ ACS 5 Year Rolling Estimates, 2019-2023.

⁷ ACS 5 Year Rolling Estimates, 2006-2010 and 2019-2023.

⁸ ACS 5 Year Rolling Estimates, 2006-2010 and 2019-2023.

⁹ ACS 5 Year Rolling Estimates, 2019-2023.

¹⁰ ACS 5 Year Rolling Estimates, 2019-2023.

¹¹ ACS 5 Year Rolling Estimates, 2006-2010 and 2019-2023.

¹² ACS 5 Year Rolling Estimates, 2019-2023.

¹³ ACS 5 Year Rolling Estimates, 2019-2023.

¹⁴ ACS 5 Year Rolling Estimates, 2019-2023.

¹⁵ ACS 5 Year Rolling Estimates, 2019-2023.

¹⁶ ACS 5 Year Rolling Estimates, 2006-2010 and 2019-2023.

¹⁷ ACS 5 Year Rolling Estimates, 2019-2023.

	Al lable 6: Population by Age							
	Total 2010	Percent of Total	Total 2023	Percent of Total	Change 2010 - 2023	Percent Change 2010 - 2023		
Under 19 Years	724,299	28%	761,750	24%	37,451	5%		
20 to 34 Years	555,537	21%	636,070	20%	80,533	14%		
35 to 44 Years	385,280	15%	430,660	14%	45,380	12%		
44 to 54 Years	365,739	14%	397,939	13%	32,200	9%		
55 to 64 Years	299,437	11%	392,164	12%	92,727	31%		
65 to 74 Years	182,624	7%	320,868	10%	138,244	76%		
75 Years and Over	120,415	5%	201,549	6%	81,134	67%		
Total	2,633,331	100%	3,141,000	100%	507,669	19%		

AI Table 6: Population by Age

Source: U.S. Census Bureau, American Community Survey, 5-year estimates, 2010 & 2023

The number of individuals with disabilities has increased as Nevada's population has aged. In 2023, approximately 1 in 8 Nevadans (12.3%) had a cognitive, ambulatory, or self-care difficulty.¹⁸ While these individuals could be of any age, they are disproportionately older adults. The most common disability in Nevada was an ambulatory disability, which made walking difficult and required special accommodation within housing units. Additionally, 1 in 20 Nevadans reported being unable to live independently due to their disability.¹⁹

Al Table 7: Population by Age and Disability Status

	Population With a Disability	Percentage of Population With a Disability
With A Cognitive Difficulty	151,317	5.20%
Population Under 18 Years	23,492	4.60%
Population 18 to 64 Years	85,471	4.50%
Population 65 Years and Over	42,354	8.20%
With An Ambulatory Difficulty	207,714	7.10%

¹⁸ ACS 5 Year Rolling Estimates, 2019-2023.

¹⁹ ACS 5 Year Rolling Estimates, 2019-2023.

	Population With a Disability	Percentage of Population With a Disability
Population Under 18 Years	3,810	0.70%
Population 18 to 64 Years	90,395	4.80%
Population 65 Years and Over	113,509	21.90%
With A Self-Care Difficulty	76,859	2.60%
Population Under 18 Years	6,020	1.20%
Population 18 to 64 Years	32,356	1.70%
Population 65 Years and Over	38,483	7.40%
With An Independent Living Difficulty	136,822	5.70%

Source: U.S. Census Bureau, American Community Survey, 5-year estimates, 2023.

Income and Jobs

Significant disparities in household earnings by race and ethnicity were evident across Nevada. The statewide median household income is \$75,561.²⁰ White and Asian households earned above this median, with incomes of \$81,785 and \$84,254, respectively. In contrast, the median income for Black or African American households was approximately two-thirds of the statewide median at \$51,085, while tribal households earned about three-quarters of the median at \$59,076. Hispanic and Latino households also earned slightly below the statewide median, with an income of \$69,247.

AI Table 8: Median Income by Racial and Ethnic Group

Racial or Ethnic Group	Median Household Income
Statewide	\$75,561
White Alone	\$81,785
Black or African American Alone	\$51,085
American Indian and Alaska Native	\$59,076
Asian Alone	\$84,254
Native Hawaiian and Other Pacific Islander Alone	\$70,574
Some Other Race Alone	\$64,687
Two or More Races Alone	\$75,227
Hispanic or Latino	\$69,247

Source: U.S. Census Bureau, American Community Survey, 5-year estimates, 2023.

Nevada's households span a wide range of income levels, with a significant number of low and very low-income earners. In 2023, half of all households, totaling 560,780, earned above 100% of the median income, classifying them as middle-income. Among the remaining households, 122,870 were moderate-income, earning between 80% and 100% of the HUD Area Median Family Income (HAMFI).²¹ Additionally, 194,420 households were low-income, earning between 60% and 80% of HAMFI, while 125,720 were very low-income, earning between 30% and 50% of HAMFI.²² Finally,

²⁰ ACS 5 Year Rolling Estimates, 2019-2023.

²¹ Comprehensive Housing Affordability Strategy (CHAS), 2017-2021. The HUD Area Median Family Income is based on the Area Median Income but has been adjusted for variances in income and family size.
²² CHAS, 2017-2021.

136,150 households were extremely low-income, earning less than 30% of HAMFI.²³ Households with members aged above 62 or with children under 6 were more likely to fall into the low-income or below categories.²⁴

²³ CHAS, 2017-2021.

²⁴ CHAS, 2017-2021.

A lable 3. Fieular Fairity meetics by Type, 2021							
Type of Household	Extremely Low Income (Household Income <= 30% HAMFI)	Very Low Income (Household Income >30% to <=50% HAMFI)	Low Income (Household Income >50% to <=80% HAMFI)	Moderate Income (Household Income >80% to <=100% HAMFI)	Middle Income or Higher (Household Income >100% HAMFI)		
Total Households	136,150	125,720	196,420	122,870	560,785		
Small Family Households	45,340	54,585	97,265	66,695	357,035		
Large Family Households	8,805	11,690	19,005	12,830	55,165		
Household Contains At Least One Person 62-74 Years of Age	35,310	32,315	47,720	30,265	142,505		
Household Contains At Least One Person Aged 75 or Older	17,695	20,935	23,560	12,240	47,415		
Households With One or More Children 6 Years Old or Younger	19,084	20,715	33,515	19,490	74,605		

AI Table 9: Median Family Incomes by Type, 2021

Source: Comprehensive Housing Affordability Strategy (CHAS), 2017-2021

In 2023, the poverty rate in Nevada (12%) was higher than the national average (11%).²⁵ Families with children under 18 years old were particularly affected, with 17% of individuals in this age group living in poverty.²⁶ In contrast, older adults were less likely to experience poverty, with 10% of the elderly population living in this condition.²⁷

Al Table 10: Persons in Poverty and Poverty Rate by Age

	Persons in Poverty	Poverty Rate
Under 18 years	114,206	17%
18 to 64 Years	222,303	12%
65 Years and Over	53,905	10%
Total	390,414	12%

Source: U.S. Census Bureau, American Community Survey, 5-year estimates, 2023.

Poverty rates in Nevada vary significantly by racial and ethnic group. Black or African American residents had the highest poverty rate in 2023 at 19.1%, followed by Tribal residents at 14.6%, and

²⁵ ACS 5 Year Rolling Estimates, 2019-2023.

²⁶ ACS 5 Year Rolling Estimates, 2019-2023.

²⁷ ACS 5 Year Rolling Estimates, 2019-2023.

Latino or Hispanic residents at 14% .²⁸ In contrast, White and Asian residents had poverty rates slightly below the statewide median, at 9.7% and 9.5%, respectively.²⁹

AI Table 11: Poverty Rate by Race and Ethnicity

Racial or Ethnic Group	Percentage in Poverty
White Alone	9.7%
Black or African American Alone	19.1%
American Indian and Alaska Native Alone	14.6%
Asian Alone	9.5%
Native Hawaiian and Other Pacific Islander Alone	3.4%
Some Other Race Alone	15.2%
Two or More Races	13.6%
Hispanic or Latino Origin (of any race)	14%
White Alone, Not Hispanic or Latino	9.3%

Source: U.S. Census Bureau, American Community Survey, 5-year estimates, 2019-2023

Jobs and Workforce Analysis

Nevada has a diverse, service-based economy, with unemployment rates consistently above the national average. Between 2019 and 2023, Nevada's overall unemployment rate exceeded the national average of 5.2%.³⁰ Table 12 below provides five-year averages for the Nevada civilian labor force and unemployment rates during this period.

AI Table 12: Statewide Labor Force

Total Population in the Civilian Labor Force	1,582,026
Civilian Employed Population 16 years and over	1,474,290
Unemployment Rate	6.80%
Unemployment Rate for Ages 16-24	13.20%
Unemployment Rate for Ages 25-64	6%

Source: U.S. Census Bureau, American Community Survey, 5-year estimates, 2019-2023

Nevada's economy is predominantly service-based, with the largest employment sectors being arts, entertainment, and recreation, along with accommodation and food services, which account for 23.4% of the workforce.³¹ Educational services, health care, and social assistance follow at 16.94%, while professional, scientific, and management services, along with administrative and waste management services, make up 12.3% of employment.³²

²⁸ ACS 5 Year Rolling Estimates, 2019-2023.

²⁹ ACS 5 Year Rolling Estimates, 2019-2023.

³⁰ ACS 5 Year Rolling Estimates, 2019-2023.

³¹ ACS 5 Year Rolling Estimates, 2019-2023.

³² ACS 5 Year Rolling Estimates, 2019-2023.

These figures highlight Nevada's role as a major tourist destination, which generates a substantial workforce in hotels, restaurants, and leisure activities. Additionally, industries providing essential services to these workers and other residents play a crucial role in the state's economy.

	Number of	Number	Share of	Share	Jobs and Workers
	Workers	of Jobs	Workers	of Jobs	Difference
Agriculture, Forestry, Fishing and	19,380	15,400	1.31%	1.03%	-0.29%
Hunting, and Mining					
Construction	111,606	124,000	7.57%	8.26%	0.69%
Manufacturing	78,475	70,000	5.32%	4.66%	-0.66%
Wholesale Trade	28,334	41,300	1.92%	2.75%	0.83%
Retail Trade	164,994	154,600	11.19%	10.30%	-0.89%
Transportation and Warehousing, and Utilities	105,311	109,200	7.14%	7.27%	0.13%
Information	23,215	20,300	1.57%	1.35%	-0.22%
Finance and Insurance, and Real	87,179	77,100	5.91%	5.14%	-0.78%
Estate, and Rental and Leasing					
Professional, Scientific, and	181,294	216,000	12.30%	14.39%	2.09%
Management, and Administrative, and Waste Management Services					
Educational Services, and Health	249,790	174,500	16.94%	11.62%	-5.32%
Care and Social Assistance					
Arts, Entertainment, and	297,753	351,900	20.20%	23.44%	3.24%
Recreation, and Accommodation					
and Food Services					
Other Services, Except Public	65,996	47,300	4.48%	3.15%	-1.33%
Administration					
Public Administration	60,963	99,700	4.14%	6.64%	2.51%
Total	1,474,290	1,501,300	100.0%	100.0%	0.00%

AI Table 13: Workforce Sectors in Nevada

Source: U.S. Census Bureau, American Community Survey, 5-year estimates, 2019-2023

The average travel time for employees in Nevada highlights that while most Nevadans have commutes of 30 minutes or less, long travel times can pose a barrier to employment for some. About one-third of Nevadans face very long commutes, reflecting significant distances between their homes and workplaces.³³ Specifically, 29% of Nevadans travel more than 30 minutes to work, and 5% have commutes exceeding 60 minutes.³⁴ Overall, more than two-thirds of working Nevadans travel less than 30 minutes to their place of employment.³⁵

³³ ACS 5 Year Rolling Estimates, 2019-2023.

³⁴ ACS 5 Year Rolling Estimates, 2019-2023.

³⁵ ACS 5 Year Rolling Estimates, 2019-2023.

AI Table 14: Travel Time to Work

	Number	Percentage
Less Than 30 minutes	858,302	65.98%
30-59 Minutes	372,243	28.62%
More Than 60 Minutes	70,232	5.40%
Total	1,300,777	

Source: U.S. Census Bureau, American Community Survey, 5-year estimates, 2019-2023

Housing Overview

Nevada's housing supply has struggled to keep pace with its population growth, leading to significant incongruities between the types of housing produced and the needs of residents, including location, size, and unit configuration. This imbalance has driven high prices and a housing shortage, particularly affecting older adults. Additionally, high housing costs disproportionately impact lower-income residents, who are more likely to be Black or African American, and Hispanic or Latino renters.

Housing Inventory

Since 2010, Nevada has added housing units, but the number of households moving into the state has increased even faster. Specifically, Nevada has added 166,783 housing units and 203,772 households since 2010, resulting in four housing units created for every five net households added.³⁶

In 2010, the state experienced high vacancy rates for both homeowner and rental housing in the aftermath of the financial crisis. As the economy recovered, these units slowly became occupied, leading to a very tight vacancy rate in 2023.³⁷ In 2023, only 1.2% of ownership units and 6.7% of rental units were vacant.³⁸ In rural areas, even though the population is declining, vacancy rates are paradoxically tightening the fastest.

AI Table 15: Housing Units by Tenure and Vacancy

U	-	
Statewide	2010	2023
Occupied Housing Units	979,621	1,183,393
Vacant Housing Units	160,934	123,945
Total Housing Units	1,140,555	1,307,338
Homeowner Vacancy Rate	4.3%	1.2%
Rental Vacancy Rate	10.6%	6.7%

Source: U.S. Census Bureau, American Community Survey, 5-year estimates, 2006-2010 and 2019-2023

Most Nevadans own their homes, but as the state has grown, the share of rental housing is rising. In 2023, 40.7% of households (390,571) were renters, while 59.3% (589,050) owned their homes.³⁹ However, since 2010, the number of renter households has grown faster than owner households,

³⁶ ACS 5 Year Rolling Estimates, 2006-2010 and 2019-2023.

³⁷ ACS 5 Year Rolling Estimates, 2006-2010 and 2019-2023.

³⁸ ACS 5 Year Rolling Estimates, 2006-2010 and 2019-2023.

³⁹ ACS 5 Year Rolling Estimates, 2019-2023.

particularly in the Las Vegas, Reno, and Carson City metropolitan areas.⁴⁰ In contrast, rural areas have seen a decline in both owner and renter households, with the relative share of owners increasing.

		State of Nevada		State of Nevada Metropolitan Areas		Metropolitan Areas		Non-Metropolitan Areas		tan Areas
Household Type	2010	2023	Percentage Change, 2010 - 2023	2010	2023	Percentage Change, 2010 - 2023	2010	2023	Percentage Change, 2010 - 2023	
Owner Households	589,050	701,914	19%	516,928	634,534	23%	72,122	67,380	-7%	
Renter Households	390,571	481,479	23%	362,863	457,518	26%	27,708	23,961	-14%	
All Households	979,621	1,183,393	21%	879,791	1,092,052	24%	99,830	91,341	-9%	

AI Table 16: Number of Households by Tenure, 2010-2023

Source: U.S. Census Bureau, American Community Survey, 5-year estimates, 2010 & 2023

Across Nevada, there were significant differences in homeownership and renting among different racial and ethnic groups. Households with White or Asian members were more likely to own their homes, while Black or African American households were more likely to rent.⁴¹ Nearly 2 out of every 3 White and Asian households owned their homes.⁴² For Black or African American households, the trend was reversed, with two out of every three renting their homes.⁴³ For Hispanic or Latino households and for tribal households, just over half owned their homes.⁴⁴ These variations in homeownership rates mirror differences in median income.

AI Table 17: Households by Racial or Ethnic Group

Racial or Ethnic Group	Percent That Are Owners	Percent That Are Renters
White	67%	33%
Black or African American	34%	66%
American Indian and Alaska Native	54%	46%
Asian or Pacific Islander	67%	33%
Some Other Race	47%	53%
Two or More Races	55%	45%
Hispanic or Latino origin	52%	48%
All Households	60%	40%

Source: U.S. Census Bureau, American Community Survey, 5-year estimates, 2010 & 2023

Recent residential development in Nevada has been dominated by single-family homes and large multifamily buildings, leading to unmet housing needs of some residents. Single-family units and apartment buildings with more than 20 units make up about 70% of the state's housing stock.⁴⁵ Between 2010 and 2023, Nevada added 121,159 new single-family homes, accounting for 73% of

⁴⁰ ACS 5 Year Rolling Estimates, 2006-2010 and 2019-2023.

⁴¹ ACS 5 Year Rolling Estimates, 2019-2023.

⁴² ACS 5 Year Rolling Estimates, 2019-2023.

⁴³ ACS 5 Year Rolling Estimates, 2019-2023.

⁴⁴ ACS 5 Year Rolling Estimates, 2019-2023.

⁴⁵ ACS 5 Year Rolling Estimates, 2019-2023.

all new housing growth.⁴⁶ The most significant percentage increase was in large (20+ unit) structures, nearly doubling their stock.⁴⁷

In contrast, small to mid-sized multifamily buildings (2 to 19 units), also known as "middle housing," make up the remaining 20% of the housing stock.⁴⁸ These buildings, which may suit older adults or multigenerational families, saw limited growth between 2010 and 2023.⁴⁹ Units in buildings with five to 19 units actually declined, despite population growth and increased housing demand.⁵⁰

Statewide	2010	2023	Percentage Change					
1-Unit, Detached	675,639	787,304	16.53%					
1-Unit, Attached	55,109	64,603	17.23%					
2 Units	16,126	17,784	10.28%					
3 or 4 Units	70,983	81,536	14.87%					
5 to 9 Units	103,515	88,283	-14.71%					
10 to 19 Units	69,554	64,525	-7.23%					
20 or More Units	75,164	131,277	74.65%					
Mobile Home	72,403	69,076	-4.60%					
Boat, RV, Van, etc.	2,062	2,950	43.06%					
Total Housing Units	1,140,555	1,307,338	14.62%					

AI Table 18: Housing Units by Structure

Source: U.S. Census Bureau, American Community Survey, 5-year estimates, 2010 & 2023

Most of the state's homeownership units are large, multibedroom homes. Three and four-bedroom units comprised 75% of Nevada's for sale units in 2023.⁵¹ The state does not possess many starter homes, defined as one- and two-bedroom ownership units, that may be better aligned with the needs of the state's older adult population. Despite its significant population growth between 2010 and 2023, it experienced very limited growth of starter homes.⁵²

AI Table 19: Number of Bedrooms and Change Over Time for Owners

	2010	2023	Percentage Change
No Bedroom	Bedroom 1,666		185.95%
1 Bedroom	11,595	11,221	-3.23%
2 Bedrooms	106,643	107,452	0.76%
3 Bedrooms	284,347	330,662	16.29%
4 Bedrooms	145,766	194,623	33.52%
5 or More Bedrooms	39,033	53,192	36.27%
Total	589,050	701,914	19.16%

Source: U.S. Census Bureau, American Community Survey, 5-year estimates, 2010 & 2023

⁴⁶ ACS 5 Year Rolling Estimates, 2006-2010 and 2019-2023.

⁴⁷ ACS 5 Year Rolling Estimates, 2006-2010 and 2019-2023.

⁴⁸ ACS 5 Year Rolling Estimates, 2019-2023.

⁴⁹ ACS 5 Year Rolling Estimates, 2006-2010 and 2019-2023.

⁵⁰ ACS 5 Year Rolling Estimates, 2006-2010 and 2019-2023.

⁵¹ ACS 5 Year Rolling Estimates, 2019-2023.

⁵² ACS 5 Year Rolling Estimates, 2006-2010 and 2019-2023.

The state has a greater balance between rental units of different sizes, but most of its growth has been in smaller units, which do not typically provide adequate housing for families. While the majority of rental units (64%) are two- or three-bedroom apartments, studios and one-bedroom apartments have constituted over half of net multifamily rental growth between 2010 and 2023.⁵³ The state experienced a smaller net growth for larger apartments.

	2010	2023	Percentage Change		
No Bedroom	15,158	29,555	94.98%		
1 Bedroom	86,821	96,335	10.96%		
2 Bedrooms	151,319	176,925	16.92%		
3 Bedrooms	103,329	129,734	25.55%		
4 Bedrooms	28,235	40,590	43.76%		
5 or More Bedrooms	5,709	8,340	46.09%		
Total	390,571	481,479	23.28%		

AI Table 20: Number of Bedrooms & Change Over Time for Renters

Source: U.S. Census Bureau, American Community Survey, 5-year estimates, 2010 & 2023

Imbalances between housing growth and demographic growth disproportionately impact older adults, persons with disabilities, and families with children. Between 2010 and 2023, most new housing units were either three- or four-bedroom homes for sale or rentals with two bedrooms or less.⁵⁴ As one example, the state saw a 75% increase in its older adult population, which likely fueled additional unmet demand for smaller homes. Additionally, while the state experienced growth in five+ person households, most rental growth consisted of smaller apartments, leaving a deficit of large multibedroom rental properties.

Participants consulted for this analysis identified increasing the inventory of affordable housing as a top need in their communities. They reported a particularly low inventory of one-bedroom units compared to two-bedroom units and noted a significant lack of units with accessible accommodations and design features for seniors and people with disabilities.⁵⁵

Nevada's rural communities report growing housing needs. Nevada's rural communities are experiencing increasing housing needs. The rural housing inventory is shrinking faster than the population is declining, due to deterioration and demolition. Consultation participants also highlighted a lack of resources and housing options for the homeless population in rural areas, with waiting times for housing units up to three years and an immediate need for emergency shelters and rental assistance.⁵⁶

Housing Affordability

As a consequence of population growth and housing underproduction, housing has become considerably more expensive in both urban and rural Nevada, which has disproportionately impacted families, older adults, Black or African American, and Hispanic or Latino households.

⁵³ ACS 5 Year Rolling Estimates, 2006-2010 and 2019-2023.

⁵⁴ ACS 5 Year Rolling Estimates, 2006-2010 and 2019-2023.

⁵⁵ Consultations conducted for the State of Nevada Consolidated Plan, February 2025

⁵⁶ Consultations conducted for the State of Nevada Consolidated Plan, February 2025

Between 2010 and 2023, home values increased by more than half in both urban and rural areas. Urban and rural communities also experienced a large rise in rents (65.4% vs. 44.9%).⁵⁷

	Home Values				Contra	act Rents
	2010 2023 Percentage Change			2010	2023	Percentage Change
Median Urban	\$270,500	\$426,700	57.74%	\$911	\$1,507	65.42%
Median Rural	\$145,000	\$256,800	77.10%	\$718	\$1,040	44.88%

AI Table 21: Home Value and Contract Rent Change, 2010 to 2023

Source: U.S. Census Bureau, American Community Survey, 5-year estimates, 2010 & 2023

Households in Nevada's urban areas live in more expensive rental units. The table below shows that more than half (51.6%) of rents paid in urban areas are above the statewide median of \$1,489 per month, with one in five units now costing \$2,000 or more per month.⁵⁸ In contrast, rents in rural areas are significantly lower. 14.6% of rural renters reported not being charged any rent by their landlord, who might be a family member or fellow community member.⁵⁹

	l	Urban Areas	Remainder of The State		
	2023 Percentage of Total		2023	Percentage of Total	
Less Than \$500	10,366	2.27%	1,776	7.12%	
\$500 to \$999	57,634	12.62%	6,329	25.36%	
\$1,000 to \$1,499	152,891	33.49%	8,072	32.34%	
\$1,500 to \$1,999	136,252	29.85%	3,497	14.01%	
\$2,000 to \$2,499	60,939	13.35%	1,248	5.00%	
\$2,500 to \$2,999	16,588	3.63%	251	1.01%	
\$3,000 or More	10,708	2.35%	144	0.58%	
No Rent Paid	11,140	2.44%	3,644	14.60%	
Total	456,518		24,961		

AI Table 22: Distribution of Gross Rent Amounts by Area

Source: U.S. Census Bureau, American Community Survey, 5-year estimates, 2023

As rents and home values have spiked, a growing number of Nevadans have experienced housing cost burdens since 2011. According to HUD, households are considered cost-burdened when they spend more than 30% of their income on rent, mortgage payments, and other housing costs. Households spending more than 50% of their income on housing costs are considered severely cost-burdened. For renters, cost burden includes the share of income spent on rent. For homeowners, it includes mortgage payments, insurance, property taxes, and utilities.

In Nevada, renter cost burdens are extremely high. In 2021, 35% (406,990) of Nevadan households paid more than 30% of their income on housing costs. ⁶⁰ Nearly half (48% or 225,105) of renters are cost-burdened, paying more than 30% of their income on housing. These high burdens reflect a combination of income disparities and rising statewide rents due to underproduction.

⁵⁷ ACS 5 Year Rolling Estimates, 2006-2010 and 2019-2023.

⁵⁸ ACS 5 Year Rolling Estimates, 2006-2010 and 2019-2023.

⁵⁹ ACS 5 Year Rolling Estimates, 2006-2010 and 2019-2023.

⁶⁰ HUD CHAS, 2017-2021.

Homeowners in Nevada also face significant cost burdens, as 26% or 225,105 owners pay more than 30% of their income on housing. 61

⁶¹ HUD CHAS, 2017-2021.

AI Table 23: Cost Burden and Severe Cost Burden by Tenure

	Less Than	30%	31-50	%	Above 5	0%	Not Corr	puted	Total
	Households	%	Households	%	Households	%	Households	%	
Owner-Occupied									
Owners	504,330	76.45%	85,470	12.96%	63,205	9.58%	6,670	1.01%	659,675
				Re	enters				
Renters	242,975	50.38%	115,405	23.93%	109,700	22.75%	14,195	2.94%	482,275
Total									
All Households	747,305	65.44%	200,875	17.59%	172,905	15.14%	20,865	1.83%	1,141,950

Source: HUD Comprehensive Housing Affordability Strategy (CHAS), 2017-2021

In Nevada, older adults and families are most likely to be severely burdened by the rising cost of housing. 72,020 (or two-thirds) are either families or older adults, many of whom earn incomes at or below half of the median.⁶² These households are classified as very low-income (earning between 30% to 50% of HUD Area Median Family Income, HAMFI) or extremely low-income (earning below 30% of HAMFI).⁶³

Category	Household Income Less Than 30% HAMFI	Household Income Between 30% and 50% HAMFI	Household Income Between 50% and 80% HAMFI	Household Income Between 80% and 100% HAMFI	Household Income 100% HAMFI	Total
Small Related	17,800	11,465	3,665	140	210	33,280
Large Related	5,260	2,475	545	55	0	8,335
Elderly	17,960	8,660	3,135	385	265	30,405
Other	21,455	11,155	4,720	250	100	37,680
Total Need by Income	62,475	33,755	12,065	830	575	109,700

AI Table 24: Severe Renter Cost Burden by Household Type & Income

Source: HUD Comprehensive Housing Affordability Strategy (CHAS), 2017-2021

Among homeowners, older adults represent a significant portion of those spending more than half their income on housing. Approximately 29,805 older adult owners are severely cost-burdened, representing 47% of all cost-burdened homeowners statewide.⁶⁴ This likely reflects the challenges many older adults face, as they often live on fixed incomes and struggle with rising property tax, home insurance, and utility costs. An additional 20,000 severely cost-burdened households are families, most of whom earn less than half of the area median income.⁶⁵

- ⁶³ HUD CHAS, 2017-2021.
- ⁶⁴ HUD CHAS, 2017-2021.
- ⁶⁵ HUD CHAS, 2017-2021.

⁶² HUD CHAS, 2017-2021.

Cost Burden >50% Category	Household Income Less Than 30% HAMFI	Household Income Between 30% and 50% HAMFI	Household Income Between 50% and 80% HAMFI	Household Income Between 80% and 100% HAMFI	Household Income 100% HAMFI	Total
Small Related	6,000	5,205	3,870	1,185	980	17,240
Large Related	1,195	1,530	495	110	120	3,450
Elderly	13,050	8,710	5,630	1,255	1,160	29,805
Other	5,280	2,870	2,915	840	805	12,710
Total Need by Income	25,525	18,315	12,910	3,390	3,065	63,205

AI Table 25: Severe Owner Cost Burden by Household Type & Income

Source: Comprehensive Housing Affordability Strategy (CHAS), 2017-2021

Black or African American and Hispanic renters are more likely to face cost burden and severe cost burden than White or Asian renters. While the level of cost burden varies significantly by racial or ethnic background, it is high among all groups. Among White renters, who tend to earn incomes above the statewide median, 45% of households are considered cost-burdened.⁶⁶ A similar breakdown occurs for Asian renters. In contrast, 61% of Black or African American renters face cost burden.⁶⁷ Hispanic or Latino Nevadans also face substantial cost burden.⁶⁸ These differences in cost burden reflect lower income levels for Black or African American and Hispanic or Latino Nevadans.

AI Table 26: Cost Burden by Racial and Ethnic Group

	Not Cost Burdened (Pays Less than 30% on Rent)	Cost Burdened (Pays Between 30% and 50% on Rent)	Severely Cost Burdened (Pays More than 50% on Rent)
White Alone	56%	24%	21%
Black or African American	38%	28%	33%
Hispanic, Any Race	15%	46%	39%
Asian or Pacific Islander	57%	20%	23%
American Indian or Alaska Native Alone, Non- Hispanic	60%	19%	20%
Other (Including Multiple Races)	86%	6%	8%
Total	52 %	25%	23%

Source: Comprehensive Housing Affordability Strategy (CHAS), 2017-2021

⁶⁶ HUD CHAS, 2017-2021.

⁶⁷ HUD CHAS, 2017-2021.

⁶⁸ HUD CHAS, 2017-2021.

Consultation and survey participants identified cost as one of the most significant barriers to choosing where to rent or buy a home. These costs include rent, utilities, application fees, mortgage interest rates, and insurance increases. Another barrier to obtaining and maintaining housing is high debt-to-income ratios, exacerbated by high housing costs. Senior housing, specifically senior care facilities, was also described as unaffordable for many families, with costs estimated at around \$5,000 per month and waiting lists that can be years long.⁶⁹

Housing Conditions

Despite Nevada's new housing stock, some existing units require significant rehabilitation. This poses challenges for older adults and persons with disabilities, who may reside in homes lacking essential accessibility features.

A significant portion of the state's housing stock has been constructed recently. More than 13% of the available housing units across the state were built after 2010. An additional 26% were constructed between 2000 and 2009, and 24% constructed between 1990 and 1999. In total, 63% of the state's housing stock is 35 years or younger. Just 22.5% of the state's housing units were constructed before 1980.

Statewide	2023	Percentage of Total
Built 2020 or Later	24,593	1.88%
Built 2010 to 2019	150,511	11.51%
Built 2000 to 2009	342,783	26.22%
Built 1990 to 1999	310,367	23.74%
Built 1980 to 1989	185,133	14.16%
Built 1970 to 1979	159,330	12.19%
Built 1960 to 1969	71,525	5.47%
Built 1950 to 1959	34,418	2.63%
Built 1940 to 1949	13,640	1.04%
Built 1939 or Earlier	15,038	1.15%
Total	1,307,338	

AI Table 27: Year Structure Built

Source: U.S. Census Bureau, American Community Survey, 5-year estimates, 2023

While Nevada's housing stock is new, there are aging properties, especially in rural areas where the population is also aging. In consultations, rural participants noted a growing need for housing rehabilitation programs and services for these aging properties.⁷⁰ These needs are compounded by a lack of contracting labor, making it difficult for rural homeowners to rehabilitate their properties.

There is also a need to rehabilitate housing with accessibility features to accommodate the growing population of older adults and people with ambulatory disabilities. This analysis does not study the number of accessible homes due to data limitations. However, in consultations, organizations

⁶⁹ Consultations conducted for the State of Nevada Consolidated Plan, February 2025 and Statewide Survey for Con Plan, February 2025

⁷⁰ Consultations conducted for the State of Nevada Consolidated Plan, February 2025.

across the state noted a large unmet need and long waiting lists for such properties in both urban and rural Nevada.⁷¹

Rent Debt

Rising rents have put urban and suburban residents at immediate risk of losing their housing. According to U.S. Census Pulse Data, in 2024, 68,000 residents statewide were behind on rent. The vast majority of these live in Clark or Washoe Counties, where rents have been increasing rapidly. These areas are more likely to be home to Black or African American and Hispanic or Latino households.⁷² Moreover, the vast majority of Nevadans in rent debt have children.⁷³ In contrast, non-urbanized communities, which have experienced slower rent increases, have far fewer households in rent debt.⁷⁴

County	Total Rent Debt	Households Behind on Rent	Children in Behind Households
Carson City	\$1,400,000	1,370	1,300
Clark	\$60,500,000	52,000	49,400
Washoe	\$12,200,000	10,730	10,200
Non-Urbanized	\$3,900,000	3,900	4,100
State	\$78,000,000	68,000	65,000

AI Table 28: Households Behind on Rent by Geography

Source: Aggregated from United States Census Pulse Survey, 2024

Due to the lack of eviction protections, some Nevadans in rent debt are at risk of losing their housing altogether. Additionally, the state lacks protections for certain households not currently classified as a protected class.⁷⁵ Nevada does not have statewide source of income protections for rent-assisted households, nor does it have age protections for both youth and elderly in these households.

Statewide Housing Survey Responses

A survey of Nevadans on the state of their housing and unmet housing needs confirms the overall analysis. When asked to rank the top housing needs in their communities, survey respondents indicated a significant need to increase the supply and sustainability of affordable rental housing. Participants identified various types of housing needs, including rental, senior housing, and workforce housing. They also highlighted the need for housing assistance programs, lower rent, rent caps based on square footage, and deeper affordability restrictions in dedicated affordable rental buildings.⁷⁶

⁷¹ Consultations conducted for the State of Nevada Consolidated Plan, February 2025.

 $^{^{\}rm 72}$ Aggregated from United States Census Pulse Survey, 2024

⁷³ Aggregated from United States Census Pulse Survey, 2024

⁷⁴ Aggregated from United States Census Pulse Survey, 2024

⁷⁵ Consultations conducted for the State of Nevada Consolidated Plan, February 2025.

⁷⁶ Statewide Survey for Con Plan, February 2025.

Additionally, survey respondents ranked access to homeownership as the second most important issue. They emphasized the need to increase the supply of starter homes to provide more choices for Nevadans looking to purchase property. Respondents also prioritized a need for strategies to revitalize and preserve existing homes, including increased code enforcement at the local level to ensure properties are well-maintained and livable for current inhabitants and future buyers.⁷⁷

Those interviewed during the survey noted a significant need for eviction protections, with many indicating that eviction prevention would be most helpful to community members who are at risk of homelessness. Respondents anecdotally described renters in need of eviction protections after an emergency or unexpected expense causes them to fall behind on their payments. Survey respondents also identified landlord engagement and legal aid as significant needs for preventing eviction.⁷⁸

Finally, survey respondents noted an increased need for programs to address and prevent homelessness. They emphasized the need for more emergency shelters to provide immediate housing solutions for individuals experiencing homelessness. Additionally, respondents highlighted the importance of diversion programs designed to prevent individuals from becoming homeless in the first place. Furthermore, respondents stressed the need for comprehensive mental health and substance abuse services. These services are crucial for helping individuals maintain stable housing by addressing underlying issues that may contribute to homelessness.⁷⁹

These dynamics limit the available choices for housing and disproportionately impact protected classes in the state. Because Nevada's housing supply has struggled to keep pace with its population growth, there is a shortage of affordable rental, starter homes, and senior housing. The resulting high housing costs disproportionately impact lower-income residents, who are more likely to be Black or African American, and Latino or Hispanic renters.

Barriers to Housing Production and Choice

This section identifies local barriers to housing production, focusing on public sector requirements and restrictions that impede the private sector's ability to meet the housing needs of all protected classes in the state. These barriers, imposed by various local government units, hinder the market's capacity to address the state's housing shortage and affordability crisis. This crisis disproportionately affects Black or African American households, Latino or Hispanic households, older adults, families, and persons with disabilities.

Jurisdictional Barriers to Housing Development

Most jurisdictions across the state have restrictive land use policies that limit the overall supply and location of housing, especially multifamily housing, which affects renters seeking such housing. According to the National Zoning Atlas, out of Nevada's nine largest jurisdictions, only one permits multifamily housing in at least 30% of its total residential land area.⁸⁰ Similarly, only one

⁷⁷ Statewide Survey for Con Plan, February 2025.

⁷⁸ Statewide Survey for Con Plan, February 2025.

⁷⁹ Statewide Survey for Con Plan, February 2025.

⁸⁰ National Zoning Atlas, 2024.

jurisdiction allows small lot single-family homes on more than half of its land area. There is no comparable data available for Nevada's rural jurisdictions.⁸¹

	Pe	Percentage of Residential Land Zoned for Each Use						
	Single Family Homes on All Lots	Single Family Homes on Small Lots	Multifamily Homes	Accessory Dwelling Units				
Clark County	74%	16%	4%	85%				
Boulder City	28%	16%	6%	22%				
Henderson	48%	28%	9%	54%				
Las Vegas	33%	24%	13%	3%				
Mesquite	20%	19%	14%	8%				
North Las Vegas	33%	23%	6%	17%				
Washoe County	96%	3%	0	94%				
Reno	43%	25%	28%	0%				
Sparks	80%	76%	64%	0%				

AI 29: Allowed Use on Residentially Zoned Land by Jurisdiction

Source: National Zoning Atlas, 2024.

Due to these restrictions, it is unsurprising that most recent market-rate residential construction has consisted of large, multibedroom single-family homes. In large urban jurisdictions, land use laws serve as effective barriers to the construction of new multifamily apartments, limiting housing choices for families. These laws also hinder the development of new starter homes, impacting choices for older adults. Additionally, land use restrictions constrain supply, which can increase prices and reduce affordability, disproportionately affecting Black or African American and Latino or Hispanic renters. Consultations additionally identified restrictive zoning policies and special use permits as major barriers for group homes and emergency shelters.⁸²

During consultations, affordable housing organizations and developers observed that these barriers also increase project timelines and development costs across the state.⁸³ Slow and arduous zoning and permitting processes can add considerable cost and delay to projects. Additionally, some jurisdictions and entitlement departments lack the staff capacity to keep up, further increasing delays and costs. These various factors make it more difficult to build housing, even in locations where it is technically permitted, creating an additional barrier to housing choice.

In rural areas, participants also noted the need for infrastructure improvements, such as water and sewer systems, broadband access, electrical upgrades, and sidewalks.⁸⁴ The lack of infrastructure can be a significant barrier to developing affordable housing because most developers and builders cannot afford the necessary site improvements. This may explain why rural housing prices are

⁸¹ National Zoning Atlas, 2024.

⁸² Consultations conducted for the State of Nevada Consolidated Plan, February 2025.

⁸³ Consultations conducted for the State of Nevada Consolidated Plan, February 2025.

⁸⁴ Consultations conducted for the State of Nevada Consolidated Plan, February 2025.

increasing and available housing choices are decreasing even though the overall population has declined.

Jurisdictional Measures to Remove Housing Barriers

Jurisdictions across the state have made recent progress in remediating some local regulatory barriers to housing production. In 2018, Nevada began monitoring progress in local housing regulations. The 2023 Annual Housing Progress Report tracks the state's nine largest jurisdictions across progress made in adopting 12 measures designed to lower regulatory barriers to the creation of affordable housing, which include impact fees, land sales and donations, land use reforms, and financial assistance.⁸⁵ The report finds that eight out of these nine jurisdictions have at least four measures in use in 2023.⁸⁶

 ⁸⁵ "Annual Housing Progress Report", Housing Division, Nevada Department of Business & Industry, 2023.
 ⁸⁶ "Annual Housing Progress Report", 2023.

Jurisdiction	Reduced Impact Fees	Sell Public Land for AH	Donate Land for AH	Leasing Land for AH	Requesting Federal Land for AH	Housing Trust Fund	Expedited Approval	Density Bonuses or Grants for LIHTC	Density Bonuses for ETOD	Density Bonuses for other AH	Financial Assistance for Purchase	Funding for Supportive Services	In Use
Clark County	х	х	_	_	_	х	х	х	-	_	Х	х	7
Boulder City	-	-		-			-	-	-	-			0
Henderson	Х	-		Х		х	х	X	х	х	x	X	8
Las Vegas		-	x	-	-	х		x			х	х	5
Mesquite	x	-	Х	-	-	-	х	X	-	-	-	-	4
North Las Vegas	x	-			-			Х			X	x	4
Washoe County	x	-			-	x	-		-	-	x	x	4
Reno	х	-	х			х		Х	-	-	X	х	6
Sparks		-	х	-	-			х	-	-	х	х	4
In Use	6	1	4	2		5	3	7	1	1	7	7	

AI Table 30: Jurisdictional Measures for Removing Housing Barriers

KEY Measure in Use: X Measure in Plan: -

Source: "Annual Housing Progress Report", Housing Division, Nevada Department of Business & Industry, 2023.

The most common measures include reduced impact fees, financial support for transactions, and supportive services.⁸⁷ These measures provide resources or incentives for housing production, which helps market-rate and affordable housing developers pursue more projects or construct more units, resulting in increased housing choices for Nevadans.

Fewer urban jurisdictions have adopted land use reforms that would allow market-rate or affordable housing, increasing the percentage of available land for multifamily rentals or starter homes.⁸⁸ Additionally, targeted reforms such as transit-oriented development (TOD) would place more new housing units near mass transportation, effectively giving residents options to reach jobs, retail, and other amenities. Without broader land use reforms, most jurisdictions will continue to restrict the residential land available for certain housing types, limiting choices.

There has been some progress. In 2024, the Reno City Council passed an ordinance amendment that would increase the allowable density for affordable multifamily housing, defined as projects providing units to households at 60% of Area Median Income or below.⁸⁹ In 2025, the City Council directed its city staff to draft an ordinance to allow accessory dwelling units on single-family properties.⁹⁰

The Council considered allowing "middle housing" in single-family areas, which would have resulted in the creation of new housing units of different bedroom sizes and configurations, potentially to the benefit of families, older adults, and persons with disabilities. The Council chose not to do so.

Additionally, in Henderson, the jurisdiction is considering plans to enable new housing as part of TOD along the Boulder Highway Corridor, which connects the City with downtown Las Vegas. The City and the Regional Transportation Commission of Southern Nevada procured a USDOT grant for this effort, which includes strategies to increase housing and economic development and is currently underway.⁹¹

While these changes are a promising step, more is needed to ease the housing supply crunch and expand housing choices for all Nevadans. This issue has pressured affordability and disproportionately affected low-income Nevadans, especially Black or African American and Hispanic or Latino residents. Without further changes, the state will continue to see a lag in the construction of multibedroom apartments and starter homes, diminishing available choices.

Barriers to Access to Opportunity

This section of the analysis examines how the state's housing program investments impact residents' access to opportunities, defined as access to jobs, reliable transportation, and high-performing schools. It assesses whether these investments help residents access these

⁸⁷ "Annual Housing Progress Report", Housing Division, Nevada Department of Business & Industry, 2023.

 ⁸⁸ "Annual Housing Progress Report", Housing Division, Nevada Department of Business & Industry, 2023.
 ⁸⁹ "Watered-down housing amendment passes through Reno City Council first reading", *Jaedyn Young and Jason Hildago, Reno Gazette Journal*. June 14, 2024.

⁹⁰ "City council moves forward with ADU ordinance after decades of debate", Kelsey Penrose, *This Is Reno*, April 28, 2025.

⁹¹ "Connecting Communities To Transit", City of Henderson, Nevada, 2024.

opportunities or segregate them in communities far from these resources. When households have access to opportunities, they are more likely to achieve social mobility. Conversely, when households lack access to these resources, they tend to remain segregated and excluded from opportunities, perpetuating poverty across generations.

This analysis primarily uses the HUD Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), which utilizes percentile-based indices to measure a neighborhood's performance in terms of racial or ethnic concentration, poverty, access to transportation, access to jobs, and access to high-performing schools. It evaluates whether NHD investments in dedicated units or public rent support help households move to these areas or push them into communities with higher poverty and lower access.

Overview of NHD Housing Units and Assistance

NHD funds tend to support studio and one-bedroom units, which do not meet the needs of some protected classes, including multigenerational families. Almost half (45%) of subsidized housing units are studios and one-bedroom apartments.⁹² Nearly three-fourths (73%) of buildings with units for families consist of two bedrooms or less.⁹³ Additionally, during consultations, respondents reported that programs do not support enough small housing units.⁹⁴ For housing supporting older adults, only 732 units (3.8%) are studio apartments, though many more (60%) have one bedroom.⁹⁵

	Studios	1 Bedroom Units	2 Bedroom Units	3 Bedroom Units	4 Bedroom Units	Total
All Units in Subsidized Buildings	1,819	16,236	15,998	5,356	890	40,299
Buildings That Include Units for Families	1,207	5,100	10,497	5,348	890	23,042
Buildings That Include Units for Older Adults	732	11,425	6,340	395	63	18,955

AI Table 31: Analysis of NHD Production

Source: Nevada Housing Division, 2024.

These investments account for only 3% of the state's housing stock. It is unrealistic to expect that this small share, compared to private investment, could overcome the barriers to housing access and choice. However, these public investments are crucial for addressing historical patterns of inequality throughout the state. If these investments do not directly address impediments, such as access to opportunity, they may inadvertently contribute to them.

⁹² Nevada Housing Division, 2024.

⁹³ Nevada Housing Division, 2024.

⁹⁴ Consultations conducted for the State of Nevada Consolidated Plan, February 2025.

⁹⁵ Nevada Housing Division, 2024.

Racial and Ethnic Concentrations of Poverty

A R/ECAP (Racially/Ethnically-Concentrated Area of Poverty) is a geographic area with significant concentrations of poverty and concentrations of people of color (e.g., Black or African American, Hispanic, Asian/Pacific Islander, Native American/Alaska Native individuals, or other designations). R/ECAPS are areas that are 50% or more majority non-White with 40% or more individuals living at or below the poverty line. This data helps to assess patterns of segregation and/or integration of protected class groups.

Nevada has a limited number of R/ECAPS. Only 25 out of the state's 687 Census tracts are classified as R/ECAPS.⁹⁶ Of these, 20 are located in Clark County, primarily in central Las Vegas, and the remaining five are in Washoe County, centered in Reno.⁹⁷ This indicates that Nevada does not have high levels of segregated racial poverty. Due to the low number of R/ECAPS, most NHD-assisted units are situated in neighborhoods that are not considered areas of segregated racial or ethnic poverty. Only 5% of income-restricted units, totaling 1,708, are in these areas, along with 879 publicly assisted units.⁹⁸

Al Table 32: Racial and Ethnic Concentrations of Poverty and Income Restricted and Public Units

	Income Ro	estricted Units	Units Assisted by Public Housing or Rental Assistance		
	Number	Percentage	Number	Percentage	
Located Within a RECAP	1,708	5%	879	9%	
Located Outside of a RECAP	33,536	95%	9,293	91%	
All Units	35,244	100%	10,172	100%	

Source: Nevada Housing Division data overlaid on HUD AFFH-T data, 2024.

Areas of Low Poverty

Conversely, most of Nevada's assisted affordable housing units are in communities with higherthan-average poverty levels, while very few are found in the state's lowest poverty neighborhoods. This analysis utilizes the HUD Low Poverty Index, which evaluates the depth and intensity of poverty in a neighborhood based on the poverty rate at the census tract level. The table below categorizes NHD-assisted buildings by their location in low-, mid-, or high-poverty areas.

AI Table 33: Income Restricted and Rent Assisted Units in Areas of Low Poverty

⁹⁶ HUD Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), 2024.

⁹⁷ HUD AFFH-T, 2024.

⁹⁸ Nevada Housing Division data overlaid on HUD AFFH-T data, 2024.

	Income Res	stricted Units	Rent Assi	sted Units
	Total	Percentage	Total	Percentage
Very Low Poverty Tract (81 st to 100 th Percentile)	1,356	4%	103	1%
Low Poverty Tract (61 st to 80 th Percentile)	3,462	11%	118	1%
Moderate Poverty Tract (41 st to 60 th Percentile)	6,305	19%	1,328	14%
High Poverty Tract (21 st to 40 th Percentile)	8,650	26%	1,442	15%
Very High Poverty Tract (1 st to 20 th Percentile)	12,944	40%	6,679	69%
All Census Tracts	32,717	100%	9,670	100%

Source: Nevada Housing Division and HUD AFFH-T, 2024.

Most of Nevada's publicly assisted units are concentrated in high-poverty areas. Nearly 70% of public housing or rent-assisted units are located in very high-poverty areas, and nearly 40% of dedicated affordable units are in high-poverty areas.⁹⁹ Conversely, very few affordable housing units, and virtually no public or rent-assisted units, are found in very low-poverty areas. Only 1,345 income-assisted units (4%) and 103 rent-assisted households (1%) are situated in neighborhoods with the lowest levels of poverty.¹⁰⁰ This indicates that most of Nevada's publicly assisted housing units are concentrated in communities with higher needs, while fewer are integrated into communities with higher incomes and lower poverty rates.

Areas of Low Transportation Cost

Additionally, many units and rent assisted households are located far from reliable mass transportation, measured by HUD's Low Transportation Cost Index. The Low Transportation Cost Index is based on estimates of transportation costs for a family that meets the following description: a three-person single-parent family with income at 50% of the median income for renters for the region (defined as the Core-Based Statistical Area).¹⁰¹ The estimates come from the Location Affordability Index (LAI), or Transportation costs may be low for a variety of reasons,

⁹⁹ Nevada Housing Division data overlaid on HUD AFFH-T data, 2024.

¹⁰⁰ Nevada Housing Division data overlaid on HUD AFFH-T data, 2024.

¹⁰¹ These estimates originate from the Location Affordability Index, available at <u>https://www.hudexchange.info/programs/location-affordability-index/</u>.

including greater access to public transportation and the density of homes, services, and jobs in the neighborhood, which reduces reliance on automobiles.

In Nevada, 55% of units and 71% of rent assisted units are in areas with below average transportation costs, defined by percent of income spent on transportation costs.¹⁰² This may reflect the fact that NHD-assisted units and households tend to be located in more central locations, where land use allows for multifamily housing, as opposed to more outlying locations, where zoning only permits low density housing.

	Units in State Assisted Properties	Income Restricted Units	Units Assisted by Public Housing or Rental Assistance
Very Low Transportation Cost Areas (81st to 100th Percentile)	8,339	6,968	2,111
Low Transportation Cost Areas (61st to 80th Percentile)	13,829	10,973	4,733
Moderate Transportation Cost Areas (41st to 60th Percentile)	9,926	8,755	1,412
High Transportation Cost Areas (21st to 40th Percentile)	5,979	5,423	1,042
Very High Transportation Cost Areas (1st to 20th Percentile)	644	598	372
Total	38,717	32,717	9,670

AI Table 34: Prevalence of Income Restricted and Public Housing Units and Transportation Cost

Source: Nevada Housing Division and HUD AFFH-T, 2024.

While NHD-assisted units and households tend to be in areas with lower-than-median transportation costs, this does not guarantee strong access to transportation alternatives. Table 35 shows the number of households across the state near high-frequency transit, defined as transit arriving every 15 minutes or less. In Nevada, over 75% of households live near transit, but only a small fraction has access to frequent service.¹⁰³ In Washoe and Clark Counties, only 2% of families earning under \$50,000 live near reliable mass transportation.¹⁰⁴ Although this analysis cannot gauge whether low-income households live near high frequency transit, it is likely similar.

¹⁰² Nevada Housing Division data overlaid on HUD AFFH-T data, 2024.

¹⁰³ Center for Neighborhood Technology (CNT), AllTransit, 2024.

¹⁰⁴ CNT AllTransit 2024.

Jurisdiction	Total Households	Households Near Transit	Households Near High Frequency Transit	Households Earning Under \$50K Near Transit	Households Earning Under \$50K Near High Frequency Transit
Carson City	22,158	16,680	0	9,366	0
Clark	74,9858	552,278	77,228	281,588	7,719
Elko	4,290	346	0	166	0
Humboldt	6,261	714	0	285	0
Washoe	173,519	97,204	19,746	53,362	14,541

AI Table 35: Households Near Transit

Source: Center for Neighborhood Technology AllTransit, 2024.

Access to Jobs

Some NHD-assisted units are also located far from job centers, which limits access to economic opportunity. This analysis uses the HUD Jobs Proximity Index to measure a neighborhood's accessibility to job locations within a region, with larger employment centers weighted more heavily.

AI Table 36: Income Restricted and Public Housing Units and Access to Jobs

	Income Restricted Units		Units Assisted by I Rental As	•
	Number	Percentage	Number	Percentage
Very High Access to Jobs (81st to 100th Percentile)	6,989	21%	2,966	31%
High Access to Jobs (61st to 80th Percentile)	6,778	21%	2,473	26%
Moderate Access to Jobs (41st to 60th Percentile)	6,709	21%	1,992	21%
Low Access to Jobs (21st to 40th Percentile)	7,395	23%	1,659	17%
Very Low Access to Jobs (1st to 20th Percentile)	4,846	15%	580	6%
Total	32,717	100%	9,670	100%

Source: Nevada Housing Division and HUD AFFH-T, 2024.

Access to jobs is uneven for households living in NHD-assisted housing. Statewide, 42% of incomerestricted unit developments are in neighborhoods with high or very high job access, while 37% are in areas with low or very low job access.¹⁰⁵ Households receiving public rent assistance are more likely to live near jobs, with 57% in communities with high or very high job access and only 6% in neighborhoods far from jobs.¹⁰⁶

¹⁰⁵ Nevada Housing Division data overlaid on HUD AFFH-T data, 2024.

¹⁰⁶ Nevada Housing Division data overlaid on HUD AFFH-T data, 2024.

Access to Schools

Finally, NHD housing assistance tends to serve households in neighborhoods with below median school performance. To measure this, this analysis uses the HUD School Proficiency Index. The HUD School Proficiency Index illustrates school-level data to describe neighborhoods relative to nearby school performance. The school proficiency index uses school-level data on the performance of fourth grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools.

	Income Re	stricted Units	Units Assisted by Public Housing or Rental Assistance		
	Total	Percentage	Total	Percentage	
Very High Performing Schools (81st- 100th Percentile)	4,925	15%	705	7%	
High Performing Schools (61st-80th)	4,676	14%	356	4%	
Moderate Performing Schools (41st- 60th)	7,481	23%	1,250	13%	
Low Performing Schools (21st-40th)	6,497	20%	2,813	29%	
Very Low Performing Schools (0- 20th)	9,138	28%	4,546	47%	
Total	32,717	100%	9,670	100%	

AI Table 37: Income Restricted and Public Housing Units Proximity to Schools

Source: Nevada Housing Division and HUD AFFH-T, 2024.

In Nevada, nearly half of the units and two-thirds of assisted households are in below-median performing schools, with almost half of assisted households in the lowest median schools.¹⁰⁷ In contrast, very few units or assisted households are in the highest performing districts. Out of the state's 4,546 rent-assisted households, only 7.05 (7%) live in neighborhoods with schools performing in the highest quintile.¹⁰⁸

Barriers to Fair Housing Access

Access to housing in Nevada is unevenly distributed across the state. White households consistently receive home loans more frequently than other racial and ethnic groups. Furthermore, recent fair housing complaints indicate ongoing discrimination against individuals seeking housing, particularly based on race or disability.

Discrimination in Home Lending

Nevadans encounter uneven access to mortgages essential for purchasing, maintaining, or refinancing a home. Statewide, Black or African American and Hispanic or Latino households are significantly more likely to be denied for a loan or refinancing. This disparity likely contributes to the gap in homeownership between these groups and others in the state.

The following analysis utilizes data from the Home Mortgage Disclosure Act (HMDA), which mandates financial institutions to collect and report information on mortgage applications, originations, and purchases. This includes loan details, applicant demographics, and property information. HMDA data helps regulators monitor lending practices and ensure compliance with fair lending laws. The analysis presented here is based on data from the HMDA site.

The data from 2020-2023 highlights significant disparities in access to loans among different racial demographics. White borrowers led in loan originations with 311,274 loans, which is more than six

¹⁰⁷ Nevada Housing Division data overlaid on HUD AFFH-T data, 2024.

¹⁰⁸ Nevada Housing Division data overlaid on HUD AFFH-T data, 2024.

times the number originated by Black or African American borrowers (25,938).¹⁰⁹ The data also reveals notable denial rates, with 63,800 loan applications denied for White applicants and 8,426 denied for Black or African American borrowers.¹¹⁰ Asian applicants had the highest number of loans originated among minority groups at 47,044, but they also faced significant challenges, with 13,265 applications denied.¹¹¹

These figures reveal systemic inequalities, where minority groups experience higher rates of loan denial and fewer loan originations compared to their White counterparts. These discrepancies reflect differences in income, homeownership rates, and access to resources among these groups.

AI Table 38: Loan Actions Taken 2020-2023

Source: Consumer Financial Protection Bureau, Home Mortgage Disclosure Act (HMDA) Data on Mortgage Lending, 2020-

Selected Variables	# of Records
Loan Originated, 2 or More Minority Races	1,950
Loan Originated, American Indian or Alaska Native	2,921
Loan Originated, Asian	47,044
Loan Originated, Black or African American	25,938
Loan Originated, Native Hawaiian or Other Pacific Islander	3,647
Loan Originated, White	311,274
Application Denied, 2 or More Minority Races	720
Application Denied, American Indian or Alaska Native	1,198
Application Denied, Asian	13,265
Application Denied, Black or African American	8,426
Application Denied, Native Hawaiian or Other Pacific Islander	1,180
Application Denied, White	63,800

2023.

The distribution of home loans varies across Nevada's three metropolitan areas. In the Las Vegas Metropolitan Statistical Area, there is a significant variation in home loans among different racial and ethnic groups. Asian borrowers had the highest number of loans originated, with 36,626 loans.¹¹² Black or African American borrowers collectively had a moderate representation with 18,293 loans. However, the denial rates reveal critical issues for minority groups.¹¹³ Denials for Asian applicants totaled 13,265, indicating that despite a higher number of originations, barriers still exist.¹¹⁴ Additionally, 8,426 loan applications were denied for Black or African American applicants, further emphasizing their struggles in securing loans.¹¹⁵ Lower application counts suggest potential underrepresentation and lack of outreach for those groups.

¹⁰⁹ Consumer Financial Protection Bureau, Home Mortgage Disclosure Act (HMDA) Data on Mortgage Lending, 2020-2023.

¹¹⁰ HMDA Data, 2020-2023.

¹¹¹ HMDA Data, 2020-2023.

¹¹² HMDA Data, 2020-2023.

¹¹³ HMDA Data, 2020-2023.

¹¹⁴ HMDA Data, 2020-2023.

¹¹⁵ HMDA Data, 2020-2023.

Race	Loans Originated	Apps. Approved But Not Accepted	Applications Denied	Applications Withdrawn	Files Closed for Incompleteness	Purchased Loans
American Indian or Alaska Native	1,946	88	857	623	316	49
Asian	35,626	1879	10,852	10,826	3,672	1,210
Black or African American	24,482	1,340	7,912	7,260	2,416	880
Native Hawaiian or Other Pacific Islander	3,223	162	1,022	905	349	111
White	20,6762	9,563	44,167	48,788	15,399	8,602
2 or More Minority Races	1,748	96	635	507	185	49

Source: HMDA Data, 2020-2023.

The analysis of loan actions in the Reno region reveals trends similar to those observed in Las Vegas. The total number of loans originated indicates notable differences, with White borrowers originating the largest share—59,903 loans—compared to Black or African American and Asian borrowers, who originated 754 and 3,943 loans, respectively. This stark contrast highlights the systemic barriers faced by minority groups in accessing loan opportunities. The denial data shows that 194 applications were denied for Black or African American borrowers, signifying ongoing challenges for this demographic. Although Asian applicants have somewhat better representation with 3,943 loans originated, their denial rates and total loans are still lower than White borrowers.

Race	Loans Originated	Apps Approved but Not Accepted	Applications Denied	Applications Withdrawn	Files Closed for Incompleteness	Purchased Loans
American Indian or Alaska Native	303	14	101	81	56	10
Asian	3,943	254	903	1193	389	183
Black or African American	754	33	194	173	69	28
Native Hawaiian or Other Pacific Islander	250	15	74	70	35	11
White	59,903	2,489	9,591	12,675	3,853	2,226
2 or More Minority Races	105	5	28	26	16	0

AI Table 40: Loan Actions	Faken Reno MSA	, 2020-2023
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Source: HMDA Data, 2020-2023.

In Carson City, the data shows that the number of loans originated among different racial groups is much lower than in Nevada's larger metropolitan areas. White borrowers dominate, with 6,364 loans, while American Indian or Alaska Native borrowers have only 77 loans.¹¹⁶ This is partly due to the larger share of White households in the overall population. Minority application and denial rates are minimal, with even lower numbers for Black or African American and Asian applicants, indicating limited access to resources and opportunities to obtain loans. The denial rates for these groups reflect significant challenges. For example, despite only 77 loans for American Indian or Alaska Native borrowers, a notable number of applications were denied.¹¹⁷

¹¹⁶ HMDA Data, 2020-2023.

¹¹⁷ HMDA Data, 2020-2023.

Race	Loans Originated	Apps Approved but Not Accepted	Applications Denied	Applications Withdrawn	Files Closed for Incompleteness	Purchased Loans
American Indian or Alaska Native	77	2	16	22	8	0
Asian	158	4	27	36	9	5
Black or African American	24	1	3	5	3	2
Native Hawaiian or Other Pacific Islander	18	1	5	4	1	0
White	6,364	176	959	1,336	338	128
2 or More Minority Races	11	0	2	3	0	0

Source: HMDA Data, 2020-2023.

This analysis highlights a statewide need to address lending gaps and improve outreach and resources for minority groups. The figures from Carson City, in particular, underscore the broader challenges that minorities face in various regions when applying and being approved for home loans.

Across the state, there are differences in the number and types of loans pursued by various racial and ethnic groups. Home purchases dominate the statistics, indicating a significant interest among all racial groups in buying homes. White Nevadans had the highest number of home purchase loans, with 181,100.¹¹⁸ While White households are the largest racial group in the state, this data suggests they also have better access to capital and resources. Similarly, Asian borrowers show notable investment in home purchases with 37,467 loans, indicating potential growth in property investment for this demographic.¹¹⁹ On the other hand, minority groups such as Black or African American borrowers, with only 19,512 home purchase loans, reflect a continuing racial disparity in homeownership access.¹²⁰

Refinancing data shows similar trends, with White borrowers leading at 165,629 loans, compared to significantly fewer among Asians and other racial groups, despite comparable rates of homeownership.¹²¹ These differences likely prevented these groups from taking advantage of

¹¹⁸ HMDA Data, 2020-2023.

¹¹⁹ HMDA Data, 2020-2023.

¹²⁰ HMDA Data, 2020-2023.

¹²¹ HMDA Data, 2020-2023.

historically low interest rates to lower their monthly mortgage payments. The data also highlights that Nevada's minority groups struggle to achieve parity in homeownership.

Selected Variables	Number of Records
Home Purchase, 2 or more minority races	1,655
Home Purchase, American Indian or Alaska Native	2,043
Home Purchase, Asian	37,467
Home Purchase, Black or African American	19,512
Home Purchase, Native Hawaiian or Other Pacific Islander	2,430
Home Purchase, White	181,100
Refinancing, 2 or more minority races	830
Refinancing, American Indian or Alaska Native	1,708
Refinancing, Asian	24,252
Refinancing, Black or African American	13,893
Refinancing, Native Hawaiian or Other Pacific Islander	1,991
Refinancing, White	165,629

AI Table 42: Loan Purpose by Race, 2020-2023

Source: HMDA Data, 2020-2023.

Between 2020 and 2023, Nevada saw concerning trends in loan denial rates among different racial and ethnic groups. Black or African American applicants consistently faced the highest denial rates, peaking at 33% in the first quarter of 2023, indicating significant barriers to obtaining loans.¹²² Hispanic applicants had a more stable denial rate, generally hovering between 18-21%, suggesting they faced fewer obstacles than Black or African American applicants.¹²³ Asian applicants experienced fluctuating denial rates, peaking at 15% in the second quarter of 2020 and remaining in the 11-15% range through 2021.¹²⁴

¹²² HMDA Data, 2020-2023.

¹²³ HMDA Data, 2020-2023.

¹²⁴ HMDA Data, 2020-2023.

Year Quarter	Asian	Black or African American	Hispanic	White
2020-Q1	13%	31%	22%	13%
2020-Q2	15%	30%	23%	13%
2020-Q3	12%	26%	19%	11%
2020-Q4	11%	24%	18%	11%
2021-Q1	11%	24%	18%	11%
2021-Q2	12%	25%	18%	11%
2021-Q3	11%	25%	18%	11%
2021-Q4	13%	25%	19%	12%
2022-Q1	15%	28%	22%	14%
2022-Q2	14%	31%	23%	14%
2022-Q3	14%	30%	23%	13%
2022-Q4	13%	31%	22%	14%
2023-Q1	13%	33%	24%	14%
2023-Q2	12%	29%	21%	11%
2023-Q3	12%	29%	21%	11%
2023-Q4	13%	29%	21%	12%

AI Table 43: Denial Rates by Race

Source: HMDA Data, 2020-2023.

This home lending data was collected during the COVID-19 pandemic, a period marked by significantly fluctuating economic conditions, especially for individuals in industries that experienced work interruptions. While all racial groups saw variations in denial rates, the differences reveal unequal pressures on minority groups. While White households experienced increased loan denials, their rates were considerably more stable than those of Black or African American, Hispanic or Latino, and Asian households. This data underscores the urgent need for initiatives aimed at reducing systemic biases and creating equal opportunities for all racial groups seeking loans.

Overall, this data suggests uneven access to capital and home loans for Nevada's Black or African American and Hispanic or Latino populations. Differences in denial rates indicate disparities for all households, including Asian households, despite their high homeownership rate. Variations in home loan and refinancing approval will continue to impact homeownership rates for minority households. As home prices rise, it will become more difficult for these groups to purchase homes. Conversely, as prices fall, refinancing challenges will persist, leading to differences in monthly payments for equivalently priced houses.

Fair Housing Complaints of Discrimination

An analysis of fair housing complaints reveals the challenges Nevadans face when trying to rent an apartment or buy a home. The Fair Housing Act prohibits housing discrimination based on race, color, national origin, religion, sex, familial status, or disability. Individuals can file a complaint if

they believe their rights have been violated. HUD maintains records of complaints that indicate potential and actual violations of federal housing law.

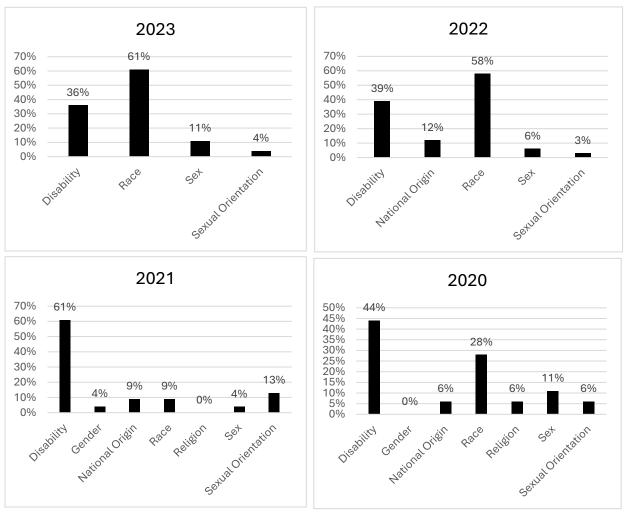
Currently, Nevada does not have a dedicated entity for receiving, investigating, and resolving fair housing complaints, so most discrimination complaints are registered with HUD. The Nevada Equal Rights Commission provides data on complaints filed. The data below show fair housing complaints that were both filed and resolved from 2020 to 2023. This data does not include complaints that were filed but not resolved during this period.

Between 2020 and 2023, the State of Nevada experienced a notable shift in the basis for fair housing complaints. In 2020, the majority of resolved complaints (44%) were related to disability.¹²⁵ This was followed by sexual orientation (13%), race (9%), and national origin (9%).¹²⁶ Over the next four years, the proportion of fair housing complaints linked to race saw a marked increase. By 2023, more than half of the fair housing complaints were based on race (61%), with disability (36%), sex (11%), and sexual orientation (4%) following behind.¹²⁷ This shift highlights a growing concern regarding racial discrimination in housing within the state.

¹²⁵ Nevada Equal Rights Commission, "Discrimination in Employment" dataset, 2020-2023.

¹²⁶ Nevada Equal Rights Commission, "Discrimination in Employment" dataset, 2020-2023.

¹²⁷ Nevada Equal Rights Commission, "Discrimination in Employment" dataset, 2020-2023.



Housing Discrimination Complaints Resolved

Source: Nevada Equal Rights Commission, "Discrimination in Employment" dataset, 2020-2023

Due to the limited data on fair housing complaints in Nevada for 2023 and 2024, the National Fair Housing Alliance's annual Trends Report provides a more detailed view of fair housing complaint data. This report reveals significant differences in housing discrimination cases filed across Nevada, California, and Arizona, despite demographic similarities among these states.

In 2023, Nevada recorded 47 complaints initiated by the Department of Housing and Urban Development (HUD), a relatively small number compared to California's 6,500 and Arizona's 400 cases.¹²⁸ By 2024, the number of complaints in Nevada increased to 83, with over half—44 cases— being initiated by Fair Housing Organizations, highlighting the proactive role of local advocacy groups. However, California again saw a high number of complaints, with 8,600 cases in 2024, while Arizona experienced a slight decline, recording 351 cases.¹²⁹

¹²⁸ 2024 Fair Housing Trends Report, National Fair Housing Alliance, July 2024.

¹²⁹ 2024 Fair Housing Trends Report, 2024.

Housing discrimination likely occurs frequently in Nevada, at rates similar to neighboring states, but the state lacks a dedicated system to comprehensively capture and analyze these incidents. This absence of a structured mechanism makes it challenging to draw specific conclusions about the extent and nature of housing discrimination in Nevada. Without detailed data, it is difficult to identify patterns, address issues effectively, and implement targeted interventions to combat discrimination. California's consistently high figures reflect both a larger population and more robust reporting systems. Conversely, Nevada's smaller numbers, despite the increase in 2024, indicate a lack of proper avenues for reporting instances of discrimination or limited awareness of fair housing rights among residents.

Unlike its neighboring states, Nevada does not have an agency or organization conducting fair housing enforcement, including activities funded by the HUD Fair Housing Assistance Program (FHAP). As a result, most discrimination claims are filed through HUD's national office rather than a local entity. This reliance on federal mechanisms complicates the state's ability to address and resolve fair housing complaints locally. Even without a FHAP, increased outreach and education could lead to more filings with the Nevada Equal Rights Commission or the Silver State Fair Housing Council. The absence of dedicated state capacity limits its effectiveness of efforts to monitor and address discrimination on an ongoing basis.

Local and National Fair Housing Cases

Local and national fair housing cases highlight discrimination across the nation. The information below, sourced from the Fair Housing Trends Reports (2022-2024) by the National Fair Housing Alliance (NFHA) and the Department of Justice (2020-2024), demonstrates significant efforts to combat housing discrimination. These cases address issues such as disability discrimination, racial bias, and inequitable housing practices, underscoring the need for reform to ensure fairness and inclusivity. Notably, several cases focus on Nevada, highlighting recurring challenges within the state. National cases also show how impediments to fair housing choice can lead to discrimination for protected classes and suggest effective reforms to remedy such impediments.

Two recent noteworthy cases in Nevada highlighted the protection of persons with disabilities requiring assistance animals. In United States v. Premiere Holdings, Inc. (2023), the owners and managers of a Las Vegas apartment building were accused of refusing to accommodate a resident's assistance animal—a pit bull—and threatening to enforce lease terms if the animal remained on the property.¹³⁰ The settlement required fair housing training, the adoption of non-discrimination policies, \$35,000 in compensation to the complainant, and the vacating of a small claims judgment. Similarly, in United States v. Pereos (2021), rental property operators in Reno were accused of violating the Fair Housing Act by denying service and assistance animal accommodation requests.¹³¹ This case was resolved with a consent order mandating the implementation of a reasonable accommodation policy, fair housing training, and \$27,500 in damages to the complainants.

Other noteworthy cases across the country address various forms of discrimination against protected classes. In United States v. Housing Authority of New Orleans (HANO) (2022), disability

¹³⁰ United States v. Premiere Holdings, Inc., No. 2:23-cv-00181, decided in Nevada, 2023.

¹³¹ United States v. Pereos, 3:21-cv-00031-MMD-CSD, decided in Nevada, 2022.

discrimination was central, as the failure to incorporate accessibility features in multi-family housing led to retrofits, damages, and penalties.¹³² Similarly, in United States v. LJLD, LLC (2022), issues of inaccessible design and construction resulted in property modifications and compensation for affected individuals.¹³³ Racial discrimination was highlighted in United States v. Town of Franklinton (2023), where the obstruction of a housing development for Black or African American residents prompted penalties and commitments to facilitate affordable housing opportunities.¹³⁴ Additionally, familial status discrimination was addressed in United States v. Teruel et al. (2022), with remedial measures ensuring protections for families unjustly pressured to vacate their housing.¹³⁵

Recent cases have addressed zoning and land use discrimination. In United States v. The Commonwealth of Pennsylvania (2024), the state's building code was challenged for requiring automatic sprinkler systems in community homes for persons with intellectual disabilities or autism, which was not required for other similar homes.¹³⁶ Similarly, Stanton Square, LLC v. The City of New Orleans (2024) involved allegations that the city blocked the development of a multifamily apartment complex based on discriminatory objections, violating the Fair Housing Act and Title VI.¹³⁷ Additionally, instances of retaliation and interference were highlighted in United States v. Tammy Estrada et al. (2022), where defendants were accused of refusing to allow a resident to live with her assistance animals and retaliating against her for exercising her fair housing rights.¹³⁸ These cases resulted in damages and local land use reforms to uphold fair housing rights.

Collectively, these cases showcase the persistent challenges in housing equity and the vital role played by both federal enforcement efforts and private organizations in advocating for change. Nevada and federal cases findings the critical need for robust accountability to safeguard fair housing opportunities for all protected classes in the state.

Assessment of Existing Statewide Fair Housing Landscape

The state of Nevada lacks a strong capacity to educate residents about fair housing and create forums to resolve discrimination claims. Despite substantial interest in fair housing principles and expanded protections in localities, there is a lack of education on housing rights and avenues to enforce these protections or improve fair housing outcomes. While Nevada has invested significant resources into programs that reach populations needing fair housing measures, there is a shortage of resources specifically targeted at fair housing education and enforcement. Qualitative research from public consultations has highlighted how these programs and their constituents navigate the challenges of obtaining housing.

There are opportunities for growth in fair housing programs and policies within Nevada to address systemic challenges that hinder equitable access to housing. Participants emphasized a critical

¹³² United States v. Housing Authority of New Orleans, No. 2:22-cv-03568, decided in Louisiana, 2022.

¹³³ United States v. LJLD, LLC, No. 4:22-cv-01012, decided in Missouri, 2022.

¹³⁴ United States v. Town of Franklinton, No. 2:23-cv-00181, decided in Louisiana, 2023.

¹³⁵ United States v. Teruel et al., No. 23-cv-03536, decided in California, 2023.

¹³⁶ United States v. The Commonwealth of Pennsylvania, No. 1:24-cv-01987, decided in Pennsylvania, 2024.

¹³⁷ Stanton Square, LLC v. The City of New Orleans, No. 2:23-cv-05733, decided in Louisiana, 2023.

¹³⁸ United States v. Tammy Estrada et al., No. 2:22-cv-00181, 2022.

lack of renter protections, such as the absence of rent control measures, which has allowed rental prices to rise disproportionately compared to wage growth, placing considerable strain on tenants.¹³⁹ Insufficient funding for legal aid programs has left many renters without adequate support to combat discrimination, and the lack of mediation services perpetuates conflicts between tenants and landlords.¹⁴⁰ The absence of landlord accountability further exacerbates these issues, as landlords are not required to disclose tenant rights, nor are there robust penalties—such as fines or mandatory training—to deter housing discrimination.¹⁴¹ Additionally, the void in protections against no-cause evictions and policies mandating the acceptance of housing vouchers as income reflects systemic inequities.

Participants also highlighted the gap in fair housing education, noting that many residents are unaware of their rights and responsibilities, which compounds the difficulties faced by tenants. Additionally, Nevada's exclusion of two vulnerable groups—voucher holders and residents of youth or elderly households in rent-assisted housing—from statewide protections creates significant disparities. Specifically, Nevada lacks statewide source of income protection for households that hold Housing Choice Vouchers, leaving voucher holders disadvantaged compared to those in jurisdictions with such protections.¹⁴² Without these protections, voucher holders face barriers to moving into racially integrated or lower-poverty neighborhoods.¹⁴³ Similarly, the lack of specific safeguards for youth and elderly populations leaves these groups exposed to housing vulnerabilities.¹⁴⁴

These findings suggest a pressing need for comprehensive policy reforms, increased funding for legal aid, and enhanced public education initiatives to address these systemic shortcomings. By prioritizing renter protections, enforcing landlord accountability, and extending legal safeguards to underserved groups, the state can make meaningful progress toward achieving fair and equitable housing access.

During the consultations conducted for this AI, participants highlighted several deficiencies in fair housing programs and measures within the state. They noted a significant lack of protections for renters, particularly the absence of rent control measures, which has resulted in rental prices increasing at a rate far exceeding wage growth.¹⁴⁵

¹³⁹ Consultations conducted for the State of Nevada Consolidated Plan, February 2025.

¹⁴⁰ Consultations conducted for the State of Nevada Consolidated Plan, February 2025.

¹⁴¹ Consultations conducted for the State of Nevada Consolidated Plan, February 2025.

¹⁴² Consultations conducted for the State of Nevada Consolidated Plan, February 2025.

¹⁴³ Consultations conducted for the State of Nevada Consolidated Plan, February 2025.

¹⁴⁴ Consultations conducted for the State of Nevada Consolidated Plan, February 2025.

¹⁴⁵ Consultations conducted for the State of Nevada Consolidated Plan, February 2025.

Actions to Assess and Overcome Impediments

This Analysis of Impediments identified numerous barriers to housing choice and access across the state of Nevada. While these barriers affect many Nevadans, they disproportionately impact protected classes due to differences in income, homeownership, access to resources, and housing needs.

The AI concludes with a list of ten impediments to fair housing choice, each supported by contributing factors identified throughout the analysis. Each impediment is accompanied by a list of actions that can be taken to remedy it over the next five years (2025-2029). It is the responsibility of the State of Nevada to take proactive measures with its funds, including HUD funds, to ensure that its program decisions further fair housing choice in the state. These actions will not completely remedy all identified barriers to housing choice or action, but they represent meaningful steps to address fair housing over the duration of its next Consolidated Plan.

Impediment #1: Nevada has an insufficient supply of affordable rental options. The affordable rental shortage disproportionately impacts Black or African American and Hispanic or Latino renters, who have lower incomes on median and are more likely to pay more than 30% of their regular income on rent.

Summary of Contributing Factors: 225,105 or 48% of Nevada renters pay 30% or more of income on rent and the majority of these cost burdened renters are considered very low income at 50% of AMI or below. Black or African American and Latino or Hispanic renters are significantly more likely to face cost burdens than other renters.

Actions To Overcome Impediment Include: The development of subsidized, affordable rental options in urban and rural communities throughout the state. While any new affordable rental unit would expand availability and choice, the greatest need is for very low-income renters earning 50% of AMI or below. To do this, Nevada can continue its support for rental development through its HOME and Low-Income Housing Tax Credit program. Additionally, the state can consider expanding resources for land acquisition to address the impacts of the rising cost of land on affordable rental projects.

Impediment #2: There is an insufficient supply of rental housing. The lack of housing supply limits choices, raises prices, and contributes to the state's shortage of affordable rental housing, which disproportionately limits choices for Black or African American and Latino or Hispanic renters, families and older adults.

Summary of Contributing Factors: Between 2010 and 2023, the state added more households than housing units, causing rents to rise in metropolitan areas. Additionally, 54% of new multifamily rental growth consisted of units with two bedrooms or fewer, which restricts options for families and larger households. Furthermore, seven out of the state's nine largest jurisdictions limit multifamily housing to less than 20% of zoned land area, further restricting available locations.

Actions To Overcome Impediments: Land use laws are local and outside of statewide jurisdiction. Instead, the state and local jurisdictions must collaborate to find effective local solutions. To support local jurisdictions in policy changes that increase rental supply, Nevada staff can leverage existing monitoring of local housing production measures and conduct additional analysis to help jurisdictions understand which local actions result in the most significant increase in housing activity.

Impediment #3: There are insufficient protections for tenants statewide. Weak protections impact cost-burdened renters, who are disproportionately Black or African American and Hispanic or Latino, as well as youth and older adults.

Summary of Contributing Factors: A substantial number of Nevadans in Clark and Washoe County are behind on rent. The lack of eviction protections puts those in rent debt at risk of losing their housing altogether. Additionally, Nevada lacks statewide source of income protections for rent-assisted households, as well as age protections for both youth and elderly in these households.

Actions to Overcome Impediments: The State of Nevada, specifically NHD, will collaborate with various organizations across Nevada that provide eviction protection resources to better connect them with tenants in need. Specific collaborations include working with the Rural Nevada Continuum of Care to gather input on increasing case management or legal services for impacted renters and partnering with legal aid organizations to expand eviction protection resources statewide. Additionally, NHD will consider rapid rehousing as a potential goal of its Emergency Solutions Grant program.

Impediment #4: There is an insufficient supply of small and affordable homeownership units. This lack of supply significantly curtails housing options and choices for older adults and other households seeking affordable homeownership opportunities.

Summary of Contributing Factors: six out of nine major urban jurisdictions limit small single-family zoning to just 20% of land area. As a result, 55% of new net homeownership units were 4 bedrooms or more between 2010 and 2023. Just 3% of new net homeownership units were two bedrooms or less between 2010 and 2023.

Actions to Overcome Impediments: Nevada will continue to prioritize the development of affordable homeownership opportunities, including starter homes, in its funding decisions, particularly through the HOME program. Nevada will also support jurisdictions aiming to expand their supply of starter homes by conducting analyses to help these areas understand which local actions can most significantly boost new construction activity. In rural areas, Nevada will focus on rehabilitation activities and explore assisting grantees with advertising strategies to expand the pool of contractors supporting these efforts.

Impediment #5: There are barriers to homeownership. Black or African American and Latino households are less likely to take out home loans or refinance their homes compared to White households. This disparity limits housing access for these buyers, especially as home sale prices continue to rise.

Summary of Contributing Factors: Throughout the 2020s, White households have disproportionately taken out loans and refinanced compared to Black or African American or Hispanic or Latino households. The state lacks an ecosystem of programs to help bridge this gap. This includes assistance programs that offer homebuyer support and education, as well as organizations that provide housing counseling and case management services. Nevada has nine Housing Counseling Agencies, all concentrated in the Reno and Las Vegas metropolitan areas, placing Nevada in the bottom 10 of all states.

Actions to Overcome Impediments: NHD will explore expanding its existing homebuyer assistance program, particularly in rural areas where prices have significantly increased. Additionally, NHD will seek to expand collaborations with organizations that provide housing counseling and case management services to close geographic gaps in services. This may include further collaboration with Nevada Rural Housing to help address the shortage of HUD-certified housing counselors in rural parts of the state.

Impediment #6: There is an insufficient supply of housing options for older adults & persons with disabilities. This lack of supply reduces the housing choices available to both groups.

Summary of Contributing Factors: Older adults were Nevada's fastest growing age cohort between 2010 and 2023. The number of Nevadans with a disability grew by 47% during the same period. Consultations revealed a significant shortage of homes with accessibility features and affordable one-bedroom units that meet the needs of this growing demographic.

Actions to Overcome Impediments: Nevada will enhance accessibility in state-supported housing by developing fair housing evaluation criteria, including the fulfillment of Section 504 marketing requirements for accessible units. Nevada will collect and analyze data from the checklist to identify gaps and recommend policy changes. Additionally, NHD staff will explore collaboration with LIHTC program administrators to adjust scoring, incentivizing accessible and older adultfriendly units. Finally, Nevada will partner with organizations to distribute resources on universal design provided by AARP and other organizations.

Impediment #7: NHD program investments do not align with all housing needs. This limits availability and housing choices for families with children and older adults, who are mismatched with available housing.

Summary of Contributing Factors: Nevada's LIHTC and HOME programs often support studio and one-bedroom units, which do not meet the needs of larger families. Almost half of subsidized housing units are studios and one-bedrooms, and nearly three-fourths of buildings with units for families consist of two bedrooms or less

Actions to Overcome Impediments: NHD will explore the feasibility of program or scoring changes to LIHTC and HOME/HTF for developers willing to commit to smaller ownership units and larger rental units to provide more diverse affordable housing options.

Impediment #8: NHD investments do not fully direct housing into areas of opportunity. Stateassisted affordable housing is often found in high-poverty communities with limited transportation access and fewer high-quality schools. This situation disproportionately affects lower-income Nevadans, who are more likely to be Black or African American or Hispanic or Latino.

Summary of Contributing Factors: Very few affordable housing units, and virtually no public or rentassisted units, are located in very low poverty areas. Nearly half of these units and two-thirds of assisted households are in below-median performing schools. Additionally, very few low-income households live near reliable transit. Actions to Overcome Impediments: Nevada will explore changing program requirements to better target resources to affordable housing developments in communities near transportation, jobs, good schools, and other amenities. NHD staff will collaborate with LIHTC program administrators to target state housing awards to communities with low poverty rates, higher-performing schools, and greater access to transportation.

Impediment #9: There is a lack of enforcement capacity of Fair Housing laws across the state. This disproportionately impacts all protected classes affected by the lack of housing choice and access and limits options to address.

Summary of Contributing Factors: Nevada does not have an entity solely dedicated to receiving, investigating and remediating fair housing complaints. HUD Region 9 processed the largest number of complaints, which indicates the need for additional capacity for intake. Individuals experience difficulties finding housing due to their identity, financial history or health status.

Actions to Overcome Impediments: The State will better collaborate with organizations and share information, especially the impediments and barriers identified in AI process.

Impediment #10: There are barriers to access to existing programs and services. This disproportionately impacts all protected classes affected by limitations accessing housing across Nevada.

Summary of Contributing Factors: Direct service providers have highlighted that program funding requirements lack the flexibility needed to help clients overcome barriers to accessing housing. Additionally, these providers lack shared infrastructure for case management, which complicates their efforts. This issue is further compounded by gaps in internet access, reducing participation in rural areas

Actions to Overcome Impediments: NHD will engage with the Continuum of Care (CoC) and non-CoC funded organizations to improve system wide access to services and increase coordination across systems in areas such as domestic violence, human trafficking, and elderly care. Additionally, NHD will collaborate with other state agencies and housing entities to reduce silos through training and technical assistance. This effort includes coordinating, engaging, and building relationships with CoCs to address the barriers of paperwork and coordination among service providers.

Appendix A

State of Nevada Consultation Summary

February 2025

Nevada 2025 - 2029 ConPlan and AI Consultation/Public Engagement

Introduction

To inform the Analysis to Impediments, the Consolidated Plan, and the 2025 Annual Action Plan, ICF used a combination of public engagement sessions and consultations. The schedule is included below and is available in SharePoint at: <u>State of Nevada Consultation and Public Engagement Schedule 012125.xlsx.</u>

Meeting Description	Date	Time (PST)
State of Nevada Consultation around Homeless Needs and CoC Collaboration	Tuesday, January 28, 2025	10 - 11am PST/1 - 2pm EST
State of Nevada Consultation around Local Government, Broadband, Public Land Management, Emergency Management, and Lead Based Paint Hazards	Tuesday, January 28, 2025	1 - 2pm PST/4 - 5pm EST
State of Nevada Consultation around Housing Opportunities for Persons with AIDS	Wednesday, January 29, 2025	11 - 12am PST/2 - 3pm EST
State of Nevada Consultation around Housing Needs	Wednesday, January 29, 2025	1 - 2pm PST/4 - 5pm EST
State of Nevada Consultation around Health, Victim Services, Employment, Education, and Systems of Care	Thursday, January 30, 2025	10 - 11am PST/1 - 2pm EST
State of Nevada Consultation around Social Services, Fair Housing, and Protected Classes	Thursday, January 30, 2025	1 - 2pm PST/4 - 5pm EST
State of Nevada Public Engagement Session around Public Services, Public Facilities, Economic Development, and Housing	Tuesday, February 4, 2025	1 - 2pm PST/4 - 5pm EST

Input Opportunities:

The State of Nevada convened six consultation meetings, engaging over 150 participants from more than 35 distinct consultation groups across the state, representing a total of 77 organizations.

Additionally, 13 participants attended the Public Engagement session. Three participants from representing two organizations participated in the Public Hearing, which was conducted prior to the drafting of the ConPlan and the Analysis of Impediments to Fair Housing Choice. Furthermore, the Consultation and Public Engagement Survey garnered 57 responses, including submissions from 42 organizations and eight individuals.

In total, the State of Nevada's Consultation and Public Engagement efforts have culminated in over 225 interactions with individuals and organizations statewide.

Data, including charts detailing the responses from each Input Opportunity can be found in Appendix I: Consolidated Nevada Consultation, Public Engagement, and Survey Responses. Summaries from each Input Opportunity can be found below:

Input	Date/ Time/	Participant Details
Opportunity	Method	
Consultation:	January 28,	25 participants representing 15 organizations –
Homeless Needs	2025	
and Continuum		Advocates to End Domestic Violence, Carson City Health and
of Care (CoC)	10 – 11am PT	Human Services, Churchill County, City of Henderson, Clark
Collaboration		County, Department of Health and Human Services Nevada
	Virtual	Division of Public and Behavioral Health (DPBH), Eddy House,
	Meeting	Edward Kline Memorial Homeless Veterans Fund, HopeLink of
		Southern Nevada, Lyon County, Salvation Army, Silver Summit
		Health Plan,
		Vitality Unlimited, Washoe County, Winged Wolf Innovations,
		LLC

The primary challenge to reducing homelessness as identified was the lack of affordable housing, including insufficient inventory, barriers for individuals below 30% AMI, and landlords unwilling to rent to voucher holders. Attendees also highlighted gaps in mental health and substance use services, stigma, and the need for supportive infrastructure like job training, life skills development, and permanent supportive housing. Participants emphasized the need for increased rental assistance, more vouchers, and permanent supportive housing, alongside flexible funds for rental arrears. Participants also recommended programs that focus on eviction prevention, such as emergency rental and utility assistance, landlord engagement, and support for individuals transitioning from treatment centers or incarceration.

Most Common Input Topics Per Question:

Top Housing Needs – Deeper Affordability Restrictions, Affordable Housing, Senior Housing.

Actions to Overcome Barriers to Access or Development – Need for Increased Funding for Programs/Services, Rental/Mortgage/Utility Assistance, Public Land Management, Restrictive Zoning Regulations, Provide Training/TA/Collaboration/Capacity Building for Providers, and More Targeted Funding.

Most Significant Barriers to Finding and Maintaining Safe and Affordable Housing – Landlord Issues/Requirements, Lack of Affordable Housing, Deeper Affordability Restrictions.

Top Barriers to Accessing Housing – Landlord Issues/Requirements, Lack of Affordable Housing, More Targeted Funding Needed, Rental/Mortgage/Utility Assistance Needed.

Top Obstacles to Developing or Preserving Housing Using State Funds – Need for Increased Funding for Programs/Services, Housing Accessibility, Landlord Engagement/Incentives, Development Costs/Fees, More Targeted Funding, Senior Housing, NIMBYism.

Barriers to Housing Development Existing at Other Levels of Government – Development Timeline (Zoning and Permitting) and Development Costs/Fees.

Input Opportunity	Date/ Time/ Method	Participant Details
Consultation:	January 28, 2025	42 participants representing 21 organizations –
Local Government,		
Broadband, Public	1 – 2pm PT	Carson City, Churchill County, City of Carlin, City of Elko,
Land Management,		City of Henderson, City of Las Vegas, City of Reno, Clark
Emergency	Virtual Meeting	County, State of Nevada Department of Health and Human
Management, and		Services Division of Welfare and Supportive Services,
Lead Based Paint		Douglas County, Eddy House, Elko County, Humboldt
Hazards		County, Emergency Management, Lincoln County – WSAP,
		Lyon County, NV Governor's Office of Economic
		Development, Pershing County, Silver Summit Health Plan,
		Southwest Central Regional Economic Development
		Authority, Washoe County

The primary need identified during this consultation is for increased affordable housing stock across the state, particularly for young families, seniors, individuals with disabilities, and youth. Youth face significant barriers, including limited rental options in college towns and restrictions on group housing. Rural Nevada lacks shelter options for homeless youth, forcing them to relocate, while elderly residents face long waitlists for affordable housing. Tiny home villages are emerging as a potential solution, with efforts in Douglas County serving as a good example in using tiny homes as primary and accessory dwellings. Existing low-income housing is at risk of losing affordability restrictions, further limiting options for vulnerable populations.

Key barriers to housing development include high costs for land, labor, materials, and infrastructure, especially in rural areas. Limited available land, lengthy processes for obtaining land held under the Bureau of Land Management, and complicated financing and reporting requirements delay projects.

Most Common Input Topics Per Question:

Input Around Public Land Management, Emergency Management, or Lead Based Paint Hazards – Broadband Access, Need for Increased Funding for Programs/Services, Provide TA/Training/Collaboration/Capacity Building for Providers, Public Land Management.

Top Barriers Preventing Residents from Buying or Renting – Lack of Affordable Housing and Broadband Access.

Top Barriers to Developing Housing – Development Costs/Fees, Rental/Mortgage/Utility Assistance, Public Land Management.

Top Housing Needs – Lack of Affordable Housing, Senior Housing Needed, Shelters Needed.

Barriers to Broadband Access – Broadband Access (Public Land Management) and Provide Training/TA/Collaboration/Capacity Building for Providers.

Input Opportunity	Date/ Time/ Method	Participant Details
Consultation: Housing	January 29, 2025	11 participants representing 7 organizations –
Opportunities for Persons		
with AIDS (HOPWA)	10 – 11am PT	Access to Healthcare Network, City of
		Henderson, City of Las Vegas, Clark County,
	Virtual Meeting	Eddy House, Northern Nevada HOPES, Silver
		Summit Health Plan

Stigma and discrimination are the largest barriers for people living with HIV/AIDS, as indicated during this session. The top need identified is education around HIV/AIDS. Another challenge for community members living with HIV/AIDS is transportation barriers. While urban areas have robust bus systems, rural areas suffer from underdeveloped public transportation, requiring long walks to access bus stops. Additionally, limited bus run times in some areas prevent residents from relying on buses for work transportation. Homeless individuals face the added difficulty of lacking secure storage for their HIV/AIDS medication and fear disclosing their condition to communities that could provide shelter and resources.

Barriers to implementing meaningful programs and services for those living with HIV/AIDS include insufficient funding and the inability of community agencies to execute programs. Staffing issues, the administrative burden of program management, and the limited capacity of agencies further hinder efforts. Additionally, there is a disparity between the capacity and willingness of agencies to implement these programs effectively.

Most Common Input Topics Per Question:

Existing Barriers for Community Members Living with HIV/AIDS – Stigma and Discrimination for People Living with HIV/AIDS and Affordability of Housing.

Barriers that Might Prevent Implementation of Meaningful Programs for Community Members Living with HIV/AIDS – Stigma and Discrimination for People Living with HIV/AIDS.

Programs or Services That Would Be Most Helpful to Community Members Living with HIV/AIDS – Education around HIV/AIDS.

Input Opportunity	Date/ Time/ Method	Participant Details
Consultation: Housing Needs	January 29, 2025	42 participants representing 21 organizations and 2 individuals –
	Virtual Meeting	American Covenant Senior Housing Foundation, Carson City Health and Human Services, City of Henderson, Clark County, Corporation for Supportive Housing, Eddy House, Gregory Development Group and Weststates Property Management, Habitat for Humanity Las Vegas, Mountain West Builders, Nevada Hand, Nevada Housing Division, Nevada Rural Housing Authority, Ovation, Praxis Consulting Group, Rebuilding Together Northern Nevada, Reno Housing Authority, Rural Nevada Development Corporation, Silver Summit Health Plan, Southern Nevada Regional Housing Authority, Spirit of Hope, Inc. Carson City, Ulysses Development Group

The primary housing needs identified include a lack of affordable housing and mental health and substance abuse programs. Attendees anecdotally reported a particularly low inventory of one-bedroom units compared to two-bedroom units, with a specific need for one-bedroom units for seniors, which are rarely vacated once occupied. Finding options and resources for clients is challenging, and available units are quickly taken. Background checks and the lack of affordable housing exacerbate the issue. Landlord incentives were suggested as a possible solution, and landlord issues were discussed as a barrier to housing. Permanent supportive housing is also a critical need. Additionally, there was robust discussion around the importance of ensuring homeowners can age safely in their homes, as it is the most affordable option available to them. Mental health support is also essential.

Most Common Input Topics Per Question:

Ways In Which the State Can Better Support CoCs and Homeless Service Providers in the State – Provide Training/TA/Collaboration/Capacity Building for Providers, Prioritize Support for Rural Communities and CoCs, Increase Funding for Programs/Services.

Most Significant Barriers to Reducing Homelessness – Lack of Affordable Housing, Mental and Substance Use, Youth Services Needed, Economic Development – Jobs.

Programs or Services Most Helpful in Alleviating Homelessness – Rental/Mortgage/Utility Assistance, More Affordable Housing, Mental Health and Substance Use Programs.

Programs or Services Most Helpful in Helping Community Members At-Risk of Homelessness – Rental/Mortgage/Utility Assistance, Mental Health and Substance Use Programs, Landlord Engagement/Incentives.

Input Opportunity	Date/ Time/ Method	Participant Details
Consultation:	January 30, 2025	12 participants representing 8 organizations –
Health, Victim		
Services,	10 – 11am PT	Carson City Health and Human Services, Clark County,
Employment,		Eddy House, Nevada Outreach Training Organization -
Education, and	Virtual Meeting	Advocates for Children of Rural Nevada, Reno Community
Systems of Care		Services Agency, Silver Summit Health Plan, Southwest
		Central Regional Economic Development Authority, The
		Cupcake Girls

During this session, participants indicated that there are limited protections for renters, particularly regarding rental prices, which far outpace wages. Landlord issues and requirements were identified as the most pressing need for the State during this session. Landlords and companies are hoarding real estate and intentionally driving up market rates. The State also retains properties, contributing to the issue. There is a lack of communication and reliable information from those in positions of power. Youth face significant challenges in finding housing due to a lack of rental history, credit, and fleeing violent situations at home. It's crucial to ensure that resources are available to them without discrimination. The lack of mental health services and resources is leading to homelessness. Rent control was recommended as a solution. Additionally, upfront fees pose a significant barrier to applying for housing, causing applicants to lose money during the process. The State lacks reliable public transportation for protected classes to attend appointments. It was noted that the State should engage directly with protected classes and strengthen their protections. Affordability of housing was also identified as a barrier during this session.

Most Common Input Topics Per Question:

Ways in Which the State Can Better Support Organizations in Enforcing Fair Housing – Landlord Issues/Requirements and Increased Community Involvement and Education.

Ways in Which the State Can Better Support Organizations in Providing Services to Protected Classes – Strengthen Protections for Members of Protected Classes, Federal/State/Local Laws, Provide TA/Training/Collaboration/Capacity Building for Providers.

Main Challenges in Providing Services to Clients – Affordability of Housing and Landlord Requirements.

Ways in Which the State Can Better Support Organizations in Providing Services to Program Beneficiaries – Mental Health and Substance Use Assistance, Provide TA/Training/Collaboration/Capacity Building to Providers, Landlord Issues/Requirements.

Input	Date/ Time/	Participant Details
Opportunity	Method	
Consultation:	January 30,	26 participants representing 18 organizations and 1 individual –
Social	2025	
Services, Fair		Neighborhood Housing Services Southern Nevada, Carson City
Housing, and	1 – 2pm PT	Health and Human Services, Catholic Charities of Northern Nevada,
Protected		City of Henderson, Clark County Social Service, Community
Classes	Virtual	Development Partners, Department of Health & Human
	Meeting	Services Aging and Disability Services Division, Eddy House, Gregory
		Development Group and Weststates Property Management, HELP of
		Southern Nevada, Neighborhood Housing Services of Southern
		Nevada, Opportunity Village, Silver Summit Health Plan, Southern
		Nevada Senior Law Program, The Empowerment Center, Two Hearts
		Community Development, UnitedHealthcare Health Plan of Nevada
		Medicaid, University of Nevada, Reno Volunteers of America

The participants primarily serve households at risk of or experiencing homelessness, older adults and people with disabilities, low-income individuals and families, and youth populations such as LGBTQ+ and foster youth. They highlighted several challenges, including the scarcity of affordable housing with ADA accommodations, the need for aging-in-place solutions, and the difficulty in securing supportive housing for elderly individuals. There is a significant need for ADA and design features. Affordable housing is scarce, and affordable housing with accommodations is even more limited. Youth fleeing violence and aging out of foster care face barriers like lack of credit history and financial literacy, making housing access particularly difficult despite strong partnerships for supportive services. Consequently, landlord mediation was also identified as a top need. Rental, mortgage, and utility assistance were identified as top needs.

Restrictive zoning policies and special use permits were identified as major barriers to fair housing, particularly for group homes and emergency shelters. Licensed group homes often face citations from zoning authorities, forcing them to shut down, while HOAs and municipalities use code violations to push vulnerable residents out. Additionally, county workers play a key role in providing applications and connecting individuals to housing resources. To better support organizations, the State of Nevada can focus on releasing more Bureau of Land Management land and promoting urban infill and redevelopment, with cost offsets to ensure land is available for affordable housing. Additional support is needed to address the high costs of housing development, including infrastructure investments. Ensuring programs provide updated information to state referral systems, such as Nevada 211, would also improve service delivery and access for beneficiaries.

Most Common Input Topics Per Question:

Ways in Which Participants Currently Engage the Community to Identify and Address Fair Housing Issues and What Has Been Most Successful – Landlord Engagement/Incentives, Increased Community Involvement and Engagement, TA/Training/Collaboration/Capacity Building for Providers.

Ways in Which the State Can Better Support Organizations in Enforcing Fair Housing – Landlord mediation.

Resources, Remediation, and Advocacy People are Most Seeking When Reaching Out to Organizations – Rental/Mortgage/Utility Assistance, Community Resources for Members of Protected Classes, Affordability of Housing, Landlord Issues/Requirements.

Input Opportunity	Date/ Time/ Method	Participant Details
Public Engagement	February 4,	13 participants representing 13 organizations and 1
Session: Housing,	2025	individual –
Homelessness Needs,		
Public Services, Public	1 – 2pm PT	American Covenant Senior Housing, Attorney for the
Facilities, and		Rights of Older Persons and Persons with a Physical
Economic	Virtual Meeting	Disability, an Intellectual Disability, or a Related
Development		Condition, Black Wall Street, City of Reno, Boxabl,
		Churchill County, HELP USA, McCormack Baron
		Salazar, Millenium Commercial Properties, NV
		Governor's Office of Economic Development, The
		Nevada Commission on Minority Affairs, University of
		Nevada, Reno US Department of Agriculture

Homeless individuals face significant challenges navigating program eligibility due to missing information such as addresses, phone numbers, and credentials. Some may have assistance linked to their last known address, even if they are now in Nevada, which complicates their eligibility verification. There is a need to better prepare individuals for life through micro-solutions like skills training. Awareness of resources needs to be increased, especially in rural areas. Coordinating among service providers can help raise awareness. Financial/Housing education and case navigation were identified as needs during this session, as access to certain public sites requires an id.me or login.gov account, which not everyone can manage.

Broadband Access, Workforce Development, and Mental Health/Substance Abuse programs were also identified as needs for the State. In Nevada, many areas require a car to access work, school, or programs, highlighting a gap in public transportation.

Most Common Input Topics Per Question:

Economic Development Activities that would be Most Helpful to the State – Economic Development Activities for Seniors, Provide Economic Incentive Packages, Promote Mixed Use/Mixed Income Development, Economic Development – Partnerships.

Programs or Activities that would be Helpful in Assisting People who are Homeless – Case Navigation and Mental Health/Substance Use Programs.

Programs or Activities that would be Most Helpful in Assisting Residents in Obtaining/Maintaining Housing – Financial/Housing Education.

Public Facilities and Infrastructure Development or Upgrades Most Important in the State – Broadband Access.

Public Services Most Useful in the State – Workforce Development.

Appendix B

State of Nevada Survey Summary

February 2025

Input Opportunity	Date/ Time/ Method	Participant Details
Consultation	Opened on	57 responses representing 42 organizations and 8 individuals –
and Public	January 23,	
Engagement	2025	Advocates to End Domestic Violence, C.P.L.C. of Nevada (owner)
Survey		& La Causa Development Nevada (Developer), City of Carlin, City
-	Closed on	of Henderson, City of Reno, City of Sparks, City of Wells, Clark
	February 11,	County, Community Development Programs Center of Nevada,
	2025	Consolidated Agencies of Human Services, Lincoln NV County
		Commissioner, DHHS ADSD Office of Advocacy Rights Attorney,
		Douglas County, DPBH Rural Clinics, Eddy House, Elko County,
		Esmeralda County, FISH, HELP of Southern Nevada, HopeLink of
		Southern Nevada, Jackson Street Alliance, Elko County Juvenile
		and Family Court, 4th Judicial District Court, Las Vegas
		Metropolitan Police Department, Las Vegas, NV, Nevada HAND,
		No To Abuse - Nevada Outreach Training Organization, Northern
		Nevada HOPES, Oikos Development Corporation, Ovation,
		Pershing County Economic Development / NV 95-80 RDA, Reno
		Community Services Agency,
		Rural Nevada Development Corporation, Southern Nevada
		Regional Housing Authority,
		Southwest Central Regional Economic Development Authority,
		Spirit of Hope, Inc. Carson City, City of Ely, Vegas Stronger,
		Vets365, Vitality Unlimited, Volunteers of America - Northern
		California and Northern Nevada, Washoe County, Weststates
		Property Management Co - Gregory Development
-		

Survey respondents highlighted the development and maintenance of affordable housing as the State's top priority. They also emphasized the importance of supporting local planning activities, emergency shelters, income assistance to maintain existing housing and prevent evictions/foreclosures, and the creation or rehabilitation of facilities for individuals with special needs, such as unhoused people and victims of domestic violence. Additionally, health, mental health, substance abuse programs, and employment programs were identified as critical areas for State funding.

Most Common Input Topics Per Question:

Most Important Community Development Project Types – Affordable Housing, Community Planning and Development, Public Facilities and Infrastructure, Economic Development.

Most Important Affordable Housing Needs – Affordable Rental Units, Assistance for Local Affordable Housing Providers with Administrative, Operating, and Capacity Building Expenses, Senior Housing, Financial Assistance for Renters.

Most Important Community Planning and Capacity Building Needs – Encourage Local and Regional Planning Activities to Facilitate Understanding of Current Housing, Community Development, and Resiliency Needs and Develop a Plan for their Sustainable Future, Assist Communities with Identifying Achievable Goals to Address Community Needs, Align Community Goals with Funding Opportunities to Meet those Goals. **Most Important Community Stabilization and Development Needs** – Support Development and Maintenance of Affordable Housing Stock, Demolish Vacant/Blighted Structures, Support Strategic Property Acquisition and Disposition Activities.

Most Important Economic Development Needs – Create and Retain Jobs, Create and Expand Businesses, Job Training.

Most Important Needs for People Who Are Unhoused – Emergency Shetler (including essential services for people in emergency shelter and renovation/rehab/conversion of buildings to be used as emergency shelter), Short-and-Medium-Term Rental Assistance.

Most Important Needs Among Members of the Community Living with HIV/AIDS – Transitional Housing (e.g. hotel/motel short term shelter), Supportive Services (e.g. social workers, case management), Help Finding Permanent Affordable Housing.

Most Important Needs for People who are At-Risk of Homelessness – Income support to maintain existing housing, Permanent Supportive Housing, Mental Health/Substance Abuse/Behavioral Health Services.

Most Important Public Facilities and Improvement Needs – Creation/Rehab of Facilities for Persons with Special Needs such as Homeless or Domestic Violence Shelters, Nursing Homes, or Group Homes for People Living with Disabilities.

Most Important Public Services Needs – Employment Services (e.g. job training), Health/Mental Health/Substance Abuse Services, Childcare Services.

Appendix C

State of Nevada Data Sources Summary

February 2025

Data Sources

• United States Census, American Community Survey,