



## Executive Summary

### ES-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

#### 1. Introduction

The City of Lawton is a Federal Entitlement Community under the US Department of Housing and Urban Development (HUD) and therefore receives annual formula Community Development Block Grant (CDBG) and Home Investments Partnership Program (HOME) grants. As a condition of the funding, the City of Lawton is required to prepare a Consolidated Plan every five years to HUD. The purpose of the Consolidated Plan is to update the community-based analysis of current demographics and economic trends and to evaluate the community needs as a whole and the needs of low and moderate income population as related to public services, housing, and economic development opportunities. Each year, the City of Lawton also prepares an Annual Action Plan (AAP) to allocate funds to activities to address the goals of the Consolidated Plan. At the end of each year, the City of Lawton prepares a Consolidated

Annual Performance Evaluation Report (CAPRER) that provides an evaluation of how well the City of Lawton has performed in meeting the goals laid out in the Consolidated Plan and Annual Action Plan.

The CDBG program goals are to develop viable urban communities by providing safe and decent housing, a suitable living environment, and expanding economic opportunities for low and moderate income persons. HUD regulations require that each activity must meet one of the three National Objectives: Benefit people with low and moderate incomes; Aid in the prevention or elimination of slum and blight; or Meet an urgent need (such as earthquake, flood, or tornado relief). The HOME program supports the development of affordable housing, expands capacity of affordable housing developers, and leverages private sector investments. This Consolidated Plan details the City of Lawton's strategy for meeting National Objectives and HOME program goals.

## **2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview**

The City of Lawton conducted a Needs Survey in February-March of 2021 and as a result the City of Lawton has prioritized the following needs:

- Creation and Retention of Affordable Housing
- Elimination of Slum and Blight
- Public Services
- Public Facilities and Infrastructure
- Prevention and Elimination and Homelessness

While some needs did not rank as high as others according to the Needs Survey, the City of Lawton feels that all are critical and can make a huge difference in the community.

## **3. Evaluation of past performance**

The City of Lawton has made progress towards the accomplishment of goals outlined in the 2016-2020 Consolidated Plan. The City of Lawton has also been successful in accomplishing goals established by the 2018 Amendment and 2019 Amendment to the Consolidated Plan. Affordable Housing has been and remains a priority need for the City of Lawton. The City continues to provide assistance to low-income homeowners with needed repairs on their home so they are able to continue to reside in a safe and sanitary condition along with keeping up a nice appearance that in return reflects positively on the neighborhood. Through a partnership with Great Plains Improvement Foundation, rental homes for low-income families have been rehabilitated in order to keep the rental stock from declining. Community Centers have seen improvements allowing citizens a place to participate in recreational activities and skills training.

## **4. Summary of citizen participation process and consultation process**

The consultation process for this Consolidated Plan provided opportunities for residents, service providers, and other community leaders to contribute. A Community Needs Survey was conducted from February 2021 through March 2021 for citizens and community partners to describe the needs they felt the community had and what the priority needs are. A request for funding proposals was sent out to non-profits in the community through United Way and was published in the paper on April 30, 2021. The City Planning Commission reviewed funding applications at their meeting on June 10, 2021. Public Services Organizations were able to provide input as to what they felt the community needs were. Draft reports were available for public comment at five different locations in town, including the three community centers and the public library. A public notice was published in the Lawton Constitution on June 23, 2021 notifying the public of the locations where the drafts could be reviewed and of the public hearings that took place at the City Planning Commission meeting on July 15, 2021 and the City Council meeting that took place on July 27, 2021.

## **5. Summary of public comments**

The public participation process included two hundred and thirty-seven people participating in the Community Needs survey and nine non-profit organizations providing funding proposals and giving input on community needs. No comments were received by phone, email, or in person by citizens via the public comment sheets at each location where the draft was available to be reviewed nor at either of the public hearings.

## **6. Summary of comments or views not accepted and the reasons for not accepting them**

All comments were received and evaluated. One funding request from an organization was not accepted since they did not meet the qualifications of a public service organization.

## **7. Summary**

The City of Lawton has had more involvement from the community this year as part of the Consolidated Plan than in the last several years. We look at this as a positive step in the development and growth of the City. The more the community is involved in the planning, the more they care about the outcomes and see the impact HUD funding can have on the community. The City of Lawton is excited about the upcoming economic developments on the horizon. The Chamber of Commerce and City leaders have been working hard to prepare Lawton for new opportunities.

## The Process

### PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

**1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source**

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	LAWTON	HOUSING AND COMMUNITY DEVELOPMENT
HOME Administrator	LAWTON	HOUSING AND COMMUNITY DEVELOPMENT

**Table 1 – Responsible Agencies**

### Narrative

The lead agency for overseeing the development of the Consolidated Plan and the Annual Action Plan, and for administering the programs covered by the plan is the Housing & Community Development Division of the City of Lawton, Community Services Department.

### Consolidated Plan Public Contact Information

For questions or comments regarding the plan, please contact Christine James, Housing & Community Development Administrator, City of Lawton, 1405 SW 11th Street, Lawton, OK 73501.

## **PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)**

### **1. Introduction**

The lead agency for overseeing the development of the Consolidated Plan and for administering programs covered by the plan is the Housing & Community Development Division of the City of Lawton, Community Services Department. The City of Lawton routinely communicates with several Public Service Organizations and the Lawton Housing Authority to listen to and understand their needs and the needs of their clients. The City Planning Commission reviewed funding proposals this year from non-profit organizations and was able to hear their needs firsthand. The Housing & Community Development Division staff is looking into ways to increase community involvement and open to any ideas brought forward for increased community involvement. Two new non-profit organizations came forward this year to be a part of the process.

#### **Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I)).**

The City of Lawton routinely communicates with the Lawton Housing Authority (LHA) and Great Plains Improvement Foundation (GPIF) to understand their programs and needs. The City continues to provide LHA with funding to assist in their prevention and rehousing program. LHA also manages the Homeless Management Information System (HMIS) that coordinates available resources for anyone needing assistance with a one-stop shop approach. The City also continues to provide GPIF with funding to assist in the rehabilitation of their rental homes to keep as many affordable homes as possible safe and sanitary and ready to be rented.

The City of Lawton also interacts with Public Service Organizations that provide services such as alcohol and drug counseling, delinquency prevention, senior services, and homelessness prevention counseling. The City of Lawton and partnering organizations work well together to provide information to clients about all resources that may be available.

#### **Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness**

Planning for the homeless strategies and outcomes starts with the City of Lawton Coalition to End Poverty. This is a broad based group of service/housing providers, faith based organizations; volunteer advocates and service recipients. This group provides insight and feedback on the Plan objectives to meet the needs of people who are homeless and have special needs. The Coalition updates the City’s

10-Year Plan to End Homelessness and works to provide awareness to elected officials, interested parties and the public about homelessness and people who have special needs.

The City of Lawton Housing and Community Development (HCD) works closely with the SW Continuum of Care (SWCoC) and its member agencies in our effort to address the needs of those experiencing homelessness. The City has placed particular emphasis on the chronically homeless, veterans experiencing homelessness and unaccompanied youth (ages 18-23), while adopting a housing first philosophy for addressing the overall issue. HCD has worked specifically to eliminate homelessness among veterans and has worked with the Lawton Housing Authority in their efforts to establish a network of service delivery, to be administered at the Veterans Resource Center currently under renovation. LHA works with the Veteran's Administration for administer VASH vouchers and case management and further with the Community Service Council (Tulsa, OK), which provide the Supportive Services for Veteran's Families grant funds locally.

**Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS**

The Executive Committee of the SW Continuum of Care oversees and evaluates the housing and service programs funded through the continuum, reviews proposals, and makes funding recommendations to the City's Housing and Community Development Division, which in turn makes recommendations to the City Council. HCD consults with the CoC, whenever possible, to assist in determining how to allocate Emergency Solution Grant (ESG) funds locally, further augmenting the city's ability to provide prevention and rehousing services to families experiencing homelessness or at risk. Additionally, recipients of the city's Public Service Grants are required to participate not only in SWCoC, but also in the HMIS.

Homeless Management Information System (HMIS) policies and procedures are developed through the Data Committee of the SWCoC, to comply with HUD data requirements, as well as other federal and local requirements and to meet the data needs of the CoC, as well as the City of Lawton which are helpful in developing performance standards and evaluating outcomes of the services provided. The HMIS for the SWCoC was officially merged with the statewide system on May 7, 2021, which means that all systems across the state of Oklahoma are now running together, allowing for greater access to client data for participating agencies and increased ability to accurately access the full extent of client needs, provide a more comprehensive system of care, and to evaluate the success of programs and resources dedicated to meeting those needs identified.

**2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities**

**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	Lawton Support Services, Inc.
	<b>Agency/Group/Organization Type</b>	PHA Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Lawton Support Services, a branch of the Lawton Housing Authority, was consulted directly by City staff to gauge current needs for public housing and Section 8 tenants. Information was provided by LHA about inventory, occupancy rates, and waiting list. The City of Lawton will continue to provide funding for their Prevention and Rehousing Program. New funding is being provided for a Veteran's Resource Center that will provide resources to homeless veterans including a temporary shelter.
2	<b>Agency/Group/Organization</b>	GPIF C. CARTER CRANE HOMELESS SHELTER
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Great Plains Improvement Foundation manages the C Carter Crane Homeless Shelter and was consulted directly by City staff to gauge current needs for homeless shelters and the services that comes along with providing temporary housing. Great Plains Improvement Foundation is also a Community Action Agency of Oklahoma and provides emergency repairs and weatherization activities to homeowners. Great Plains Improvement Foundation will continue to be funding to help manage the C Carter Crane Homeless Shelter.



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3	<b>Agency/Group/Organization</b>	Lawton City Planning Commission
	<b>Agency/Group/Organization Type</b>	Planning organization
	<b>What section of the Plan was addressed by Consultation?</b>	General City Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Lawton City Planning Commission (CPC) was consulted by presenting the plan at a regular commissioners meeting. At the meeting nine non-profit organizations were able to present their request for funding and explain their needs to the commissioners. The CPC was able to provide their own ideas of how and where funding could be allocated. The commission is made up of nine community members with different backgrounds and professions.
4	<b>Agency/Group/Organization</b>	Marie Detty Youth and Family Services, Inc.
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Victims of Domestic Violence
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Families with children
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Marie Detty manages New Directions Shelter which is a shelter for victims of domestic violence. They were able to describe their program and provide information on the need for such a shelter in our community.
5	<b>Agency/Group/Organization</b>	Christian Family Counseling Center
	<b>Agency/Group/Organization Type</b>	Services-Health Services-Education
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Counseling Services
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Christian Family Counseling provides professional counseling to individuals and families in a variety of areas. They were invited to a City Planning Commission meeting where they were able to describe their program and provide information on the need for such a service in our community.

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6	<b>Agency/Group/Organization</b>	Center for Creative Living, Corp.
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons
	<b>What section of the Plan was addressed by Consultation?</b>	Senior Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Center for Creative Living, Corp. provides programs, services and activities that enhance the overall wellbeing of senior citizens. They were invited to a City Planning Commission meeting where they were able to describe their program and provide information on the need for such a service in our community.
7	<b>Agency/Group/Organization</b>	Family Promise of Lawton
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-homeless Services-Education
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Families with children
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Family Promise provides a homeless shelter for families where they can stay together as a family unit. They were invited to a City Planning Commission meeting where they were able to describe their program and provide information on the need for such a service in our community.
8	<b>Agency/Group/Organization</b>	TEEN COURT, INC.
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Education
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Teen Court supports delinquency prevention through educational classes for first time youthful offenders. They were invited to a City Planning Commission meeting where they were able to describe their program and provide information on the need for such a service in our community.

9	<b>Agency/Group/Organization</b>	Grady Brewer Foundation
	<b>Agency/Group/Organization Type</b>	Services-Children Foundation
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Grady Brewer Foundation supports delinquency prevention through after school boxing lessons for at risk youth. They were invited to a City Planning Commission meeting where they were able to describe their program and provide information on the need for such a service in our community.

**Identify any Agency Types not consulted and provide rationale for not consulting**

The City of Lawton consulted with relevant agencies and provided an opportunity to the public to comment and provide feedback on the plan priorities through public meetings and needs survey.

**Other local/regional/state/federal planning efforts considered when preparing the Plan**

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
Continuum of Care	Lawton Housing Authority	???

**Table 3 – Other local / regional / federal planning efforts**

**Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))**

Consolidated Plan priority needs, goals and action steps have been discussed with the Lawton City Planning Commission and the Lawton Housing Authority. There responses have been used to develop the plan.

**Narrative (optional):**

**PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)**

**1. Summary of citizen participation process/Efforts made to broaden citizen participation  
Summarize citizen participation process and how it impacted goal-setting**

The consultation process for this Consolidated Plan provided opportunities for residents, service providers, and other community leaders to contribute. A Community Needs Survey was conducted from February 2021 through March 2021 for citizens and community partners to describe the needs they felt the community had and what the priority needs are. A request for funding proposals was sent out to non-profits in the community through United Way and was published in the paper on April 30, 2021. The City Planning Commission reviewed funding applications at their meeting on June 10, 2021. Public Services Organizations were able to provide input as to what they felt the community needs were. Draft reports were available for public comment at five different locations in town, including the three community centers and the public library. A public notice was published in the Lawton Constitution on June 23, 2021 notifying the public of the locations where the drafts could be reviewed and of the public hearings that took place at the City Planning Commission meeting on July 15, 2021 and the City Council meeting that took place on July 27, 2021.

The public participation process included two hundred and thirty-seven people participating in the Community Needs survey and nine non-profit organizations providing funding proposals and giving input on community needs. No comments were received by phone, email, or in person by citizens via the public comment sheets at each location where the draft was available to be reviewed nor at either of the public hearings.

The Community Needs Survey was the most impactful when it came to goal setting with over 200 citizens responding to the survey.

**Citizen Participation Outreach**

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
1	Newspaper Ad	Non-targeted/broad community	No comments were received via email, phone or in person.	NA	NA	
2	Public Hearing	Non-targeted/broad community	Seven non-profit organizations spoke regarding their funding request and the need their program filled in the community.	No public comments were received outside of the non-profit organizations. All organizations comments were received and evaluated.	NA	
3	Public Hearing	Non-targeted/broad community	No public responses.	NA	NA	
4	Internet Outreach	Non-targeted/broad community	The Community Needs Survey had 237 responses. Surveys were conducted mostly online but you could also call or visit City Hall to submit a survey.	Several comments were related to slum and blight removal and needed improvements to public infrastructure.	NA	

**Table 4 – Citizen Participation Outreach**

## **Needs Assessment**

### **NA-05 Overview**

#### **Needs Assessment Overview**

The City of Lawton conducted a Community Needs Assessment in February-March of 2021. This was the first Community Needs Assessment conducted since 2005. The 2021 Needs Assessment was an online survey that was publicized on the local news station, local radio stations, City of Lawton website, and through local non-profit organizations. At the time the Assessment was conducted, the City of Lawton was in the process of opening back up from the COVID 19 pandemic, and decided that an online survey would potentially receive the most responses versus public meetings. The City plans to conduct regular Needs Assessments in the future to verify that the Annual Action Plans goals and projects meet the community needs as a whole. The City of Lawton was also able to hire a consultant to conduct an Analysis of Impediments to Fair Housing, and that analysis provided valuable information as well.

## NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

### Summary of Housing Needs

The following data shows that a significant percentage of household (both renters and homeowners) earning less than 50% of the Area Median Income (AMI) suffer from housing problems. According to the data, 70% of renter households and 55% of owner households earning less than 50% AMI, are experiencing 1 or more of four housing problems, which may include the lack of a kitchen or complete plumbing, severe overcrowding and/or severe cost burden. While only about 3% of renters lack complete plumbing or kitchen facilities or experience severe overcrowding, 63% of renters experience a housing cost burden. The percentage is a little lower for homeowners, but still 48% experience housing cost burden. The Small Related category (2-4 family members) has the highest percentage of all households.

Demographics	Base Year: 2009	Most Recent Year: 2017	% Change
Population	90,766	95,140	5%
Households	33,107	33,035	-0%
Median Income	\$40,811.00	\$44,335.00	9%

**Table 5 - Housing Needs Assessment Demographics**

**Data Source:** 2000 Census (Base Year), 2013-2017 ACS (Most Recent Year)

### Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	4,690	3,970	6,495	3,720	14,150
Small Family Households	1,450	1,630	2,875	1,330	6,910
Large Family Households	285	320	550	465	1,205
Household contains at least one person 62-74 years of age	635	465	840	754	2,743
Household contains at least one person age 75 or older	495	390	680	410	1,055
Households with one or more children 6 years old or younger	1,084	1,020	1,429	863	1,765

**Table 6 - Total Households Table**

**Data Source:** 2013-2017 CHAS



**Housing Needs Summary Tables**

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Substandard Housing - Lacking complete plumbing or kitchen facilities	115	10	135	65	325	45	10	15	10	80
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	50	0	65	55	170	10	0	30	10	50
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	35	55	80	50	220	4	0	50	20	74
Housing cost burden greater than 50% of income (and none of the above problems)	2,160	805	210	0	3,175	590	320	119	30	1,059

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	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	414	1,590	1,390	310	3,704	190	230	690	250	1,360
Zero/negative Income (and none of the above problems)	290	0	0	0	290	145	0	0	0	145

**Table 7 – Housing Problems Table**

Data 2013-2017 CHAS  
Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Having 1 or more of four housing problems	2,355	870	495	170	3,890	650	330	209	70	1,259
Having none of four housing problems	909	2,010	3,650	2,000	8,569	345	755	2,144	1,480	4,724
Household has negative income, but none of the other housing problems	290	0	0	0	290	145	0	0	0	145

**Table 8 – Housing Problems 2**

Data 2013-2017 CHAS  
Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	900	1,225	905	3,030	180	199	295	674
Large Related	245	154	180	579	30	54	110	194
Elderly	294	220	194	708	379	164	232	775
Other	1,258	839	478	2,575	244	140	175	559
Total need by income	2,697	2,438	1,757	6,892	833	557	812	2,202

Table 9 – Cost Burden > 30%

Data 2013-2017 CHAS  
Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	830	455	50	1,335	165	124	45	334
Large Related	205	29	0	234	30	19	0	49
Elderly	255	85	70	410	219	79	49	347
Other	954	244	189	1,387	224	100	20	344
Total need by income	2,244	813	309	3,366	638	322	114	1,074

Table 10 – Cost Burden > 50%

Data 2013-2017 CHAS  
Source:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	70	55	99	80	304	14	0	80	20	114

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	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Multiple, unrelated family households	10	0	15	0	25	0	0	0	0	0
Other, non-family households	0	0	35	30	65	0	0	0	10	10
Total need by income	80	55	149	110	394	14	0	80	30	124

Table 11 – Crowding Information – 1/2

Data Source: 2013-2017 CHAS

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	0	0	0	0	0	0	0	0

Table 12 – Crowding Information – 2/2

Data Source  
Comments:

**Describe the number and type of single person households in need of housing assistance.**

There are approximately 9,257 “Nonfamily households” in the City of Lawton, or 29% of the population. Of that amount, 7,802 or 84% are identified as “Householder living alone.” As a result, 24.6% of Lawton’s population can be identified as single person households. The elderly population of 65 years of age or older, accounts for 31% of the living alone population. According to the 2015-2019 American Community Survey (ACS) 5-year estimates, the median housing value is \$112,800, with average monthly mortgage of \$1,110 and rent of \$832. As a result, it can be anticipated that most single elderly households face a housing cost burden and therefore may be forced to live in substandard housing. Tenant based rental assistance offered through the Lawton Housing Authority, and funding partially by the City of Lawton, may reduce the housing cost burden for single person household.

**Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.**

It is estimated that over 2,000 clients will reach out to New Directions Shelter over the next year. New Directions Shelter is for victims of domestic violence, sexual assault and stalking. Victims of domestic violence usually include a mother and her children, but this is not always the case. Leaving a domestic violence situation usually also means leaving financial stability. Funding is provided by the City of

Lawton to Marie Detty Youth and Family Services to help fund the New Directions Shelter. Creating safe and affordable housing would give these families a fresh start.

**What are the most common housing problems?**

Substandard housing continues to be problematic, especially for households in the lowest income brackets. Housing cost burden is overwhelmingly the biggest housing problem with households of less than 30% AMI, for renters and homeowners. In most cases, the housing cost burden is greater than 50% of the household income even with no other housing problems. Some of the high housing cost may be attributed to Ft Sill and the housing allowance provided to soldiers, which drives up the housing costs for the entire community. The City of Lawton has funded and plans to continue to fund a Tenant Based Rental Assistance program to help keep housing affordable. The Lawton Housing Authority and Great Plains Improvement Foundation also have utility assistance programs.

**Are any populations/household types more affected than others by these problems?**

As can be expected, those households at and below 30% AMI experience overcrowding, substandard housing conditions, and very high housing costs burden in excess of 50% at a much higher rate than other income demographics. This is especially true for renters. Homeowners tend to experience these issues more frequently when earning between 50-80% AMI. This differential can be primarily attributed to the inability of households below the 80% income level to qualify for mortgage financing, resulting in an inability to achieve homeownership.

**Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance**

These at risk individuals and families are often referred to the Lawton Housing Authority for assistance under the Section 8 program. Unfortunately, there are not enough Section 8 vouchers to support the need. The Lawton Housing Authority also offers rental and utility assistance to keep formerly homeless families in their homes. Housing counseling along with skills training can help provide the knowledge and skills to keep a monthly budget that can lead to self-sufficiency.

**If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:**

"At-risk population" is defined as individuals and families who are currently housed, but are at risk of becoming homeless without immediate financial assistance. Estimates are generated from requests

made for Section 8 housing assistance, consultation with service providers and recipients of Tenant Based Rental Assistance and Utility Assistance.

**Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness**

There is a shortage of affordable rental housing in Lawton. In 2014, the median monthly rent was \$773 and in 2019 has increased to \$832 according to American Community Survey (ACS). Individuals and families living in some of the most cost efficient units often find they are no longer able to afford them as housing demand increases leading to rising rents. The inability to make rental security deposits and utility deposits is often a barrier to those households who are being evicted or are attempting to locate a cheaper housing option. Short term assistance is often the difference between maintaining shelter and avoiding homelessness.

**Discussion**

The shortage of affordable rental housing and the shortage of affordable homeownership housing has been and remains a top housing concern for the City of Lawton. The City has started a program to acquire dilapidated homes, or homes at risk of being declared dilapidated, and conduct a major rehabilitation of them to either sell to first-time homebuyers or to make them available for rent through the Lawton Housing Authority or Great Plains Improvement Foundation. The COVID pandemic has slowed this process, but the City of Lawton is preparing to sell their first home in the early Fall of 2021. The City of Lawton is lacking a large development organization to rehabilitate or construct affordable housing.

### NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

#### Introduction

An analysis of the 2013-2017 Comprehensive Housing Affordability Strategy (CHAS) tables for the City of Lawton area as reflected below show disproportionately greater need for persons experiencing housing problems among five (5) different minorities and ethnicities, and within various income demographics. The four housing problems included in the data analysis include lack of complete kitchen facilities, lack of complete plumbing facilities, more than one person per room, and housing cost burden greater than 30%. A "disproportionately greater need" exists when the members of a racial or ethnic group at a given income level experience housing problems at a greater rate (10% or more) than the income level as a whole.

#### 0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,615	645	435
White	1,605	365	270
Black / African American	995	170	120
Asian	95	0	0
American Indian, Alaska Native	289	69	0
Pacific Islander	19	0	0
Hispanic	330	20	44

**Table 13 - Disproportionally Greater Need 0 - 30% AMI**

Data 2013-2017 CHAS  
Source:

\*The four housing problems are:

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

**30%-50% of Area Median Income**

<b>Housing Problems</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	3,015	949	0
White	1,389	583	0
Black / African American	769	140	0
Asian	29	20	0
American Indian, Alaska Native	129	45	0
Pacific Islander	0	0	0
Hispanic	515	95	0

**Table 14 - Disproportionally Greater Need 30 - 50% AMI**

Data 2013-2017 CHAS  
Source:

\*The four housing problems are:

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

**50%-80% of Area Median Income**

<b>Housing Problems</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	2,780	3,714	0
White	1,520	2,205	0
Black / African American	754	684	0
Asian	60	30	0
American Indian, Alaska Native	90	210	0
Pacific Islander	0	0	0
Hispanic	260	309	0

**Table 15 - Disproportionally Greater Need 50 - 80% AMI**

Data 2013-2017 CHAS  
Source:

\*The four housing problems are:

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



**80%-100% of Area Median Income**

<b>Housing Problems</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	805	2,920	0
White	490	1,675	0
Black / African American	175	475	0
Asian	14	80	0
American Indian, Alaska Native	20	110	0
Pacific Islander	55	49	0
Hispanic	20	295	0

**Table 16 - Disproportionally Greater Need 80 - 100% AMI**

Data 2013-2017 CHAS  
Source:

\*The four housing problems are:

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

**Discussion**

In the 0-30% AMI bracket, a disparate need is represented by the Black/African American population of which 27% report one or more of the four housing problems. For households earning 30-50% AMI, the Black/African American population reflects a disproportionately high rate of 25% reporting at least one of the four housing problems. For households earning 50-80% AMI, the Black/African American population reflects a disproportionately high rate of 27% reporting at least one of the four housing problems. No disproportionate needs have been identified in the 80-100% AMI categories and each ethnic minority group experiences housing problems in a similar manner as the general population.

**NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)**

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

**Introduction**

An analysis of the 2013-2017 Comprehensive Housing Affordability Strategy (CHAS) tables for the City of Lawton area as reflected below show disproportionately greater need for persons experiencing housing problems among five (5) different minorities and ethnicities, and within various income demographics. The four housing problems included in the data analysis include lack of complete kitchen facilities, lack of complete plumbing facilities, more than one person per room, and housing cost burden greater than 30%. A "disproportionately greater need" exists when the members of a racial or ethnic group at a given income level experience housing problems at a greater rate (10% or more) than the income level as a whole.

**0%-30% of Area Median Income**

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	3,005	1,254	435
White	1,350	615	270
Black / African American	755	410	120
Asian	70	25	0
American Indian, Alaska Native	250	108	0
Pacific Islander	19	0	0
Hispanic	305	45	44

**Table 17 – Severe Housing Problems 0 - 30% AMI**

Data 2013-2017 CHAS  
Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

**30%-50% of Area Median Income**

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	1,200	2,765	0
White	549	1,425	0
Black / African American	369	540	0
Asian	19	30	0
American Indian, Alaska Native	25	145	0
Pacific Islander	0	0	0
Hispanic	175	435	0

**Table 18 – Severe Housing Problems 30 - 50% AMI**

Data 2013-2017 CHAS  
Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

**50%-80% of Area Median Income**

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	704	5,794	0
White	320	3,405	0
Black / African American	224	1,215	0
Asian	25	70	0
American Indian, Alaska Native	35	265	0
Pacific Islander	0	0	0
Hispanic	110	464	0

**Table 19 – Severe Housing Problems 50 - 80% AMI**

Data 2013-2017 CHAS  
Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

**80%-100% of Area Median Income**

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	240	3,480	0
White	185	1,975	0
Black / African American	19	630	0
Asian	0	94	0
American Indian, Alaska Native	20	110	0
Pacific Islander	0	104	0
Hispanic	0	320	0

**Table 20 – Severe Housing Problems 80 - 100% AMI**

Data 2013-2017 CHAS  
Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

**Discussion**

In the 0-30% AMI bracket, a disparate need is represented by the Black/African American population of which 25% report one or more of the four housing problems. For households earning 30-50% AMI, the Black/African American population reflects a disproportionately high rate of 30% reporting at least one of the four housing problems. For households earning 50-80% AMI, the Black/African American population reflects a disproportionately high rate of 31% reporting at least one of the four housing problems. No disproportionate needs have been identified in the 80-100% AMI categories and each ethnic minority group experiences housing problems in a similar manner as the general population.

**NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)**

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

**Introduction:**

An analysis of the 2013-2017 Comprehensive Housing Affordability Strategy (CHAS) tables for the Oklahoma City area as reflected below show disproportionately greater housing cost burdens at varying levels among five (5) different minorities and ethnicities. A "disproportionately greater need" exists when the members of a racial or ethnic group at a given income level experience housing problems at a greater rate (10% or more) than the income level as a whole.

**Housing Cost Burden**

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	22,554	5,469	4,544	455
White	13,975	2,820	2,050	285
Black / African American	3,785	1,430	1,265	130
Asian	500	120	90	0
American Indian, Alaska Native	809	194	275	0
Pacific Islander	95	55	19	0
Hispanic	2,184	560	545	44

**Table 21 – Greater Need: Housing Cost Burdens AMI**

Data 2013-2017 CHAS  
Source:

**Discussion:**

The CHAS data suggests the Black/African American households experience a cost burden in excess of 50% at a somewhat disproportionately greater rate (19.8%) than the general population. Hispanics also experience a disproportionately greater cost burden at 10% above the general population.

### **NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)**

#### **Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?**

As noted previously, the following ethnicities in the 30-50% Ami category have reported one or more housing problems indicating a disproportionately greater need than the general population: Black/African American (19.8%) and Hispanic (10%).

#### **If they have needs not identified above, what are those needs?**

Areas with higher percentages of households experiencing one or more housing problems cluster around publicly supported housing in Lawton, with these neighborhoods seeing over 30% and even over 50% of their housing units having housing problems. These neighborhoods also have higher exposure to poverty, lower environmental air quality, and lower labor market engagement.

#### **Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?**

Geographically, low income households are located throughout the city; however, a significant concentration of Black/African Americans remain in the south and north central sector of the City. Although the Black population changed little between the 2000 and 2019 as a share of the City's overall population, these families remain disproportionately concentrated in Census Tracts to the south and north central of the city center.

**NA-35 Public Housing – 91.205(b)**

**Introduction**

The Lawton Housing Authority (LHA) oversees public housing in the community. The City of Lawton only appoints the LHA’s Board of Commissioners, which consists of five (5) members. The City oversees the action of the LHA through the commission by written and oral reports. The City does not have any relationships regarding hiring, contracting, and procurement; and the City does not provide any funded services to the LHA. LHA operates as a private non-profit entity. The Authority is a federally subsidized authority operating under the rules, regulations and guidelines of the U.S. Department of Housing and Urban Development (HUD). The overall goal of the housing authority is to implement strategies that will maximize the effectiveness in the use of federal funds to provide quality housing services to client residents and the community. LHA offers several types of housing opportunities to the Lawton/Ft. Sill community.

**Totals in Use**

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	286	120	0	120	0	0	0

**Table 22 - Public Housing by Program Type**

**\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Data Source: PIC (PIH Information Center)

**Characteristics of Residents**

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	0	10,574	12,065	0	12,065	0	0
Average length of stay	0	0	3	3	0	3	0	0
Average Household size	0	0	1	3	0	3	0	0
# Homeless at admission	0	0	0	0	0	0	0	0
# of Elderly Program Participants (>62)	0	0	70	8	0	8	0	0
# of Disabled Families	0	0	101	12	0	12	0	0
# of Families requesting accessibility features	0	0	286	120	0	120	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

**Table 23 – Characteristics of Public Housing Residents by Program Type**

Data Source: PIC (PIH Information Center)



**Race of Residents**

Race	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	167	29	0	29	0	0	0
Black/African American	0	0	99	85	0	85	0	0	0
Asian	0	0	8	2	0	2	0	0	0
American Indian/Alaska Native	0	0	10	3	0	3	0	0	0
Pacific Islander	0	0	2	1	0	1	0	0	0
Other	0	0	0	0	0	0	0	0	0

**\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

**Table 24 – Race of Public Housing Residents by Program Type**

Data Source: PIC (PIH Information Center)

**Ethnicity of Residents**

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	27	11	0	11	0	0	0
Not Hispanic	0	0	259	109	0	109	0	0	0

**\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

**Table 25 – Ethnicity of Public Housing Residents by Program Type**

City of Lawton FFY 2021-2025 Consolidated Plan

**Data Source:** PIC (PIH Information Center)

**Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:**

At the present time, the Lawton Housing Authority (LHA) does not maintain a separate waiting list for accessible units. If an applicant's name comes to the top of the list and they are unable to function in a non-accessible unit, they can refuse the apartment without losing their place on the waiting list. In some cases, LHA is able to accommodate the tenant with minor modifications to the available unit(s). Approximately 10% of available units are handicapped accessible. Many times, apartments are leased to a current tenant who has aged in place and now requires features that were not needed at the time of move-in. Units are modified as resources allow.

**Most immediate needs of residents of Public Housing and Housing Choice voucher holders**

In the authority's housing inventory there are 332 units of public housing, 96 Section 8 Housing Choice Vouchers, and 13 Veterans Administration Supportive Housing (VASH) Vouchers. LHA's current inventory provides 150 general purpose units in the Lawton View Addition; 97 elderly units located in the Benjamin O. Davis HI-Rise, and 50 units located in the Pleasant Valley Addition provide housing for elderly/disabled households; and 35 units located in Old Towne Square Elderly housing (Section 202).

Additionally, the LHA manages 26 single family two and three bedroom residences, in conjunction with a HUD approved Section 5(h) Homeownership Program. Presently, fifteen (15) of the twenty-six (26) households are participating in homeownership.

The Housing Authority currently has 105 Section 8 Housing Choice Voucher units. These baseline vouchers consist of 92 Housing Choice Vouchers and 13 Veterans Administration Supportive Housing (VASH) vouchers. LHA has adopted a Section 8 Homeownership Program, and currently has one participant. The current waiting list for a Section 8 voucher consists of 64 applicants with a waiting time of approximately one year.

**How do these needs compare to the housing needs of the population at large**

The need for available affordable units mirrors that of the general population. The need continues to exceed the available resources. Market rate rental units generally do not maintain a waiting list and units can typically be occupied within 60 days. The need for capital improvements in public housing units is greater than that of the general population due to LHA reliance on HUD funding to meet ongoing property concerns. The private market by contrast is generally supported by the ability to increase gross rents in response to decreasing cash flow. In addition, the availability of private capital and the ability to

borrower against equity at favorable loan terms provides a cushion of protection from rising maintenance costs.

**Discussion**

Increased funding for Section 8 continues to be the greatest need identified by the local housing authority. In addition, the wait list for public housing units continues to grow and presently exceeds 105 units for families and seniors combined. Concentration of low income housing continues to be problematic for the City in terms of creating mixed-income housing throughout the urban core. The concentration of public housing and Section 8 units in low-income census tracts exacerbates social issues in impoverished neighborhoods and fails to provide a healthy environment for personal improvement.

## NA-40 Homeless Needs Assessment – 91.205(c)

### Introduction:

Information and data to adequately assess the nature and full extent of homelessness in the Lawton-Fort Sill community is limited in quantity as well as scope. Homeless service providers generally maintain records to document services provided, but none currently maintain data regarding unmet needs such as turn-away or referrals that the agencies cannot provide for. Within the community, all service agencies must do a better job of documenting shortcomings in services to provide information for prioritization and allocation of limited funding. This assessment is based on limited data provided from the 2020 Census and limited information made available by various service agencies and a recent (FFY 2020) Point-in-Time survey conducted by the SW Oklahoma CoC. The 2020 census shows the Lawton/Comanche County population found on the day of the survey in Lawton's emergency shelters; shelters for runaway, neglected, and homeless children; and shelters for abused women. The numbers resulted in a fifty (54) percent occupied rate for beds in shelters in Comanche County and the City of Lawton (and the southwest region of the state, as well).

### Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	2	30	0	0	0	0
Persons in Households with Only Children	0	0	0	0	0	0
Persons in Households with Only Adults	19	65	0	0	0	0
Chronically Homeless Individuals	0	0	0	0	0	0
Chronically Homeless Families	0	8	0	0	0	0
Veterans	7	5	0	0	0	0
Unaccompanied Child	0	0	0	0	0	0

City of Lawton FFY 2021-2025 Consolidated Plan

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons with HIV	0	0	0	0	0	0

Table 26 - Homeless Needs Assessment

**Data Source Comments:** Data obtained from the Lawton Housing Authority

Indicate if the homeless population is: Has No Rural Homeless

**If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):**

Data not available

**Nature and Extent of Homelessness: (Optional)**

<b>Race:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>
White	0	0
Black or African American	0	0
Asian	0	0
American Indian or Alaska Native	0	0
Pacific Islander	0	0
<b>Ethnicity:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>
Hispanic	0	0
Not Hispanic	0	0

Data Source  
Comments:

**Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.**

Data not available

**Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.**

Data not available

**Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.**

Data not available

**Discussion:**

Data not available

## **NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)**

### **Introduction:**

Priorities are assigned to objectives based on the availability of funds and on the needs identified within the community. Objectives that are ranked as high priority will be addressed through funding program activities in the Annual Action Year Plans. The non-homeless special needs population objectives focus on maintaining the ability of non-homeless special needs populations to continue independent living.

The primary obstacle to meeting underserved needs is funding availability. The City is allocating HOME funds for Tenant Based Rental Assistance in the 2021-2025 Consolidated Plan or Annual Action Year Plans. Federal grant funds from the City's CDBG and HOME formula grants are used to fund part of the non-homeless needs activities identified in the Consolidated Plan.

### **Describe the characteristics of special needs populations in your community:**

The City defines "special needs" as the homeless, seniors over age 62, persons with permanent disabilities, victims of domestic violence, abused children, and children aging out of the foster care system. As the Baby Boom generation matures, low to moderate income seniors over age 62 are in need of affordable housing alternatives. Resources for domestic violence victims have also been a common concern noted by the community throughout the public participation process. Local service providers are reporting a substantial increase in the number of homeless youth seeking resources and the need for drop-in centers.

### **What are the housing and supportive service needs of these populations and how are these needs determined?**

The City of Lawton City works closely with the Marie Detty Youth & Family Services Inc in order to provide supportive services to victims of domestic violence. Part of the program oversight and funding for services are provided CDBG & HOME grants. Marie Detty Youth & Family Services Inc is able to provide emergency shelter for 650 persons annually for families that have become homeless due to domestic violence. The Marie Detty Youth & Family Services inc also works to provide supportive services such as skill training for jobs, child care, counseling, legal services, transportation, and referrals to mental health services to keep the victim and family safe.

### **Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:**

RAIN Oklahoma is a nonprofit organization whose mission is to compassionately serve individuals and communities impacted by HIV/AIDS and other chronic diseases through education, volunteerism and



coordinated access to healthcare and support services. It provides housing assistance for individuals with HIV/AIDS, ADvantage Medicaid case management and Ryan White case management services throughout Central and Western Oklahoma.

Priority for CDBG and HOME program funding will be based on the new needs assessment and request for funding from service providers that address the needs of persons and/or families with alcohol or other drug addiction.

**Discussion:**

Emergency shelter and transitional housing strategies were addressed previously. The key to success is to continue to work with the Continuum of Care in this region, and it's member agencies to development appropriate housing strategies and promote maximum participation in the Homeless Management Information System (HMIS) for the region. Great Plains Improvement Foundation (GPIF) recently assumed the leadership role in the continuum, serving as the Collaborative Agency and lead HMIS, which is critical to our ability to track the progress of the homeless population from entry into the continuum of care to reentry into society via employment and either renting or purchasing a home. Assistance to homeless individuals and families will be accomplished through a holistic approach that addresses their specific economic, housing, and social needs within the continuum of care to provide opportunities for homeless households to achieve economic independence and free of supportive assistance.

## **NA-50 Non-Housing Community Development Needs – 91.215 (f)**

### **Describe the jurisdiction’s need for Public Facilities:**

The City of Lawton’s public facilities needs are for more homeless and mental health facilities. These needs are addressed through Public Service Organizations that are partially funded by the City of Lawton. With the amounts of funding towards Public Service Organizations capped by HUD regulations, the City can only refer clients to such services. The City of Lawton has over the last few years, put several thousand dollars into improving the three community centers in Lawton that are owned and managed by the City of Lawton. These community centers provide a recreational center for the community youth and senior adults.

### **How were these needs determined?**

These needs were determined by the 2021 Community Needs Survey that was conducted from February to March 2021. The needs survey resulted in two hundred and thirty-seven responses.

### **Describe the jurisdiction’s need for Public Improvements:**

The City of Lawton’s public improvement needs are street and sidewalk improvements and the cleaning and removal of dilapidated structures. With improvements to the infrastructure and appearance of the city as a whole, citizens are more inclined to maintain their own property. When you feel good about where you live, you can start to care about your neighborhood and your community.

### **How were these needs determined?**

These needs were determined by the 2021 Community Needs Survey that was conducted from February to March 2021. The needs survey resulted in two hundred and thirty-seven responses. These needs are also involved in the majority of complaints through the City's iHelp website.

### **Describe the jurisdiction’s need for Public Services:**

The City of Lawton’s public service needs are for more youth services, homeless services, and mental health services. These needs are addressed through Public Service Organizations that are partially funded by the City of Lawton. With the amounts of funding towards Public Service Organizations capped by HUD regulations, the City can only refer clients to such services.

### **How were these needs determined?**

These needs were determined by the 2021 Community Needs Survey that was conducted from February to March 2021. The needs survey resulted in two hundred and thirty-seven responses.

# Housing Market Analysis

## MA-05 Overview

### Housing Market Analysis Overview:

The purpose of the Market Analysis is to provide a clear picture of the environment in which the City of Lawton must administer their programs over the five (5) year Consolidated Plan period. In conjunction with the Needs Assessment, the Market Analysis provides the basis for the Strategic Plan and Projects/Activities to be funded and administered. General characteristics such as housing costs, market demand, area demographics, type and condition of existing housing stock, planned development, and current economic conditions all provide a snapshot of community needs and opportunities, and have been considered in the development of this Plan.

## MA-10 Number of Housing Units – 91.210(a)&(b)(2)

### Introduction

Within the City of Lawton there are a variety of housing types for both rent and purchase. The local housing stock includes single family residences, duplexes, multifamily apartment complexes, and mobile homes. The older subdivisions in the central part of Lawton have the oldest houses with little rehabilitation occurring. Most applicants for assistance through the Housing & Community Development office, live in the central part of town. New construction of single family residences has been occurring on the southwest and northeast sides of town.

### All residential properties by number of units

Property Type	Number	%
1-unit detached structure	27,590	69%
1-unit, attached structure	1,440	4%
2-4 units	2,840	7%
5-19 units	5,264	13%
20 or more units	2,105	5%
Mobile Home, boat, RV, van, etc	934	2%
<b>Total</b>	<b>40,173</b>	<b>100%</b>

Table 27 – Residential Properties by Unit Number

Data Source: 2013-2017 ACS

### Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	30	0%	1,355	8%
1 bedroom	230	2%	2,675	15%
2 bedrooms	1,900	13%	5,345	30%
3 or more bedrooms	12,959	86%	8,539	48%
<b>Total</b>	<b>15,119</b>	<b>101%</b>	<b>17,914</b>	<b>101%</b>

Table 28 – Unit Size by Tenure

Data Source: 2013-2017 ACS

### Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

The City of Lawton aims to spend approximately \$275,000 a year (7 households) on 50-80% AMI households through the whole home rehabilitation program, \$150,000 a year (15 households) on 0-50% AMI households through the exterior housing improvement program, and \$75,000 a year (12

households) on 0-50% AMI households through the emergency repair program. The City of Lawton also sets aside \$15,000 annual to assist a first-time homebuyer with downpayemnt and closing costs.

**Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.**

It is not anticipated that the affordable housing inventory will be reduced in the near future. There are not any Section 8 contracts that will be expiring. Older housing stock may need to be rehabilitated or replaced with a newer home, but it is anticipated that through the City of Lawton and other community partnerships that the affordable housing stock will only increase in the coming years and not decrease.

**Does the availability of housing units meet the needs of the population?**

The City of Lawton’s population is expected to slightly decreased over the next few years. Affordable, safe and decent housing stock with 2-3 bedrooms for the 0-50% AMI households is always a need. Housing for this population is usually concentrated in areas of town with higher crime rate and with more housing problems which detours young families, especially single mothers. As a result, these families face a housing burden by residing elsewhere.

**Describe the need for specific types of housing:**

More affordable 2-3 bedroom rental properties for 0-50% AMI households are needed in the City of Lawton. There are currently over 100 households on either the Public Housing waiting list or the Section 8 Voucher waiting list. The majority of the families on the waiting list are waiting for 1-3 bedroom units.

**Discussion**

Affordable housing and the rehabilitation of aging housing stock remain high priorities under this Plan. Needs and opportunities will be evaluated annually to ensure that resources are targeted strategically and that the stated goals of the Plan remain timely and relevant. Emphasis on mixed-income housing and de-concentration of poverty will remain a focus in all funding decisions.

## MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

### Introduction

The 2013-2017 ACS data below reflects a 25% increase in median home values and an increase of 35% in median contract rent. Out of the 17,914 rental units in Lawton, only 35% are affordable for 30-50% AMI households. Of the 15,119 owner occupied units, only 38.8% are affordable for 50-80% AMI households. The median contract rent is \$635 with 31% of renters paying less than \$500 per month. Fifty-three percent of renters pay between \$500 and \$999 per month.

### Cost of Housing

	Base Year: 2009	Most Recent Year: 2017	% Change
Median Home Value	90,200	112,700	25%
Median Contract Rent	470	635	35%

Table 29 – Cost of Housing

Data Source: 2000 Census (Base Year), 2013-2017 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	5,568	31.1%
\$500-999	9,432	52.6%
\$1,000-1,499	2,195	12.3%
\$1,500-1,999	555	3.1%
\$2,000 or more	157	0.9%
<b>Total</b>	<b>17,907</b>	<b>100.0%</b>

Table 30 - Rent Paid

Data Source: 2013-2017 ACS

### Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	1,190	No Data
50% HAMFI	5,244	1,633
80% HAMFI	12,134	4,237
100% HAMFI	No Data	5,959
<b>Total</b>	<b>18,568</b>	<b>11,829</b>

Table 31 – Housing Affordability

Data Source: 2013-2017 CHAS

## Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	548	562	741	1,052	1,189
High HOME Rent	548	562	741	1,052	1,189
Low HOME Rent	548	562	741	879	981

**Table 32 – Monthly Rent**

Data Source: HUD FMR and HOME Rents

### Is there sufficient housing for households at all income levels?

There is a significant need for rental units affordable to households earning less than 30% of area median income. At the present only 6.6% of available units are available to this demographic. The problem persists for households earning between 30-50% AMI as only 29% of rental units are affordable to this population. A rental unit is considered affordable if gross rent, including utilities, is no more than 30% of the annual household income.

On the homeownership side, over half (61.2%) of all units are unaffordable to households earning less than 80% of the area median income. An owner unit is considered affordable if monthly housing costs, including principal and interest, taxes, hazard insurance, mortgage insurance and HOA dues are no more than 30% of the annual household income.

### How is affordability of housing likely to change considering changes to home values and/or rents?

Based on the 25% increase in median home values according to the 2013-2017 ACS, it can be anticipated that average homes priced will continue to increase. Although economic factors can contribute significantly to housing values, City of Lawton has remained somewhat insulated from the recent recession and the local housing market has experienced very minor price movement in comparison to other parts of the country. While the rate of return may not be as significant in times of prosperity, losses are historically less likely in times of economic distress.

### How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

The HUD Fair Market Rents for City of Lawton were \$548 for an efficiency unit, \$562 for a one-bedroom unit, \$741 for a two-bedroom unit and \$1,052 for a three bedroom unit. Four bedroom units are considered to be an outlier and are not included in this calculation. The difference between the average gross rents and FMR's indicate a continued need for affordable housing subsidies for low and very low income families.



The High HOME Rent is \$548 for an efficiency unit, \$562 for a one-bedroom unit, \$741 for a two-bedroom unit and \$1,052 for a three-bedroom unit. Low HOME Rent is currently \$548 for an efficiency unit, \$562 for a one-bedroom unit, \$741 for a two-bedroom unit, and \$879 for a three-bedroom unit. It is important to note that the FMR and HOME rent standards are *inclusive* of monthly utilities, so comparison with the average market rents quoted above (which do not include utilities in most cases) can be misleading. In actuality, HOME-assisted units are capped at a monthly rent that is affordable to low income families when all costs are considered. By contrast, the market driven data is reflective of all households without regard to total monthly housing cost.

Market rents have remained steady over the last several years in the City of Lawton area with average annual rent increases typically below the national average. However, the demand for additional affordable rental units has continued to increase as the cost of housing in relation to annual household income continues to rise disproportionately, particularly among the very lowest income families. High concentrations of poverty within the City have restricted the mobility of low income households, and the average rents are not reflective of higher end markets in thriving neighborhoods. Priority housing needs and annual objectives identified in this Plan continue to support mixed-income development and diversity of neighborhoods.

## **Discussion**

In arriving at conclusions about the rental housing market, a presumption was made that households of one or two persons occupy the efficiency and one-bedroom units, small related households for three (3) or four (4) persons occupy the two-bedroom rental units, and that large related households of five (5) or more persons occupy the three-bedroom and larger units.

# MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

## Introduction

The 2013-2017 ACS data below reflects that 19% of owner-occupied units and 42% of rental units suffer from at least one adverse condition. These include (1) Lacking complete plumbing facilities, (2) Lacking complete kitchen facilities, (3) More than one person occupancy per room, and (4) Cost burden exceeding 30%. It is also noted that 68% of owner-occupied units and 58% of rental units were constructed prior to 1979.

There is currently, very little affordable housing stock within our city, while our poverty level is on the rise. Most of the affordable housing is around the city center which also happens to be the oldest housing stock within the city. We are currently working with Lawton Support Services and Great Plains Improvement Foundation to keep their affordable housing rental stock in livable condition, by assisting in repairs between tenants, while also utilizing our Emergency Repair Program, Exterior Repair Program, and Homeowner Occupied Rehabilitation Program to keep current homeowner in safe livable homes. We assist citizens with the transition from renter to homeowner with our First Time Home Buyer Program, which provides qualified homebuyers with down payment and closing cost assistance and have recently started a new program, in which we purchase dilapidated homes in established neighborhoods to rehabilitate and add them back into the affordable housing stock by selling them too low to moderate income first-time home buyers. This not only gives a family or individual sustainable housing but overall increases the property values of the neighborhood.

## Definitions

**Standard Condition:** The International Code Council (ICC), as amended, is the City's adopted minimum acceptable standards for the maintenance of existing buildings, structures, premises and facilities to protect the general health and welfare of the public. The code was adopted and incorporated fully to control property maintenance in existing buildings within the corporate limits of the City. Homes that do not meet this definition are considered substandard.

**Substandard Condition but Sustainable for Rehabilitation:** Any home that does not meet the above definition of standard condition, may be determined to be financially feasible and structurally suitable for rehabilitation as long as the current condition of the home does not create a nuisance or pose a threat to the health, safety and/or welfare of the surrounding neighborhood or residents. If City funds are needed to complete the rehabilitation then the cost of the rehab must not exceed the housing rehabilitation program's funding limits.

## Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	2,820	19%	7,470	42%

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With two selected Conditions	60	0%	464	3%
With three selected Conditions	0	0%	0	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	12,239	81%	9,975	56%
<b>Total</b>	<b>15,119</b>	<b>100%</b>	<b>17,909</b>	<b>101%</b>

**Table 33 - Condition of Units**

Data Source: 2013-2017 ACS

### Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	1,904	13%	3,250	18%
1980-1999	3,030	20%	4,185	23%
1950-1979	8,745	58%	8,670	48%
Before 1950	1,433	9%	1,800	10%
<b>Total</b>	<b>15,112</b>	<b>100%</b>	<b>17,905</b>	<b>99%</b>

**Table 34 – Year Unit Built**

Data Source: 2013-2017 CHAS

### Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	10,178	67%	10,470	58%
Housing Units build before 1980 with children present	2,620	17%	750	4%

**Table 35 – Risk of Lead-Based Paint**

Data Source: 2013-2017 ACS (Total Units) 2013-2017 CHAS (Units with Children present)

### Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	0	0	0
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

**Table 36 - Vacant Units**

Data Source: 2005-2009 CHAS

### Need for Owner and Rental Rehabilitation

As noted previously, 68% of owner occupied residences and 58% of rental units were constructed prior to 1979. This large supply of aging housing stock in itself is an indicator that rehabilitation needs will continue to increase. Additionally, 19% of owner occupied residences and 42% of rental units reported in the table above have at least one (1) substandard condition that requires immediate attention. The City does not maintain a database or inventory of substandard housing.

The majority of City-funded rehabilitation programs support owner-occupied housing units because the City's affordable housing strategy encourages homeownership, and HOME funds allocated to the City are not sufficient to cover the demand for rehabilitation in the private rental market. However, the City does allocate CDBG and HOME funds for rehabilitation of rental housing owned by the Lawton Housing Authority and Great Plains Improvement Foundation.

### **Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards**

The 2013-2017 ACS (total units) and the 2013-2017 CHAS (units with children present) data reflects that 10,178 owner occupied units were built prior to 1980, of which 17% have children present. On the rental side, 10,470 units were built prior to 1980, of which 4% have children present. Based upon the income demographics for total households, 37% of all households earn less than 80% of area median income. When applying the same percentages for determination of potential Lead Based Paint hazards, it can be expected that approximately 3,765 owner-occupied homes built prior to 1980 are occupied by low or very low income families. Likewise, it can be estimated that 3,873 rental units constructed prior to 1980 are occupied by low or very low income households.

### **Discussion**

Since July 2001, the Housing Rehab Staff has tested and cleared every home that the City has rehabilitated to the standards for lead-safe housing regulated by the Department of Housing and Urban Development (HUD) and the State of Oklahoma's Department of Environmental Quality (DEQ).

The City is directly involved in alerting and educating households concerning lead hazards, particularly regarding housing units proposed for CDBG or HOME rehabilitation assistance, and indirectly through each of its sub recipients, Community Development Housing Organizations, and other for-profit and nonprofit organizations providing housing. For its part, all applicants seeking housing assistance from the City receive a pamphlet informing them of the dangers of lead hazards.

## MA-25 Public and Assisted Housing – 91.210(b)

### Introduction

The Lawton Housing Authority (LHA) oversees public housing in the community. The City of Lawton only appoints the LHA’s Board of Commissioners, which consists of five (5) members. The City oversees the action of the LHA through the commission by written and oral reports. The City does not have any relationships regarding hiring, contracting, and procurement; and the City does not provide any funded services to the LHA. LHA operates as a private non-profit entity. The Authority is a federally subsidized authority operating under the rules, regulations and guidelines of the U.S. Department of Housing and Urban Development (HUD). The overall goal of the Housing Authority is to implement strategies that will maximize the effectiveness in the use of federal funds to provide quality housing services to client residents and the community. LHA offers several types of housing opportunities to the Lawton/Ft. Sill community.

### Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available			307	105	35	92	13	0	0
# of accessible units			55						
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 37 – Total Number of Units by Program Type

Alternate Data Source Name:

Lawton Housing Authority

Data Source Comments:

**Describe the supply of public housing developments:**

**Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:**

In the Authority's housing inventory, there are 307 units of public housing, 92 Section 8 Housing Choice Vouchers, and an additional 13 Veterans Administration Supportive Housing (VASH) Vouchers. LHA's current inventory provides 150 general purpose units in the Lawton View Addition. 97 elderly units located in the Benjamin O. Davis HI-Rise, and 50 units located in the Pleasant Valley Addition provide housing for elderly/disabled households. Additionally, LHA has a HUD approved Section 5(h) Homeownership Program, with an inventory of 26 single-family houses.

The Capital Fund Grant is intended for use in the modernization/rehabilitation of existing dwelling units. Since the age of all of the public housing units in the authority's inventory is 45 years of age or older, the amount of money needed to upgrade and maintain these units far exceeds the amount of capital funds received each year. The estimated amount of modernization costs for all projects is in excess of \$4 million. The authority expects to receive approximately \$600,000.00 each year from HUD for this purpose. The focus of the next couple of years for modernization of dwelling units will

Be the replacement of windows, doors, heating and cooling systems, and exterior repairs, concrete repair and replacement.

## Public Housing Condition

Public Housing Development	Average Inspection Score
0	88

Table 38 - Public Housing Condition

### Describe the restoration and revitalization needs of public housing units in the jurisdiction:

Items included in this modernization plan include central heat and air conditioning, redesign of the outside elevation of the units in order to get rid of the “public housing” look, new separate entrances and parking spaces, and fencing between units to allow each resident to have their “own” area or space.

### Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

The Lawton Housing Authority (LHA) is a nonprofit organization operating in accordance with policies established by the Board of Directors and statutes administered by the U.S. Department of Housing and Urban Development (HUD). They are dedicated to one purpose, providing clean, safe and decent housing for low-income families and senior citizens of the City of Lawton. Special services are offered to residents that want to have and enjoy a better quality of life for themselves and their families. Some services help working parents with low-cost child care and can aid in the growth and development of the family as a whole.

### Discussion:

LHA is the recipient of federal funds. Each fiscal year, LHA receives an Operating Subsidy Fund, Capital Improvement Funds, and from time to time additional grant funds. The amount of federal funds received each year is subject to change depending on the amount of funding that is approved by Congress. For the fiscal year of 2020-2021, the amount of Operating Subsidy that is expected to be received is \$911,000.00. The amount projected to be received in CFP funds is \$600,000.00.

The Operating Funds received by the authority are intended to assist in the daily operations of the business. Additional income received for operations are from rental income, interest income, and other miscellaneous income. Items that are considered as other income may be maintenance charges to residents, community room rental, management company income, and rooftop lease income. The amount of rental income for the coming year is projected to be \$485,210.00. Interest income is projected to be \$6000.00. Other income is projected to be \$36,500.00.

## MA-30 Homeless Facilities and Services – 91.210(c)

### Introduction

Information and data to adequately assess the nature and full extent of homelessness in the Lawton-Fort Sill community is limited in quantity as well as scope. Homeless service providers generally maintain records to document services provided, but none currently maintain data regarding unmet needs such as turn-away or referrals that the agencies cannot provide for. Within the community, all service agencies must do a better job of documenting shortcomings in services to provide information for prioritization and allocation of limited funding.

### Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	0	0	0	0	0
Households with Only Adults	0	0	0	0	0
Chronically Homeless Households	0	0	0	0	0
Veterans	0	0	0	0	0
Unaccompanied Youth	0	0	0	0	0

**Table 39 - Facilities and Housing Targeted to Homeless Households**

Data Source Comments:



**Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons**

Great Plains Improvement Foundation, Inc., through the C. Carter Crane Shelter, provides temporary shelter to the homeless. The shelter provided shelter to approximately 250 homeless persons annually. C. Carter Crane Shelter provides food and limited clothing. Other supportive services include job counseling, referral services, referral to other social service agencies, and assistance in locating permanent housing. Additionally, GPIF manages fifteen (15) transitional housing units.

The Salvation Army provides emergency shelter housing assistance and a variety of other services. Salvation Army's emergency shelter provided assistance to approximately 200 individuals annually. The Salvation Army serves primarily the transient population of the community, including food, clothing, and housing assistance in the form of utility, rent, and mortgage payment assistance. Furniture, other household items, and transportation assistance are included. The Salvation Army serves a meal a day at their Lawton facility. The organization also provides group and individual counseling, character building classes, and family budgeting assistance. In addition, Family Promise of Lawton houses approximately 95 households in a family setting annually.

Marie Detty Youth and Family Service Center, Inc. provide short-term shelter for youth ranging in age from 11 to 17. The purpose of the shelter intervention program is to reunify families experiencing problems. The youth receive 24-hour supervised care. While in the shelter, the youth participate in a personal responsibility program, which includes the daily living skills curriculum, educational enhancement, and growth through group, individual, and family counseling. Professional, skilled counselors are available to help individuals and families overcome barriers to happiness. Marie Detty Youth and Family Service Center provides emergency housing for 200 youth at its short-term shelter. In addition to youth services, Marie Detty manages the New Directions Shelter, which is a shelter for domestic violence victims, and they assist approximately 220 families annually.

**List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.**

Roadback, Inc. provides detoxification, continuing treatment, vocational assistance, and rehabilitation for recovering adult and adolescent alcohol and drug addicts. Roadback, Inc. operates the only non-medical detoxification unit in southwest Oklahoma. Treatment takes place in a residential setting at their five facilities. The program targets principally the indigent population, and those who cannot afford to pay for these needed services. The organization provides clients assistance in applying for food stamps, social services, and vocational training assistance. Currently, Roadback, Inc. has 67 adults participating in the Halfway House programs. 37 adolescents are also involved in their program. There are a total of 270 participants in the detoxification program at their facilities, including Miller Manor, Helen Holliday Home, Pathway House, Serenity House, and Delta House. Roadback also provides outpatient for

adolescents and adults, on an as needed basis, for approximately 120 clients. In addition, the organization provides a new multi-dimensional outpatient family therapy program. This program is one (1) of only three (3) in Oklahoma. The program is designed for recovering adolescents and their families to enhance the family situation for reunification. Roadback provides emergency housing for four (4) individuals at its male and female detoxification centers. Roadback provides supportive housing for seven (7) adult males at Miller Manor, fourteen (14) adult females at Helen Holiday Home, and ten (10) adolescents, male and female, at Pathway House. Additionally, the organization provides transitional housing for five (5) individuals at its Serenity House. Roadback's waiting list has 68 individuals for all of its supportive housing programs. In order to receive services, clients in most cases must wait between six (6) and twelve (12) months. All waiting lists are open.

Marie Detty Youth and Family Service Center, Inc. provide short-term shelter for youth ranging in age from 11 to 17. The purpose of the shelter intervention program is to reunify families experiencing problems. The youth receive 24 hour supervised care. While in the shelter the youth participate in a personal responsibility program, which includes the daily living skills curriculum, educational enhancement, and growth through group, individual and family counseling. Professional, skilled counselors are available to help individuals and families overcome barriers to happiness. Marie Detty Youth and Family Service Center provides emergency housing for twenty (20) youth at its short-term shelter.

## **MA-35 Special Needs Facilities and Services – 91.210(d)**

### **Introduction**

The City defines "special needs" as the homeless, seniors over age 62, persons with permanent disabilities, victims of domestic violence, abused children, and children aging out of the foster care system. As the Baby Boom generation matures, low to moderate income seniors over age 62 are in need of affordable housing alternatives. Resources for domestic violence victims have also been a common concern noted by the community throughout the public participation process. Local service providers are reporting a substantial increase in the number of homeless youth seeking resources and the need for drop-in centers.

### **Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs**

Elderly families/households are 12.9 percent of the total renter population, but they comprise 13.4 percent of renter families/households with incomes at or below 50 percent of the area median family income. Not surprisingly, a large proportion of elderly renters experience housing problems, particularly affordability of housing. The LHA has recently converted the B.O. Benjamin High Rise complex for elderly rental only. While this will increase the affordable housing for the elderly, younger disabled populous may experience a decrease in affordable housing in the short term. 70.8 percent of extremely low-income elderly families/households reported housing cost burdens in excess of 30 percent of their gross incomes, while 51.2 percent of them live under the strain of severe cost burdens, paying in excess of 50 percent of their family/household incomes for housing.

There are 1,615 disabled families/households in the community, including 415 elderly families/households, and 1,200 other households, who rent housing. It further shows that 26.9 percent of all disabled low-income renters surveyed experienced some kind of housing problem related to physical defects and accessibility. There are 1,477 disabled families/households in the community, including 848 elderly families/households, and 629 other households, who own housing. It further shows that 41.3 percent of all disabled low-income owners surveyed experienced some kind of housing problem related to physical defects and accessibility.

### **Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing**

Ideally, these individuals should be connected with family or an agency that can provide them with housing. Unfortunately, this does not always occur. When it does occur, these individuals are referred to one of the CoC's providers that specialize in housing for those with mental health concerns, or one that

can accommodate any physical disabilities they may have. These individuals will be assessed and housed if they are determined to be in the direst need. If they cannot be housed immediately, providers will connect them with the services necessary to address other concerns.

**Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)**

The City will continue to support Lawton Housing Authority to address the needs of the special needs population.

**For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))**

The priority needs and specific objectives focus on maintaining the ability of special needs populations to continue and/or achieve independent residency. One-year goals related to non-homeless special needs include ongoing support of the CDBG program.

## **MA-40 Barriers to Affordable Housing – 91.210(e)**

### **Negative Effects of Public Policies on Affordable Housing and Residential Investment**

The major obstacles to affordable housing in Lawton are the level of housing prices relative to the levels of income earned by low-income members of the community. Future economic development of the community to raise the incomes of low-income households is one key to affordability. Another obstacle is the community's perspective of affordable housing. In the past, the Council has not supported affordable housing developments because the community felt that these types of developments would compete with existing apartment complexes and local developers. The Housing and Community Development staff will continue to support affordable housing developments and will advocate for them to the Council.

## MA-45 Non-Housing Community Development Assets – 91.215 (f)

### Introduction

The City’s current major employers are Fort Sill, Comanche County Memorial, Lawton Public Schools, Walmart, Cameron University, Goodyear, and the Lawton-Fort Sill Reginal Airport. Our median income is lower than that of the county, which indicates there is a lacking in competitive wages in the area. That tied with most of our workforce having minimal education explains the abundance in retail, service, and laborer/manufacturing positions. The unemployment rate is above the national average, which indicates a lack of suitable employment in the area, which drives away home grown intellectual capital, as our graduates seek better pay and benefits outside of our community. Bringing in new employers with higher pay scales would assist in decreasing the unemployment rate while raising the median household income and there for lowering the poverty level.

### Economic Development Market Analysis

#### Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	502	85	2	0	-2
Arts, Entertainment, Accommodations	4,535	4,564	20	20	0
Construction	1,179	1,106	5	5	0
Education and Health Care Services	3,647	3,663	16	16	0
Finance, Insurance, and Real Estate	1,573	1,819	7	8	1
Information	458	562	2	2	0
Manufacturing	2,277	3,221	10	14	4
Other Services	703	650	3	3	0
Professional, Scientific, Management Services	2,079	2,348	9	10	1
Public Administration	0	0	0	0	0
Retail Trade	3,929	3,897	17	17	0
Transportation and Warehousing	915	654	4	3	-1
Wholesale Trade	692	340	3	1	-2

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Total	22,489	22,909	--	--	--

**Table 40 - Business Activity**

**Data Source:** 2013-2017 ACS (Workers), 2017 Longitudinal Employer-Household Dynamics (Jobs)

## Labor Force

Total Population in the Civilian Labor Force	40,444
Civilian Employed Population 16 years and over	36,680
Unemployment Rate	9.33
Unemployment Rate for Ages 16-24	19.33
Unemployment Rate for Ages 25-65	5.19

**Table 41 - Labor Force**

Data Source: 2013-2017 ACS

Occupations by Sector	Number of People
Management, business and financial	7,475
Farming, fisheries and forestry occupations	1,595
Service	4,800
Sales and office	8,585
Construction, extraction, maintenance and repair	2,759
Production, transportation and material moving	2,460

**Table 42 – Occupations by Sector**

Data Source: 2013-2017 ACS

## Travel Time

Travel Time	Number	Percentage
< 30 Minutes	35,925	92%
30-59 Minutes	2,168	6%
60 or More Minutes	780	2%
<b>Total</b>	<b>38,873</b>	<b>100%</b>

**Table 43 - Travel Time**

Data Source: 2013-2017 ACS

## Education:

### Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	2,005	385	2,315



Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
High school graduate (includes equivalency)	8,615	1,104	5,155
Some college or Associate's degree	11,040	900	4,560
Bachelor's degree or higher	7,125	124	1,760

**Table 44 - Educational Attainment by Employment Status**

Data Source: 2013-2017 ACS

### Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	170	270	260	593	555
9th to 12th grade, no diploma	1,130	1,284	860	1,439	1,025
High school graduate, GED, or alternative	6,350	5,295	3,370	6,720	3,370
Some college, no degree	4,395	5,545	3,370	5,630	2,335
Associate's degree	645	1,030	1,205	1,233	525
Bachelor's degree	1,020	2,650	1,330	2,563	1,070
Graduate or professional degree	60	820	845	1,895	950

**Table 45 - Educational Attainment by Age**

Data Source: 2013-2017 ACS

### Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	45,570
High school graduate (includes equivalency)	76,040
Some college or Associate's degree	97,695
Bachelor's degree	115,560
Graduate or professional degree	174,075

**Table 46 – Median Earnings in the Past 12 Months**

Data Source: 2013-2017 ACS

### Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

With our largest current employers being Fort Sill, Comanche County Memorial, Lawton Public School, Walmart, Cameron University, Goodyear, and Lawton- Fort Sill Reginal the most prominent industries

are retail, service, and laborer/manufacturing. We primarily attribute this to lacking industry diversity and low rates of continued further education.

**Describe the workforce and infrastructure needs of the business community:**

With our community having limited major employers and most of the labor force being in the service and laborer/manufacturing sector, there is a need for more complex industry to decrease wage gaps and improve employment incentives with better benefits and further employer subsidized education.

**Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.**

The single biggest recent economic impact on our community has been the forced shut down of business due to Covid-19. Many businesses could not withstand the loss of profits, especially those that were smaller and locally owned. This is obvious all over the City, as closed store fronts are numerous. On the other hand, several new businesses and industry are currently moving to the area and there is hope they will off set the current unemployment rates and bring higher wages. Most notable in the area is Carter Wind Turbines' new manufacturing plant. It is set to bring 300 new jobs to the area in the next five years with high higher wages that may increase competitive incentives for employees and assist in lowering our poverty rates. Another move is the City's investment in the Central mall. They have paired with FISTA (FIRES Innovation Science and Technology Accelerator), which keeps business within the city and allows for room for expansion.

**How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?**

A large percentage of our citizens have an education ranging from high school graduate to high school graduate with some collage but no degree, it is reasonable to say that majority also make up the bulk of the work force in retail, service, and laborer/manufacturing positions. It seems that the youth that are obtaining high educations are moving outside of the area in search of higher wages and possibly better benefits. This may be due to a lack in available comparable positions and a less diverse job market.

**Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.**

In our area there are two major providers of higher education, Cameron University and Great Plains Technology Center. Many of our larger employers utilize both providers for advanced training of their employees, offering incentives, such as tuition reimbursement. Workforce Oklahoma also has multiple

on job training programs, that place qualified candidates directly into jobs to train on site. The continued assistance of the City to resource prospective businesses to make our area their home, while showcasing these educational centers as an amazing opportunity for an avenue to qualified employees.

**Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?**

No

**If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.**

The purchase of Central Mall and continued development of 2nd Street and 82nd Street brings not only options for citizens as consumers but employment opportunities and economic growth for the City. Continuing to work to bring in complex industry, such as, Carter Wind Turbines and FISTA to the area raising competitive wages and employment incentives, decreasing overall poverty in the area.

In 2006, the City of Lawton partnering with the Lawton Economic Development Authority (LEDA) and the Lawton Urban Renewal Authority (LURA) approved the Lawton Downtown Economic Development Project Plan which provides tax incentives for development in the area. The project is expected to stimulate new investment of over \$150 million with the project area and will generate additional indirect economic benefits outside the project area. The 2nd Street Enhancement Project was within this area and continues to be developed. Central Mall is also in this area and with the recent purchase and renovation of the mall, new development is currently under way.

**Discussion**

The continued dedication of our leaders to diversify our employment market while building relationships with prospective businesses is essential to the growth and prosperity of our area. Making investment to develop 2nd Street, 82nd Street, and the investments made in Central Mall is a much needed effort to meet that overwhelming need. Our continued support of those projects is necessary in the future economic growth of the City.

## **MA-50 Needs and Market Analysis Discussion**

### **Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")**

The City defines "concentration" as those Census tracts that have percentages of housing problems that exceed the city-wide average.

It is unknown, based upon the data available, where the deficient units are located or if a disparate concentration of substandard housing exists. Anecdotally, it has been noted that neighborhoods located in the central section of the City appear to be in greater need of maintenance and repair than those in other areas of the City since that is the location of the oldest houses. The goals and priorities of this Consolidated Plan have prioritized rehabilitation of older housing stock within these areas, which includes the urban core. In addition, vacant and abandoned buildings are being addressed by the Neighborhood Services Division of the City of Lawton. This should help address non-occupied structures that create nuisance and safety issues within the community. No ACS or Census data is available to identify the condition of vacant housing units.

### **Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")**

The City of Lawton defines "concentration" of minorities as those Census tracts in which the percentage of minorities exceeds the citywide average. The Black and African American population changed little as a share of the city's overall population during the last Consolidated Plan period; however they remain disproportionately concentrated in Census tracts to the south central and north of the city center. As the Hispanic population grew in absolute numbers and as a share of the population, the number of Census tracts with high concentrations of Hispanic residents also grew. However, such tracts tended to be located next to tracts with relatively high shares of Hispanic residents in the northeast of the downtown area.

### **What are the characteristics of the market in these areas/neighborhoods?**

Homes in Census tracts with large concentrations of minorities, low income households, and households with housing problems are generally concentrated in the central section of the City. Property values and market rents tend to be lower for similar sized homes than in other areas of the City. Lack of sidewalks, aging infrastructure and deferred maintenance are common in lower income areas. These areas also tend to have greater numbers of vacant lots and buildings.

### **Are there any community assets in these areas/neighborhoods?**

The City of Lawton, over the last two years, has made improvements to parks and community centers in the area including upgrading a spray park, playground, and indoor basketball courts. The largest park in

Lawton is located in the central part of town and is currently under review as part of the parks master plan. It has also stepped up code enforcement to help beautify the community thereby creating a more livable environment.

**Are there other strategic opportunities in any of these areas?**

It is anticipated that City transportation services will be improved to provide evening and weekend service, and additional buses will be added where feasible. Infill opportunities still abound in all areas of the City, and it is anticipated that new development proposals will be received for projects in underserved areas of the City. The City has just completed a bike route that connects these areas to the rest of the community. This should greatly enhance to health and well being of residents.

## **MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)**

### **Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.**

The internet provides access to a wealth of information. It can help people with learning new skills, staying connected with friends/ family, finding a job completing work or school projects and earning an income or starting a business. In response to the current health crisis, this access is more critical than ever. Therefore free internet access or government assistance to pay for that access is essential for low or moderate-income households.

### **Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.**

Increased competition among Internet service providers should lower rates for service and in turn provide service to greater numbers of low or moderate-income households. Grant funds will go farther. The Lawton area has 6 broadband companies serving the community. 5 of the 6 participate in the FCC program, The Emergency Broadband Benefit. Has an income that is at or below 135% of the Federal Poverty Guidelines or participates in certain assistance programs, such as SNAP, Medicaid, or Lifeline. The Emergency Broadband Benefit is an FCC program to help families and households struggling to afford internet service during the COVID-19 pandemic. This new benefit will connect eligible households to jobs, critical healthcare services, virtual classrooms, and so much more. The Emergency Broadband Benefit will provide a discount of up to \$50 per month towards broadband service for eligible households and up to \$75 per month for households on qualifying Tribal lands. Eligible households can also receive a one-time discount of up to \$100 to purchase a laptop, desktop computer, or tablet from participating providers if they contribute more than \$10 and less than \$50 toward the purchase price. The Emergency Broadband Benefit is limited to one monthly service discount and one device discount per household. A household is eligible if a member of the household meets one of the criteria below:

- Approved to receive benefits under the free and reduced-price school lunch program or the school breakfast program, including through the USDA Community Eligibility Provision, in the 2019-2020, 2020-2021, or 2021-2022 school year;
- Received a Federal Pell Grant during the current award year;
- Experienced a substantial loss of income due to job loss or furlough since February 29, 2020 and the household had a total income in 2020 at or below \$99,000 for single filers and \$198,000 for joint filers; or
- Meets the eligibility criteria for a participating provider's existing low-income or COVID-19 program.



## **MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)**

### **Describe the jurisdiction's increased natural hazard risks associated with climate change.**

Observed seasonal weather changes include:

- Summers have increased variability in seasonal precipitation totals;
- More frequent warm nights in the last decade;
- Falls are dryer with an average date of first frost being three (3) days later;
- Winters are warmer and wetter; and
- Lawton is having fewer cool springs and the average date of last frost is four (4) days earlier.

According to the EPA, in the coming decades, SW Oklahoma will become warmer, and both floods and droughts may be more severe. Rising temperatures are leading to increased demand for water and energy. In parts of the region, this will constrain development, stress natural resources, and increase competition for water among communities, agriculture, energy production, and ecological needs.

### **Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.**

Any natural hazard risks associated with climate change create an increased financial burden on all households in the form of higher utility costs and damage to property through floods and fires. One of the worst recorded droughts in Oklahoma's history occurred during 2010, and southwest Oklahoma spent the next four and a half years suffering. "In nearby Altus, the ripple effect of the drought on the economy hit hard due to the failure of crops and loss of jobs, tax receipts and property taxes, which in turn impacted retail businesses, schools, health care and the crucial maintenance of roads and other infrastructure," reads an updated report of the Southwest Oklahoma Water Supply Action Plan. It is difficult for any household to recover, but for low and moderate-income households it is nearly impossible for recovery without assistance. In a 2016 report by the American Council for an Energy-Efficient Economy (ACEEE) created to understand income inequality caused by high home energy burdens while offering suggestions to make utilities more affordable to low-income communities. According to ACEEE the State of Oklahoma's average utility responsibility (also described as "energy burden", defined as the percentage of annual household income which goes to utility bills) is below 3 percent.



# Strategic Plan

## SP-05 Overview

### Strategic Plan Overview

The Consolidated Plan describes how the City of Lawton plans to provide new or improved availability, affordability, and sustainability of decent housing; a suitable living environment; and economic opportunity, principally for extremely low and low-income residents. The priority needs established in this Plan were developed through review and analysis of CHAS, Census, and ACS data. Input was also received from consultations with service providers, citizen participation, and analysis of the Housing Needs Assessment and Housing Market Analysis data presented earlier in this report. The priorities that address housing, services for the homeless, non-homeless special needs populations, and community development needs are prioritized based upon documented need and funding expectations during the five (5) year Consolidated Plan period.

In general, the needs identified in the Consolidated Plan primarily focus on the development and rehabilitation of housing for low-income and extremely low-income families, services for the homeless, creation of economic opportunities, and improvement of quality of life through public facilities improvements and public service activities. Goals include the creation and retention of affordable rental housing units for special needs populations, persons transitioning from homelessness, the elderly and families. Homeownership remains a priority goal and funding for both development and homebuyer down payment assistance is supported.

Lastly, the community and economic development goals address needed public facilities improvements and public services. Resources are primarily targeted in low-income neighborhoods to remedy problems with blight and neighborhood decay, and to encourage business development and job creation.

## SP-10 Geographic Priorities – 91.215 (a)(1)

### Geographic Area

Table 47 - Geographic Priority Areas

<b>1</b>	<b>Area Name:</b>	Lawton Downtown Economic Development Project Area
	<b>Area Type:</b>	Local Target area
	<b>Other Target Area Description:</b>	
	<b>HUD Approval Date:</b>	
	<b>% of Low/ Mod:</b>	
	<b>Revital Type:</b>	Comprehensive
	<b>Other Revital Description:</b>	
	<b>Identify the neighborhood boundaries for this target area.</b>	The target area is described as beginning at a point where the East right-of-way line of Business Highway 281 intersects the North right-of-way line of NW Ferris Avenue; thence westerly along the North right-of-way line of NW Ferris Avenue to its intersection with the West right-of-way line of NW 14th Street extended; thence southerly along the West right-of-way line of NW 14th Street to its intersection with the South right-of-way line of SW F Avenue; thence easterly along the South right-of-way line of SW F Avenue to its intersection with the West right-of-way line of SW 11th Street; thence southerly along the West right-of-way line of SW 11th Street to its intersection with the North right-of-way line of the Burlington-Northern Railroad; thence easterly and northerly along the North and West right-of-way line of the Burlington-Northern Railroad to its intersection with the East right-of-way line of the Oklahoma-Kansas-Texas Railroad; thence southerly along the East right-of-way line of the Oklahoma-Kansas-Texas Railroad to its intersection with the South right-of-way line of Interstate 44; thence northwesterly along the Southwest right-of-way line of Interstate 44 to its intersection with the East right-of-way line of Business Highway 281; thence southwesterly along the East right-of-way line of Business Highway 281 to the point of beginning.

<p><b>Include specific housing and commercial characteristics of this target area.</b></p>	<p>The Lawton Downtown Economic Development Project area has a mix of commercial and residential structures. The housing stock is poor with several dilapidated or abandoned structures. Most residents in this area face housing problems and are among the population of 0-50% Area Median Income. There are also several unoccupied commercial structures. A new retail development was constructed in this area about ten years ago and the Central Mall, that is also located in this area, is currently undergoing rehabilitation.</p>
<p><b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b></p>	<p>In 2006, the City of Lawton City Council approved this area as a TIF or tax incentive district to encourage private commercial investment. According to the above assessments, this area has a high poverty rate with limited access to jobs. This area also has a high concentration of housing problems.</p>
<p><b>Identify the needs in this target area.</b></p>	<p>The needs in this area are economic development, demolition or rehabilitation of abandoned buildings, housing options for all income populations, rehabilitation of existing housing stock, and improve infrastructure and accessibility.</p>
<p><b>What are the opportunities for improvement in this target area?</b></p>	<p>Opportunities in this target area are plentiful. Elimination of slum and blight, economic development, housing rehabilitation, property maintenance, resolve issues related to prevention of poverty, partnerships with local non-profit agencies, and improve infrastructure. These activities have all been identified as goals for this plan.</p>
<p><b>Are there barriers to improvement in this target area?</b></p>	<p>The barriers that this area faces are that homeownership in this area is low. Most of the affordable rental housing for low and moderate income households are concentrated in this area. Renters usually are not responsible for the upkeep on the homes in this area. It is up to the landlords to reinvest in their property.</p>
<p><b>2 Area Name:</b></p>	<p>Lawton View</p>
<p><b>Area Type:</b></p>	<p>Local Target area</p>
<p><b>Other Target Area Description:</b></p>	<p></p>

<b>HUD Approval Date:</b>	
<b>% of Low/ Mod:</b>	
<b>Revital Type:</b>	Housing
<b>Other Revital Description:</b>	
<b>Identify the neighborhood boundaries for this target area.</b>	The target area is generally described as SE 2nd Street to NW 38th Street from SW G Avenue to SW Coombs Road. Approximately eight square miles.
<b>Include specific housing and commercial characteristics of this target area.</b>	The Lawton View area has a mix of some commercial and residential structures but mainly residential. The housing stock is fair with several dilapidated or abandoned structures. Most residents in this area face housing problems and are among the population of 0-50% Area Median Income. There is less affordable rental housing in the far southern and western parts of this area.
<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	According to the above assessments, this area has a high poverty rate with limited access to jobs. This area also has a high concentration of housing problems with less affordable rental properties. A community center and a homeless shelter are located in this area and provide resources to the surrounding neighborhoods.
<b>Identify the needs in this target area.</b>	The needs in this area are removal and slum and blight through demolition or rehabilitation of abandoned buildings, housing options for all income populations, rehabilitation of existing housing stock, and improve infrastructure and public facilities.
<b>What are the opportunities for improvement in this target area?</b>	Opportunities in this target area are plentiful. Elimination of slum and blight, housing rehabilitation, property maintenance, resolve issued related to prevention of poverty, partnerships with local non-profit agencies, and improve infrastructure. These activities have all been identified as goals for this plan.

	<b>Are there barriers to improvement in this target area?</b>	The barriers that this area faces are that homeownership in this area is moderate. There is a reasonable concentration of affordable rental housing for low and moderate income households. Renters usually are not responsible for the upkeep on the homes in this area. It is up to the landlords to reinvest in their property. The size of this area is also a barrier, but can lead to available space for new affordable housing.
<b>3</b>	<b>Area Name:</b>	Lawton Heights (Zone One)
	<b>Area Type:</b>	Local Target area
	<b>Other Target Area Description:</b>	
	<b>HUD Approval Date:</b>	
	<b>% of Low/ Mod:</b>	
	<b>Revital Type:</b>	Housing
	<b>Other Revital Description:</b>	
	<b>Identify the neighborhood boundaries for this target area.</b>	The target area is generally described as Indian Trail Road to NW 38th Street and between NW Rogers Lane to NW Cache Road. Approximately three square miles.
	<b>Include specific housing and commercial characteristics of this target area.</b>	The Lawton Heights (Zone One) area has a mix of some commercial and residential structures but mainly residential. The housing stock is poor with several dilapidated or abandoned structures. Most residents in this area face housing problems and are among the population of 0-50% Area Median Income. Limited commercial structures are along NW Cache Road and Ft Sill Boulevard. Most commercial structures are unoccupied.
<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	According to the above assessments, this area has a high poverty rate with limited access to jobs. This area also has a high concentration of housing problems with less affordable rental properties. A community center and a homeless shelter are located in this area and provide resources to the surrounding neighborhoods.	

<p><b>Identify the needs in this target area.</b></p>	<p>The needs in this area are remove slum and blight through demolition or rehabilitation of abandoned buildings, housing options for all income populations, rehabilitation of existing housing stock, and improve infrastructure.</p>
<p><b>What are the opportunities for improvement in this target area?</b></p>	<p>Opportunities in this target area are plentiful. Elimination of slum and blight, housing rehabilitation, property maintenance, resolve issued related to prevention of poverty, partnerships with local non-profit agencies, and improve infrastructure. These activities have all been identified as goals for this plan.</p>
<p><b>Are there barriers to improvement in this target area?</b></p>	<p>The barriers that this area faces are that homeownership in this area is low. Most of the affordable rental housing for low and moderate income households are concentrated in this area. Renters usually are not responsible for the upkeep on the homes in this area. It is up to the landlords to reinvest in their property.</p>

**General Allocation Priorities**

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

The City of Lawton does not turn away any qualifying applications for assistance with the City limits of Lawton, however there are three local target areas that the City targets spending on items such as public infrastructure, public facility improvements, CHOD, rental rehabilitations, and economic development opportunities. These areas are located in the central part of Lawton which is the oldest part of town and has the most housing problems. Most of the homes in these areas require significant repairs to keep them viable for renters or homebuyers. The infrastructure in these areas are old and are in need of attention but with the lack of new development in the area they can be overlooked. The downtown are can be a viable business center but is hampered by a negative reputation, empty lots, and deteriorated structures. Code Enforcement activities are also concentrated in these areas to help eliminate the existing slum and blight to in turn spark redevelopment.

## SP-25 Priority Needs - 91.215(a)(2)

### Priority Needs

Table 48 – Priority Needs Summary

1	<b>Priority Need Name</b>	Creation and Retention of Affordable Housing
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Families with Children Elderly Chronic Homelessness Individuals Families with Children
	<b>Geographic Areas Affected</b>	Lawton Heights (Zone One) Lawton View Lawton Downtown Economic Development Project Area
	<b>Associated Goals</b>	Affordable Housing Construction and Development Affordable Housing Retention and Rehabilitation Homebuyer Financial Assistance
	<b>Description</b>	Increase supply and retention of affordable housing for low and moderate income households through development, rehabilitation, and financial assistance to first time homebuyers. Provide CDBG an HOME funding to extremely low and low income households with whole home rehabilitations, exterior maintenance improvements and emergency repairs.
	<b>Basis for Relative Priority</b>	The City continues to place a high priority on homeownership and sustainability. The city promotes homeownership opportunities and encourages mixed income housing in all neighborhoods. Affordable housing for extremely low, low and low-moderate income households is an ongoing need and is a high priority.
	2	<b>Priority Need Name</b>
<b>Priority Level</b>		Low
<b>Population</b>		Non-housing Community Development
<b>Geographic Areas Affected</b>		Lawton Heights (Zone One) Lawton View

	<b>Associated Goals</b>	Elimination of Slum and Blight
	<b>Description</b>	Fund Code Enforcement Officers that concentrate on two local target areas to eliminate property maintenance issue that lead to structures being declared dilapidated. Failure to maintain properties leads to lower property values and unsafe living conditions not only the occupants but surrounds neighbors. Once a structure becomes vacant and/or dilapidated, the structures can often be open invitation to illegal activities.
	<b>Basis for Relative Priority</b>	Neighborhood clean up of abandoned or unkept properties was identified through our Community Needs Survey as an ongoing need and therefore a goal of the plan. Appearance of one or two unkept properties can have a domino affect on the neighborhood. This activity is a lower priority than housing which is an immediate need.
<b>3</b>	<b>Priority Need Name</b>	Public Services
	<b>Priority Level</b>	Low
	<b>Population</b>	Extremely Low Low Moderate Families with Children Elderly Elderly Persons with Mental Disabilities Persons with Alcohol or Other Addictions Victims of Domestic Violence Non-housing Community Development
	<b>Geographic Areas Affected</b>	Lawton Heights (Zone One) Lawton View Lawton Downtown Economic Development Project Area
	<b>Associated Goals</b>	Public Services
	<b>Description</b>	CDBG funding is used to support qualifying public service activities including but not limited to mental health services, counseling services, and senior services.
	<b>Basis for Relative Priority</b>	The City of Lawton remains committed to supporting public services that provide a valuable resource to the low income population of the community. Providing these valuable resources is a community wide effort and much needed.
<b>4</b>	<b>Priority Need Name</b>	Public Facilities and Infrastructure



	<b>Priority Level</b>	Low
	<b>Population</b>	Non-housing Community Development
	<b>Geographic Areas Affected</b>	Lawton Heights (Zone One) Lawton View Lawton Downtown Economic Development Project Area
	<b>Associated Goals</b>	Public Facilities and Infrastructure
	<b>Description</b>	Provide CDBG funding to assist in needed repairs of public infrastructure and/or public facilities in low and moderate income areas.
	<b>Basis for Relative Priority</b>	The City of Lawton remains committed to supporting public infrastructure projects and public facility improvements for low and moderate income areas. These activities are lower priority than housing but remain important to the preservation of older neighborhoods.
5	<b>Priority Need Name</b>	Prevention and Elimination of Homelessness
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Families with Children Elderly Chronic Homelessness Individuals Families with Children Mentally Ill veterans Victims of Domestic Violence Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Alcohol or Other Addictions Victims of Domestic Violence
	<b>Geographic Areas Affected</b>	Lawton Heights (Zone One) Lawton View Lawton Downtown Economic Development Project Area
	<b>Associated Goals</b>	Prevention and Elimination of Homelessness

	<b>Description</b>	Provide financial assistance to prevent or minimize homelessness. Activities include but are not limited to over night shelters, tenant based rental assistance, homelessness prevention counseling, and mental health services.
	<b>Basis for Relative Priority</b>	The City of Lawton continues to support the elimination and prevention of homelessness and it remains a high priority.
<b>6</b>	<b>Priority Need Name</b>	Administration
	<b>Priority Level</b>	Low
	<b>Population</b>	Non-housing Community Development
	<b>Geographic Areas Affected</b>	Lawton Heights (Zone One) Lawton View Lawton Downtown Economic Development Project Area
	<b>Associated Goals</b>	Administration
	<b>Description</b>	Funding to support administration and management of the CDBG and HOME grants. Administration funds are used for staff support and program operations to ensure allocated funds and tracked and disbursed in compliance with federal regulations.
	<b>Basis for Relative Priority</b>	Funding for administration is necessary to facilitate ongoing management and administration of federal grants. Administration funds are used for staff support and program operations to ensure allocated funds and tracked and disbursed in compliance with federal regulations.

**Narrative (Optional)**

The City of Lawton has adopted strategies related to the provision of safe, decent affordable housing for all residents of the community with a particular focus on low and moderate income families. The City also strives to end homelessness by moving individuals and families from homelessness to permanent housing utilizing local and federal resources. The City strives to provide a safe and suitable living environment with adequate public facilities and services to ensure a high quality of life in all areas of the community, with particular focus on low and moderate income areas.

## SP-30 Influence of Market Conditions – 91.215 (b)

### Influence of Market Conditions

<b>Affordable Housing Type</b>	<b>Market Characteristics that will influence the use of funds available for housing type</b>
Tenant Based Rental Assistance (TBRA)	The waiting list for public housing is a good indicator that TBRA is a needed resource in the community. The City of Lawton has a current agreement with the Lawton Housing Authority to provide TBRA and the renewal of the agreement is a part of this plan.
TBRA for Non-Homeless Special Needs	The non-homeless special needs population are included in TBRA.
New Unit Production	The City of Lawton along with the Lawton Housing Authority and the Great Plains Improvement Foundation continue to seek opportunities to increase the housing stock and create new units. The City of Lawton had been unable to find a developer who is willing to develop affordable housing on a large scale.
Rehabilitation	The rehabilitation of existing owner occupied structures is conducted through the City of Lawton’s whole home rehabilitation program, exterior improvement program and emergency repair program. The City has also funded the rehabilitation of rental properties owned by the Great Plains Improvement Foundation to keep them available to low income renters. The City will continue to work with Great Plains Improvement Foundation and the Lawton Housing Authority to maintain affordable rental properties.
Acquisition, including preservation	The City of Lawton has acquired one dilapidated home and is in the process of a major rehabilitation. The plan is to sell this home to a qualifying first-time homebuyer. The City will search opportunities to be able to do this type of work again in the future. Funds have been set aside for this purpose in this plan.

**Table 49 – Influence of Market Conditions**

**SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)**

**Introduction**

First program year allocations are based upon the most recent projections available at the time of submission. CDBG allocations in the future are projected to remain steady with no significant cuts anticipated. The estimated HOME funding for the future programs years is projected to remain steady as well.

Supplemental CDBG-CV funding provided In response to the COVID-19 pandemic in FY 19 will be carried forward in the First Action Plan Year under this Plan.

**Anticipated Resources**

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	716,070	17,306	616,734	1,350,110	3,580,350	Prior year resources include unallocated funds from previous years. Future allocations assume flat funding over the next five years.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	366,488	16,490	1,445,888	1,828,866	1,832,440	Prior year resources include unallocated funds from previous years. Future allocations assume flat funding over the next five years.

Table 50 - Anticipated Resources

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

Funds are also set aside for CHDOs to assist with the development of affordable housing. Great Plains Improvement Foundation and Lawton Housing Authority are recent CHDOs that have been partially funded by the City to rehabilitate affordable housing. Additional funding for the rehabilitations has come from private funding sources. The City of Lawton continues to seek developers who can act as a CHDO and develop affordable housing on a large scale than what the City can accomplish.

**If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

The Lawton Urban Renewal Authority (LURA) owns several lots in the south central area of the City and is open to selling these lots at a discounted rate to any developer willing to construct affordable housing. A sell for several of these lots fell through this past year and LURA is eager to sell as many lots as possible.

### **Discussion**

Regarding required match contributions, HUD match reduction for fiscal distress has eliminated the need to provide 50 % of 25% match funding for the HOME program in recent program years. Although match reductions or waivers cannot be projected in future years, it should be noted that the City has accumulated a significant banked match credit which will ensure that adequate leverage is available for new activities. The City of Lawton continues to prioritize funding of projects that leverage private capital and non-federal funding. It is anticipated that sufficient match will be generated from funded activities to fulfill the match requirement without the use of banked credit.

## SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
LAWTON	Government	Economic Development Non-homeless special needs Ownership neighborhood improvements public facilities public services	Jurisdiction

Table 51 - Institutional Delivery Structure

### Assess of Strengths and Gaps in the Institutional Delivery System

The City's institutional structure for delivery of community development and affordable housing programs has the following strengths:

- Numerous nonprofit service agencies that provide a wide variety of essential public services to low income populations;
- A local housing authority that effectively provides assisted housing programs;
- CoC headed by the Great Plains Improvement Foundation

However, the following gaps in institutional structure also exist:

- Limited number and capacity of nonprofit housing developers and CHDOs with limited sources
- High cost of construction

### Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
<b>Homelessness Prevention Services</b>			
Counseling/Advocacy	X	X	
Legal Assistance	X		
Mortgage Assistance	X		
Rental Assistance	X	X	
Utilities Assistance	X		

<b>Street Outreach Services</b>			
Law Enforcement	X		
Mobile Clinics			
Other Street Outreach Services			
<b>Supportive Services</b>			
Alcohol & Drug Abuse	X	X	
Child Care	X		
Education	X		
Employment and Employment Training	X		
Healthcare	X		
HIV/AIDS	X		
Life Skills	X	X	
Mental Health Counseling	X	X	
Transportation	X		
<b>Other</b>			

**Table 52 - Homeless Prevention Services Summary**

**Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)**

The City of Lawton (City) works with numerous nonprofit social services providers through the Continuum of Care program (CoC). The CoC Committee coordinates the City's homeless assistance programs and the development of the City's annual CoC grant application. The Lawton Housing Authority (LHA) also conducts an annual Point in Time (PIT) count of the City's homeless. Data gathered through this effort, coupled with consultation with local homeless service providers is used to develop the City's homeless strategy. Public Service Organizations (Homeless Shelters) provides the vast majority of housing and services for people who are homeless within the area.

**Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above**

City of Lawton (City) has focused on housing for individuals who are chronically homeless through funding from the HUD CoC competitive grant and a commitment of matching HOME funding. Using the annual PIT as a gauge of the needs of chronically homeless, the City through community partnerships has worked to create permanent supportive housing beds in effort to eliminate homelessness.

**Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs**



Grant funds covered under the Consolidated Plan and other grant funds are utilized in an efficient manner to provide services and activities that benefit the various segments of lower-income populations in a responsible and comprehensive manner. Funds are allocated to activities that are not duplicative or competitive. Funds are allocated to activities that are designed to serve all racial segments of the population in the areas of concentrated lower-income persons to the greatest extent possible.

The primary weakness in the delivery system is lack of funds to address the identified needs within the community. The City has and continues to address underserved needs by prioritizing the programs believed to provide the most benefit to the greatest number of lower-income residents in concentrated low-income neighborhoods.

## SP-45 Goals Summary – 91.215(a)(4)

### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Housing Construction and Development	2021	2025	Affordable Housing	Lawton Heights (Zone One) Lawton View	Creation and Retention of Affordable Housing	HOME: \$475,000	Rental units constructed: 1 Household Housing Unit  Rental units rehabilitated: 4 Household Housing Unit
2	Affordable Housing Retention and Rehabilitation	2021	2025	Affordable Housing Public Housing	Lawton Heights (Zone One) Lawton View Lawton Downtown Economic Development Project Area	Creation and Retention of Affordable Housing	CDBG: \$760,000 HOME: \$1,700,000	Rental units rehabilitated: 10 Household Housing Unit  Homeowner Housing Rehabilitated: 170 Household Housing Unit
3	Homebuyer Financial Assistance	2021	2025	Affordable Housing	Lawton Heights (Zone One) Lawton View Lawton Downtown Economic Development Project Area	Creation and Retention of Affordable Housing	HOME: \$75,000	Direct Financial Assistance to Homebuyers: 5 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Elimination of Slum and Blight	2021	2025	Non-Housing Community Development	Lawton Heights (Zone One) Lawton View	Elimination of Slum and Blight	CDBG: \$460,000	Housing Code Enforcement/Foreclosed Property Care: 20000 Household Housing Unit
5	Public Services	2021	2025	Affordable Housing Non-Housing Community Development	Lawton Heights (Zone One) Lawton View Lawton Downtown Economic Development Project Area	Public Services	CDBG: \$268,525	Public service activities other than Low/Moderate Income Housing Benefit: 29125 Persons Assisted
6	Public Facilities and Infrastructure	2021	2025	Non-Housing Community Development	Lawton Heights (Zone One) Lawton View Lawton Downtown Economic Development Project Area	Public Facilities and Infrastructure	CDBG: \$440,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 8000 Persons Assisted  Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 100 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Prevention and Elimination of Homelessness	2021	2025	Homeless	Lawton Heights (Zone One) Lawton View Lawton Downtown Economic Development Project Area	Prevention and Elimination of Homelessness	CDBG: \$418,525 HOME: \$900,000	Tenant-based rental assistance / Rapid Rehousing: 50 Households Assisted  Homeless Person Overnight Shelter: 10250 Persons Assisted
8	Administration	2021	2025	Administration	Lawton Heights (Zone One) Lawton View Lawton Downtown Economic Development Project Area	Administration	CDBG: \$1,918,210 HOME: \$176,760	Other: 1 Other

Table 53 – Goals Summary

**Goal Descriptions**

1	<b>Goal Name</b>	Affordable Housing Construction and Development
	<b>Goal Description</b>	CDBG and HOME funding for the development of affordable housing projects for low-moderate income households; to include acquisition and reconstruction costs. Funds may be used to produce units for homeownership, single family rental units, multifamily housing, or mixed-use developments. Since the City does not currently have a developer, the City is estimating that at least one new single family rental unit can be constructed and 4 existing dilapidated structures can be rehabilitated.
2	<b>Goal Name</b>	Affordable Housing Retention and Rehabilitation
	<b>Goal Description</b>	CDBG and HOME funding to support whole home rehabilitation, exterior improvements, and emergency repairs for low-moderate income homeowners. Funds will also be provided to assist in the rehabilitation of rental units owned by Great Plains Improvement Foundation and the Lawton Housing Authority. During this five-year Consolidated Plan, an estimated 35 homeowners will receive whole home rehabilitations, 75 homeowners will be assisted with exterior improvements, and 60 homeowners will be assisted with emergency repairs. An estimated 10 rental units will be rehabilitated.
3	<b>Goal Name</b>	Homebuyer Financial Assistance
	<b>Goal Description</b>	HOME funds will be used to provide down payment and closing cost assistance to one household per year, with an estimated 5 first time homebuyers over the five year Consolidated Plan.
4	<b>Goal Name</b>	Elimination of Slum and Blight
	<b>Goal Description</b>	CDBG funding is allocated for two Code Enforcement Officers to concentrate their efforts on two areas of town that have the highest number of code violations. It is estimated that 20,000 code violations will be identified and corrected over the five year Consolidated Plan.
5	<b>Goal Name</b>	Public Services
	<b>Goal Description</b>	CDBG funds are allocated to eligible public service activities including youth services, senior services, and counseling services. It is estimated that over the five year Consolidated Plan that almost 30,000 persons will be assisted through these services.

6	<b>Goal Name</b>	Public Facilities and Infrastructure
	<b>Goal Description</b>	CDBG funding is provided to assist in the development or replacement of public improvements within designated neighborhoods. Sewer line replacement and the construction of new sidewalks have been identified as needed infrastructure improvements. The HC King Community Center has also identified the need for rehabilitation. The HC King Center provide a multitude of activities for the community from youth activities to senior activities.
7	<b>Goal Name</b>	Prevention and Elimination of Homelessness
	<b>Goal Description</b>	CDBG and HOME funding is allocated to overnight shelters for individuals, families, and victims of domestic violence. Funding is also allocated to homelessness prevention counseling. Lawton Housing Authority has been allocated \$700,000 in HOME funds and \$150,000 in CDBG funds for the renovation of the old Armed Forces YMCA building into a Veterans Resource Center that will not only provide valuable resource to homeless veterans, but will have 10 SRO units for immediate temporary housing. Tenant based rental assistance will also be allocated funding for at least the first two years of the five-year Consolidated Plan.
8	<b>Goal Name</b>	Administration
	<b>Goal Description</b>	CDBG and HOME funding to support administration and management of the federal grants. Allocation includes the CDBG Admin cap of 20%, HOME Admin cap of 10% and HAD Delivery Costs. This allocation also includes the Section 108 Loan payments for the next five years.

**Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)**

During the five year timeframe covered by the Consolidated Plan, it is anticipated that the City of Lawton will assist an estimated 250 households in the attainment or retention of affordable housing. This total includes new affordable units (both rental and home ownership), recipients of down payment assistance, rehabilitation program beneficiaries, and recipients of TBRA.

## **SP-50 Public Housing Accessibility and Involvement – 91.215(c)**

### **Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)**

All of the findings from the most recent Section 504 audit were addressed and resolved within the Lawton Housing Authority (LHA). LHA does not maintain a separate waiting list for accessible units; however, if an applicant's name rises to the top of the list, they can refuse the apartment and wait on one that is accessible without losing their place on the list. In some cases, a unit can be modified to meet the needs of the tenant at minimal cost. Approximately 15% of the units are handicapped accessible. LHA reports that at the present time, there does not appear to be a need for additional handicapped units.

### **Activities to Increase Resident Involvements**

LHA has set a goal of assisting three (3) families annually in achieving homeownership through the 5H Homeownership and Section 8 Homeownership Programs. Tenants are encouraged to pursue opportunities for homeownership through these programs as funding allows.

### **Is the public housing agency designated as troubled under 24 CFR part 902?**

No

### **Plan to remove the 'troubled' designation**

Not Applicable. LHA is a standard performer and is not identified as a troubled agency.

## **SP-55 Barriers to affordable housing – 91.215(h)**

### **Barriers to Affordable Housing**

The major obstacles to affordable housing in Lawton are the level of housing prices relative to the levels of income earned by low-income members of the community. Future economic development of the community to raise the incomes of low-income households is one key to affordability. Another obstacle is the community's perspective of affordable housing. In the past, the Council has not supported affordable housing developments because the community felt that these types of developments would compete with existing apartment complexes and local developers. The Housing and Community Development staff will continue to support affordable housing developments and will advocate for them to the Council.

### **Strategy to Remove or Ameliorate the Barriers to Affordable Housing**

The major obstacles to affordable housing in Lawton are the level of rent and housing prices relative to the levels of income earned by low-income members of the community. Future economic development of the community to raise the incomes of low-income households is one key to affordability. The City of Lawton has some economic developments on the horizon which should increase job opportunities for the low and moderate income populations.



## **SP-60 Homelessness Strategy – 91.215(d)**

### **Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

The overall goal of Lawton's homeless programs is to assist homeless families and individuals to move from homelessness to self-sufficiency. The program is based on a holistic view of homelessness that recognizes and integrates the economic, housing, and social service needs of homeless households to develop innovative solutions to the specific needs of homeless families and individuals. Homeless assistance is provided through a continuum of care by the collaborative efforts of key government agencies and service providers, both profit and nonprofit.

### **Addressing the emergency and transitional housing needs of homeless persons**

A local homeless program has been established in Lawton through the collaborative efforts of both, providers in the public sector and participating members of the Continuum of Care. The strategy consists of three essential elements: (1) Prevention (2) Expansion Availability of affordable housing and (3) increased accessibility to needed services and resources. From 2007 until January 2021, Lawton Support Services as the lead agency for the SW CoC, did much to implement the strategies adopted, developing each element in lock step with one another. As Prevention resources were made available, it decreased the need for emergency shelter, and establishing a network for housing and service resources, allowed for greater availability of affordable housing, and access to services necessary to keep people in permanent housing. Equally as important, the transition process is carefully managed to ensure that people who are homeless do not experience any interruption in services or additional hardship, as a result. Consequently, the city has experienced significant reductions in the homeless population, with reductions in the numbers entering the interim housing system, and an increase in the number of households exiting the system to permanent self-sufficiency.

In January 2021, the C. Carter Crane Center for Empowerment and Advancement, a part of the Great Plains Improvement Foundation, replaced Lawton Support Services as the lead agency and lead HMIS. The agency offers emergency shelter services to those facing homelessness, as well as assistance with seeking employment, housing, stability and well-being, and is thus uniquely qualified to not only build upon the work already accomplished, but should expand the scope of our homeless strategy.

The C. Carter Crane Shelter for the Homeless, in partnership with Great Plains Improvement Foundation (GPIF), Inc., is the primary provider of housing for homeless families and individuals. GPIF, a community action agency, manages one homeless shelter, and nine transitional houses for homeless families, and administers an Emergency Solutions Grant (ESG) program, which provides prevention and rehousing assistance. Additional transitional houses are required to expand the shelter's capacity to provide housing assistance for homeless families. The Director estimates the shelter can effectively manage up

to 20 transitional houses without additional staffing, although she admits it would further stress an already over-extended staff. The shelter is highly dependent on volunteers and rely on volunteers to assist in delivery of over 200 homeless persons to job sites, doctor's appointments, and interviews. They facilitated over 5,000 nights (total number of beds used during the year or stated differently, a running total of each bed used in the shelter throughout the year) to clients who were in need. Over 125 working (full- and part-time) clients were given a stable environment to begin good work ethics and provided shelter, laundry facilities and transportation to their employment. The agency anticipates providing shelter to a similar number of homeless people next year. It is important to note that, like many of Lawton's human service providers, C. Carter Crane serves not only the local community, but it also draws some of its homeless clientele from Comanche County at large as well as parts of other surrounding counties. To meet future homeless needs the shelter is developing plans to expand the capacity of the shelter and has requested assistance in procuring additional transitional houses to address the needs of families, particularly large ones.

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.**

Service providers in the community who collaborate with the City direct homeless persons to the appropriate services and financial assistance needed to achieve independent living. Lawton Support Services has been instrumental in establishing a Coordinated Intake System (CIS) to ensure those in need are linked to required services and resources. This may include assistance in obtaining permanent housing, medical treatment, mental health treatment, counseling, supervision, and/or other government or private assistance available such as:

- Medicaid
- Supplemental Nutrition Assistance Program
- Women, Infants and Children (WIC)
- Federal-State Unemployment Insurance Program
- Social Security Disability Insurance
- Supplemental Security Income
- Child and Adult Care Food Program

- Veterans Services

Additionally, Lawton Support Services has secured funding for a Veterans Resource Center, which will be open by the end of the 2021 to assist with veterans experiencing homelessness or at risk, in not only Lawton but also the surrounding areas.

**Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs**

Transition of homeless households to permanent housing is the overall objective for those households that want to become homeowners. The transitional housing program serves as the vehicle for assistance in moving from homelessness to independent living. Households will be provided information, assistance, and access to the FTHB program to provide homeownership opportunities. Additionally, in appropriate cases, households will be provided advice and assistance in procuring financing from other sources if FTHB funds are unavailable or the households are not selected for the program.

Outreach assessment will be an ongoing effort in the community. There is a need for improved collaboration and information sharing throughout the continuum of care to develop a clearer perspective of the degree of homelessness and availability of supportive services in the community. The efforts of the Southwest Region Continuum of Care group will continue to pay dividends through better tracking of the homeless, better care and through increases in supportive services and housing as the exact nature and extent of the homeless problem in the region is identified.

## **SP-65 Lead based paint Hazards – 91.215(i)**

### **Actions to address LBP hazards and increase access to housing without LBP hazards**

Any home constructed before 1978, has the protentional to contain a lead based paint hazard. A lead based paint hazard is defined as lead based paint that is deteriorated which may cause adverse human health effects. All homes assisted with CDBG or HOME funds are first inspected to verify if lead based paint is detected. Not all lead based paint is in a condition that would deem it a hazard. Contractors are required to use safe work practices when in contact with a surface that contains lead based paint. Lead based paint hazards are remediated to eliminate the hazard and clearance testing is required before occupants are allowed back inside the home.

### **How are the actions listed above related to the extent of lead poisoning and hazards?**

All applicants to the City's Rehabilitation programs receive priority for contracting and funding when lead based paint is present in a home with children.

### **How are the actions listed above integrated into housing policies and procedures?**

The City of Lawton Housing and Community Development Division has adopted a Lead-Based Paint Policy that provides for compliance with the requirements of 24 CFR Part 35 regarding assessment and treatment of lead-based paint hazards.

## **SP-70 Anti-Poverty Strategy – 91.215(j)**

### **Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families**

The City of Lawton (City) does not have a formal antipoverty strategy, but has implemented numerous local and federal job creation and education programs with the lead agency being Lawton Support Services that cumulatively work to reduce poverty. The City has provided substantial revenue for improvements in school districts that educate children of Oklahoma our residents. Education serves as one of the cornerstone of most effective anti-poverty strategies. In addition to the locally funded economic development and job creation efforts to combat poverty, the City utilizes federal resources to stimulate job growth.

### **How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan**

The City places a high priority on mixed income neighborhoods and de-concentration of poverty. All funding decisions are sensitive to the highest levels of need, and the desire to allocate limited resources strategically to provide a holistic approach to neighborhood revitalization.

## **SP-80 Monitoring – 91.230**

**Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements**

The City of Lawton monitors all activities it funds with federal grants. A compliance review is conducted for all sub-recipients on an annual basis.

Office of the City Auditor and Outside Auditor (A-133):

1. The City's internal auditors randomly audit various programs in city departments.
2. As part of the annual independent A-133 audit, federally funded activities are audited to determine compliance with grant provisions and federal guidelines. The City Manager, City Council and the auditing firm review any responses to exceptions and corrective actions.
3. Agreements with sub-grantees require annual independent audits be made and that copies of the audits be provided to the City within 30-days of receipt by the agency. The audit reports are reviewed along with corrective actions for any exceptions found.
4. The documentation required in support of federal draw-down requests is also required to access funds through the City's accounting system.

Activities that are not funded by the City are monitored through reports, by review of minutes of committees and agencies, and through staff participation on or attendance at meetings of various committees and boards.

When Subgrantees are monitored, the following procedure is used:

- Prepare schedule of monitoring visits.
- Notify subrecipients of date(s) set for monitoring visit(s).
- Review with subrecipient the monitoring checklist that will be used as a monitoring guide.
- Conduct the monitoring review as follows:
  - Check minutes of Board meetings for actions, authorizations affecting operations, expenditures, and personnel actions.
  - Review time records and other documents relating to time spent on program activities.

- Check deposit records.
- Check expenditures by examining vouchers, supporting documentation and/or canceled checks to determine eligibility of costs.
- Determine that books of account(s) agree with the reports submitted by the funded agency.
- Review records to determine eligibility of low and moderate income beneficiaries, to include examination of income source documents.
- Determine that requested funds are spent timely, if applicable.
- Conduct an exit interview to review findings and/or concerns noted during the audit with relevant agency staff.
- Prepare a written report to the Board Chairperson/President relating the method of review, determination of compliance, concerns, findings or other relevant comments. The letter must identify a deadline for correction or submission of information and must offer technical assistance if appropriate.
- Subgrantee monitoring reports are presented to the Housing & Community Development Administrator for review.

## Expected Resources

### AP-15 Expected Resources – 91.220(c)(1,2)

#### Introduction

First program year allocations are based upon the most recent projections available at the time of submission. CDBG allocations in the future are projected to remain steady with no significant cuts anticipated. The estimated HOME funding for the future programs years is projected to remain steady as well.

Supplemental CDBG-CV funding provided In response to the COVID-19 pandemic in FY 19 will be carried forward in the First Action Plan Year under this Plan.

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	716,070	17,306	616,734	1,350,110	3,580,350	Prior year resources include unallocated funds from previous years. Future allocations assume flat funding over the next five years.



Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	366,488	16,490	1,445,888	1,828,866	1,832,440	Prior year resources include unallocated funds from previous years. Future allocations assume flat funding over the next five years.

Table 54 - Expected Resources – Priority Table

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

Funds are also set aside for CHDOs to assist with the development of affordable housing. Great Plains Improvement Foundation and Lawton Housing Authority are recent CHDOs that have been partially funded by the City to rehabilitate affordable housing. Additional funding for the rehabilitations has come from private funding sources. The City of Lawton continues to seek developers who can act as a CHDO and develop affordable housing on a large scale than what the City can accomplish.

**If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

The Lawton Urban Renewal Authority (LURA) owns several lots in the south central area of the City and is open to selling these lots at a discounted rate to any developer willing to construct affordable housing. A sell for several of these lots fell through this past year and LURA is eager to sell as many lots as possible.

**Discussion**

Regarding required match contributions, HUD match reduction for fiscal distress has eliminated the need to provide 50 % of 25% match funding for the HOME program in recent program years. Although match reductions or waivers cannot be projected in future years, it should be noted that the City has accumulated a significant banked match credit which will ensure that adequate leverage is available for new activities. The City of Lawton continues to prioritize funding of projects that leverage private capital and non-federal funding. It is anticipated that sufficient match will be generated from funded activities to fulfill the match requirement without the use of banked credit.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Housing Construction and Development	2021	2025	Affordable Housing	Lawton Heights (Zone One) Lawton View	Creation and Retention of Affordable Housing	HOME: \$100,000	Rental units constructed: 1 Household Housing Unit
2	Affordable Housing Retention and Rehabilitation	2021	2025	Affordable Housing Public Housing	Lawton Heights (Zone One) Lawton View Lawton Downtown Economic Development Project Area	Creation and Retention of Affordable Housing	CDBG: \$151,624 HOME: \$332,626	Rental units rehabilitated: 2 Household Housing Unit Homeowner Housing Rehabilitated: 34 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Homebuyer Financial Assistance	2021	2025	Affordable Housing	Lawton Heights (Zone One) Lawton View Lawton Downtown Economic Development Project Area	Creation and Retention of Affordable Housing	HOME: \$15,000	Direct Financial Assistance to Homebuyers: 1 Households Assisted
4	Elimination of Slum and Blight	2021	2025	Non-Housing Community Development	Lawton Heights (Zone One) Lawton View	Elimination of Slum and Blight	CDBG: \$90,700	Housing Code Enforcement/Foreclosed Property Care: 4000 Household Housing Unit
5	Public Services	2021	2025	Affordable Housing Non-Housing Community Development	Lawton Heights (Zone One) Lawton View Lawton Downtown Economic Development Project Area	Public Services	CDBG: \$53,705	Public service activities other than Low/Moderate Income Housing Benefit: 5825 Persons Assisted
6	Public Facilities and Infrastructure	2021	2025	Non-Housing Community Development	Lawton Heights (Zone One) Lawton View Lawton Downtown Economic Development Project Area	Public Facilities and Infrastructure	CDBG: \$240,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 8000 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 50 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Prevention and Elimination of Homelessness	2021	2025	Homeless	Lawton Heights (Zone One) Lawton View Lawton Downtown Economic Development Project Area	Prevention and Elimination of Homelessness	CDBG: \$203,705 HOME: \$900,000	Tenant-based rental assistance / Rapid Rehousing: 10 Households Assisted Homeless Person Overnight Shelter: 2050 Persons Assisted
8	Administration	2021	2025	Administration	Lawton Heights (Zone One) Lawton View Lawton Downtown Economic Development Project Area	Administration	CDBG: \$383,642 HOME: \$35,352	Other: 1 Other

Table 55 – Goals Summary

**Goal Descriptions**

1	<b>Goal Name</b>	Affordable Housing Construction and Development
	<b>Goal Description</b>	CDBG and HOME funding for the development of affordable housing projects for low-moderate income households; to include acquisition and reconstruction costs. Funds may be used to produce units for homeownership, single family rental units, multifamily housing, or mixed-use developments.

2	<b>Goal Name</b>	Affordable Housing Retention and Rehabilitation
	<b>Goal Description</b>	CDBG and HOME funding to support whole home rehabilitation, exterior improvements, and emergency repairs for low-moderate income homeowners. Funds will also be provided to assist in the rehabilitation of rental units owned by Great Plains Improvement Foundation and the Lawton Housing Authority.
3	<b>Goal Name</b>	Homebuyer Financial Assistance
	<b>Goal Description</b>	HOME funds will be used to provide down payment and closing cost assistance to one household per year.
4	<b>Goal Name</b>	Elimination of Slum and Blight
	<b>Goal Description</b>	CDBG funding is allocated for two Code Enforcement Officers to concentrate their efforts on two areas of town that have the highest number of code violations.
5	<b>Goal Name</b>	Public Services
	<b>Goal Description</b>	CDBG funds are allocated to eligible public service activities including youth services, senior services, and counseling services.
6	<b>Goal Name</b>	Public Facilities and Infrastructure
	<b>Goal Description</b>	CDBG funding is provided to assist in the development or replacement of public improvements within designated neighborhoods. Sewer line replacement and the construction of new sidewalks have been identified as needed infrastructure improvements. The HC King Community Center has also identified the need for rehabilitation. The HC King Center provide a multitude of activities for the community from youth activities to senior activities.
7	<b>Goal Name</b>	Prevention and Elimination of Homelessness
	<b>Goal Description</b>	CDBG and HOME funding is allocated to overnight shelters for individuals, families, and victims of domestic violence. Funding is also allocated to homelessness prevention counseling. Lawton Housing Authority has been allocated \$700,000 in HOME funds and \$150,000 in CDBG funds for the renovation of the old Armed Forces YMCA building into a Veterans Resource Center that will not only provide valuable resource to homeless veterans, but will have 10 SRO units for immediate temporary housing. Tenant based rental assistance will also be allocated funding for at least the first two years of the five-year Consolidated Plan.

<b>8</b>	<b>Goal Name</b>	Administration
	<b>Goal Description</b>	CDBG and HOME funding to support administration and management of the federal grants. Allocation includes the CDBG Admin cap of 20%, HOME Admin cap of 10% and HAD Delivery Costs. This allocation also includes the Section 108 Loan payments for the next five years.

# Projects

## AP-35 Projects – 91.220(d)

### Introduction

The following initiatives and goals for the 1st Action Year are consistent with those established in the Five-Year Consolidated Plan with an effective date of July 1, 2021, and are compatible with the purposes set forth in **24 CFR Section 91.1**, that include:

1. Affordable Housing Programs consisting of housing rehabilitation and new construction that focus on home ownership, programs to assist lower-income persons to attain home ownership, as well as single and multi-family rental rehabilitation and new construction program activities
2. The goals and objectives that are addressed in this 1st Action Year Plan specifically relate to the goals outlined in the 2016-2020 Consolidated Plan and the Department of Housing and Urban Development goals that include:
  - a. The provision of decent housing
  - b. The provision of a suitable living environment, and
  - c. Expanding economic opportunities principally for persons of low and moderate income.

The program activities are outlined below as they relate to availability/accessibility, affordability, and sustainability with regard to decent housing, suitable living environment and economic opportunity.

City of Lawton formula grant funding allocations, recommended for adoption the 1st Action Year Plan (fiscal year July 1, 2021 through June 30, 2022), follow the priorities established in the new five-year Consolidated Plan that expires June 30, 2026. The FFY 2021-2025 Consolidated Plan contains specific funding recommendations to implement the goals established in the five-year Plan tables to the extent possible depending on federal funding allocations awarded to the City of Lawton.

The funding recommendations for the First Year Action Year were considered by the City Planning Commission on July 15, 2021, and received their favorable recommendation. Final Plan approval was granted by the City Council on August 10, 2021.

### Projects

#	Project Name
1	Whole Home Rehabilitation
2	Exterior Housing Improvements



#	Project Name
3	Emergency Repair
4	First Time Homebuyer Assistance
5	CHDO Set-Aside
6	Section 108 Loan Payments
7	Public Service Organizations
8	Homeless Programs and Prevention
9	Slum and Blight Code Enforcement
10	Public Facilities and Infrastructure Improvements
11	CDBG Administration
12	HOME Administration
13	HAD Delivery
14	Affordable Housing Development

**Table 56 – Project Information**

**Describe the reasons for allocation priorities and any obstacles to addressing underserved needs**

Priority is assigned to housing objectives based on the amount of federal funds available, unmet needs identified in the preceding analysis as they relate to creating affordable owner housing and encouraging home ownership, and in an effort to direct funds to long term solutions to problems. Housing objectives that receive a ranking of high are the objectives that will be addressed through program activities funded in the Annual Action Year programs. Other housing criteria evaluated to provide a ranking of high priority include:

1. Preservation of existing housing stock, particularly in areas where the greatest concentration of lower-income persons and minorities reside. Funding is allocated to fund rehabilitation of private homes, provide for emergency home repair, exterior maintenance repair, and rehabilitation of public housing units.
2. Permanent housing for the chronic homeless that includes persons with serious mental illness, substance abuse, and other disabilities. Funds can be allocated to match other grant in aid programs, or to accumulate sufficient funds to start a sponsored permanent homeless housing projects.
3. Down payment and closing cost assistance to increase the affordability of home ownership.
4. Increasing the supply of affordable housing is a high priority. Community Housing Development Organizations (CHDOs) and other non-profits are eligible to apply for allocations of HOME funds to construct new homes, or purchase/rehab homes for eligible owner households.
5. Objectives that improve the quality of owner housing have a high priority including emergency home repair, housing exterior maintenance and whole house rehabilitation. Public infrastructure

improvements is also a priority to provide safe and sanitary living conditions.

**AP-38 Project Summary**  
**Project Summary Information**

<b>1</b>	<b>Project Name</b>	Whole Home Rehabilitation
	<b>Target Area</b>	Lawton Heights (Zone One) Lawton View Lawton Downtown Economic Development Project Area
	<b>Goals Supported</b>	Affordable Housing Retention and Rehabilitation
	<b>Needs Addressed</b>	Creation and Retention of Affordable Housing
	<b>Funding</b>	CDBG: \$277,652
	<b>Description</b>	Provide financial assistance to low income homeowners for whole home rehabilitations of their single family dwelling.
	<b>Target Date</b>	6/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The City estimates that seven (7) moderate or low income households will be assisted by this project.
	<b>Location Description</b>	This project may take place anywhere within the city limits of Lawton.
	<b>Planned Activities</b>	Provide financial assistance for the whole home rehabilitation of 7 owner-occupied single family dwellings.
<b>2</b>	<b>Project Name</b>	Exterior Housing Improvements
	<b>Target Area</b>	Lawton Heights (Zone One) Lawton View Lawton Downtown Economic Development Project Area
	<b>Goals Supported</b>	Affordable Housing Retention and Rehabilitation
	<b>Needs Addressed</b>	Creation and Retention of Affordable Housing
	<b>Funding</b>	CDBG: \$91,624
	<b>Description</b>	Provide financial assistance to low income homeowners for exterior housing improvements of their single family dwelling.
	<b>Target Date</b>	6/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The City estimates that fifteen (15) low income households will be assisted by this project.
	<b>Location Description</b>	This project may take place anywhere within the city limits of Lawton.

	<b>Planned Activities</b>	Provide financial assistance for the exterior improvements of 15 owner-occupied single family dwellings.
<b>3</b>	<b>Project Name</b>	Emergency Repair
	<b>Target Area</b>	Lawton Heights (Zone One) Lawton View Lawton Downtown Economic Development Project Area
	<b>Goals Supported</b>	Affordable Housing Retention and Rehabilitation
	<b>Needs Addressed</b>	Creation and Retention of Affordable Housing
	<b>Funding</b>	CDBG: \$60,000
	<b>Description</b>	Provide financial assistance to low income homeowners for emergency repairs of their single family dwelling.
	<b>Target Date</b>	6/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The City estimates that twelve (12) low income households will be assisted by this project.
	<b>Location Description</b>	This project may take place anywhere within the city limits of Lawton.
	<b>Planned Activities</b>	Provide financial assistance for the emergency repairs of 12 owner-occupied single family dwellings.
<b>4</b>	<b>Project Name</b>	First Time Homebuyer Assistance
	<b>Target Area</b>	Lawton Heights (Zone One) Lawton View Lawton Downtown Economic Development Project Area
	<b>Goals Supported</b>	Homebuyer Financial Assistance
	<b>Needs Addressed</b>	Creation and Retention of Affordable Housing
	<b>Funding</b>	HOME: \$15,000
	<b>Description</b>	Provide financial assistance in the form of downpayment and/or closing cost assistance to a moderate or low income household for the purchase of a home.
	<b>Target Date</b>	6/30/2022

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The City estimates that one (1) moderate or low income household will be assisted by this project.
	<b>Location Description</b>	This project may take place anywhere within the city limits of Lawton.
	<b>Planned Activities</b>	Provide financial assistance for the purchase of a home to 1 household.
5	<b>Project Name</b>	CHDO Set-Aside
	<b>Target Area</b>	Lawton Heights (Zone One) Lawton View Lawton Downtown Economic Development Project Area
	<b>Goals Supported</b>	Affordable Housing Retention and Rehabilitation
	<b>Needs Addressed</b>	Creation and Retention of Affordable Housing
	<b>Funding</b>	HOME: \$54,974
	<b>Description</b>	Provide financial assistance to a qualifying CHDO(s) for the rehabilitation of affordable rental units.
	<b>Target Date</b>	6/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The City estimates that two (2) affordable rental units will be assisted by this project.
	<b>Location Description</b>	This project may take place anywhere within the city limits of Lawton.
	<b>Planned Activities</b>	Provide financial assistance for the rehabilitation of 2 affordable rental units.
6	<b>Project Name</b>	Section 108 Loan Payments
	<b>Target Area</b>	Lawton Downtown Economic Development Project Area
	<b>Goals Supported</b>	Administration
	<b>Needs Addressed</b>	Administration
	<b>Funding</b>	CDBG: \$135,438
	<b>Description</b>	Provide financial assistance to repay the note on an outstanding Section 108 loan.
	<b>Target Date</b>	6/30/2022

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The City estimates that this project originally created 400 jobs for low and moderate income individuals.
	<b>Location Description</b>	
	<b>Planned Activities</b>	Provide financial assistance to make the annual payments of the outstanding Section 108 loan.
<b>7</b>	<b>Project Name</b>	Public Service Organizations
	<b>Target Area</b>	Lawton Heights (Zone One) Lawton View Lawton Downtown Economic Development Project Area
	<b>Goals Supported</b>	Public Services Prevention and Elimination of Homelessness
	<b>Needs Addressed</b>	Public Services Prevention and Elimination of Homelessness
	<b>Funding</b>	CDBG: \$107,410
	<b>Description</b>	Provide financial assistance to qualifying Public Service Organizations to assist low and moderate income person within the community.
	<b>Target Date</b>	6/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The City estimates that approximately eight thousand low or moderate individuals will be assisted by this project.
	<b>Location Description</b>	This project may take place anywhere within the city limits of Lawton, but will take place at each individual Public Service Organization's office.
	<b>Planned Activities</b>	Provide financial assistance to qualifying Public Service Organizations to assist approximately 8,000 low or moderate income individuals within the community.
<b>8</b>	<b>Project Name</b>	Homeless Programs and Prevention
	<b>Target Area</b>	Lawton Downtown Economic Development Project Area
	<b>Goals Supported</b>	Prevention and Elimination of Homelessness
	<b>Needs Addressed</b>	Prevention and Elimination of Homelessness

	<b>Funding</b>	CDBG: \$150,000 HOME: \$900,000
	<b>Description</b>	Provide financial assistance to the Lawton Housing Authority for the prevention of homelessness.
	<b>Target Date</b>	6/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The City estimates that ten (10) households will be assisted by TBRA and ten (10) bed will be added for homeless Veterans once the Veterans Resource Center is completed.
	<b>Location Description</b>	This project may take place anywhere within the city limits of Lawton.
	<b>Planned Activities</b>	Provide financial assistance to the Lawton Housing Authority for a Tenant Based Rental Assistance program to prevent homelessness and provide financial assistance for the rehabilitation of the old Armed Forces YMCA into a Veterans Resource Center for homeless veterans within the community.
9	<b>Project Name</b>	Slum and Blight Code Enforcement
	<b>Target Area</b>	Lawton Heights (Zone One) Lawton View
	<b>Goals Supported</b>	Elimination of Slum and Blight
	<b>Needs Addressed</b>	Elimination of Slum and Blight
	<b>Funding</b>	CDBG: \$90,700
	<b>Description</b>	Provide financial assistance to fund Code Enforcement Officers who work two designated areas of town with the most slum and blighted properties.
	<b>Target Date</b>	6/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The City estimates that four thousand (4,000) properties will be addressed by this project.
	<b>Location Description</b>	The target areas of this project are located within the central areas of town; Lawton View and Lawtoon Heights (Zone One).
<b>Planned Activities</b>	Provide financial assistance to fund 2 Code Enforcement Officers who work two designated areas of town with the most slum and blighted properties.	



10	<b>Project Name</b>	Public Facilities and Infrastructure Improvements
	<b>Target Area</b>	Lawton Heights (Zone One) Lawton View Lawton Downtown Economic Development Project Area
	<b>Goals Supported</b>	Public Facilities and Infrastructure
	<b>Needs Addressed</b>	Public Facilities and Infrastructure
	<b>Funding</b>	CDBG: \$240,000
	<b>Description</b>	Provide financial assistance for the repair, rehabilitation, or replacement of public facilities and/or infrastructure.
	<b>Target Date</b>	6/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The City estimates that eight thousand fifty (8,050) will benefit from this project.
	<b>Location Description</b>	This project may take place anywhere within the city limits of Lawton.
<b>Planned Activities</b>	Provide financial assistance for the replacement of sewerline segments within low and moderate neighborhoods to maintain safe and sanitary living conditions and assist with the rehabilitation of the HC King Community Center located within a low income neighborhood.	
11	<b>Project Name</b>	CDBG Administration
	<b>Target Area</b>	Lawton Heights (Zone One) Lawton View Lawton Downtown Economic Development Project Area
	<b>Goals Supported</b>	Administration
	<b>Needs Addressed</b>	Administration
	<b>Funding</b>	CDBG: \$143,214
	<b>Description</b>	Provides funding for general administrative management, oversight, and coordination costs and carrying charges for planning, administering, and conducting CDBG and HOME Program activities. In accordance with 24 CFR 570.200(g), the CDBG Program allows up to 20 percent of annual funding for administration.
	<b>Target Date</b>	6/30/2022

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	This is an administrative project.
	<b>Location Description</b>	
	<b>Planned Activities</b>	Provides funding for general administrative management, oversight, and coordination costs and carrying charges for planning, administering, and conducting CDBG and HOME Program activities. In accordance with 24 CFR 570.200(g), the CDBG Program allows up to 20 percent of annual funding for administration.
<b>12</b>	<b>Project Name</b>	HOME Administration
	<b>Target Area</b>	Lawton Heights (Zone One) Lawton View Lawton Downtown Economic Development Project Area
	<b>Goals Supported</b>	Administration
	<b>Needs Addressed</b>	Administration
	<b>Funding</b>	HOME: \$35,352
	<b>Description</b>	Provides funding for planning and administrative expenses for the HOME Program's housing development activities described in the Annual Action Plan. The HOME Program allows 10 percent of the annual funding allocation for administration.
	<b>Target Date</b>	6/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	This is an administrative project.
	<b>Location Description</b>	
	<b>Planned Activities</b>	Provides funding for planning and administrative expenses for the HOME Program's housing development activities described in the Annual Action Plan. The HOME Program allows 10 percent of the annual funding allocation for administration.
	<b>Project Name</b>	HAD Delivery

13	<b>Target Area</b>	Lawton Heights (Zone One) Lawton View Lawton Downtown Economic Development Project Area
	<b>Goals Supported</b>	Administration
	<b>Needs Addressed</b>	Administration
	<b>Funding</b>	CDBG: \$104,990
	<b>Description</b>	Provides funding for rehabilitation administration for CDBG and HOME program housing activities. It also funds zero-interest loans to low- and moderate-income households for rehabilitation of owner-occupied single-family residential properties, and lead-based paint testing. This project funds two staff members along with their required annual training regarding lead-based paint and environmental reviews.
	<b>Target Date</b>	6/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	This is an administrative project.
	<b>Location Description</b>	Provide funding to assist low, very low and moderate household with emergency repairs and exterior home improvements of owner occupied homes.
<b>Planned Activities</b>	Provides funding for rehabilitation administration for CDBG and HOME program housing activities. It also funds zero-interest loans to low- and moderate-income households for rehabilitation of owner-occupied single-family residential properties, and lead-based paint testing. This project funds two staff members along with their required annual training regarding lead-based paint and environmental reviews.	
14	<b>Project Name</b>	Affordable Housing Development
	<b>Target Area</b>	Lawton Heights (Zone One) Lawton View Lawton Downtown Economic Development Project Area
	<b>Goals Supported</b>	Affordable Housing Construction and Development
	<b>Needs Addressed</b>	Creation and Retention of Affordable Housing
	<b>Funding</b>	HOME: \$375,000
	<b>Description</b>	Provide financial assistance for the purchase and major rehabilitation of four dilapidated houses into affordable rental units.

<b>Target Date</b>	6/30/2023
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The City estimates that four (4) moderate or low income households will be assisted by this project.
<b>Location Description</b>	This project may take place anywhere within the city limits of Lawton.
<b>Planned Activities</b>	Provide financial assistance for the purchase and total rehabilitation of 4 dilapidated structures into affordable rental units over the next two years.

## **AP-50 Geographic Distribution – 91.220(f)**

### **Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed**

The City of Lawton’s population of 94,017 makes up about 77% of Comanche County’s population according to 2019 ACS 5 year estimates. The community is racially diverse with a total minority population exceeding 42%. The minority population in Lawton remains in transition. In the 2019 American Community Survey, persons of Hispanic or Latino origin represent 14.32% of the total population. African American persons, the largest minority/ethnic population in Lawton, comprise of 20.22% of the total population. Black and African America families are disproportionately located in Census tract 16.00 which is located in the south-central area of the city. Poverty continues to be concentrated in the central part of Lawton which has the oldest housing stock with the most housing problems.

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
Lawton Heights (Zone One)	15
Lawton View	60
Lawton Downtown Economic Development Project Area	5

**Table 57 - Geographic Distribution**

### **Rationale for the priorities for allocating investments geographically**

The City targets resources strategically to support neighborhood revitalization efforts in the areas with the greatest community need. The central area of Lawton has the highest concentration of poverty, highest percentage of minorities, the highest percentage of housing problems, and the oldest structures and infrastructure in Lawton. The City will continue to focus on areas where most federal funds will be expended to benefit the largest numbers of low income residents and areas of greatest need within the community.

### **Discussion**

The City of Lawton strives to invest a total of 80% of federal CDBG and HOME funds within the three local targeted areas. The three target areas lie within the central part of the city where the community need is the greatest. The City continues to prioritize housing with safe and sanitary living conditions for all residents within the City of Lawton.

## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

The data listed below supports the construction of 10 new beds to be located within the new Veteran Resource Center which will be under construction this year, 10 families with tenant based rental assistance, 7 whole home rehabilitations, 15 exterior housing improvements, 12 emergency repairs, 2 rental unit rehabilitations, and one new rental unit.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	10
Non-Homeless	47
Special-Needs	0
Total	57

**Table 58 - One Year Goals for Affordable Housing by Support Requirement**

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	10
The Production of New Units	11
Rehab of Existing Units	36
Acquisition of Existing Units	0
Total	57

**Table 59 - One Year Goals for Affordable Housing by Support Type**

#### Discussion

The City of Lawton’s highest priority is affordable housing. The City strives to rehabilitation existing structures to maintain them as viable affordable housing units. Whole home rehabilitations, exterior housing improvements and emergency repairs programs are for low income homeowners the ability to remain in their homes. New efforts are underway to purchase dilapidated homes for rehabilitation into affordable rental units. The City of Lawton will work with the Lawton Housing Authority and Great Plains Improvement Foundation to implement the development of affordable housing for low income households.

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

The Lawton Housing Authority (LHA) is responsible for the administration of public housing projects and some of the Section 8 Housing Choice Vouchers. There are currently 1,094 household in publicly assisted housing with a waiting list of over 100 for public housing and waiting list of 55 for Section 8 Vouchers. Increasing the public housing stock for low income families continues to be a priority for the City of Lawton. The City continues to search for partnerships for the development of affordable housing.

Currently, the Oklahoma Housing Finance Agency (OHFA) has an application for a Housing Tax Credit Development in Lawton that would bring 72 new affordable units to the westside of the City of Lawton. The location of this project would be outside of the poverty center of town and is close to employment opportunities such as Goodyear Tire, Republic Paper, and Bar S which are all establish industries. The application will be considered on November 17, 2021 by OHFA Board of Trustees.

### **Actions planned during the next year to address the needs to public housing**

The City of Lawton will continue to work with the Lawton Housing Authority and Great Plains Improvement Foundation to rehabilitate existing affordable rental units to prevent them from becoming unoccupiable and will search out opportunities to purchase dilapidated homes that could be rehabilitated into affordable rental units.

### **Actions to encourage public housing residents to become more involved in management and participate in homeownership**

Lawton Housing Authority has set a goal of assisting three (3) families annually in achieving homeownership through the 5H Homeownership and Section 8 Homeownership Programs. Tenants are encouraged to pursue opportunities for homeownership through these programs as funding allows.

### **If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance**

Not applicable

### **Discussion**

The Lawton Housing Authority (LHA) administers the public housing rental projects owned by the Housing Authority and administers the Section 8 rental assistance voucher program. Section 8 is a Federal program that provides rental assistance to low and very-low income families to obtain decent, safe and sanitary housing. The subsidy provides that an eligible tenant must pay (the higher of) 30% of adjusted income or 10% of gross income as their share of the rent; Section 8 funds make up the

difference between the amount paid by the tenant and the fair market rent established for the rental unit by the Housing Authority and HUD.



## **AP-65 Homeless and Other Special Needs Activities – 91.220(i)**

### **Introduction**

The City and local service providers manage a community-wide effort to prevent and end homelessness within the Continuum of Care by building inter-agency partnerships. These partnerships work together to provide members of the community with the necessary tools to remain in their homes or to obtain appropriate affordable permanent housing. All community partners work to provide a streamlined process of screening, assessment, referral, service coordination, direct assistance and follow up to individuals and families who are in need of safe, affordable and stable housing.

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including**

#### **Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

In order to reach unsheltered homeless individuals and families, CDBG funds are used to assist Public Service Organizations outreach activities to help connect this population with emergency shelter, housing, and/or services. Assistance is sometimes extended to non-facility based medical/mental health care if recipients of that care are unable or unwilling to access an appropriate health facility. Activities supported in the first Action Plan Year to address homelessness include CDBG and HOME funds. Tenant Based Rental Assistance (TBRA) and the construction of a Veterans Resource Center that will provide 10 new beds to homeless Veterans are allocated fund for the upcoming year.

#### **Addressing the emergency shelter and transitional housing needs of homeless persons**

A local homeless program has been established in Lawton through the collaborative efforts of both, providers in the public sector and participating members of the Continuum of Care. The strategy consists of three essential elements: (1) Prevention (2) Expansion Availability of affordable housing and (3) increased accessibility to needed services and resources. From 2007 until January 2021, Lawton Support Services as the lead agency for the SW CoC, did much to implement the strategies adopted, developing each element in lock step with one another. As Prevention resources were made available, it decreased the need for emergency shelter, and establishing a network for housing and service resources, allowed for greater availability of affordable housing, and access to services necessary to keep people in permanent housing. Equally as important, the transition process is carefully managed to ensure that people who are homeless do not experience any interruption in services or additional hardship, as a result. Consequently, the city has experienced significant reductions in the homeless population, with reductions in the numbers entering the interim housing system, and an increase in the

number of households exiting the system to permanent self-sufficiency.

In January 2021, the C. Carter Crane Center for Empowerment and Advancement, a part of the Great Plains Improvement Foundation, replaced Lawton Support Services as the lead agency and lead HMIS. The agency offers emergency shelter services to those facing homelessness, as well as assistance with seeking employment, housing, stability and well-being, and is thus uniquely qualified to not only build upon the work already accomplished, but should expand the scope of our homeless strategy.

The C. Carter Crane Shelter for the Homeless, in partnership with Great Plains Improvement Foundation (GPIF), Inc., is the primary provider of housing for homeless families and individuals. GPIF, a community action agency, manages one homeless shelter, and nine transitional houses for homeless families, and administers an Emergency Solutions Grant (ESG) program, which provides prevention and rehousing assistance. Additional transitional houses are required to expand the shelter's capacity to provide housing assistance for homeless families. The Director estimates the shelter can effectively manage up to 20 transitional houses without additional staffing, although she admits it would further stress an already over-extended staff. The shelter is highly dependent on volunteers and rely on volunteers to assist in delivery of over 200 homeless persons to job sites, doctor's appointments, and interviews. They facilitated over 5,000 nights (total number of beds used during the year or stated differently, a running total of each bed used in the shelter throughout the year) to clients who were in need. Over 125 working (full- and part-time) clients were given a stable environment to begin good work ethics and provided shelter, laundry facilities and transportation to their employment. The agency anticipates providing shelter to a similar number of homeless people next year. It is important to note that, like many of Lawton's human service providers, C. Carter Crane serves not only the local community, but it also draws some of its homeless clientele from Comanche County at large as well as parts of other surrounding counties. To meet future homeless needs the shelter is developing plans to expand the capacity of the shelter and has requested assistance in procuring additional transitional houses to address the needs of families, particularly large ones.

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

Service providers in the community who collaborate with the City direct homeless persons to the appropriate services and financial assistance needed to achieve independent living. Lawton Support Services has been instrumental in establishing a Coordinated Intake System (CIS) to ensure those in need are linked to required services and resources. This may include assistance in obtaining permanent housing, medical treatment, mental health treatment, counseling, supervision, and/or other

government or private assistance available such as:

- Medicaid
- Supplemental Nutrition Assistance Program
- Women, Infants and Children (WIC)
- Federal-State Unemployment Insurance Program
- Social Security Disability Insurance
- Supplemental Security Income
- Child and Adult Care Food Program
- Veterans Services

Additionally, Lawton Support Services has secured funding for a Veterans Resource Center, which will be open by the end of the 2021 to assist with veterans experiencing homelessness or at risk, in not only Lawton but also the surrounding areas.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs**

Transition of homeless households to permanent housing is the overall objective for those households that want to become homeowners. The transitional housing program serves as the vehicle for assistance in moving from homelessness to independent living. Households will be provided information, assistance, and access to the FTHB program to provide homeownership opportunities. Additionally, in appropriate cases, households will be provided advice and assistance in procuring financing from other sources if FTHB funds are unavailable or the households are not selected for the program.

Outreach assessment will be an ongoing effort in the community. There is a need for improved collaboration and information sharing throughout the continuum of care to develop a clearer perspective of the degree of homelessness and availability of supportive services in the community. The

efforts of the Southwest Region Continuum of Care group will continue to pay dividends through better tracking of the homeless, better care and through increases in supportive services and housing as the exact nature and extent of the homeless problem in the region is identified.

## **Discussion**

The overall goal of local homeless programs is to assist homeless families and individuals to progress from homelessness to self-sufficiency. Implementation of the strategy relies on a system of public and private homeless providers who, through their collaborative efforts, pursue a continuum of care approach to address the economic, human, and social needs of homeless families and households. The City will continue to support and work with local homeless agencies to improve the linkage between housing providers and other continuum of care providers. The City will support applications for funding by existing homeless shelters, transitional facilities, and service providers to increase funding for operations.

## **AP-75 Barriers to affordable housing – 91.220(j)**

### **Introduction:**

The Consolidated Plan identifies the high level of housing prices relative to the low incomes earned by the community's low-income population as the major obstacle to affordable housing in Lawton. Affordable housing stock is another major hurdle. The housing programs outlined in this plan were developed to address the problem.

### **Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment**

Affordability of housing for Lawton's low- and moderate-income families and households is addressed by implementation of the housing programs funded in this plan. The First-Time Homebuyer Program (FTHB) and the transitional housing programs provide housing opportunities for families and households who, due to their current economic circumstances, could not otherwise afford housing. While the total need for affordable housing is not beyond the reach of the community, limited available resources must be allocated to the highest priorities established in the Consolidated Plan to address the shortfall.

### **Discussion:**

The City of Lawton will continue to work with the Lawton Housing Authority and Great Plains Improvement Foundation to rehabilitate existing affordable rental units to prevent them from becoming unoccupiable and will search out opportunities to purchase dilapidated homes that could be rehabilitated into affordable rental units.

## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

The local and federal resources are insufficient to address all needs, even those of high priority. In some instances, there are perceptions in the community that affordable housing will decrease area property values as well as facilitate other societal problems (NIMBY issues). There is a lack of interest from service providers in developing permanent supportive housing for the chronically homeless (lack of developers).

### **Actions planned to address obstacles to meeting underserved needs**

The City will continue to work with community partners to address the underserved needs within the community. Not one organization can address the needs alone. Eight public service organization will be funded with CDBG funds this year, and all eight organizations play a vital role in the well being of citizens in needs. Mental health counseling, substance abuse case management, youth delinquency prevention all are homelessness prevention activities.

### **Actions planned to foster and maintain affordable housing**

Housing rehabilitation activities are provided through CDBG and HOME Assistance Program citywide. Funding is allocated to conduct owner occupied whole house rehabilitation activities for eligible lower income households. Along with whole house rehabilitations, exterior improvement programs and emergency repair program will allow homeowners to a maintain their homes as safe and sanitary.

### **Actions planned to reduce lead-based paint hazards**

Any home constructed before 1978, has the protentional to contain a lead based paint hazard. A lead based paint hazard is defined as lead based paint that is deteriorated which may cause adverse human health effects. All homes assisted with CDBG or HOME funds are first inspected to verify if lead based paint is detected. Not all lead based paint is in a condition that would deem it a hazard. Contractors are required to use safe work practices when in contact with a surface that contains lead based paint. Lead based paint hazards are remediated to eliminate the hazard and clearance testing is required before occupants are allowed back inside the home.

### **Actions planned to reduce the number of poverty-level families**

The City of Lawton will continue to work with the Lawton Economic Development Agency and the Chamber of Commerce to attract higher paying jobs thereby helping to lift poverty-level families individuals out of poverty. Several new developments are on the horizon within the City of Lawton with

the FIESTA already under construction with renovations at eh Central Mall.

### **Actions planned to develop institutional structure**

The C. Carter Crane Shelter for the Homeless, in partnership with Great Plains Improvement Foundation (GPIF), Inc., is the primary provider of housing for homeless families and individuals. GPIF, a community action agency, manages one homeless shelter, and nine transitional houses for homeless families, and administers an Emergency Solutions Grant (ESG) program, which provides prevention and rehousing assistance. Additional transitional houses are required to expand the shelter's capacity to provide housing assistance for homeless families. The Director estimates the shelter can effectively manage up to 20 transitional houses without additional staffing, although she admits it would further stress an already over-extended staff. The shelter is highly dependent on volunteers and rely on volunteers to assist in delivery of over 200 homeless persons to job sites, doctor's appointments, and interviews. They facilitated over 5,000 nights (total number of beds used during the year or stated differently, a running total of each bed used in the shelter throughout the year) to clients who were in need. Over 125 working (full- and part-time) clients were given a stable environment to begin good work ethics and provided shelter, laundry facilities and transportation to their employment. The agency anticipates providing shelter to a similar number of homeless people next year. It is important to note that, like many of Lawton's human service providers, C. Carter Crane serves not only the local community, but it also draws some of its homeless clientele from Comanche County at large as well as parts of other surrounding counties. To meet future homeless needs the shelter is developing plans to expand the capacity of the shelter and has requested assistance in procuring additional transitional houses to address the needs of families, particularly large ones.

### **Actions planned to enhance coordination between public and private housing and social service agencies**

In January 2021, the C. Carter Crane Center for Empowerment and Advancement, a part of the Great Plains Improvement Foundation, replaced Lawton Support Services as the lead agency and lead HMIS. The agency offers emergency shelter services to those facing homelessness, as well as assistance with seeking employment, housing, stability and well-being, and is thus uniquely qualified to not only build upon the work already accomplished, but should expand the scope of our homeless strategy.

### **Discussion:**

The City will continue to work with community partners to address the underserved needs within the community. Not one organization can address the needs alone. Eight public service organization will be funded with CDBG funds this year, and all eight organizations play a vital role in the well being of citizens in needs. Mental health counseling, substance abuse case management, youth delinquency prevention all are homelessness prevention activities.

The Veterans Resource Center that should start construction this year will add 10 beds for homeless

Veterans. This will be the first center for Veterans only. Along with the temporary shelter, resources and case management will be available in an effort to find permanent housing for these Veterans.



## Program Specific Requirements

### AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

**Introduction:**

The City of Lawton offers a one-stop-shop for citizens needing assistance. The Great Plains Improvement Foundation runs an assistance hotline (580-595-0063) that anyone needing assistance can call and they are match with community partners that can assist their needs. Calls are logged into the HMIS so they can be tracked to ensure needs have been met.

#### Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

- |  |          |
|--|----------|
| 1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed  | 0        |
| 2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan. | 0        |
| 3. The amount of surplus funds from urban renewal settlements  | 0        |
| 4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan   | 0        |
| 5. The amount of income from float-funded activities   | 0        |
| <b>Total Program Income:</b>   | <b>0</b> |

#### Other CDBG Requirements

- |   |         |
|---|---------|
| 1. The amount of urgent need activities   | 0       |
| 2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan. | 100.00% |

#### HOME Investment Partnership Program (HOME) Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is

as follows:

HOME program income is expected to be around \$17,306. \$1,445,888.17 in unallocated funds left over from previous years will be allocated this year. \$700,000 in HOME funds will be allocated for the construction of 10 SRO units within the Veterans Resource Centers. These SRO units will be temporary housing for homeless Veterans until permanent housing can be found. \$200,000 will be allocated to a TBRA agreement with the Lawton Housing Authority. Over the next 5 years, the City expects to allocate \$375,000 to the purchase and rehabilitation of dilapidated homes that can be used as affordable rental properties.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The Homebuyer Assistance Programs funded by the City of Lawton will utilize the Recapture Method provided in the HOME Regulations at 92.254(a)(5)(ii). Recapture provisions ensure that the participating jurisdiction recoups all or a portion of the HOME assistance to the homebuyers, if the housing does not continue to be the principal residence of the family for the duration of the period of affordability. As the participating jurisdiction, the City of Lawton may structure its recapture provisions based on its program design and market conditions. The period of affordability is based upon the total amount of HOME funds subject to recapture described in paragraph (a)(5)(ii)(A)

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

The City, as the participating jurisdiction, will recoup all or a portion of the HOME assistance to the homebuyers, if the assisted housing is transferred voluntarily or involuntarily during the period of affordability based on the availability of net proceeds. Net proceeds are defined as the sales price minus superior loan repayment (other than HOME funds) and any closing costs. Only the direct subsidy provided to the homebuyer, i.e., down payment and closing cost assistance and/or the difference between the fair market value of the property and a reduced sales price attributable to HOME funds, will be recouped pro-rata based on the forgivable loan terms and on the reduction during affordability period provided in the HOME regulations at 92.254(a)(5)(ii)(A)(2).

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

The City of Lawton does not anticipate using HOME funds during the First Action Plan year to refinance existing debt secured by multifamily housing.

The HOME Program funding provides funds to support Lawton’s local housing programs. The funds may be used to assist low- and moderate-income homeowners, homebuyers, and renters in the purchase, construction, rehabilitation, or rental of decent, safe, sanitary, and affordable housing. HOME funds also support Community Housing Development Organization (CHDO) activities to develop affordable housing. The Great Plains Improvement Foundation, Inc. (GPIF) and the Lawton Support Services, Inc. (LSS) are designated as CHDOs in Lawton.

## **Attachments**

## Citizen Participation Comments

### PUBLIC NOTICE

#### Public Hearing

Consolidated Plan for FFY 2021-2025

TO ALL INTERESTED PERSONS, AGENCIES AND GROUPS:

The Consolidated Plan, Annual Action Plan, and Citizen Participation Plan will be on file at the following locations from September 20, 2021 through October 22, 2021: City of Lawton's web-site ([www.fawtonok.gov](http://www.fawtonok.gov)), City Clerk's office located at City Hall, Housing & Community Development office within the Owens Multi-Purpose Center, Lawton Public Library, H.C. King Community Center, and Patterson Community Center.

Questions or comments may be emailed to [housing@lawtonok.gov](mailto:housing@lawtonok.gov), directed to the Housing & Community Development office at (580) 581-3347, or submitted in writing to City of Lawton, HCD Office, 1405 SW 11th Street, Lawton, OK 73501.

The draft report will be available at various locations in Lawton for citizens to review and provide comments for consideration in development of the final report. The CAPER will be available at the following locations and other locations specified in the Citizen Participation Plan for Housing and Community Development (HCD):

Lawton Public Library	110 SW 4 <sup>th</sup> Street
Housing and Community Development	1405 SW 11 <sup>th</sup> Street
Lawton City Clerk's Office	212 SW 9 <sup>th</sup> Street
H.C. King Community Center	1705 NW 20 <sup>th</sup> Street
Patterson Community Center	4 NE Arlington Avenue

Citizens have thirty (30) days to review and provide comments. Comments should be submitted in writing to the Housing and Community Development Administrator, 1405 SW 11<sup>th</sup> Street, Lawton, OK 73501.

A Public Notice regarding the public review and comment period for Consolidated Plan for FFY 2021-2025 and the Annual Action Plan for FFY 2021 was published in the Lawton Constitution on Sunday, September 19, 2021. The notice also gave the dates and times for the two public hearings that were held to receive comments.

The City of Lawton will take reasonable measures to provide copies of the reports in formats accessible to persons with disabilities upon request. However, there may be a delay in provision of the appropriate format required. For assistance, call the HCD office at 581-3347.



## **PUBLIC HEARING NOTES**

A Public Notice regarding the public review and comment period for Consolidated Plan for FFY 2021-2025 and the Annual Action Plan for FFY 2021 was published in the Lawton Constitution on Wednesday, June 23, 2021. The notice also gave the dates and times for the two public hearings that were held to receive comments.

The Consolidated Plan for FFY 2021-2025 and the Annual Action Plan for FFY 2021 was available for public review and comments beginning July 1, 2021 through July 26, 2021 at the following public locations: City Clerk's office located at City Hall, Housing & Community Development office within the Owens Multi-Purpose Center, Lawton Public Library, H.C. King Community Center, and Patterson Community Center. The plan was also available on the City of Lawton's website. No public comments were received.

At a public hearing before the Lawton City Planning Commission on July 15, 2021, the Housing and Community Development office presented its Consolidated Plan for FFY 2021-2025 and the Annual Action Plan for FFY 2021 to the commissioners and public. The public hearing was opened and Mr. Don McGee with Roadback Inc. came forward to speak about his organization and asked to be reconsidered for CDBG funding. The public hearing was closed and the commissioners provided their recommendation, which was to fund eight of the Public Service Organizations with the condition that Roadback finished submitting all his claims from the previous year.

At a public hearing before the Lawton City Council on July 27, 2021, the Housing and Community Development staff presented their recommendations for the Consolidated Plan for FFY 2021-2025 and the Annual Action Plan for FFY 2021 to the Lawton City Council and public, as well as the recommendation from the Lawton City Planning Commission. The public hearing was opened, and Ms. Sheryl Gregory and Ms. CC with Great Plains Improvement Foundation/ C. Carter Crane Homeless Shelter spoke about their organization and requested that the Council reconsider their allocation amount. The public hearing was closed and the council voted to table the item until August 10, 2021.

On August 10, 2021, the Lawton City Council voted to approve the Consolidated Plan for FFY 2021-2025 and the Annual Action Plan for FFY 2021 by adopting Resolution 21-161.

## Grantee Unique Appendices

### Christine James

---

**From:** Cook, Earl M <Earl.M.Cook@hud.gov>  
**Sent:** Monday, May 3, 2021 9:29 AM  
**To:** Christine James  
**Cc:** McBride, Jackie  
**Subject:** (\*\*EXTERNAL\*\*)--RE: Request for an Extension of Deadline for Lawton's Consol dated Plan

**WARNING:** This email is from outside of the City of Lawton network.  
**\*\*DO NOT CLICK\*\*** on links or open attachments unless you know the content is safe.

Good morning Christine,

Thank you for the Notification. The Extension Request is approved.

Please note that the latest that HUD may accept the Consolidated/Action Plan for FY2021 submissions is August 16, 2021.

Also, please include a copy of this email as documentation of the approved extension with your submission in IDIS.

Thank you!

Earl

Earl Cook  
CPD Director  
Oklahoma City Field Office  
U.S. Department of Housing and Urban Development  
Community Planning and Development Division  
301 NW 6<sup>th</sup> Street, 2<sup>nd</sup> Floor  
Oklahoma City, OK 73102  
Office: (405) 609-8569  
Cell: (202) 286-8064



**From:** Christine James <Christine.James@lawtonok.gov>  
**Sent:** Friday, April 30, 2021 3:14 PM  
**To:** Cook, Earl M <Earl.M.Cook@hud.gov>

**Cc:** McBride, Jackie <Jackie.McBride@hud.gov>

**Subject:** Request for an Extension of Deadline for Lawton's Consolidated Plan

Mr. Cook

The City of Lawton would like to officially request an extension to the deadline of May 15 for the submittal of our. We have conducted our Community Needs Survey and are currently working with a consultant on our Analysis of Impediments to Fair Housing Choice. The consultant plans to have the analysis completed by June 30. The City of Lawton will have the 5 Year Consolidated Plan/Annual Action Plan approved by City Council and submitted to HUD by the August deadline.

Thank you for your consideration.

Christine James  
Community Services Department Director/  
Housing & Community Development Administrator

City of Lawton  
1405 SW 11<sup>th</sup> Street  
Lawton, OK 73501  
580-581-3347  
[www.lawtonok.gov](http://www.lawtonok.gov)

\*\*Note new email address: [Christine.james@lawtonok.gov](mailto:Christine.james@lawtonok.gov)



August 2021

## ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE LAWTON, OKLAHOMA



Prepared by:

**RKG**  
ASSOCIATES INC

**RKG Associates, Inc.**

*Economic, Planning and Real Estate Consultants*

13155 Noel Rd., Suite 900

Dallas, Texas 75240

Tel: 972.905.4516

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**Analysis of Impediments to Fair  
Housing Choice  
City of Lawton, Oklahoma**

August 2021

**Prepared for:**



Ms. Christine James, Housing & Community Development Administrator  
City of Lawton Housing & Community Development  
1405 SW 11th Street  
Lawton, OK 73501  
Tel: 580-581-3347  
E-mail: [Christine.James@lawtonok.gov](mailto:Christine.James@lawtonok.gov)

**Prepared by**

**RKG**  
ASSOCIATES INC

**RKG Associates, Inc.**  
*Economic, Planning and Real Estate Consultants*  
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Dallas, TX 75240  
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Cell: 703-585-3944  
E-mail: [arch@rkgassociates.com](mailto:arch@rkgassociates.com)

# 1 INTRODUCTION

The Analysis of Impediments to Fair Housing Choice (AI) is required by the U.S. Department of Housing and Urban Development (HUD) communities receiving federal housing and community development funds such as Community Development Block Grant (CDBG) and HOME funding. The overall goal of the AI is to review and assess impediments to fair housing within the City of Lawton, Oklahoma. According to HUD, impediments to fair housing choice are:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin that restrict housing choice or the availability of housing choices.
- Any actions, omissions, or decisions that have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin.

The City of Lawton's AI was prepared in conjunction with required outreach, consultation, and coordination among various government agencies, private/nonprofit groups, public service agencies, City staff, and individuals. A list of participants in the AI is shown in the following Introduction section.

The primary federal resources for the City include the Community Development Block Grant (CDBG) program and the HOME Investment Partnerships Program (HOME) through the U.S. Department of Housing and Urban Development (HUD). The funding for the City of Lawton for Fiscal Year 2020 includes \$729,787 of CDBG funds and \$392,939 of HOME funds. Three community service organizations that serve Lawton also received \$269,064 of Emergency Shelter Grants Program (ESG) funding in 2020, and the Lawton Housing Authority received \$63,212 of Continuum of Care funds in 2020 for the Homeless Management Information System (HMIS). There is also HUD funding of \$1.2 million for the Lawton Housing Authority for public housing project maintenance and management, and another \$3 million for Section 8 voucher administration. The AI consists of seven chapters, including:

1. Introduction
2. Purpose and Need for the Study
3. Demographic and Housing Condition Analysis
4. Records of Housing Discrimination
5. Review of Public Sector Policies
6. Review of Private Sector Practices, and
7. Impediments to Fair Housing Choice

Though several of the impediments identified in this report are beyond the direct control of the City of Lawton, the City bears responsibility for identifying these issues and developing strategies to ensure that its housing market is as open and inclusive as possible. The impediments to fair housing choice identified in this report include the following, explained in detail in Section 7.

- Demand Exceeds Supply for Section 8 Vouchers,
- There is a Limited Capacity to Increase Supply of Affordable Housing in the City,
- There are Concentrations of Minority Populations In Lower Income Areas with Limited Access to Resources and Opportunities,

- There is Limited Access to Resources And Opportunities In Publicly Supported Housing Neighborhoods,
- There are Housing Condition Problems In Some Neighborhoods,
- Lending Policies and Practices,
- There is a Shortage of Affordable Homeownership Housing,
- There is a Shortage of Affordable Rental Housing,
- Rising Home Values In Some Challenged Neighborhoods are Impeding Access to Housing,
- There is a Limited Supply of Housing for Persons with Disabilities and Larger Families, and
- A Need for Increased Fair Housing Education and Encourage Real Estate Sales and Property Management Companies to Include Fair Housing Language In Real Estate Listings.

## 2 PURPOSE AND NEED FOR THE STUDY

Title VIII of the Civil Rights Act of 1968 (and its subsequent amendment in 1988) mandates that it is unlawful to discriminate in the sale, rental, or financing of housing or, in the provision of brokerage services or facilities in connection with the sale or rental of housing, based on:

- Race,
- Color,
- Religion,
- National origin,
- Sex,
- Families with children, and
- Persons with disabilities.

The U.S. Department of Housing and Urban Development (HUD) requires that all recipients of federal funds under the Community Development Block Grant Program (CDBG), HOME Investment Partnership (HOME), Emergency Shelter Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) programs take actions to affirmatively further fair housing. This obligation includes conducting an analysis to identify impediments to fair housing choice within the jurisdiction. The City of Lawton receives CDBG and HOME funds annually and is required to update its Analysis of Impediments to Fair Housing Choice (AI).

This report will be the City's first AI since leadership and management changes in the Community Services Department several years ago. The purpose of this study is to conduct an independent Analysis of Impediments (AI) in accordance with HUD regulations under 24 CFR 570.904(c)(1). The City is committed to furthering fair housing choice within the Lawton city limits.

### A. PREPARATION OF THE ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

The City of Lawton principally administers its housing and community development programs through the Community Services Department. The Department includes the Planning, Licenses and Permits, Inspection Services, Home, Housing and Community Development, Neighborhood Services, and provides oversight for the Lawton Area Transit System. The Department coordinates planning initiatives of the City, including plan preparation with citizen participation and community collaboration. It is also the lead agency for producing the Analysis of Impediments to Fair Housing Choice. The AI was prepared by RKG Associates, Inc. of Alexandria, Virginia, a planning, economic and real estate advisory firm working on behalf of the City of Lawton.

### B. PARTICIPANTS IN THE ANALYSIS OF IMPEDIMENTS

The City of Lawton's Analysis of Impediments to Fair Housing Choice included input from city officials and key persons involved in the housing and community development industry and affiliated service providers and nonprofit organizations. In conducting the AI, the consultant collaborated with individuals and organizations that represent the interests of protected groups. Participants included:

- City of Lawton Community Services Department,
- Metropolitan Fair Housing Council of Oklahoma, Inc.,
- Great Plains Improvement Foundation,
- C. Carter Crane Homeless Shelter,
- Lawton Support Services, Inc.,
- Marie Detty New Directions Youth and Family Services, Inc.,
- Family Promise of Lawton,
- Roadback, Inc.,
- Lawton Housing Authority, and
- U.S. Department of HUD Fort Worth Region IV Office.

### C. METHODOLOGY

This analysis includes a combination of quantitative and qualitative research. RKG Associates obtained data from The Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) developed by the Department of Housing and Urban Development (HUD), 2019 American Community Survey 5-Year Estimates (provided by the U.S. Census Bureau), the 2010 Census, ESRI, a private supplier of geographic information system software and data, the Home Mortgage Disclosure Act (HMDA), and relevant reports published by various local agencies. The qualitative component includes interviews with agency staff and others involved in the provision of fair housing and/or related services in the Lawton area.

# 3 DEMOGRAPHIC AND HOUSING ANALYSIS

## A. INTRODUCTION

This section examines the existing demographic and housing characteristics of the City of Lawton, Oklahoma by census tract and on the city level. It uses the categories, indexes, and data from the Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) developed by the Department of Housing and Urban Development (HUD). Affirmatively Furthering Fair Housing (AFFH) is a legal requirement that federal grantees further the purposes of the Fair Housing Act, and the AFFH Data and Mapping Tool provides a uniform system for HUD grant recipients to following to assess their efforts and challenges they have in such compliance.

The following analysis provides an overview and insights into seventeen demographic and housing topics included in the latest AFFH-T raw data. The latest data version that the RKG team used is Version AFFHT0006, dated July 2020. Also, the analysts complemented the study with population, racial and ethnic composition, household, and household income data of 2010 and 2019 obtained from American Community Survey 2010 and 2019 5-year Estimates, and 2025 projections obtained from ESRI, an international supplier of geographic information system software and data, as well as the Decennial Census.

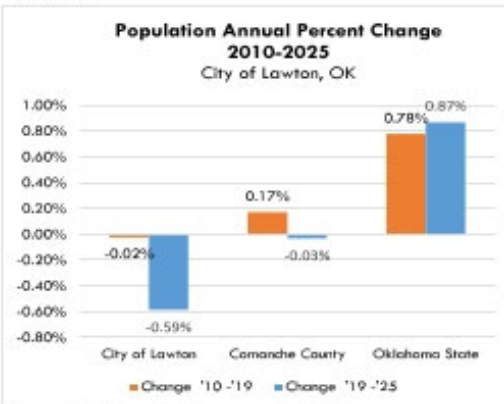
## B. POPULATION, HOUSEHOLDS, AND HOUSEHOLD INCOME TRENDS

### 1. Population Trends

The City of Lawton's population was estimated at 94,017 people in 2019, which accounted for 77.2% of the County's population of 121,762. The City has slightly decreased its share of the County's population since 2010 and is projected to further reduce its share to 74.6% by 2025. This indicates that on a comparative basis, population growth outside the City is occurring faster than inside the city limits.

Unlike Comanche County or the State of Oklahoma, the City experienced a slight decline in its population (loss of 200 people, 0.02% annually) between 2010 and 2019, while the County and the State saw a growth of population. The City's population is projected to drop further (loss of 3,307, 0.6% annually) between 2019 and 2025, a faster decrease than the County (0.03% annually), while the State's population is projected to continue to increase (Table 3-1 /Figure 3-1).

Figure 3-1



Source: ACS, ESRI and RKG Associates, Inc., 2021

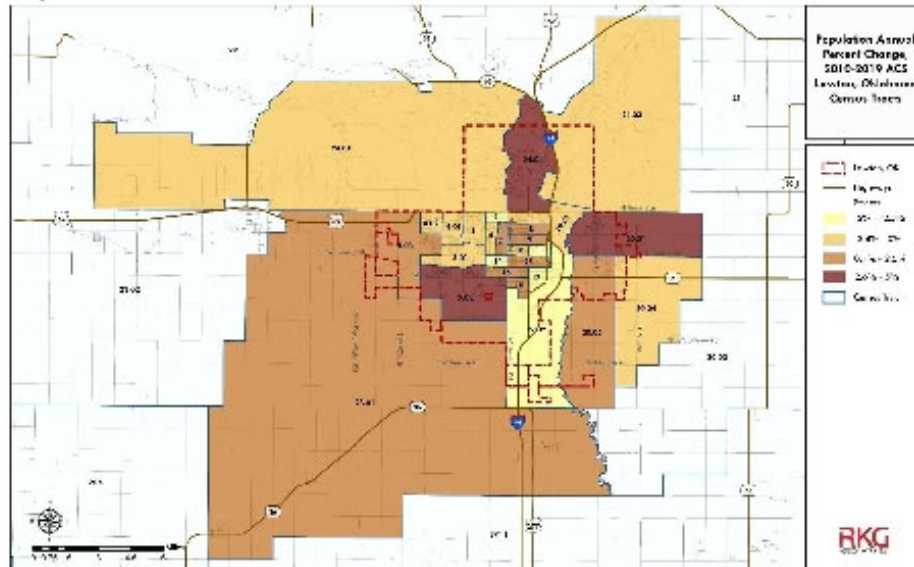
Among the 28 census tracts within the City of Lawton, 15 experienced a population decrease between 2010 and 2019, and similar losses are projected to continue through 2025. Census tracts that saw the fastest population growth between 2010 and 2019 are on the southwest corner and on the east side of the City, as well as in the center of Fort Sill, generally overlapping with the City's major employers including Fort Sill, Comanche County Memorial Hospital, Lawton Public Schools, Walmart, and Cameron University (Map 3-1).

**Table 3-1  
Population Trend, 2010-2025**

City of Lawton, Comanche County, and State of Oklahoma							
	2010	2019	2025	Change '10-'19		Change '19-'25	
				Actual Chg.	Ann. % Chg.	Actual Chg.	Ann. % Chg.
City of Lawton	94,217	94,017	90,710	(200)	-0.02%	(3,307)	-0.59%
Comanche County	119,902	121,762	121,530	1,860	0.17%	(232)	-0.03%
Oklahoma State	3,675,339	3,932,870	4,137,471	257,531	0.78%	204,601	0.87%

Source: American Community Survey 2019 5-Year Estimates, ESRI and RKG Associates, Inc., 2021

**Map 3-1**



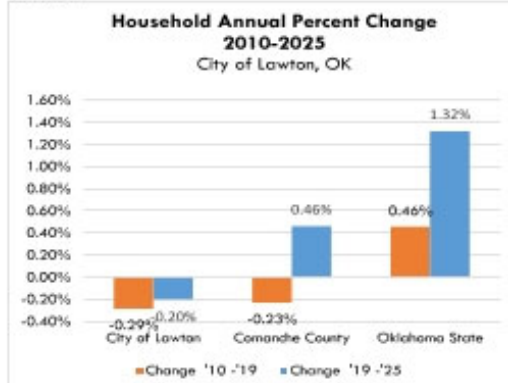


**2. Household Trends and Household Size**

The household changes between 2010 and 2019 in the City of Lawton, Comanche County, and the State of Oklahoma all follow a trend somewhat like the population growth, while the County's households actually decreased and the City's households dropped at a faster rate than the population, as the average household sizes in the three areas are all increasing (Figure 3-2).

The City of Lawton has had a smaller household size (2.57 per household) than both the County (2.62 person) and the State (2.58 persons) since 2019 (Table 3-2). This finding is a little unusual in military communities, which tend to have larger household sizes than the rest of the population.

Figure 3-2



Source: ACS, ESRI and RKG Associates, Inc., 2021

Table 3-2

**Household Trend, 2010-2025  
City of Lawton, Comanche County, and State of Oklahoma**

	2010	2019	2025	Change '10-'19		Change '19-'25	
				Actual Chg.	Ann. % Chg.	Actual Chg.	Ann. % Chg.
City of Lawton	33,858	32,984	32,586	(874)	-0.29%	(398)	-0.20%
Comanche County	43,757	42,842	44,028	(915)	-0.23%	1,186	0.46%
Oklahoma State	1,421,705	1,480,061	1,597,366	58,356	0.46%	117,305	1.32%
<b>Average Household Size</b>							
City of Lawton	2.45	2.57	2.48	N/A	N/A	N/A	N/A
Comanche County	2.48	2.62	2.53	N/A	N/A	N/A	N/A
Oklahoma State	2.51	2.58	2.52	N/A	N/A	N/A	N/A

Source: American Community Survey 2019 5-Year Estimates, ESRI and RKG Associates, Inc., 2021

**3. Median Household Income**

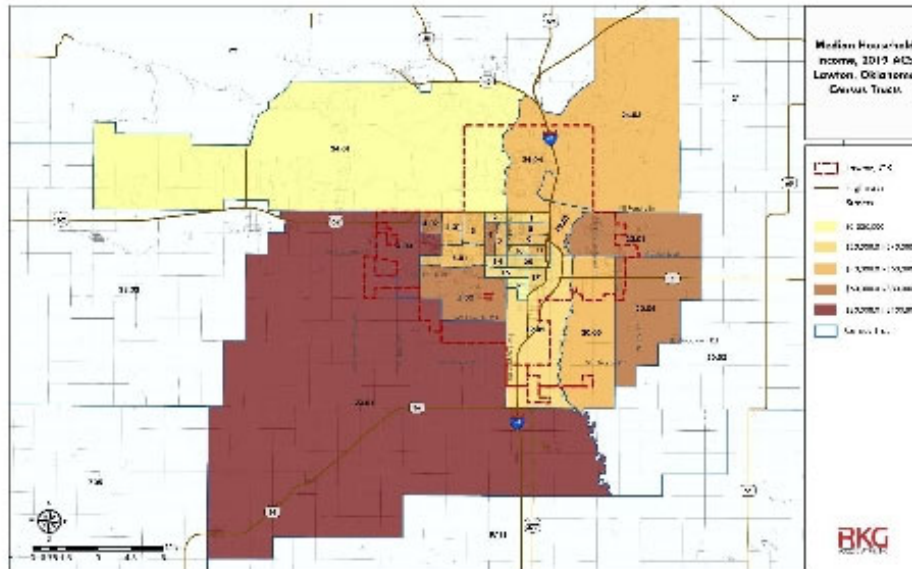
The median household income in the City of Lawton has been lower than both the County and the State levels since 2010 and has been growing at a slower rate at 1.6% annually than either the County or State over the past decade. The City's median household income was \$47,779 in 2019, which is 92% of the County level of \$52,161, and is projected to remain so through 2025 even though it is estimated to grow at a faster rate of 1.0% compared to 0.9% in the County and 0.7% in the State per year between 2019 and 2025 (Table 3-3). The census tracts with the highest median household incomes within the City are on the southwest and on the east side of the City, generally matching the census tracts with the fastest population growth since between 2010 and 2019 and the City's major employers. In comparison, apart from Census Tracts 24.01, 24.03 and 24.04 that overlap with the Fort Sill base, the City's center has the lowest median household income, especially Census Tract 16 (Map 3-2). All but four census tracts have experienced an increase in the median household income between 2010 and 2019, with Census Tracts 8, 11 and 23.01 seeing the fastest annual growth of their median household incomes. However, apart from Census Tract 24.01 which overlaps with the Fort Sill base and

**Table 3-3**  
**Median Household Income Trend, 2010-2025**  
**City of Lawton, Comanche County, and State of Oklahoma**

	2010	2019	2025	Change '10-'19		Change '19-'25	
				Actual Chg.	Ann. % Chg.	Actual Chg.	Ann. % Chg.
<b>City of Lawton</b>	\$41,940	\$47,779	\$50,678	\$5,839	1.55%	\$2,899	1.01%
<b>Comanche County</b>	\$44,012	\$52,161	\$54,852	\$8,149	2.06%	\$2,691	0.86%
<b>Oklahoma State</b>	\$42,979	\$52,919	\$55,136	\$9,940	2.57%	\$2,217	0.70%

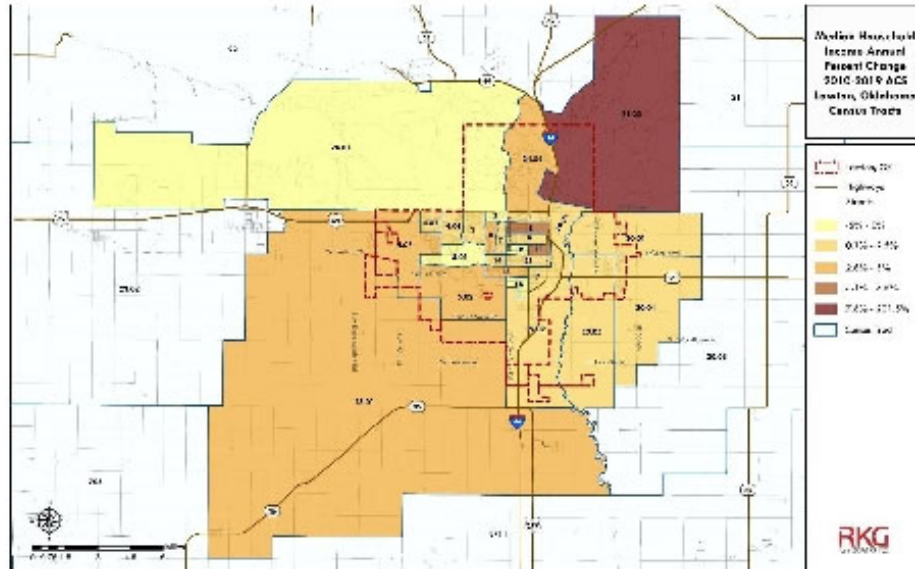
Source: American Community Survey 2019 5-Year Estimates, ESRI and RKG Associates, Inc., 2021

**Map 3-2**



has no income information from the 2010 and 2019 American Community Survey, Census Tract 2, 5, 01, 10 and 16 have seen a decrease in their median household incomes between 2010 and 2019 between 0.6% and 3% per year. It seems like Census Tract 16 is the most challenged area in terms of income levels, as it has the lowest median household income in 2019 and has experienced the fastest drop in its household income between 2010 and 2019. However, there are several colleges around Census Tracts 14, 15, 17 and 25, including the Cameron University, Platt College, and Oklahoma University School of Nursing. It should be noted that some of the residents with lower household incomes in these areas are likely college students. (Map 3-3).

Map 3-3



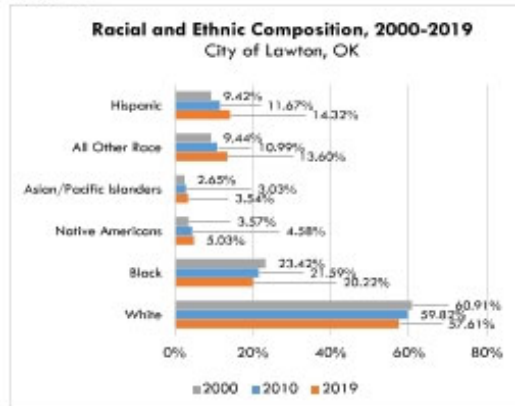
**C. RACE AND ETHNICITY**

**1. Racial/Ethnic Trends and Composition**

The City's White population accounted for the largest share (57.6%) of the population in 2019, followed by the African American population at 20.2%, and the Hispanic population at 14.3% (Figure 3-3). It should be noted that the term "Hispanic" does not refer to a racial group. The U.S. Census Bureau uses the ethnonyms "Hispanic or Latino" to refer to "a person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin regardless of race" and states that Hispanics or Latinos can be of any race, any ancestry, any ethnicity<sup>1</sup>.

The Native American population represented 5.0% of the City's

Figure 3-3



Source: ACS, ESRI and RKG Associates, Inc. 2021

<sup>1</sup> Wikipedia, <https://en.wikipedia.org/wiki/Hispanic>

population in 2019, which was five times the share on the national level at 1%.

The White and African American population saw a drop between 2000 and 2019, but all other racial and ethnic groups experienced population gains during the same decade, especially the Native American population and people with Hispanic ethnicity, which grew by over 2.8% annually. Proportionally, all Minority (Non-White) groups also saw a steady rise of their population share during this decade, while the White population share reduced from 60.9% to 57.6% and the African American population share dropped from 23.4% to 20.2% due to slower population growth rates.

In comparison, the share of the All Minority (Non-White) group rose further from 39.1% in 2000 to 42.3% in 2019. In particular, people of Hispanic ethnicity have maintained a strong annual population growth (2.8%). The fastest growing racial or ethnic group between 2000 and 2019 are the people of all other race, which increased by 2.4% per year during those 19 years. Also, the Asian or Pacific Islander population have experienced a faster annual growth compared to the previous decade. The remaining racial groups have seen a slower but modest population increase during the same period. This could be partially influenced by the diverse local college student population (Table 3-4/Map 3-4).

**Table 3-4**  
**Racial and Ethnic Composition of Population and Trend, 2000-2019**  
City of Lawton, Oklahoma

Persons	2000		2010		2019		Chg. '00-'10		Chg. '10-'19	
	Count	Percent	Count	Percent	Count	Percent	Actual Chg.	Ann. % Chg.	Actual Chg.	Ann. % Chg.
<b>Total</b>	<b>93,030</b>	<b>100.00%</b>	<b>94,217</b>	<b>100.00%</b>	<b>94,017</b>	<b>100.00%</b>	<b>1,187</b>	<b>0.13%</b>	<b>(200)</b>	<b>-0.02%</b>
White	56,669	60.91%	56,357	59.82%	54,161	57.61%	(312)	-0.06%	(2,196)	-0.43%
Black	21,790	23.42%	20,341	21.59%	19,012	20.22%	(1,449)	-0.66%	(1,329)	-0.73%
Native Americans	3,323	3.57%	4,312	4.58%	4,732	5.03%	989	2.98%	420	1.08%
Asian or Pacific Islanders	2,463	2.65%	2,851	3.03%	3,326	3.54%	388	1.58%	475	1.85%
All Other Race	8,785	9.44%	10,356	10.99%	12,706	13.60%	1,571	1.79%	2,430	2.61%
All Minority (Non-White)	36,361	39.09%	37,860	40.18%	39,856	42.39%	1,499	0.41%	1,996	0.59%
Hispanic Ethnicity	8,768	9.42%	10,993	11.67%	13,460	14.32%	2,225	2.54%	2,467	2.49%

Source: Decennial Census, American Community Survey 2019 5-Year Estimates and RKG Associates, Inc., 2021

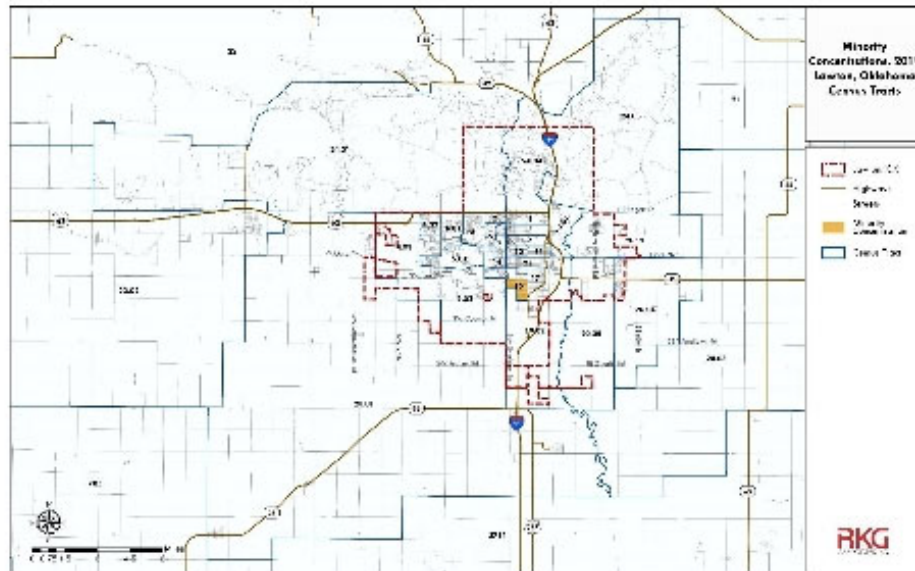
## 2. Racial/Ethnic Concentration

Federal regulations at Title 24 Housing and Urban Development Part 91.210 "Housing Market Analysis" require grantees of HUD Community Planning and Development programs to identify and describe any areas within their jurisdictions that have concentrations of racial/ethnic minorities and/or low-income families. HUD currently leaves the determination of thresholds defining "concentrations" up to each local grantee.

The approach currently applied by HUD's Office of Policy Development and Research calls for an evaluation of population distribution in two primary categories: White, which includes any Census respondent who identifies as White and non-Hispanic, and minority, which includes any respondent identifying as a member of a non-White racial group or Hispanic ethnicity. Hispanic White people would be in the latter category.

RKG defined concentrations of minority populations as census tracts with non-White populations greater than 150% of the city-wide percentage of the combined minority population. For example, if the Hispanic population equaled 14.3% of the City's population in 2019, then census tracts with Hispanic population shares of 21.5% or greater would be classified as a concentration. Lawton has a concentration of the All-Minority population and the Hispanic population in Census Tract 16, which also had the lowest median household income in 2019 and the fastest decrease of median household income compared to the rest of the City between 2010 and 2019 (Map 3-4).

Map 3-4



#### D. RACIAL/ETHNIC DISSIMILARITIES

Another factor related to the geographic distribution of racial and ethnic groups within a jurisdiction is the Racial Dissimilarity Index included in the HUD AFFH-T database. According to HUD's definition, "the dissimilarity index represents the extent to which the distribution of any two groups (frequently racial or ethnic groups) differs across census tracts or block groups". In other words, the index measures how much one racial/ethnic group is spatially separated from another within a jurisdiction. The data for each racial/ethnic group is presented in comparison to the White segment of Lawton's population (Table 3-5).

The Dissimilarity Index has values between 0 and 100, with a score of 0 representing perfect integration and a value of 100 corresponding with total segregation. A Dissimilarity Index below 40 represents low segregation, a value between 40 and 55 suggests moderate

Table 3-5  
Dissimilarity Index by Race/Ethnicity, 2000-Current  
City of Lawton, Oklahoma

	2000	2010	Current
Non-White/White	14.58	11.17	13.58
Black/White	19.01	14.70	18.98
Asian/Pacific Islander/White	12.35	13.36	17.85
Hispanic/White	12.75	10.08	11.87

Source: HUD AFFH Data Version AFFHT0006 and RKG Associates, Inc., 2021

segregation, and a score above 55 indicates high segregation. All the Dissimilarity Index values for the City of Lawton are below 40, indicating low segregation between racial and ethnic minority groups and the White population (Table 3-5).

**E. PLACE OF NATIONAL ORIGIN**

According to the definition of the U.S. Census Bureau, the foreign-born population includes anyone who is not a U.S. citizen at birth, including those who become U.S. citizens through naturalization. Limited English Proficiency is used to refer to a person who is not fluent in the English language, often because English is not their native language. Understanding the foreign-born population and people with limited English proficiency is important for identifying the impediments to fair housing choice as well as associated solutions in the City of Lawton, as these population groups often have more limited fair housing options, usually due to cultural and language barriers.

The year 2015 is the most current data series from HUD for the place of national origin data. According to the HUD AFFH data, the foreign-born population in the City of Lawton was 6,207 in 2015, accounting for 6.4% of the total population (Table 3-6). The largest foreign-born group is the Mexican population, accounting for 21% of the total foreign-born population in the City. The second-largest immigration group is the German population, followed by people from Korea, the Philippines, and Western Africa. Only 2.8% of the total population in the City had limited English proficiency in 2015. Apart from English, the most populous language was Spanish, as 6.0% of the total population in the City were Spanish speakers, followed by West Germanic language, other and unspecified language, Korean, and other Asian and Pacific language (Table 3-7).

Between 2010 and 2015, the foreign-born population has seen an annual increase of 2.5% while the population with limited English proficiency has experienced a slight drop at 1.7% annually. The shares out of the total population of these two groups also changed in opposite directions during the five years according to the HUD AFFH data (Table 3-8).

**Table 3-6  
Population by Top 5 Most Populous National Origin Groups  
City of Lawton, Oklahoma, 2015**

	Count	% of Total Population
<b>Total Foreign-Born Population</b>	<b>6,207</b>	<b>6.41%</b>
Mexico	1,310	1.46%
Germany	1,255	1.40%
Korea	565	0.63%
Philippines	459	0.51%
Western Africa	355	0.40%

Source: HUD AFFH Data Version AFFHT0006 and RKG Associates, Inc., 2021

**Table 3-7  
Limited English Proficiency Persons by Top 5 Most Populous Languages  
City of Lawton, Oklahoma, 2015**

	Count	% of Total Population
<b>Total Population with Limited English Proficiency</b>	<b>2,713</b>	<b>2.80%</b>
Spanish	5,400	6.03%
West Germanic Language	1,270	1.42%
Other & Unspecified Language	1,000	1.12%
Korean	610	0.68%
Other Asian & Pacific Language	540	0.60%

Source: HUD AFFH Data Version AFFHT0006 and RKG Associates, Inc., 2021

**Table 3-8  
Foreign-Born Population and Limited English Proficiency Persons  
City of Lawton, Oklahoma, 2000-2015**

	2000	2010	2015	Chg. '00-'10		Chg. '10-'15	
				Actual	Ann. %	Actual	Ann. %
<b>Foreign-Born Population</b>							
Number	5,697	5,521	6,207	(176)	-0.31%	686	2.49%
Percent of Total Population	6.14%	5.70%	6.41%	N/A	N/A	N/A	N/A
<b>Limited English Proficiency Persons</b>							
Number	3,354	2,970	2,713	(384)	-1.14%	(257)	-1.73%
Percent of Total Population	3.62%	3.07%	2.80%	N/A	N/A	N/A	N/A

Source: HUD AFFH Data Version AFFHT0006 and RKG Associates, Inc., 2021

**F. DISABILITY BY TYPE AND AGE GROUP**

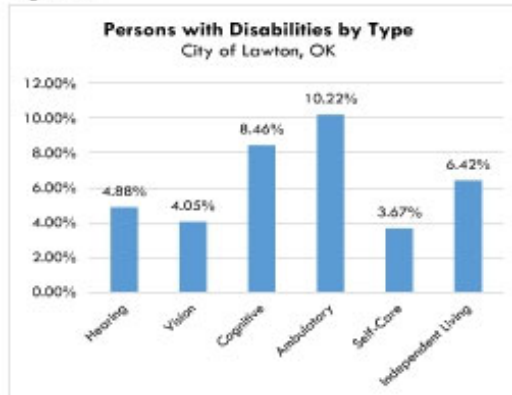
The Americans with Disabilities Act (ADA) defines a person with a disability as “a person who has a physical or mental impairment that substantially limits one or more major life activity.” People with disabilities may face more barriers to fair housing options as they often need special physical accommodations in their housing and are more likely to experience housing discrimination.

Ambulatory difficulty is the most common type of disability for Lawton residents, with 10.2% of people having trouble walking, followed by people with cognitive difficulty, which affects 8.5% of the total population. It should be noted that a person can have more than one type of disability, and therefore can be counted more than once under multiple disability categories (Figure 3-4).

Census Tracts 6, 11, 14, 15, 16, 17, 19.01, 20.05 and 25 have seen over 10% of their population with more than one type of disability (Table 3-9). These census tracts mostly cluster in the middle and on the southeast side of the City, generally overlapping with neighborhoods with lower median household incomes and higher concentrations of the non-white and Hispanic population. This indicates that there is a geographic disparity among census tracts in terms of concentrations of persons with disabilities in Lawton.

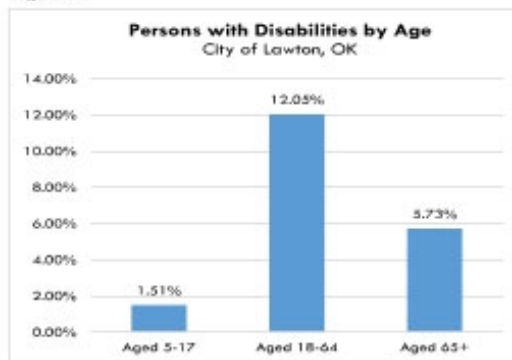
Most people with disabilities in the City of Lawton are between 18 and 64 years old, according to the HUD AFFH data, accounting for 12.0% of the total population (Figure 3-5).

Figure 3-4



Source: HUD AFFH Data Version AFFHT0006 and RKG Associates, Inc., 2021

Figure 3-5



Source: HUD AFFH Data Version AFFHT0006 and RKG Associates, Inc., 2021

**Table 3-9**  
**Percent of Persons with Disabilities of Total Population by Type**  
**City of Lawton Census Tracts, Oklahoma**

	With Hearing Difficulty	With Vision Difficulty	With Cognitive Difficulty	With Ambulatory Difficulty	With Self- Care Difficulty	With Independent Living Difficulty
0001	4.03%	3.03%	9.30%	6.86%	3.41%	6.78%
0002	3.23%	8.08%	8.12%	18.34%	6.70%	8.76%
0003	8.39%	5.18%	7.95%	15.55%	4.63%	8.85%
0004.01	4.57%	3.85%	8.08%	12.67%	5.11%	7.68%
0004.02	4.11%	1.94%	3.78%	7.12%	3.01%	4.60%
0004.03	5.18%	2.49%	3.93%	8.55%	2.18%	4.59%
0005.01	3.49%	3.23%	6.42%	7.19%	3.03%	4.63%
0005.02	3.78%	2.83%	9.18%	7.32%	3.35%	5.44%
0006	8.27%	5.86%	12.58%	10.12%	5.31%	8.42%
0007	9.17%	5.50%	12.48%	8.37%	2.68%	5.28%
0008	2.52%	2.19%	8.42%	5.38%	1.14%	3.76%
0009	4.72%	3.15%	5.03%	5.35%	1.78%	3.99%
0010	4.44%	1.83%	9.05%	9.82%	2.84%	8.64%
0011	3.44%	2.90%	10.92%	11.23%	4.28%	9.90%
0014	11.80%	2.61%	12.97%	12.88%	5.23%	6.22%
0015	6.76%	5.75%	11.44%	12.73%	4.39%	8.30%
0016	4.72%	11.15%	11.74%	16.09%	6.11%	9.54%
0017	6.99%	8.52%	11.42%	22.26%	11.63%	9.14%
0019.01	7.76%	3.43%	18.06%	13.20%	3.91%	10.54%
0019.02	8.69%	2.40%	8.63%	6.74%	4.60%	4.47%
0020.01	2.78%	1.62%	3.63%	5.85%	1.82%	3.71%
0020.04	4.38%	4.49%	6.93%	11.93%	1.70%	6.68%
0020.05	6.57%	3.50%	10.94%	11.29%	3.82%	9.72%
0023.01	5.14%	3.21%	5.47%	8.15%	3.33%	4.38%
0024.01	0.00%	0.00%	0.00%	15.38%	0.00%	0.00%
0024.03	2.17%	2.85%	0.59%	0.59%	0.00%	0.59%
0024.04	2.24%	1.51%	5.88%	1.07%	0.34%	0.44%
0025	8.25%	13.67%	17.40%	21.32%	4.32%	8.15%

Source: HUD AFFH Data Version AFFHT0006 and RKG Associates, Inc., 2021

**G. POVERTY INDEX**

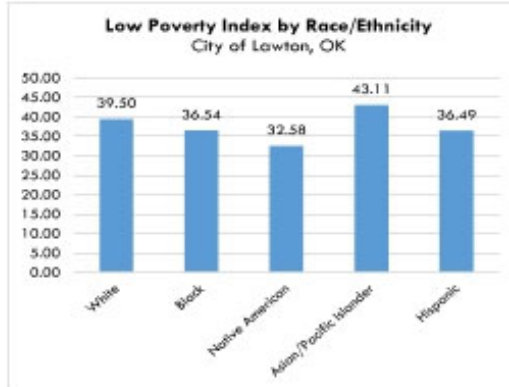
The poverty level of the population within a jurisdiction is often associated with how easy the community can access opportunities and resources including housing. If a community is exposed to high levels of poverty, then the residents may encounter more barriers to fair and affordable housing options. For example, a person living below the poverty level would not likely qualify for a mortgage loan due to lower income levels. HUD’s Low Poverty Index uses family poverty rates (based on the federal poverty line) to measure how much a community is exposed to poverty. The Low Poverty Index has scores ranging from 0 to 100, and a higher value represents less exposure to poverty in a neighborhood.

Within the City of Lawton, though the Low Poverty Index scores of the different racial/ethnic groups fall not too far apart in the low-to-medium range, the Asian/Pacific Islander population with the highest score of 43.1 has the least exposure to poverty, closely followed by the White population (39.5). In contrast, the Native American population with a score of 32.6 has the greatest exposure to poverty compared to other racial/ethnic groups, closely followed by the Hispanic population (36.5) (Figure 3-6).



There is also a geographic disparity of poverty levels across the City. The census tracts with the lowest Poverty Index scores generally match the areas with concentrations of the non-White and the Hispanic population compared to other census tracts within the City of Lawton. This result corresponds with the conclusion that the non-White and the Hispanic population in the City has the most exposure to poverty. This map also closely aligns with the 2019 median household income map in that census tracts with low scores and thus high poverty levels generally have lower median household incomes and are located around the center of the City.

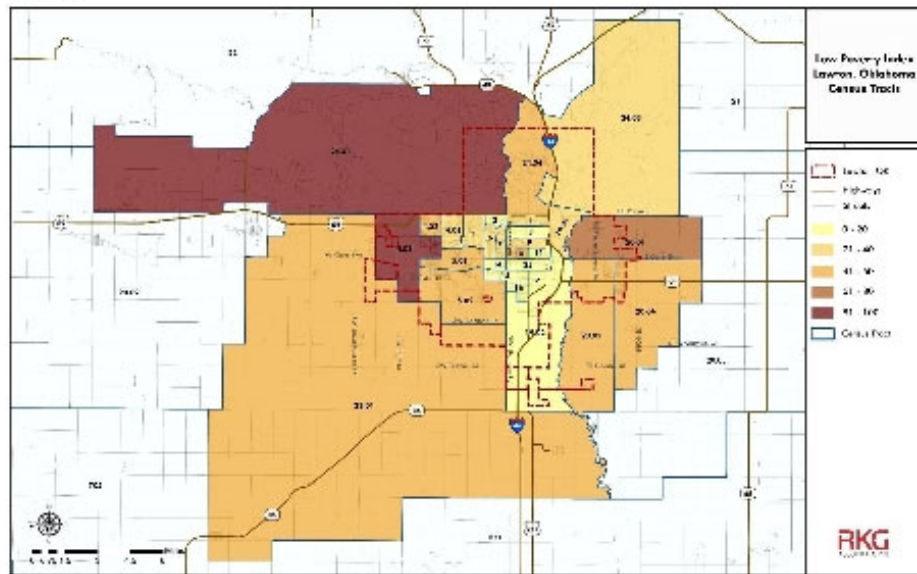
Figure 3-6



Source: HUD AFFH Data Version AFFHT0006 and RKG Associates, Inc., 2021

It should be noted that some of these non-white and Hispanic population with lower household incomes in these areas are likely college students. There are several colleges in these neighborhoods including Cameron University, Platt College, and Oklahoma University School of Nursing. Besides, this map shows once again that except for the Fort Sill area which overlaps with Census Tracts 24.01, 24.03 and 24.04, census tracts with the lowest poverty levels are generally located on the west, southwest and east sides of the City where employment centers tend to cluster, and the fastest population gains occurred between 2010 and 2019 (Map 3-6).

Map 3-6

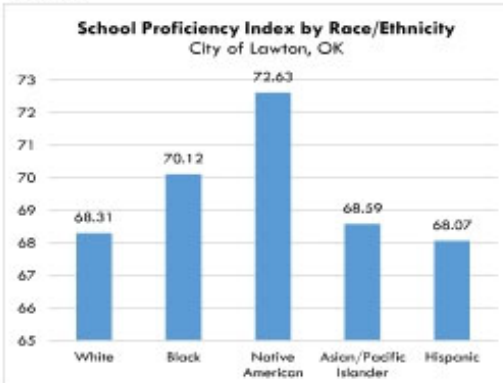


## H. SCHOOL PROFICIENCY INDEX

School proficiency is an indicator of the quality of the education available to a given community. Higher education quality is usually associated with better access to opportunities and higher income in addition to a higher quality of life. HUD's School Proficiency Index is based on the test scores of elementary schools within an area and measures which neighborhoods have high-performing elementary schools nearby. The values of the index range from 0 to 100 and higher scores indicate higher school system quality in a community.

Though the school proficiency index scores of the different racial/ethnic groups in Lawton are relatively high and fall not too far apart in the upper range, a disparity of access to quality education does exist among the racial/ethnic groups (Figure 3-7). Though the Native American population has the lowest Poverty Index, this group has the highest School Proficiency Index score of 72.6, compared to the Hispanic population, which has the lowest score of 68.1. The White population has the second-lowest score of 68.3, indicating that this group along with the Hispanic population has comparatively much less access to education quality.

Figure 3-7

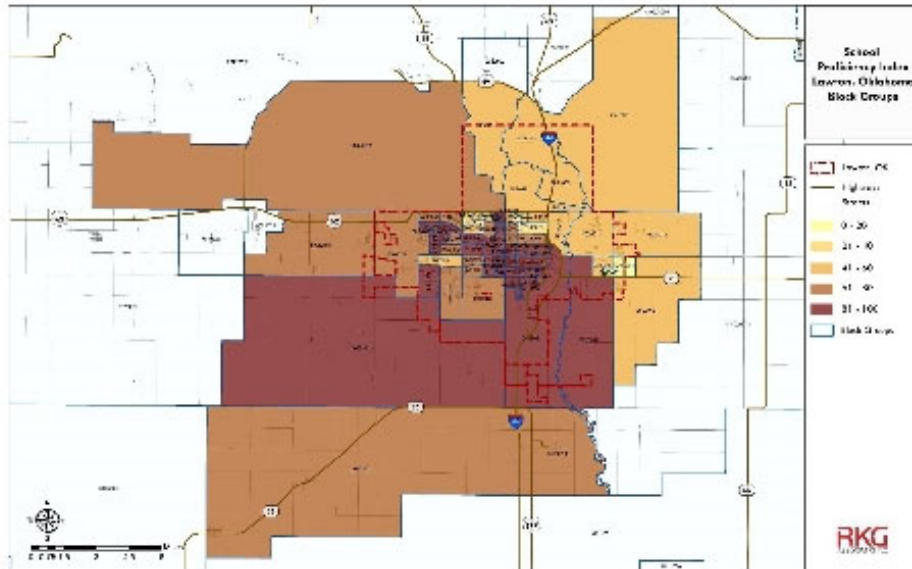


Source: HUD AFFH Data Version AFFH0006 and RKG Associates, Inc., 2021

The City may need to consider how to address the mismatch between the highest School Proficiency Index and the lowest Low Poverty Index among the Native American population. It is likely that this group has access to better performing elementary schools but lower education attainment levels. A lower level of higher education attainment exists for Native American and Hispanic population ages 25 and over in the City. Only 8.0% of the Native American population and 7.7% of the Hispanic population aged 25 and over in Lawton have at least a bachelor's degree, compared to the citywide level of 21.2% across all racial/ethnic groups according to the 2019 American Community Survey five-year estimates.

The School Proficiency Index values were then mapped by block group in the City, with darker colors indicating higher values and thus better elementary school performances (Map 3-7). The lowest-performing census tracts in terms of school proficiency (below a value of 25) tend to be in the center of the City south to Route 62 and on the east edge of the City north to Highway 7.

Map 3-7

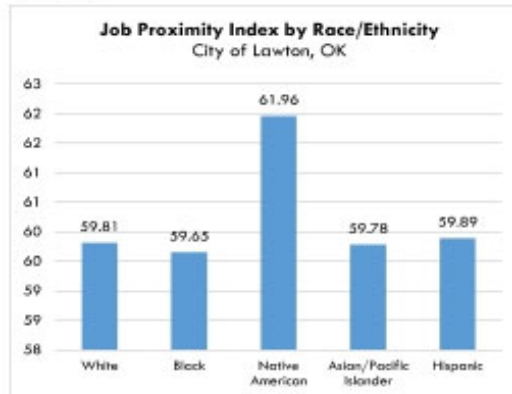


**I. JOB PROXIMITY INDEX**

HUD measures a community's access to employment opportunities with the Job Proximity Index and Labor Market Engagement Index. Job Proximity Index quantifies the distance between a given block group and employment centers within a Core Based Statistical Area (CBSA). The index values range from 0 to 100, with higher scores indicating better access to job opportunities for residents in a neighborhood.

The City's Native American population resides within the closest proximity to jobs, with the highest score of 62, followed by the Hispanic population, with a score of 59.9 (Figure 3-8). The African American population, in contrast, resides the furthest away from employment centers, with the lowest score of 59.6 (Figure 3-8).

Figure 3-8



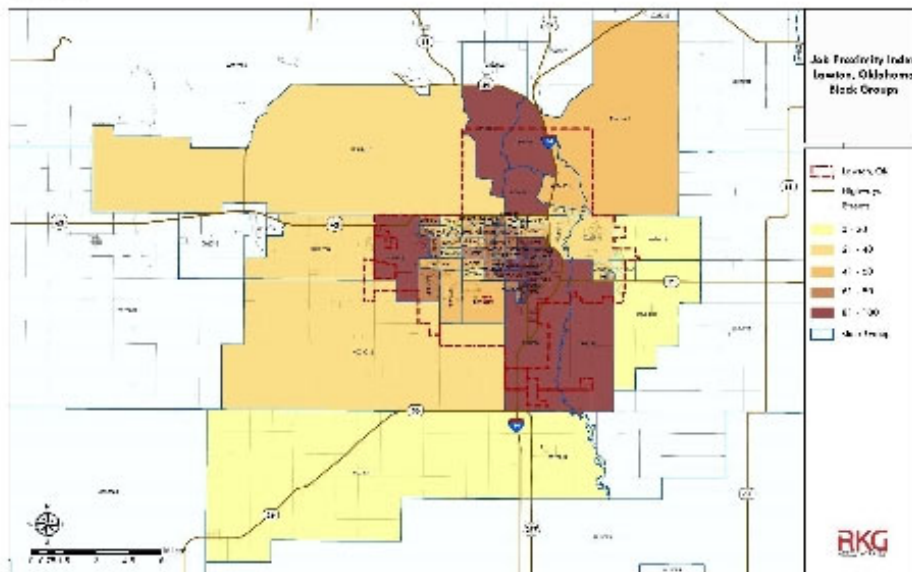
Source: HUD AFFH Data Version AFHT0006 and RKG Associates, Inc., 2021

Darker colors on the Job Proximity Index Map indicate higher index values and therefore closer proximity to job opportunities. Neighborhoods along the I-44, around the center of the City, and on

the west end of the City's boundary are closer to jobs compared to the rest of the City due to the cluster of major employment centers in these areas, such as Fort Sill, Comanche County Memorial Hospital, Lawton Public Schools, Walmart, Cameron University, and the Lawton-Fort Sill Regional Airport (Map 3-8).

It should be noted that the areas in the center and the south of the City along the I-44 have higher Job Proximity Index scores, higher School Proficiency Index values but lower Low Poverty Index scores. These areas overlap with neighborhoods with higher concentration of the non-White and the Hispanic population, and lower median household incomes. It likely means that residents in these neighborhoods, especially non-White, Hispanic, and Native American residents, only have access to lower-paying jobs, which is linked to relatively lower level of higher education attainment and higher poverty level in these neighborhoods.

Map 3-8



#### J. LABOR MARKET ENGAGEMENT INDEX

In addition to the proximity to job centers, HUD also measures a neighborhood's job access with the Labor Market Engagement Index, which, according to HUD's description, "provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood." The Index is based on the unemployment rate, labor force participation rate, and educational attainment data. This is because distance alone does not solely determine a community's access to employment opportunities, such as the types of jobs available, and whether the education and skills these jobs require match the education attainment levels of the residents in a neighborhood. The index values range from 0 to 100, with higher scores representing higher labor force participation and human capital in the community.

Similar to the Low Poverty Index, there is a disparity among racial/ethnic groups in labor market engagement and human capital in Lawton, though the index scores among different racial/ethnic groups are generally in the lower range. The City's Asian/Pacific Islander population has the highest Labor Market Engagement Index score at 37.3. This finding suggests that this racial group has the closest match between the local jobs and the people that access those jobs.

The Native American population which has the lowest score of 26.5 and the Hispanic population which has the second-lowest score of 30.1 have lower levels of engagement in the labor market and human capital compared to other groups (Figure 3-9).

This mirrors this group's lower level of higher education attainment and household incomes as discussed earlier.

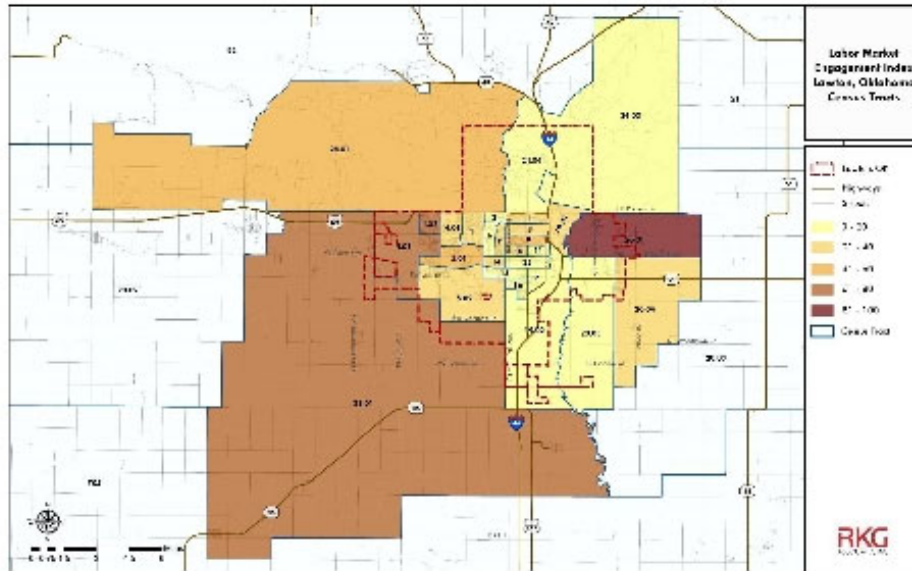
Labor Market Engagement Index values by census tract vary throughout the City, with darker colors indicating higher levels of labor market engagement and human capital, and therefore, better access to employment opportunities in a neighborhood. The data indicate that the greatest access to employment is achieved on the east side of the City, generally matching the neighborhoods that experienced the fastest population gains between 2010 and 2019, and the highest median household incomes. In comparison, the lowest access is seen in center and in the south side of the City, where higher poverty levels and more non-White and Hispanic population tend to concentrate in Lawton. In addition, Census Tracts 24.03 and 24.04 that overlap with the Fort Sill base and the Kiowa-Comanche-Apache-Fort Sill Apache tribe jurisdiction also have some of the lowest labor market engagement levels (Map 3-9).

Figure 3-9



Source: HUD AFFH Data Version AFFHT0006 and RKG Associates, Inc., 2021

Map 3-9

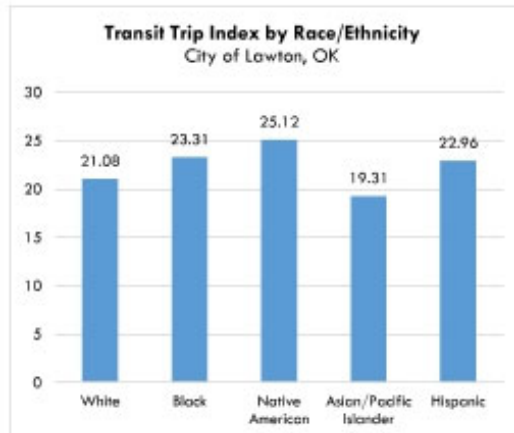


**K. TRANSIT TRIP INDEX**

A community’s access to opportunities is also influenced by the levels of mobility and availability of low-cost transportation options. This can be measured by HUD’s Transit Index and Low Transportation Cost Index. Both indices are based on the data of 3-person, single-parent families with income at 50 percent of the median income for renters in the region, with values ranging from 0 to 100. The higher the Transit Trip Index value, the more likely residents in a neighborhood utilize public transit. The Transit Trip Index controls for income such that a higher index score will often reflect better public transit access.

The Transit Trip Index scores of Lawton’s racial/ethnic groups fall closely into a low range, indicating that transit use is not prevalent in the City. The Native American population is most likely to use public transit, with the highest score of 25.1, closely followed by the African American and the Hispanic population, with scores of 23.3 and 23, respectively (Figure 3-10). The Asian/Pacific Islander

Figure 3-10



Source: HUD AFFH Data Version AFFHT0006 and RKG Associates, Inc., 2021

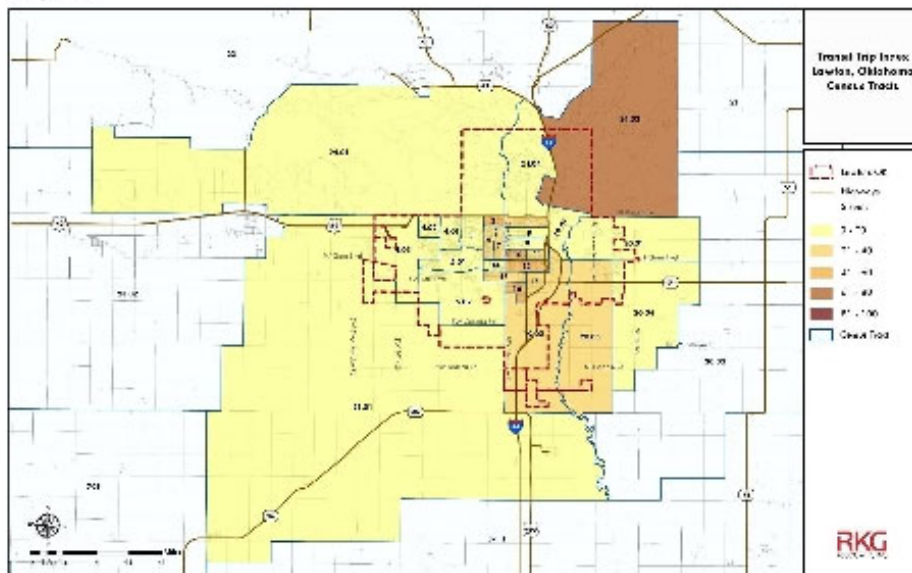
population has the lowest score of 19.3 and is least likely to use public transit compared to other racial/ethnic groups in Lawton.

Though the City of Lawton is served by bus services, most of the neighborhoods in the City have low Transit Trip Index scores of 25 or below, indicating that much of the population is not very likely to use public transit. However, some neighborhoods around the urban core have higher scores between 30 and 52. It indicates that residents living in these neighborhoods are more likely to use public transit compared to the rest of the City (Map 3-10). It is not surprising that demand for public transit is higher where the transit stops are more densely clustered.

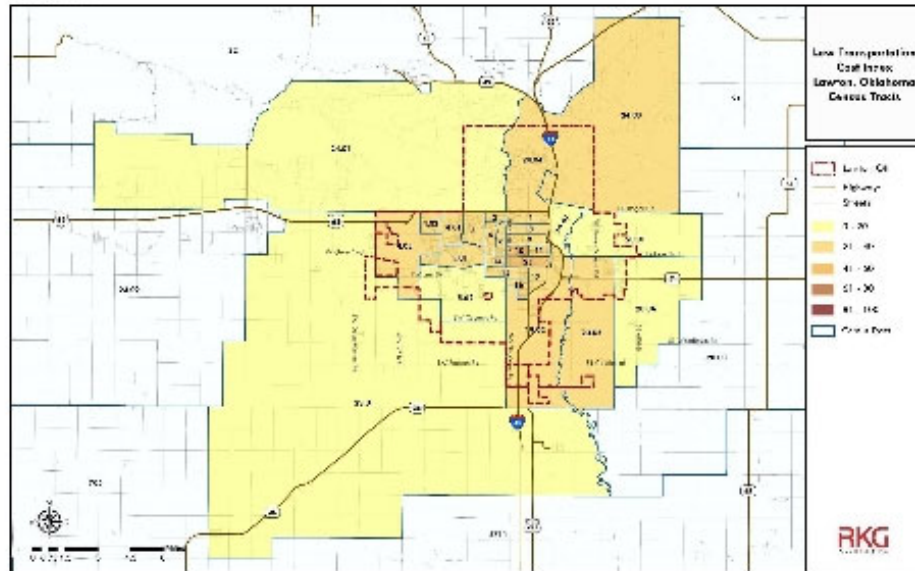
Currently, the Lawton Area Transit System (LATS) operates nine local fixed routes operating from 6:00 AM to 7:00 PM on weekdays, covering an area south to U.S. Highway 62, east to NW 67th Street, west to NE Lawrie Tatum Road, and north to SW Ranch Oak Boulevard just north of the Lawton-Fort Sill Regional Airport. There is a Fort Sill shuttle service that requires appointment by calling the LATS office, and the shuttle hours are the same as the fixed route. Passengers may schedule a pickup up to two hours before their pickup.

Lawton Area Transit System also provides para-transit services for persons with disabilities who are unable to access fixed routes or are unable to board accessible fixed route buses because of their disability. Para-transit trips are available Mondays through Fridays, 6:00 AM to 7:00 PM and Saturdays, 9:00 AM to 6:00 PM. However, LATS has temporarily suspended all the Saturday service until further notice.

Map 3-10



Map 3-11



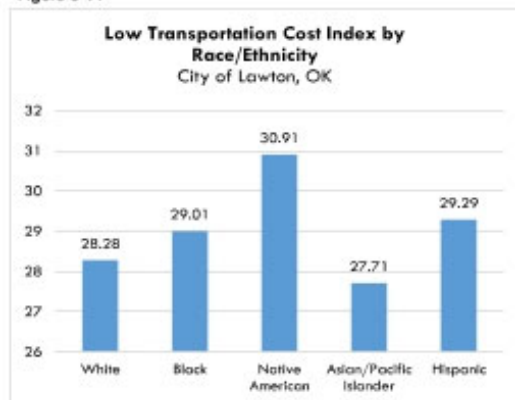
**L. LOW TRANSPORTATION COST INDEX**

Another HUD indicator that evaluates the transportation opportunity access of a community is the Low Transportation Cost Index. It measures the cost of transport by neighborhood. The index values also range from 0 to 100, and the higher the index score, the lower the cost of transportation in that community. Transportation costs may be low for several reasons, including greater access to public transportation and the density of homes, services, and jobs in the neighborhood and surrounding community.

The transportation costs for all racial/ethnic groups in the City are relatively high, as the Low Transportation Cost Index scores for different racial/ethnic groups cluster in the lower range. The Native American population in Lawton has the lowest transportation cost compared to other racial/ethnic groups, with the highest score of 30.9, followed by the Hispanic population with a score of 29.3. The Asian/Pacific Islander population has the highest transportation cost among all racial/ethnic groups, with the lowest score of 27.7 (Figure 3-11).

The Low Transportation Index scores exhibit a geographic difference across the City. Neighborhoods around the

Figure 3-11



Sources: HUD AFFH Data Version AFHT0006 and RKG Associates, Inc., 2021

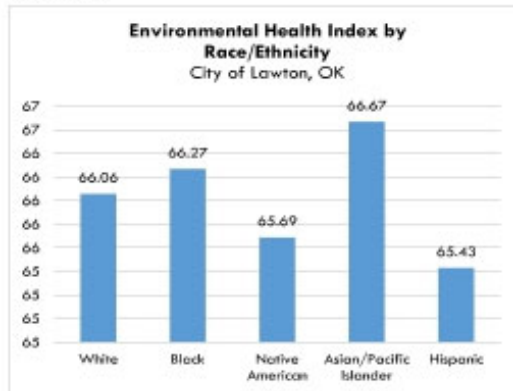


center of the City where public transit use is higher have the highest scores and the lowest transportation costs, while the remaining neighborhoods especially those on the southwest and northeast sides of the City have the highest transportation costs as these areas are more suburban/rural, have higher income levels and more residents in these areas can afford cars (Map 3-11).

### M. ENVIRONMENTAL HEALTH INDEX

HUD also measures the environmental quality of neighborhoods with the Environmental Health Index. The index measures the exposure to toxins harmful to human health at a neighborhood level. It is based on the U.S. Environmental Protection Agency (EPA) estimates of the air quality by neighborhood, and only measures issues related to air quality and no other factors impacting human health. The Environmental Health Index has values ranging from 0 to 100, with higher scores representing less exposure to harmful toxins, and therefore, better environmental quality of a neighborhood.

Figure 3-12

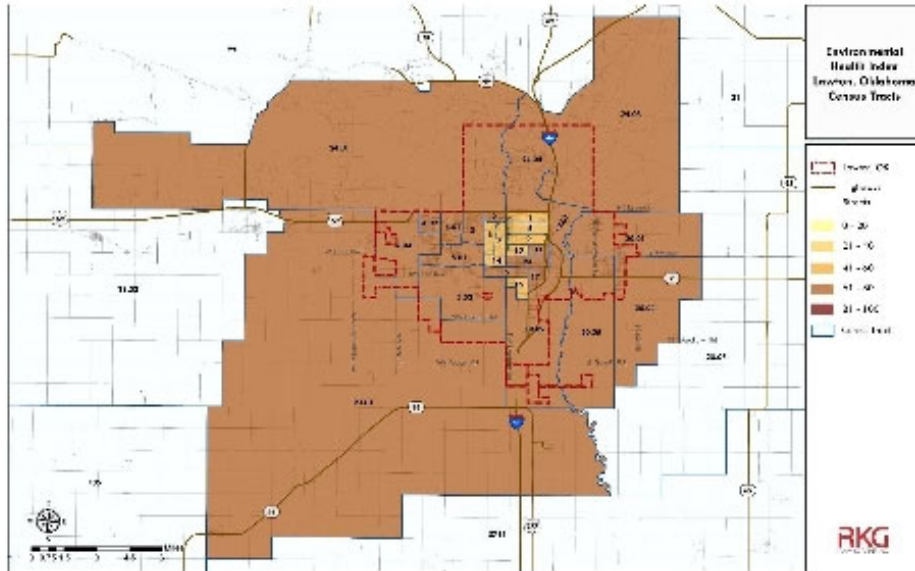


Sources: HUD AFFH Data Version AFFHT0006 and RKG Associates, Inc., 2021

The Environmental Health Index scores of different racial/ethnic groups in Lawton are close ranging between 65 and 67, indicating upper-medium environmental health for all groups (Figure 3-12). The Asian/Pacific Islander population in Lawton resides in neighborhoods with comparatively the best environmental air quality compared to other racial/ethnic groups in the City, with the highest score of 66.7. The Hispanic population has the lowest Environmental Health Index score of 65.4, followed by the Native American population with a slightly higher score of 65.7. This indicates that these two groups are more likely to reside in neighborhoods with lower air quality.

The environmental health across the City varies by geography, ranging from 56 (Census Tracts 8 and 9) to 78 (Census Tracts 20.04 and 20.05). The pattern of the geographic difference of the Environmental Health Index in Lawton is like some of the previous indices discussed, as the urban core with a concentration of lower-income neighborhoods has lower environmental quality. In contrast, people living in the outer edges of the City generally have more access to most opportunities and higher environmental quality (Map 3-12). The biggest environmental factor in most communities is automobile emissions, which are highest in urban areas where there are high traffic volumes and congestions.

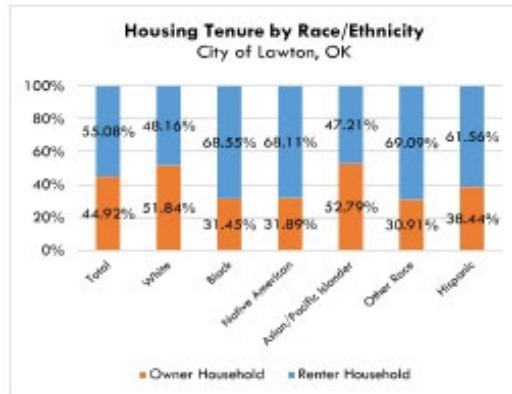
Map 3-12



**N. HOUSING TENURE**

The HUD AFFH system utilizes CHAS 2009-2013 data to analyze the housing conditions and problems in neighborhoods. The consultants also complement the analysis with housing tenure data from the 2019 American Community Survey (ACS) 5-Year Estimates. One indicator to examine the existing housing stability in the City of Lawton is the homeownership rate by racial/ethnic groups. As purchasing a home is the biggest investment most people will make in their lifetime, when property values appreciate, homeowners can accumulate asset value and household wealth at the same time. Therefore, a higher homeownership rate is usually associated with more household wealth and stability. Historically, minority racial groups tend to have lower homeownership rates than white households in the U.S (Figure 3-13).

Figure 3-13



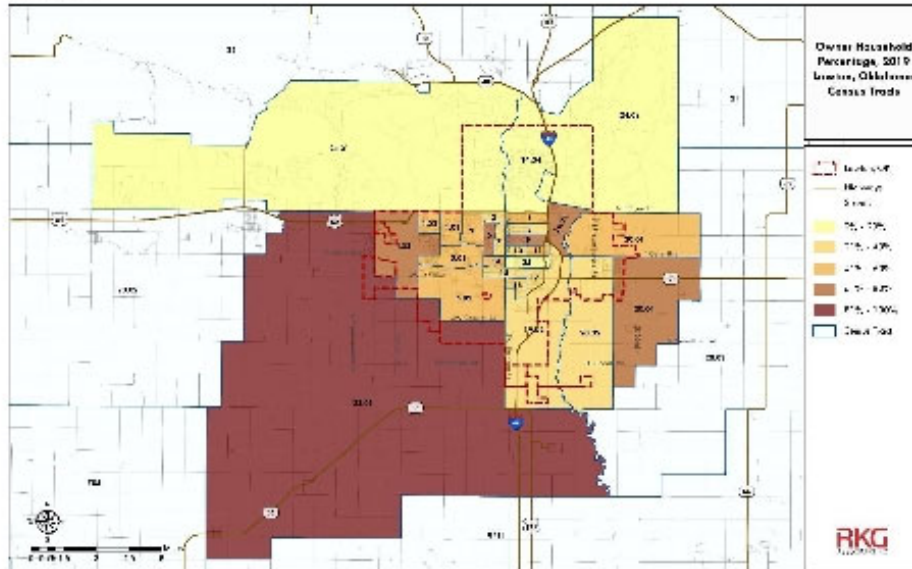
Source: HUD AFFH Data Version AFFHT0006 and RKG Associates, Inc., 2021

This also generally holds true in the City of Lawton, where the Asian/Pacific Islander population and White population in the City have the highest homeownership rates of 52.8% and 51.8% among all

racial/ethnic groups, respectively, which is higher than the citywide average of 44.9%. In comparison, other minority groups have homeownership rates lower than the City average. In particular, the population of "Other Races" has the lowest homeownership rate of 30.9% compared to other groups.

There is also a geographic disparity of homeownership rates across different neighborhoods in Lawton. In general, higher-income neighborhoods on the southwestern edge of the City have higher proportions of owner households, which are all over 85%. However, neighborhoods around the urban core especially Census Tract 25 has 17.4% of owner households, which is the lowest compared to other parts of the City. This is likely linked to the concentration of two public housing projects in this census tract, which are rental in nature. Likewise, most of the housing stock in these neighborhoods is occupied by renter households, some are likely college students as Cameron University, Plat College and Oklahoma University College of Nursing are nearby. Census Tracts 24.01, 24.03 and 24.04 which overlap with the Fort Sill base and the Kiowa-Comanche-Apache-Fort Sill Apache tribe jurisdiction also have some of the lowest homeownership rates (Map 3-13).

Map 3-13



**O. LOCATION OF AFFORDABLE RENTAL HOUSING**

The amount of affordable rental housing units within a city is an important indicator of the availability of fair housing choice options. According to the HUD AFFH data, among the 17,940 rental units in Lawton, 39.6%, or 7,101 units are classified as affordable units (Table 3-10).

**Table 3-10**  
**Affordable Rental Units (CHAS, 2009-2013)**  
**City of Lawton, Oklahoma**

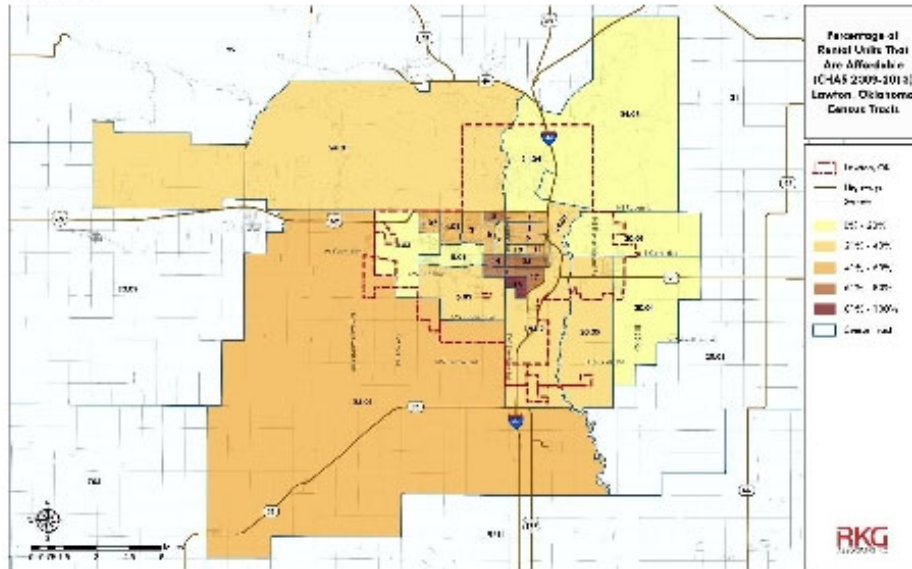
	Count	Percent
Total Renter Units	17,940	100.00%
Total Affordable Renter Units	7,101	39.58%

Source: HUD AFFH Data Version AFFHT0006 and RKG Associates, Inc., 2021

Neighborhoods in and around the City

center have over 50% of rental units that are affordable, which is the highest concentration compared to the rest of the City (Map 3-14). In comparison, apart from Census Tracts 24.01, 24.03 and 24.04 which are on the Fort Sill base, neighborhoods on the west and east sides of the City have below 15% of their rental units classified as affordable. Census Tract 20.04 even has only 1.7% of its rental units classified as affordable, which is the lowest in the City.

Map 3-14



**P. PUBLICLY SUPPORTED HOUSING AND RACE/ETHNICITY**

Lawton currently has 118 Section 8 households using rental housing vouchers administered by the Lawton Housing Authority (LHA), including 25 portable voucher households, 11 VASH (Veterans Affairs Supportive Housing) households, and 82 regular voucher households. There are four public housing projects owned by the Lawton Housing Authority totaling 334 units. In addition, Lawton has nine affordable housing tax credit projects with 642 units financed by Oklahoma Housing Finance Agency (OHFA). The total number of publicly assisted housing units in Lawton is 1,094 as of June 2021. (Table 3-11).

The consultants also obtained data relative to the total number of public housing occupants and Section 8 voucher participants by race/ethnicity from LHA. Currently, over half (58.2%) of the participants in LHA's public housing properties are White, followed by African Americans (33.7%). American Indian/Alaska Native and Asian participants are not as common, accounting for 5.0% and 3.0%, respectively. The Hispanic participants account for 8.6%, and there are 32.3% elderly and 27.1% disabled participants. Over half (59.6%) of the participants are female. Proportionally, there are more Asian participants living alone as the heads of household, as well as elderly and disabled people, as these groups have higher than average shares of participants classified as the heads of household. There are also proportionally more youths among American Indian/Alaska Native and Hispanic participants living in LHA's public housing properties (Table 3-12).

**Table 3-11  
Publicly Assisted Housing Projects  
City of Lawton, Oklahoma**

	Population Served	TOTAL
<b>Section 8 Voucher</b>		
	Family/Veteran	118
<b>Public Housing</b>		
Lawton View	Single Family	149
Benjamin O. Davis Highrise	Elderly/Disabled	100
Pleasant Valley	Elderly/Disabled	50
Old Towne Square	(Section 202) Elderly	35
<b>Low Income Housing Tax Credit Projects</b>		
Cambridge Estates	Elderly/Disabled	60
Deer Park Apartments (aka Apple Run/Deer Park)	Family	152
Garden Grove Apts. (aka Savannah House of Lawton)	Elderly	60
Garrett's Landing	Family	92
Goodwill Village	Elderly/Disabled	36
Lawton Pointe	Family	72
Sanders Heights Apts.	Family	44
Stratford Square	Family	62
Villanova (aka Columbia Square Apts.)	Family	64
<b>TOTAL</b>		<b>1,094</b>

Source: City of Lawton and RKG Associates, Inc., 2021

**Table 3-12  
Public Housing Household Composition, 2021  
City of Lawton, Oklahoma**

	TOTAL	Tenant Relationship						
		Head of Household	Co-Head of Household	Spouse	Other Adult	Student 18+	Youth	Foster Child
<b>Total</b>	421	300	6	5	15	0	93	2
White	245	171	3	3	9	0	59	0
Black	142	107	3	1	5	0	25	1
American Indian/Alaska Native	21	10	0	0	1	0	9	1
Asian	13	12	0	1	0	0	0	0
Hispanic	36	23	0	0	1	0	12	0
Elderly	136	132	1	2	1	0	0	0
Disabled	114	109	1	1	3	0	0	0
Female	251	198	1	5	4	0	43	0
<b>Percentage</b>	<b>100.00%</b>	<b>71.26%</b>	<b>1.43%</b>	<b>1.19%</b>	<b>3.56%</b>	<b>0.00%</b>	<b>22.09%</b>	<b>0.48%</b>
White	58.19%	69.80%	1.22%	1.22%	3.67%	0.00%	24.08%	0.00%
Black	33.73%	75.35%	2.11%	0.70%	3.52%	0.00%	17.61%	0.70%
American Indian/Alaska Native	4.99%	47.62%	0.00%	0.00%	4.76%	0.00%	42.86%	4.76%
Asian	3.09%	92.31%	0.00%	7.69%	0.00%	0.00%	0.00%	0.00%
Hispanic	8.55%	63.89%	0.00%	0.00%	2.78%	0.00%	33.33%	0.00%
Elderly	32.30%	97.06%	0.74%	1.47%	0.74%	0.00%	0.00%	0.00%
Disabled	27.08%	95.61%	0.88%	0.88%	2.63%	0.00%	0.00%	0.00%
Female	59.62%	78.88%	0.40%	1.99%	1.59%	0.00%	17.13%	0.00%

Source: Lawton Housing Authority and RKG Associates, Inc., 2021

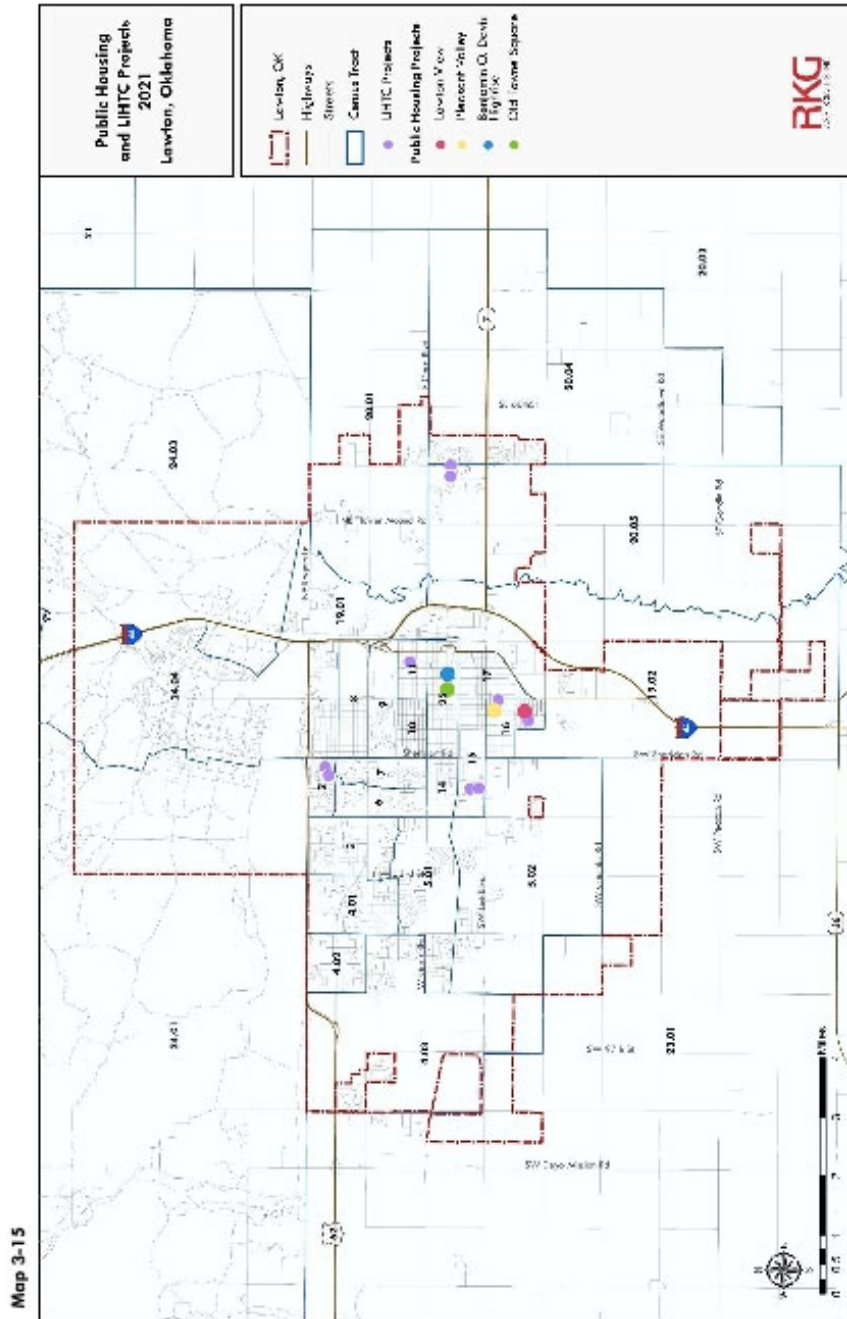
Among the existing 308 Section 8 voucher participants, most of them are also African American (64.6%), followed by White (27.3%), Hispanic (15.3%) and American Indian/Alaska Native (7.1%). Asian participants are the least common in Lawton's Section 8 voucher program, with only three participants (1.0%). The highest share (45.1%) of all the participants are Youths, followed by Heads of Household (38.3%) and Other Adults (7.1%). The American Indian/Alaska Native and Hispanic groups have seen proportionally more of their participants classified as Youths (54.6% and 51.1%, respectively) compared to other racial/ethnic groups, indicating larger family sizes with multiple children. The American Indian/Alaska Native and Hispanic groups have also seen higher shares of their participants classified as Other Adults (9.1% and 8.5%, respectively) than the average, who are likely grandparents or other relatives living with the core families. This once again suggests larger family sizes among participants of these two racial/ethnic groups. Also, over half (61.7%) of all the Section 8 voucher participants are female, 11.0% of all the participants are disabled, and 7.8% of them are elderly participants. Additionally, the elderly population and the disabled people have much higher percentages (91.7% and 73.5%, respectively) of their participants classified as the head of household than the average (38.3%), suggesting that a large portion of the elderly and the disabled Section 8 participants in Lawton live on their own (Table 3-13).

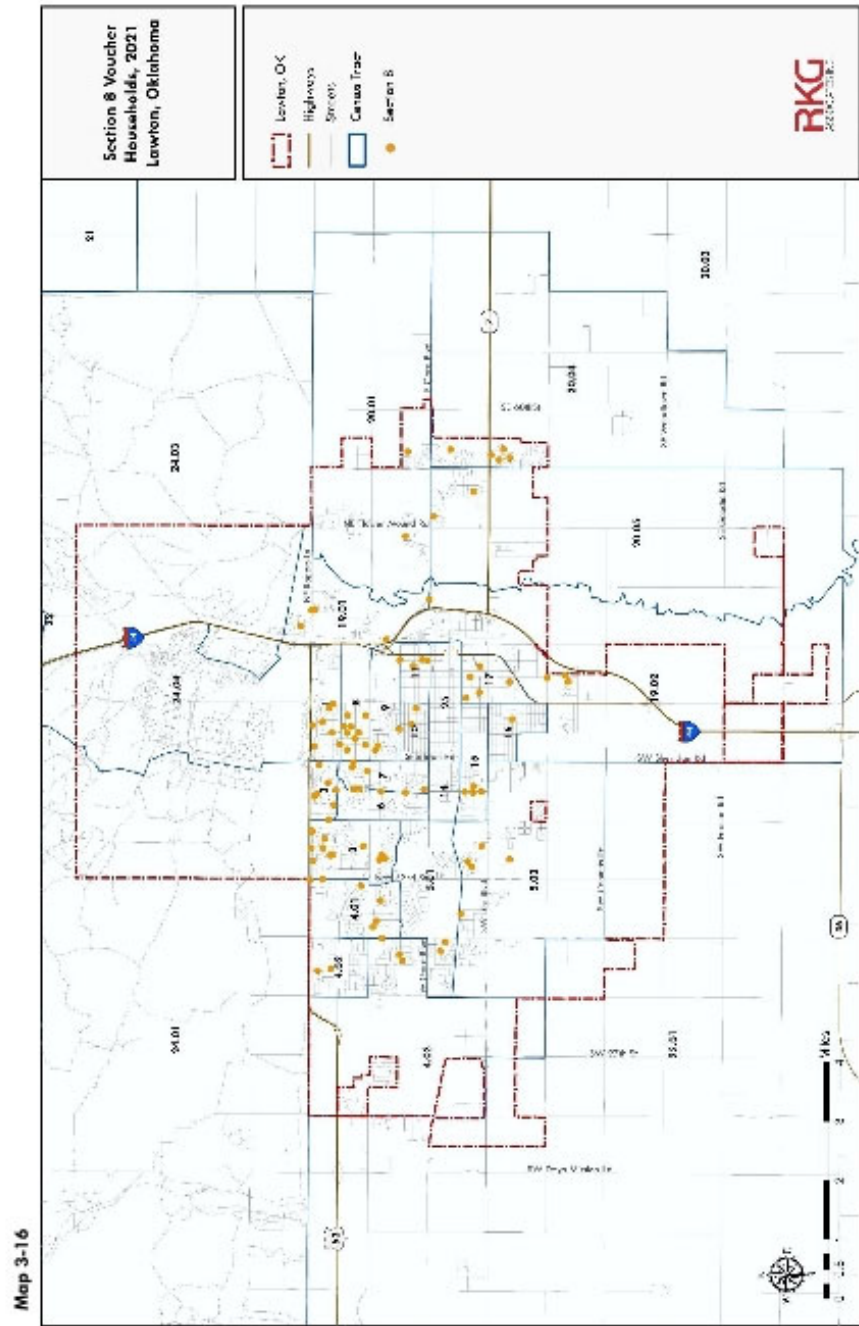
The locations of the publicly assisted housing projects and Section 8 voucher households were then mapped (Map 3-15/Map 3-16), and the results echo the previous map in that the City's center which has a high percentage of rental units that are affordable also see a cluster of publicly assisted housing projects and Section 8 households. Note that several of the dots signifying Section 8 households represent multiple units in a single location.

**Table 3-13**  
**Section 8 Voucher Program Participant Composition, 2021**  
City of Lawton, Oklahoma

	TOTAL	Tenant Relationship						Youth	Foster Child
		Head of Household	Co-Head of Household	Spouse	Other Adult	Student 18+			
<b>Total</b>	<b>308</b>	<b>118</b>	<b>2</b>	<b>6</b>	<b>22</b>	<b>21</b>	<b>139</b>	<b>0</b>	
White	84	37	1	3	4	3	36	0	
Black	199	73	1	3	15	17	90	0	
American Indian/Alaska Native	22	7	0	0	2	1	12	0	
Asian	3	1	0	0	1	0	1	0	
Hispanic	47	17	0	1	4	1	24	0	
Elderly	24	22	0	1	1	0	0	0	
Disabled	34	25	0	0	4	0	5	0	
Female	190	93	0	5	10	11	71	0	
<b>Percentage</b>									
<b>Total</b>	<b>100.00%</b>	<b>38.31%</b>	<b>0.65%</b>	<b>1.95%</b>	<b>7.14%</b>	<b>6.82%</b>	<b>45.13%</b>	<b>0.00%</b>	
White	27.27%	44.05%	1.19%	3.57%	4.76%	3.57%	42.86%	0.00%	
Black	64.61%	36.68%	0.50%	1.51%	7.54%	8.54%	45.23%	0.00%	
American Indian/Alaska Native	7.14%	31.82%	0.00%	0.00%	9.09%	4.55%	54.55%	0.00%	
Asian	0.97%	33.33%	0.00%	0.00%	33.33%	0.00%	33.33%	0.00%	
Hispanic	15.26%	36.17%	0.00%	2.13%	8.51%	2.13%	51.06%	0.00%	
Elderly	7.79%	91.67%	0.00%	4.17%	4.17%	0.00%	0.00%	0.00%	
Disabled	11.04%	73.53%	0.00%	0.00%	11.76%	0.00%	14.71%	0.00%	
Female	61.69%	48.95%	0.00%	2.63%	5.26%	5.79%	37.37%	0.00%	

Sources: Lawton Housing Authority and RKG Associates, Inc., 2021







**Q. HOUSING PROBLEMS**

According to HUD, A household is identified as having a housing problem if they have any one or more of these four problems:

- Lack of complete kitchen facilities;
- Lack of complete plumbing facilities;
- Household is overcrowded which means there is more than 1.5 persons per room, excluding bathrooms, porches, foyers, halls, or half-rooms; and,
- Household is cost burdened (paying more than 30 percent of their income for housing).

Analyzing housing problems highlights areas where deferred maintenance has resulted in condition problems and eroded the housing stock. The HUD AFFH data indicates that 10,090 households have one or more housing problems, accounting for 30.5% of the total households in Lawton. Proportionally, more African American (39.0%) and Asian/Pacific Islander (37.3%) households are experiencing greater housing problems compared to the other racial/ethnic groups in the City (Table 3-14).

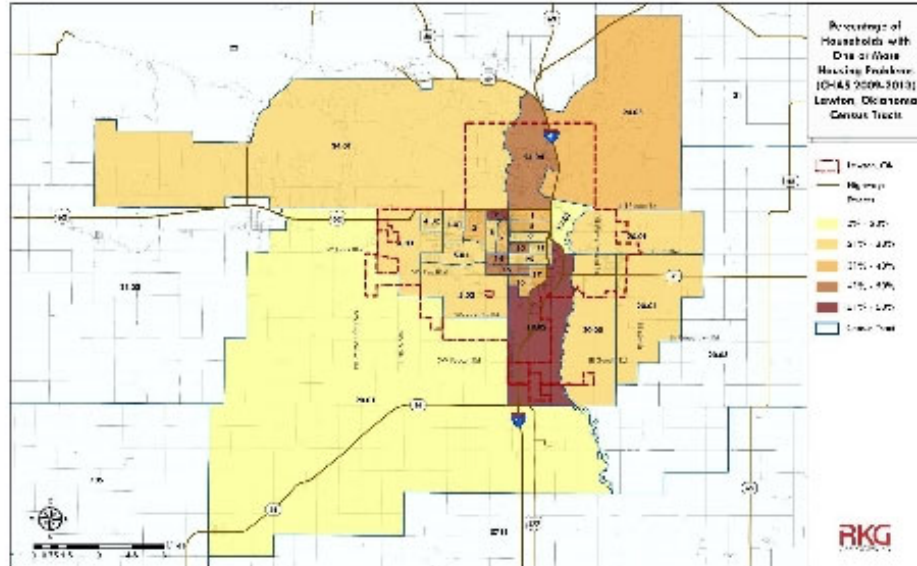
**Table 3-14**  
**Households with One or More Housing Problems**  
**City of Lawton, Oklahoma (CHAS 2009-2013)**

	Total Households	Households with One or More Housing Problems	
		Count	Percent
<b>Total</b>	<b>33,079</b>	<b>10,090</b>	<b>30.50%</b>
White, Non-Hispanic	19,273	5,065	26.28%
Black, Non-Hispanic	6,613	2,579	39.00%
Native American, Non-Hispanic	1,283	474	36.94%
Asian/Pacific Islander, Non-Hispanic	873	326	37.34%
Other Race, Non-Hispanic	1,560	487	31.22%
Hispanic	3,480	1,154	33.16%

Source: HUD AFFH Data Version AFFHT0006 and R/G Associates, Inc., 2021

The concentration of households with one or more housing problems also varies geographically. Areas with higher percentages of households experiencing one or more housing problems cluster around publicly supported housing in Lawton, with these neighborhoods seeing over 30% and even over 50% of their housing units having housing problems. These neighborhoods also have higher exposure to poverty, lower environmental air quality, and lower labor market engagement, as displayed in previous maps. In addition, Census Tracts 2 and 19.02 have the highest percentages (over 50%) of households having housing problems, followed by Census Tracts 10, 14 and 15 (over 40%), indicating a need for housing rehabilitation activities in these neighborhoods. Census Tract 24.04 which falls in the Fort Sill base also has over 40% of its households having housing problems (Map 3-17).

Map 3-17



## R. COMPOSITE INDEX SCORE

To measure and evaluate the combined performance of all racial and ethnic groups in each census tract combining all the previously presented demographic, housing, and fair housing indexes, RKG converted the value of all seven indicators into index scores that align with the HUD AFFH indexes (e.g., the Low Poverty Index) in scale and range. The seven indicators that were converted by RKG include:

### Converted Indicators

- 2019 median household income,
- 2010-2019 average annual percent change of median household income,
- percentage of the minority population,
- percentage of people with disability,
- percentage of owner-occupied housing units,
- percentage of rental units that are affordable, and
- percentage of housing units with one or more housing problems.

### HUD AFFH Indexes

- Low Poverty Index,
- School Proficiency Index,
- Job Proximity Index,
- Labor Market Engagement Index,
- Transit Trip Index,
- Low Transportation Cost Index, and

- Environmental Health Index

The consultant identified the highest average index values for all census tracts for each indicator and assigned it the highest index score. Then all other census tract values were converted to index scores as a percentage of the highest index value. In two instances (percentage of people with disability and percentage of housing units with one or more housing problems), the consultant assigned the highest index score to the lowest indicator value to reflect the actual meaning of the indicator. For example, the census tract with the lowest percentage of its population having a disability is considered to face fewer fair housing challenges compared to other census tracts, and this is reflected with the highest index score. As such, the higher the census tract's index score, the better its conditions were relative to the performance indicators.

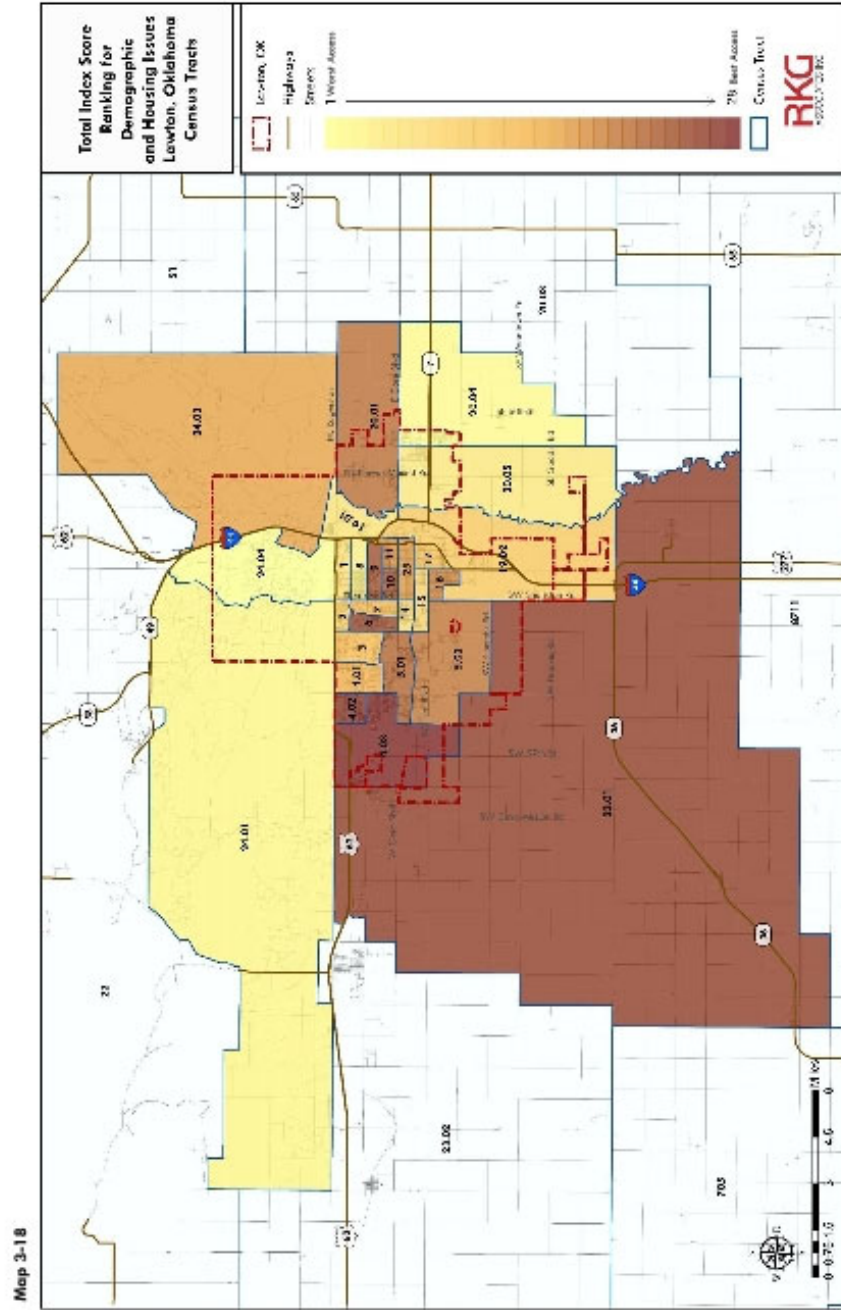
The 28 census tracts were then ranked based on their total scores (Table 3-15), and the results (the lowest total score was ranked as 1, and the highest was ranked as 28) were then mapped in ArcGIS. The darker shading reflects a higher ranking and better fair housing opportunities, while lighter shades indicate that the census tracts face more fair housing challenges (Map 3-18). Readers should note that this is not an absolute measurement of the fair housing opportunities across the City's neighborhoods as the index score conversion is only an approximation aiming to bring all indicators into a comparable scale based on currently available data. Rather, this analysis provides readers with insights into the geographic concentration of fair housing issues across Lawton, and opportunities to start to identify neighborhoods that need additional resources to increase their fair housing availability.

The analysis indicates that the best conditions exist in census tracts on the west and southwest sides of the City. The most challenged census tract is 24.04, which falls in the Fort Sill base and the Kiowa-Comanche-Apache-Fort Sill Apache tribe jurisdiction, followed by 20.04, which is in the more suburban/rural area on the southeast edge of the City. Other challenged census tracts include those in the urban core where publicly assisted housing units and Section 8 voucher households cluster with concentrations of the non-White population.

**Table 3-15**  
**Index Scores for Demographic and Housing Issues**  
**City of Lawton, OK (Census Tracts)**

Census Tract	Total Index Score	Ranking
0024.04	493	1
0020.04	515	2
0024.01	519	3
0008	521	4
0020.05	523	5
0019.01	539	6
0001	541	7
0014	541	8
0015	547	9
0002	549	10
0019.02	583	11
0017	585	12
0003	587	13
0007	589	14
0004.01	597	15
0024.03	601	16
0025	601	17
0011	610	18
0016	614	19
0005.02	626	20
0020.01	627	21
0005.01	644	22
0010	661	23
0009	661	24
0006	664	25
0023.01	725	26
0004.02	726	27
0004.03	728	28

Source: RKG Associates, Inc., 2021



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## **4 RECORD OF HOUSING DISCRIMINATION**

### **A. INTRODUCTION**

This section examined the records of housing discrimination complaints originated in the City of Lawton to analyze the types of existing fair housing issues. The Federal Fair Housing Act (FHA) of 1968, as amended in 1974 and 1988, prohibits housing discrimination based on race, color, religion, national origin, sex, disability, and familial status. Alleged violations of the FHA may be filed with:

- Metropolitan Fair Housing Council (MFHC)
- HUD Regional Office of Fair Housing and Equal Opportunity (FHEO), and
- Office of the State Attorney General

Fair housing complaints within Lawton are now under the administration of the U.S. Department of HUD, Region VI Office in Fort Worth, Texas. Therefore, RKG reached out to HUD's Fort Worth office to obtain the records of complaints filed with HUD.

### **B. METROPOLITAN FAIR HOUSING COUNCIL (MFHC)**

The Metropolitan Fair Housing Council of Oklahoma, Inc. (MFHC) is the only HUD-qualified full-service fair housing enforcement, advocacy, and educational private non-profit organization in Oklahoma, and it has representational standing and organizational standing to file fair housing claims to HUD, the U.S. Department of Justice (DOJ), and local, state, and federal courts.

Since 1979, MFHC conducts fair housing counseling, investigation and testing, complaint referral to HUD, fair housing/fair lending education, outreach training, and mediation services, including legal referral by the MFHC's staff attorney or a cooperating attorney. However, the City of Lawton currently does not provide funding to MFHC for fair housing enforcement, education, or outreach in its jurisdictional area.

According to MFHC, they generally process an average of 850 to 900 complaint intakes per year from throughout the State of Oklahoma. Most complaints are resolved with fair housing counseling and education by MFHC staff about rights and remedies under federal and state laws. Complaints not resolved by initial or secondary counseling will be referred, if applicable for: (1) in-house mediation, (2) a Requests for Reasonable Accommodation or Reasonable Modification (RA/RM), (3) further testing and investigations, (4) a complaint filing with HUD FHEO, or (5) a legal remedy by MFHC staff attorney or cooperating attorneys.

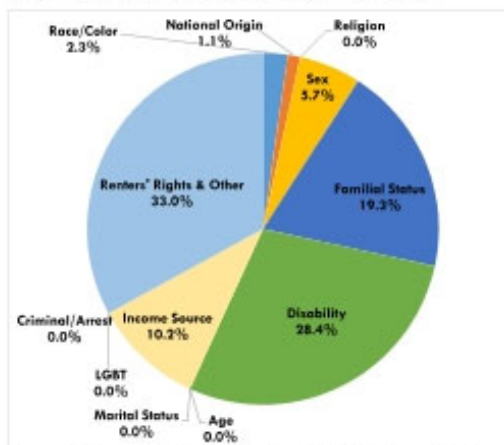
**Table 4-1**  
**Metropolitan Fair Housing Council of Oklahoma, Inc.**  
**Fair Housing Complaints, 2016-2020**  
**City of Lawton, OK**

Category	2016	2017	2018	2019	2020	Total	Total Percent
Race or Color	0	1	1	0	0	2	2.3%
National Origin	1	0	0	0	0	1	1.1%
Religion	0	0	0	0	0	0	0.0%
Sex (Harassment/Gender/LGBT)	0	0	0	5	0	5	5.7%
Familial Status	3	2	4	4	4	17	19.3%
Disability	4	1	3	15	2	25	28.4%
Age and/or Other Issue	0	0	0	0	0	0	0.0%
Marital Status	0	0	0	0	0	0	0.0%
Income Source (Section 8, etc.)	4	0	1	4	0	9	10.2%
LGBT Issue	0	0	0	0	0	0	0.0%
Criminal/Arrest Issue	0	0	0	0	0	0	0.0%
Renters' Rights & Other	4	2	5	6	12	29	33.0%
<b>Total</b>	<b>16</b>	<b>6</b>	<b>14</b>	<b>34</b>	<b>18</b>	<b>88</b>	<b>100.0%</b>

Source: Metropolitan Fair Housing Council of Oklahoma, 2021

There are 82 complaint intakes for the City of Lawton received by MFHC between January 1<sup>st</sup>, 2016, and December 31<sup>st</sup>, 2020. Among the 82 total complaints, six complaints fall under two categories at the same time and thus were counted twice (e.g., Familial Status and Disability), resulting in 88 items by category. The most common issues were about "Renter's Rights, Landlord/Tenant, and Other" issues, accounting for 33.0%. Intakes of Disability issues were the second most common, constituting 28.4%, followed by Familial Status, with 19.3%. There were nine intakes for Income Source issues, and five intakes for Sexual orientation-related (Harassment/Gender/LGBTQ) issues, accounting for 10.2% and 5.7%, respectively. Two intakes were related to Race or Color issues, and one intake was related to National Origin issues, accounting for 2.3% and 1.1%, respectively. (Table 4-1/Figure 4-1).

**Figure 4-1: MFHC Fair Housing Complaints, 2016-2020**



Source: Metropolitan Fair Housing Council of Oklahoma, 2021

Typical renter's rights complaints deal with the legal rights and responsibilities between landlords and tenants and some laws govern those interactions. Complaints regarding disabilities deal with a different set of issues. For people that have a physical or mental disability (including hearing, mobility, and visual impairments, chronic alcoholism, chronic mental illness, AIDS, AIDS Related Complex and mental disabilities) that substantially limits one or more major life activities, landlords may not refuse to let a tenant make reasonable modifications to the dwelling or common use areas, at the tenant's expense so the disabled person can use the housing. Where reasonable, the landlord may permit changes only if the tenant agrees to restore the property to its original condition when their period of

tenancy has ended. Landlords cannot refuse to make reasonable accommodations in rules, policies, practices, or services, if necessary, for the disabled person to use the housing.

Regarding family status-related complaints, unless a building or community qualifies as housing for older persons, it may not discriminate based on familial status. That is, it may not discriminate against families in which one or more children under 18 live with: (1) a parent, (2) a person who has legal custody of the child or children, or (3) the designee of the parent or legal custodian, with the parent or custodian's written permission. Familial status protection also applies to pregnant women and anyone securing legal custody of a child under 18.<sup>1</sup>

**C. U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD)**

The Office of Fair Housing and Equal Opportunity (FHEO) at HUD receives formal complaints regarding alleged violations of the FHA filed by individuals or organizations such as MFHC on behalf of the individuals. Fair housing complaints originating in Lawton were obtained and analyzed for the period starting from 2016 through 2020. A total of two complaints from Lawton were filed with HUD's Fort Worth Region VI Office. Among the 82 Lawton complaint intakes received by MFHC, two were filed to HUD by MFHC in 2020, but these two complaints were pending and not shown in the intake report provided by HUD's Fort Worth Region VI Office. One of the HUD-filed complaints was related to Disability issues, and the other complaint was for Familial Status issues (Table 4-2). The two intakes filed by MFHC were also evenly split between Disability issues (one intake) and Familial Status issues (one intake) by category.

**Table 4-2**  
**HUD Fort Worth Region VI Office**  
**Fair Housing Complaints, 2016-2020**  
**City of Lawton, OK**

Category	2016	2017	2018	2019	2020	Total	Total Percent
Race or Color	0	0	0	0	0	0	0.0%
National Origin	0	0	0	0	0	0	0.0%
Religion	0	0	0	0	0	0	0.0%
Sex (Harassment/Gender/LGBT)	0	0	0	0	0	0	0.0%
Familial Status	0	0	1	0	0	1	50.0%
Disability	1	0	0	0	0	1	50.0%
Age and/or Other Issue	0	0	0	0	0	0	0.0%
Marital Status	0	0	0	0	0	0	0.0%
Income Source (Section 8, etc.)	0	0	0	0	0	0	0.0%
LGBT Issue	0	0	0	0	0	0	0.0%
Criminal/Arrest Issue	0	0	0	0	0	0	0.0%
Renters' Rights & Other	0	0	0	0	0	0	0.0%
<b>Total</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>100.0%</b>

Sources: HUD Fort Worth Region VI Office, 2021

<sup>1</sup> LegalAidOK website: <https://oklaw.org/resource/fair-housing-its-your-right-1>

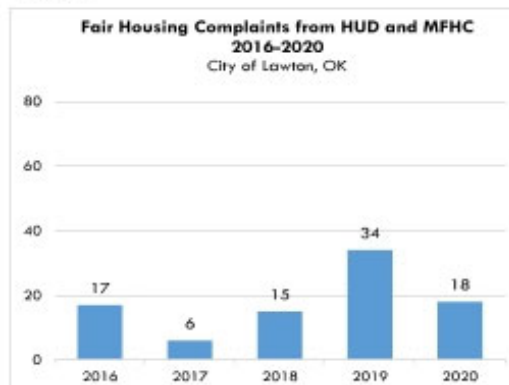
**D. OFFICE OF THE STATE ATTORNEY GENERAL**

The Office of Civil Rights Enforcement (OCRE) is a division of the Attorney General's Office of Oklahoma and is responsible for enforcing the Anti-Discrimination Act, which prohibits discrimination in employment, housing, and public accommodation, as well as enforcing other civil rights-related laws. The OCRE took over investigating fair housing complaints from the Oklahoma Human Rights Commission in July 2012. The Attorney General's Office did not respond to RKG's request for housing discrimination complaint records in June 2021, although this is likely due to the absence of complaints filed with OCRE.

**E. SUMMARY OF FAIR HOUSING COMPLAINTS**

An analysis of the combined complaint records from both HUD and MFHC indicates an increase in fair housing discrimination complaints generated in Lawton between 2018 and 2019 after a drop in 2017, but complaint records declined again in 2020 (Figure 4-2). "Renter's Rights, Landlord/Tenant and Other" was the most common complaint-type, accounting for 32.2% of all intakes and filing categories received by both HUD and MFHC. Disability was the second most common basis for complaints, accounting for 28.9%, followed by Familial Status, representing 20.0% of all categories (Table 4-3).

Figure 4-2



Source: Metropolitan Fair Housing Council of Oklahoma and HUD Fort Worth Region VI Office, 2021

Table 4-3

**Total Fair Housing Complaints, 2016-2020**  
**City of Lawton, OK**

Category	2015	2016	2017	2018	2019	Total	Total Percent
Race or Color	0	1	1	0	0	2	2.2%
National Origin	1	0	0	0	0	1	1.1%
Religion	0	0	0	0	0	0	0.0%
Sex (Harassment/Gender/LGBT)	0	0	0	5	0	5	5.6%
Familial Status	3	2	5	4	4	18	20.0%
Disability	5	1	3	15	2	26	28.9%
Age and/or Other Issue	0	0	0	0	0	0	0.0%
Marital Status	0	0	0	0	0	0	0.0%
Income Source (Section 8, etc.)	4	0	1	4	0	9	10.0%
LGBT Issue	0	0	0	0	0	0	0.0%
Criminal/Arrest Issue	0	0	0	0	0	0	0.0%
Renters' Rights & Other	4	2	5	6	12	29	32.2%
<b>Total</b>	<b>17</b>	<b>6</b>	<b>15</b>	<b>34</b>	<b>18</b>	<b>90</b>	<b>100.0%</b>

Source: Metropolitan Fair Housing Council of Oklahoma and HUD Fort Worth Region VI Office, 2021



## 5 REVIEW OF PUBLIC SECTOR POLICIES

### A. INTRODUCTION

Public policies set the direction for a city's socioeconomic trends and development prospects and priorities. They influence numerous facets of residents' life and establish principles to distribute resources. Policies, practices, or procedures that appear neutral when taken at face value, may actually deny or adversely affect the provision of housing to persons of a particular race, color, religion, sex, disability, familial status, or national origin and create impediments to fair housing choice.

An element of the Analysis of Impediments to Fair Housing Choice includes an examination of a city's policies in terms of their impact on housing choice. This section evaluates the current City policies to determine opportunities for accelerating the expansion of fair housing choice.

### B. POLICIES GOVERNING INVESTMENT OF FUNDS FOR HOUSING AND COMMUNITY DEVELOPMENT

An examination of the City's current budget is essential for understanding how the financial resources in support of fair housing choice have increased or declined over the past few years. The City of Lawton receives federal entitlement funds directly and indirectly from HUD in the form of:

- **Community Development Block Grants (CDBG):** The primary objective of this program is to develop viable urban communities by providing decent housing, a suitable living environment, and economic opportunities, principally for persons of low- and moderate-income levels. Funds can be used for a wide array of activities, including housing rehabilitation, homeownership assistance, lead-based paint remediation, construction or rehabilitation of public facilities and infrastructure, removal of architectural barriers, public services, rehabilitation of commercial or industrial buildings, and loans or grants to businesses.
- **HOME Investment Partnerships Program:** The HOME program provides federal funds for the development and rehabilitation of affordable rental and ownership housing for low- and moderate-income households. HOME funds can be used for activities that promote affordable rental housing and homeownership by low- and moderate-income households, including reconstruction, moderate or substantial rehabilitation, homebuyer assistance, and tenant-based rental assistance.

#### Project Funding Criteria

Funding allocations follow the principle of meeting high priority needs across Lawton for projects primarily benefiting low- and moderate-income residents. The assignment of funding priorities is based on meeting the statutory requirements of the CDBG and HOME programs, input from members of housing and community services, public meetings, and public hearings. Every five years, the City of Lawton Division of Housing and Community Development is required to prepare a 5-year Consolidated Plan as a federal funding grantee, which provides guidelines for annual allocations of received funds. For each

year included in the Consolidated Plan, the City is also required to prepare an Annual Action Plan, showing how annual entitlement funds will be distributed to meet the overall 5-year goals.

#### 1. Distribution of Funds

- **Community Development Block Grant (CDBG):** Table 5-1/Map 5-1 displays how the City utilized the CDBG funds by program type and location of the projects, and the allocated amounts over the last five Fiscal Years.

The CDBG Program requires that most activities benefit low- to moderate-income persons, which are defined by HUD as persons with household incomes below 80% of the area median income. Most of the designated projects will directly serve Lawton residents who qualified based on their income or other criteria (Housing Programs and Public Service funding). The other infrastructure or neighborhood projects are area benefit activities, or projects located in parts of the City where over half the residents have low or moderate incomes. Projects in other areas of the City are eligible for CDBG funding if they individually benefit low- or moderate-income individuals or persons who meet other HUD criteria including those of a presumed benefit. The City's CDBG funding allocations have increased between FY2016 and FY2020 by 13.4%. It peaked in FY2018 at \$1,187,254, before dropping 39.5% in FY2019 to \$718,294 and slightly increasing by 1.6% to \$729,787 in FY2020.

The City's CDBG allocations stayed consistent between FY2016 and FY2017, with housing related funding accounting for 42%. Allocations for housing projects reduced slightly by 0.3% between FY2016 and FY2020, and its share of the total allocation decreased from 42% in FY 2016 and FY2017 to 37% in FY2020. In particular, the Housing Rehabilitation (HAD Delivery Costs) Project funding declined by 30%, the Emergency Repair (ER) Project funding dropped by 21% while the funding for the Exterior Housing Improvement (EHIP) Program jumped by 233% between FY2016 and FY2020. In addition, funding for the LETA Paint the City Project was discontinued in FY2020.

CDBG funding for public service organizations generally remained consistent at 15% out of the total annual allocation. Among the seven public service organizations funded through CDBG, five provide services related to housing or homelessness issues, and the allocations for these five organizations constituted 9% of the total annual allocation in FY2020. CDBG funding for public service organizations rose by 11% between FY2016 and FY2020, with the largest allocation growth occurring for Homeless Shelter Project (C. Carter Crane Homeless Shelter) (27%), followed by Delinquency Prevention (Teen Court) (26%). Allocation for Lawton Support Services (LSS) Project reduced by 4% during these five fiscal years.

In FY2018, the City of Lawton started to allocate 7% of its CDBG funding to code enforcement that addresses the quality of affordable owner housing, and the percentage increased to 11% in FY2020. In FY2018, the City also allocated 9% and 30% of its CDBG funding to public facility improvement and public infrastructure projects, respectively.

According to the City's FY2020 Annual Action Plan (AAP), the COVID-19 pandemic has impacted the City allocation and spending of funds. Therefore, the City still has some funds remaining from previous years and has allocated remaining funds to several projects that it hopes to start in the near future. At this time, there are not enough projects identified to allocate all funds available, and the City continues outreach and research to find qualifying projects.

**Table S-1**  
**Uses of HUD Community Development Block Grant Funds 2016-2020**  
**City of Lawton, Oklahoma**

FFY 2016 Activities	Amount	FFY 2019 Activities	Amount
<b>Administration</b>	<b>\$128,714</b>	<b>Administration</b>	<b>\$141,928</b>
<b>Housing</b>	<b>\$268,802</b>	<b>Housing</b>	<b>\$232,545</b>
CDBG Housing Rehabilitation (HAD Delivery Costs) Project	\$153,217	CDBG Housing Rehabilitation (HAD Delivery Costs) Project	\$100,534
CDBG Emergency Repair (ER) Project	\$75,585	CDBG Emergency Repair (ER) Project	\$62,011
CDBG Exterior Housing Improvement (EHI) Project	\$30,000	CDBG Exterior Housing Improvement (EHI) Project	\$60,000
LETA Paint the City Project	\$10,000	LETA Paint the City Project	\$10,000
<b>Public Services</b>	<b>\$96,535</b>	<b>Public Services</b>	<b>\$105,147</b>
Counseling Assistance (Christian Family Counseling) Project	\$19,307	Counseling Assistance (Christian Family Counseling) Project	\$19,227
Delinquency Prevention (Teen Court) Project	\$14,894	Delinquency Prevention (Teen Court) Project	\$21,330
Domestic Violence Shelter (New Directions) Project	\$14,480	Domestic Violence Shelter (New Directions) Project	\$17,124
Homeless Shelter (C. Carter Crane Homeless Shelter) Project	\$12,067	Homeless Shelter (C. Carter Crane Homeless Shelter) Project	\$15,021
Drug & Alcohol Case Management (Roadback, Inc.) Project	\$13,274	Drug & Alcohol Case Management (Roadback, Inc.) Project	\$12,918
Homeless Shelter (Family Promise of Lawton, Inc.) Project	\$10,860	Homeless Shelter (Family Promise of Lawton, Inc.) Project	\$10,815
Lawton Support Services (LSS) Project	\$9,653	Lawton Support Services (LSS) Project	\$8,712
<b>Other – Section 108 Loan Repayment Project</b>	<b>\$149,517</b>	<b>Code Enforcement</b>	<b>\$83,540</b>
<b>TOTAL FFY 2016</b>	<b>\$643,568</b>	<b>Other – Section 108 Loan Repayment Project</b>	<b>\$155,134</b>
<b>FFY 2017 Activities</b>	<b>Amount</b>	<b>FFY 2019 Activities</b>	<b>Amount</b>
<b>Administration</b>	<b>\$128,714</b>	<b>Administration</b>	<b>\$142,496</b>
<b>Housing</b>	<b>\$268,802</b>	<b>Housing</b>	<b>\$267,883</b>
CDBG Housing Rehabilitation (HAD Delivery Costs) Project	\$153,217	CDBG Housing Rehabilitation (HAD Delivery Costs) Project	\$107,864
CDBG Emergency Repair (ER) Project	\$75,585	CDBG Emergency Repair (ER) Project	\$60,000
CDBG Exterior Housing Improvement (EHI) Project	\$30,000	CDBG Exterior Housing Improvement (EHI) Project	\$100,019
LETA Paint the City Project	\$10,000	<b>Public Services</b>	<b>\$106,672</b>
<b>Public Services</b>	<b>\$96,535</b>	Counseling Assistance (Christian Family Counseling) Project	\$19,283
Counseling Assistance (Christian Family Counseling) Project	\$19,307	Delinquency Prevention (Teen Court) Project	\$21,264
Delinquency Prevention (Teen Court) Project	\$14,894	Domestic Violence Shelter (New Directions) Project	\$17,276
Domestic Violence Shelter (New Directions) Project	\$14,480	Homeless Shelter (C. Carter Crane Homeless Shelter) Project	\$15,270
Homeless Shelter (C. Carter Crane Homeless Shelter) Project	\$12,067	Drug & Alcohol Case Management (Roadback, Inc.) Project	\$13,264
Drug & Alcohol Case Management (Roadback, Inc.) Project	\$13,274	Homeless Shelter (Family Promise of Lawton, Inc.) Project	\$11,258
Homeless Shelter (Family Promise of Lawton, Inc.) Project	\$10,860	Lawton Support Services (LSS) Project	\$9,273
Lawton Support Services (LSS) Project	\$9,653	<b>Code Enforcement</b>	<b>\$79,400</b>
<b>Other – Section 108 Loan Repayment Project</b>	<b>\$149,517</b>	<b>Other – Section 108 Loan Repayment Project</b>	<b>\$133,136</b>
<b>TOTAL FFY 2017</b>	<b>\$643,568</b>	<b>TOTAL FFY 2020</b>	<b>\$729,787</b>
<b>FFY 2018 Activities</b>	<b>Amount</b>	Source: City of Lawton, OK, 2021	
<b>Administration</b>	<b>\$141,928</b>		
<b>Housing</b>	<b>\$237,403</b>		
CDBG Housing Rehabilitation (HAD Delivery Costs) Project	\$121,818		
CDBG Emergency Repair (ER) Project	\$75,585		
CDBG Exterior Housing Improvement (EHI) Project	\$30,000		
LETA Paint the City Project	\$10,000		
<b>Public Services</b>	<b>\$105,147</b>		
Counseling Assistance (Christian Family Counseling) Project	\$19,227		
Delinquency Prevention (Teen Court) Project	\$21,330		
Domestic Violence Shelter (New Directions) Project	\$17,124		
Homeless Shelter (C. Carter Crane Homeless Shelter) Project	\$15,021		
Drug & Alcohol Case Management (Roadback, Inc.) Project	\$12,918		
Homeless Shelter (Family Promise of Lawton, Inc.) Project	\$10,815		
Lawton Support Services (LSS) Project	\$8,712		
<b>Code Enforcement</b>	<b>\$84,299</b>		
<b>Public Facility</b>	<b>\$110,000</b>		
<b>Public Infrastructure</b>	<b>\$358,960</b>		
<b>Other – Section 108 Loan Repayment Project</b>	<b>\$149,517</b>		
<b>TOTAL FFY 2018</b>	<b>\$1,187,234</b>		

It is recommended that the City consider allocating available and remaining funds to Lawton Support Services (LSS) Project and Drug & Alcohol Case Management Project (Roadback, Inc.), as they have seen a decrease or no change in CDBG funds since FY2016. The City should also consider allocating some remaining CDBG funding to Housing Rehabilitation projects (HAD Delivery Costs) and Emergency Repair (ER), as they have seen reducing allocations since FY2016.

- HOME Investment Partnerships Fund (HOME):** The HOME Investment Partnerships Program (HOME) is the largest Federal block grant designed exclusively to create affordable housing for low-income households. The HOME program requires that participating state or local governments match every dollar in program funds with 25 cents from nonfederal sources, which may include donated materials or labor, the value of donated properties, proceeds from bond financing, and other resources. At least 15% of the allocations must be reserved to fund housing to be owned, developed, or sponsored by experienced, community-driven nonprofit groups designated as Community Housing Development Organizations (CHDOs). Participating jurisdictions must also ensure that HOME-funded housing units remain affordable in the long term (20 years for new construction of rental housing; 5-15 years for construction of homeownership housing and housing rehabilitation). For rental housing and rental assistance, at least 90% of benefiting families must have incomes that are no more than 60% of the HUD-adjusted area median family income. In rental projects with five or more assisted units, at least 20% of the units must be occupied by families with incomes at or below 50% of the HUD-adjusted median. The households receiving HUD assistance must be low- or moderate-income, which is below 80% of the area median.

**Table 5-2**

**Uses of HUD HOME Investment Partnerships Funds 2016-2020**  
City of Lawton, Oklahoma

FFY 2016 Activities	Amount
<b>Administration</b>	\$29,443
<b>Housing</b>	\$223,292
HOME Homeowner Rehabilitation Project	\$208,292
HOME First-Time Homebuyer (FTHB) Project	\$15,000
<b>Community Housing Development Organization (CHDO)</b>	\$41,690
CHDO Set-Aside Project (min of 15% of entitlement)	\$41,690
<b>TOTAL FFY 2016</b>	<b>\$294,425</b>
<b>FFY 2017 Activities</b>	<b>Amount</b>
<b>Administration</b>	\$29,443
<b>Housing</b>	\$223,292
HOME Homeowner Rehabilitation Project	\$208,292
HOME First-Time Homebuyer (FTHB) Project	\$15,000
<b>Community Housing Development Organization (CHDO)</b>	\$41,690
CHDO Set-Aside Project (min of 15% of entitlement)	\$41,690
<b>TOTAL FFY 2017</b>	<b>\$294,425</b>
<b>FFY 2018 Activities</b>	<b>Amount</b>
<b>Administration</b>	\$39,844
<b>Housing</b>	\$1,201,430
HOME Homeowner Rehabilitation Project	\$466,430
HOME First-Time Homebuyer (FTHB) Project	\$15,000
Reconstruction	\$520,000
LHA Tenant Based Rental Assistance (TBRA)	\$200,000
<b>Community Housing Development Organization (CHDO)</b>	\$317,354
CHDO Set-Aside Project (min of 15% of entitlement)	\$317,354
<b>TOTAL FFY 2018</b>	<b>\$1,558,648</b>
<b>FFY 2019 Activities</b>	<b>Amount</b>
<b>Administration</b>	\$35,424
<b>Housing</b>	\$306,066
HOME Homeowner Rehabilitation Project	\$291,066
HOME First-Time Homebuyer (FTHB) Project	\$15,000
<b>Community Housing Development Organization (CHDO)</b>	\$57,354
CHDO Set-Aside Project (min of 15% of entitlement)	\$57,354
<b>TOTAL FFY 2019</b>	<b>\$398,844</b>
<b>FFY 2020 Activities</b>	<b>Amount</b>
<b>Administration</b>	\$46,398
<b>Housing</b>	\$290,063
HOME Homeowner Rehabilitation Project	\$275,063
HOME First-Time Homebuyer (FTHB) Project	\$15,000
<b>Community Housing Development Organization (CHDO)</b>	\$56,478
CHDO Set-Aside Project (min of 15% of entitlement)	\$56,478
<b>TOTAL FFY 2020</b>	<b>\$392,939</b>

Source: City of Lawton, OK, 2021

Table 5-2 shows the City's allocations since FY2016. Compared to the FY2016 budget, Lawton's FY2020 HOME allocation increased by 33.5%, despite fluctuations during the interim years. This is a positive trend, as the City's allocations for Homeowner Rehabilitation Project and

Community Housing Development Organization (CHDO) 15% Set-Aside Project also rose by 32% and 35%, respectively compared to the FY2016 allocation. However, the allocation to First-Time Homebuyer Project has remained unchanged at \$15,000 since FY2016.

Like the CDBG funding, HOME allocations to Lawton peaked in FY2018, with a new \$520,000 allocation for the reconstruction housing projects and a \$200,000 funding for Lawton Housing Authority Tenant Based Rental Assistance (TBRA). However, funding for these two projects was not included in the FY2019 and FY2020 allocations.

The City may also assist developers by providing HOME funds to document community support for Low Income Housing Tax Credit (LIHTC) applications to the Oklahoma Housing Finance Agency (OHFA) when reasonable to do so. OHFA provides bonus points for applications that receive a minimum level of funding granted to the project from the local community.

The City's Community Housing Development Organization (CHDO) set-aside includes the 15% CHDO statutory minimum and a pool of HOME funds for new home construction and rehabilitation/sale activities. CHDOs are encouraged to utilize private bank financing along with the CHDO loan pool of HOME funds in providing affordable housing. Proposals for new projects are accepted when the CHDO has completed all previously funded projects.

The City facilitates the transfer at no cost, of City owned vacant lots to nonprofit organizations for the construction of affordable housing. The primary recipients could include CHDOs, such as Great Plains Improvement Foundation (GPIF) and Habitat for Humanity. The new home construction is typically funded with private financing and other resources. The Lawton Urban Renewal Authority (LURA) still owns residential property in the south and southeast areas of the city and has a goal to develop some of their sites with mixed-income housing projects. These lots are available to the City of Lawton or CHDO for development of low-income rental housing.

As the City recognized in its FY2020 Annual Action Plan that it still needs to find new projects to utilize remaining funds, it is recommended that the City consider increasing HOME allocation to the First-Time Homebuyer Project since according to FY2020 Annual Action Plan, only one household was assisted with the \$15,000 allocation. The City should also increase the HOME allocation to the Lawton Housing Authority Tenant Based Rental Assistance (TBRA) project. The City should also identify additional CHDOs in the region such as Neighborhood Housing Services, to work with the Lawton Urban Renewal Authority. This partnership would develop LURA-owned land for affordable housing and consider allowing new project applications even when previously funded projects are still under way to accelerate the efficient development of LURA-owned land. Lawton could also consider reaching out to and encouraging developers to partner with CHDOs to apply for the Low-Income Housing Tax Credit (LIHTC) projects in Lawton and allocating some available HOME funds to support the LIHTC applications.

The FY2020 AAP mentions that finding qualified contractors to perform housing rehabilitation and construction projects has been a struggle for the City over the past few years, as many small companies do not have the financial means to construct a project and wait for phased reimbursement and larger companies are busy with other projects that have higher profit margins. The City can consider partnering with regional CHDOs which usually have a working relationship with contractors. The City could also consider expanding the partnership with community-based/faith-based organizations, larger construction companies.

- **Emergency Shelter Grant (ESG):** The ESG program provides federal funds to provide homeless persons with basic shelter and essential supportive services. The funds can also be used for short-term homeless prevention assistance to low- and moderate-income (LMI) households.

The City of Lawton does not receive ESG entitlement funding but there are several community organizations that serve Lawton and receive ESG funding from the Oklahoma Department of Commerce. Since 2015, there have been four Lawton-based organizations that received ESG funding, including Great Plains Improvement Foundation/C. Carter Crane Homeless Shelter, Marie Detty Youth and Family Services, Lawton Support Services, Inc., and Southwest Community Action Agency. Great Plains Improvement Foundation/C. Carter Crane Homeless Shelter and Marie Detty Youth and Family Services received funding every year between 2015 and 2020. The ESG funding for Great Plains Improvement Foundation/C. Carter Crane Homeless Shelter increased by 77% and that for Marie Detty Youth and Family Services decreased by 10%, respectively in 2020 compared to 2015. Lawton Support Services, Inc. received ESG funding in 2016 and 2019, and Southwest Community Action Agency was funded in 2020. In general, the ESG funding for all the organization that serve Lawton in 2020 jumped by 79% to \$269,064 from \$150,650 in 2015, which is a positive trend.

- **Continuum of Care (CoC):** The Continuum of Care Program is designed to promote communitywide commitment to the goal of ending homelessness; provide funding for efforts by nonprofit providers, and State and local governments to: (1) quickly rehouse homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness; (2) promote access to and improve the utilization of mainstream programs by homeless individuals and families; and (3) optimize self-sufficiency among individuals and families experiencing homelessness.

The City of Lawton does not receive CoC entitlement funding, but the Lawton Housing Authority receives CoC funding for the Homeless Management Information System (HMIS) and its related administration activities. The funding received by LHA was \$55,076 in 2017, and it increased by 15% to \$63,212 in 2018, and has stayed consistent through 2020.

- **Lawton Housing Authority:** The HUD Funding for the Lawton Housing Authority (LHA) from June 30, 2020 to June 30, 2021 was \$61,460 in capital fund and \$1,151,933 in operating subsidies totally \$1,213,393. This is used to assist the continuation of support to the management and maintenance of public housing units. This has decreased by 6.4% from \$1,140,367 in the fiscal year ending June 30<sup>th</sup>, 2016. In addition to the capital fund and operating subsidy for public housing projects, LHA also received around \$3 million funding in the latest fiscal year exclusively for Section 8 voucher administration. According to LHA staff, the Lawton Housing Authority has been receiving around 75% of its eligible HUD funding based on a prorated rate which fluctuates year over year and is determined by federal policymakers. However, in the past few years, there has been an effort to push the prorated rate closer to 100% of the eligible funding for LHA, which is a positive development.

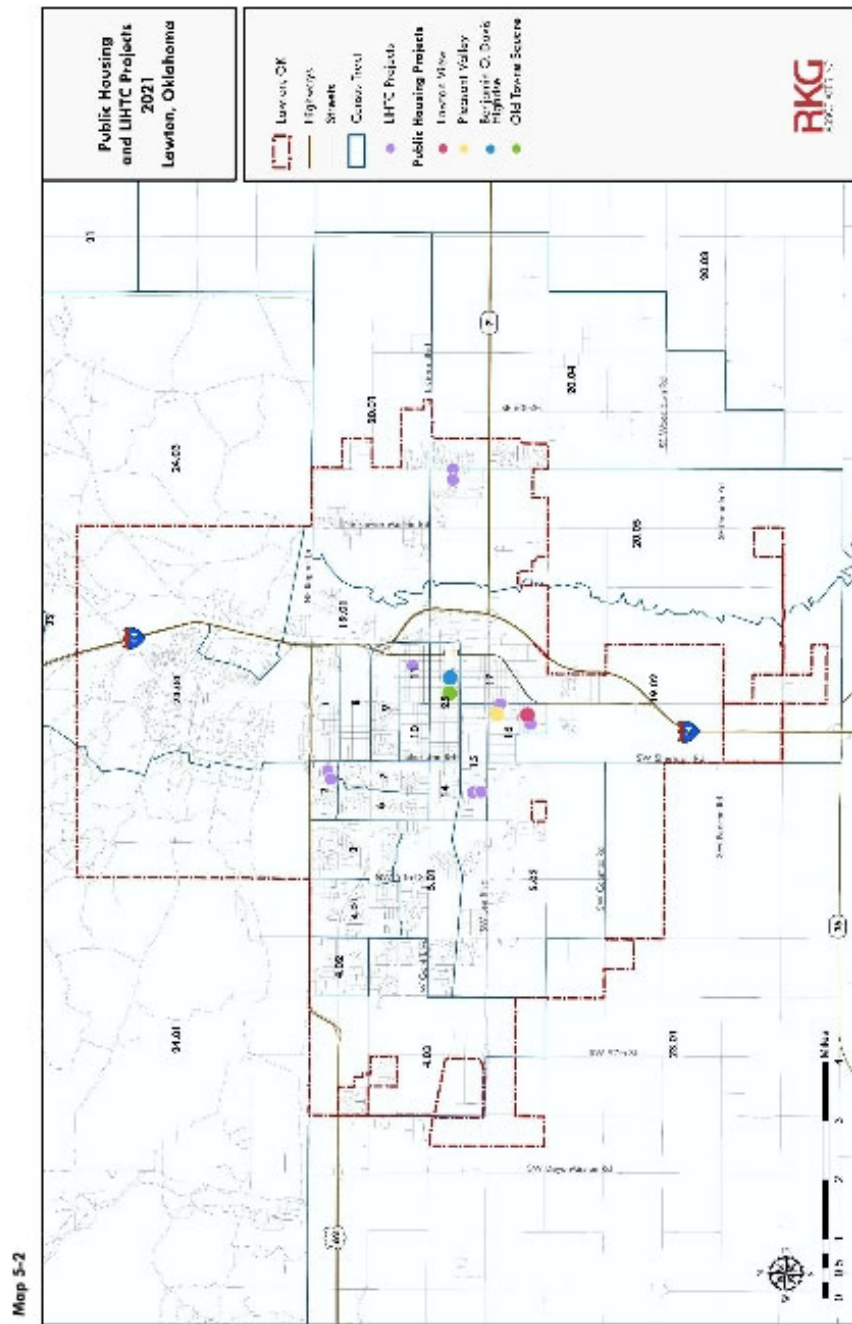
### C. PUBLIC HOUSING AND SECTION 8 VOUCHER PROGRAMS

The Lawton Housing Authority (LHA) is responsible for the administration of public housing projects and some of the Section 8 Housing Choice Vouchers. Table 5-3 shows the publicly assisted housing projects in Lawton by category. Maps 5-2 and 5-3 identify the locations of the publicly assisted housing projects and the Section 8 voucher households in Lawton, respectively. Some of the dots signifying Section 8 households represent multiple units in a single location.

**Table 5-3**  
**Publicly Assisted Housing Projects**  
**City of Lawton, Oklahoma**

	Population Served	TOTAL
<b>Section 8 Voucher</b>		
	Family/Veteran	118
<b>Public Housing</b>		
Lawton View	Single Family	149
Benjamin O. Davis Highrise	Elderly/Disabled	100
Pleasant Valley	Elderly/Disabled	50
Old Towne Square	(Section 202) Elderly	35
<b>Low Income Housing Tax Credit Projects</b>		
Cambridge Estates	Elderly/Disabled	60
Deer Park Apartments (aka Apple Run/Deer Park)	Family	152
Garden Grove Apts. (aka Savannah House of Lawton)	Elderly	60
Garrett's Landing	Family	92
Goodwill Village	Elderly/Disabled	36
Lawton Pointe	Family	72
Sanders Heights Apts.	Family	44
Stratford Square	Family	62
Villanova (aka Columbia Square Apts.)	Family	64
<b>TOTAL</b>		<b>1,094</b>

Source: City of Lawton and RKG Associates, Inc., 2021







Currently, there are 105 applicants on the waiting list for Lawton's public housing in total. Most of the applicants (73%) are on the waiting list for Lawton View, which is a single-family home community catering to family households. Most of these applicants need one-bedroom units, accounting for 44.2%, followed by two-bedroom and three-bedroom units.

Applicants who are on the waiting list for the remaining three public housing projects that serve seniors and and/or disabled persons mostly need smaller units like studios, as these applicants most likely live on their own or with a spouse. In total, one-bedroom units are the most needed unit type (35.2%), followed by studios (24.7%) and two-bedroom units (17.1%). The current estimated occupancy rate is 90%, and the estimated turnover is around 100 for the public housing units (Table 5-4).

An estimated 55 applicants/ households are currently on the waiting list for the Section 8 Voucher program, with five of them (9.1%) being families with elderly persons, and only one household is a family with disabled persons (Table 5-5).

One-bedroom units are the most sought-after unit type, with half (50.9%) of the applicants on the waiting list applying for one-bedroom units, followed by three-bedroom units accounting for 25.5%, and two-bedroom units at 20.0%. Only one applicant on the waiting list applied for a four-bedroom unit, only one application was for a large unit with five bedrooms, and there is no application for studio units.

**Table 5-4  
Current Applicants for Public Housing Waiting List, 2021  
City of Lawton, Oklahoma**

	Number	Percent
<b>Lawton View (Single Family)</b>		
<b>Total</b>	<b>77</b>	<b>100.00%</b>
0 Bedroom	1	1.30%
1 Bedroom	34	44.16%
2 Bedroom	18	23.38%
3 Bedroom	13	16.88%
4 Bedroom	11	14.29%
5 Bedroom	0	0.00%
<b>Benjamin O. Davis Highrise (Elderly/Disabled)</b>		
<b>Total</b>	<b>11</b>	<b>100.00%</b>
0 Bedroom	11	100.00%
1 Bedroom	0	0.00%
2 Bedroom	0	0.00%
3 Bedroom	0	0.00%
4 Bedroom	0	0.00%
5 Bedroom	0	0.00%
<b>Pleasant Valley (Elderly/Disabled)</b>		
<b>Total</b>	<b>13</b>	<b>100.00%</b>
0 Bedroom	10	76.92%
1 Bedroom	3	23.08%
2 Bedroom	0	0.00%
3 Bedroom	0	0.00%
4 Bedroom	0	0.00%
5 Bedroom	0	0.00%
<b>Old Towne Square (Section 202 Elderly Only)</b>		
<b>Total</b>	<b>4</b>	<b>100.00%</b>
0 Bedroom	4	100.00%
1 Bedroom	0	0.00%
2 Bedroom	0	0.00%
3 Bedroom	0	0.00%
4 Bedroom	0	0.00%
5 Bedroom	0	0.00%
<b>TOTAL</b>		
<b>Total</b>	<b>105</b>	<b>100.00%</b>
0 Bedroom	26	24.76%
1 Bedroom	37	35.24%
2 Bedroom	18	17.14%
3 Bedroom	13	12.38%
4 Bedroom	11	10.48%
5 Bedroom	0	0.00%

Source: Lawton Housing Authority and RKG Associates, Inc., 2021

**Table 5-5**  
**Current Applicants on Section 8 Voucher Program Waiting List, 2021**  
**City of Lawton, Oklahoma**

	Current Applicants (Households)	
	Number	Percent
<b>Total</b>	<b>55</b>	<b>100.00%</b>
<b>Family Type</b>		
Families with Elderly	5	9.09%
Families with Disabilities	1	1.82%
<b>Bedroom Size</b>		
0 Bedroom	0	0.00%
1 Bedroom	28	50.91%
2 Bedroom	11	20.00%
3 Bedroom	14	25.45%
4 Bedroom	1	1.82%
5 Bedroom	1	1.82%

Source: Lawton Housing Authority and RKG Associates, Inc., 2021

#### PRIVATE HOUSING PROGRAMS

The City of Lawton supports a range of services and programs that meet the needs of low- and moderate-income households, including those with special needs. The following programs focus on private sector housing:

- **Owner-Occupied Housing Rehabilitation Program:** The City provides HOME funds for the rehabilitation of owner-occupied housing units to improve the quality of housing. Geographic areas include Lawton View, Neighborhood Revitalization Strategy Area, Downtown 01 Zone One, Downtown 03 Lawton View.
- **Owner Occupied Exterior Maintenance Program:** The City provides CDBG funds for addressing exterior repair needs of owner-occupied housing units citywide. Geographic areas include Lawton View, Neighborhood Revitalization Strategy Area, Downtown 01 Zone One, Downtown 03 Lawton View.
- **Owner Occupied Emergency Repair Program:** This program allows owner-occupied properties located in Lawton View, Neighborhood Revitalization Strategy Area, Downtown 01 Zone One, and Downtown 03 Lawton View to utilize CDBG funds for urgent repair needs.
- **First-Time Homebuyer Program:** The City provides HOME funds for down payment and closing costs assistance to owner-occupied home buyers. The annual allocation of \$15,000 can usually assist one household.

#### D. LAND USE AND COMPREHENSIVE PLANNING

Lawton completed its 2030 Land Use Plan in 2008. The plan reviewed and evaluated Lawton's existing conditions and future outlooks in terms of community characteristics (population, employment, planning elements, federal lands), housing availability, affordability and quality, infrastructure (water supply, sewerage, solid waste collection and disposal, transportation, open space, and recreation), physical resources, opportunities and constraints, areas of special treatment, and land use supply and demand. The plan was developed over a two-year period with the assistance of a Land Use Steering Committee. The Committee consisted of members of the City Planning Commission and City Council, as well as

representatives from Lawton Chamber of Commerce and Industry, Fort Sill, Cameron University, and Lawton Public Schools. Two community meetings were held in 2005 and 2008 to gather public inputs, and two public hearings were held in 2008 for the formation of the plan. The plan established the following goals for land development in Lawton:

- Support the provision and preservation of safe, sanitary, decent, and affordable housing for all the citizens of the Lawton community.
- Support land uses which are in concert with the policies of the 2030 Long Range Transportation Plan including of the use of alternative modes of transportation such as public transit and a bicycle and pedestrian network.
- Protect established residential neighborhoods from commercial encroachments.
- Establish and support land uses which have adequate infrastructure to sustain their activities.
- Support economic development for both existing and new business enterprises and create new job opportunities.

The plan also identified areas of special treatment where there are specific characteristics that can be identified such as large tracts of land held under one ownership, historic properties/districts, flood plain, and areas impacted by intrusion of industrial/commercial development. Development of special treatment areas should be based on sub-plans or mini plans. The following special treatment areas are specifically related to housing in Lawton:

- Old Town North: further commercial/professional office land use encroachments shall be prevented in this residential neighborhood.
- Vernon-Legion Subdivisions: this residential area has stabilized, and future land use decisions should promote the continued stability and in accordance with the D-6 Urban Renewal Plan.

## E. ZONING

Lawton currently has five residential zoning districts: R-E Residential Estates District, R-1 Single-Family Dwelling District, R-2 Two-Family Dwelling District, R-3 Multiple-Family Dwelling District, and R-4 High Density Apartment District. There is also a Planned Unit Development (PUD) overlay zoning district that encourages the development of unified design for housing, commercial, industrial, and institutional uses in a combination of densities and varieties of functions. There is also a Simple Planned Unit Development (SPUD) overlay zoning district that provides an alternate approach to the conventional land use controls and to a Planned Unit Development (PUD) to maximize the unique physical features of a particular site.

- Residential Estates District: This district is intended for those subdivisions that are to be developed using large lots with lower residential density than permitted in other residential districts. It is intended for the subdivision situated on the fringe of the urban area, which will be undergoing urbanization in the near future or in locations where the lower density will provide a "buffer" for the U.S. Army Installation of Fort Sill. Only detached single-family dwellings and accessory buildings is allowed for residential uses. The minimum lot area is one acre.
- Single-Family Dwelling District: The R-1 district is the most restrictive residential district allowing single-family dwellings and lot density townhouse development and related recreational, religious, and educational facilities normally required to provide the basic elements of a balanced and attractive residential area. Internal stability, attractiveness, order, and efficiency are encouraged. For dwelling sites other than townhouses, served by a sanitary sewer approved by the Oklahoma Department of Environmental Quality, the minimum lot area is 6,000 square feet for each dwelling and accessory buildings. Townhouse intensity should not exceed six units per acre.

- **Two Family Dwelling District:** The R-2 district is intended to provide for a slightly higher population density but with basic restrictions like the R-1 district. The principal use is for single-family dwellings, townhouses and two-family dwellings and related recreational, religious, and educational facilities. For dwelling sites other than townhouses, served by a sanitary sewer approved by the Oklahoma Department of Environmental Quality, the minimum lot size is 6,000 square feet for each dwelling and accessory buildings. For each two-family dwelling and accessory buildings served by a sanitary sewer approved by the Oklahoma Department of Environmental Quality, the minimum lot size is 7,000 square feet. Townhouse intensity should not exceed eight units per acre.
- **Multiple-Family Dwelling District:** This district is intended to provide for medium and high population density. The principal use of land can range from single-family uses and townhouses to multi-family and garden apartment uses. For dwelling sites other than townhouses, served by a sanitary sewer approved by the Oklahoma Department of Environmental Quality, the minimum lot size is 6,000 square feet for a single-family dwelling, 7,000 square feet for a two-family dwelling, and 9,000 square feet plus an additional area of not less than 2,000 square feet for each family, with more than three occupying the dwelling for a multi-family dwelling. Townhouse intensity should not exceed 10 units per acre.
- **High Density Apartment District:** The R-4 district is intended for high population density with multi-family dwellings, including two-family dwellings, apartments, townhouses, and some single-family dwellings which are centrally located and are appropriate for multi-family and high-density apartment development. It also allows certain uses which are functionally compatible with high population density development, such as recreational, religious, and educational facilities. The minimum lot size per unit ranges from 6,000 square feet for a single unit dwelling to 1,000 square feet per unit for a dwelling with 23 or more units. Townhouse intensity should not exceed 11 units per acre.

To achieve affordable housing on a scale that is commensurate with the need, development densities are often required. Densities of 24 units per acre are typical apartment densities and should be permitted throughout the City in appropriate locations. A review of the City's zoning map confirms that while there are several R-4 zones in the center of the City, there are fewer higher density residential zones outside the center. Multi-family zoning districts are appropriate near highway interchanges with close access to employment centers and near shopping and services. The City should consider other locations to expand its higher density residential zoning through the community.

- **Planned Unit Development Overlay District:** The PUD overlay zoning district is a development of unified design for housing, commercial, industrial, and institutional uses in a combination of densities and varieties of functions. It is generally intended that a single developer be responsible for improvements and construction. All types of detached single-family residential dwellings, duplexes, low- and high-rise multiple-family housing and townhouses are allowed in the PUD district. For cluster developments, the number of dwellings in the development should not exceed seven units per gross acre. Except for cluster arrangements, residential density should not exceed what is established in the underlying zoning districts for the various types of residential uses.

The inclusion of higher-density residential zoning is a positive development for Lawton in terms of affordable housing development. The Multiple-Family Dwelling District and the High-Density Apartment District allow smaller land sizes with more units, which lowers the per unit land costs and increases revenues from rents or sales for developers. It will also lower the site infrastructure costs (e.g., roads, water, sewer, etc.) passed along to each homebuyer or renter. Often, these higher-density residential developments occur in more urban and suburban areas that are already developed, reducing the need

for site infrastructure costs. All these factors help to incentivize developers to construct affordably priced housing that meets the needs of low- and moderate-income residents in Lawton.

#### **F. PROPERTY TAXES AND HOUSING AFFORDABILITY**

According to the Comanche County Assessor's Office, there are three types of property tax exemptions and credit programs available in Lawton based on property owners' ownership, income, age, disability, and veteran status. These include Homestead Exemption, Military and Veterans Exemptions, Senior Valuation Limitation, which advance the housing affordability especially for low-income, senior, and disabled veteran homeowners.

The Homestead Exemption is available to all Comanche County homeowners who reside in their properties by January 1 and whose deeds were notarized on or before January 1 and filed with the County Clerk's Office on or before February 1. It allows for the exemption of \$1,000 in the property assessed valuation.

The Senior Valuation Limitation benefits homeowner households whose head-of-household (must be an owner-occupant of the Homestead property on January 1 of the current year) must be age 65 or older before January 1 of the current year. The gross household income must not exceed \$71,300 for the previous calendar year.

The Military and Veterans Exemptions provide a total exemption from property tax for 100% disabled veterans. The Oklahoma Department of Veterans Affairs (ODVA) would send out letters to every veteran qualified for this tax break.

#### **G. COMMUNICATION AND OUTREACH**

Lawton has a "Citizen Participation Plan" which encourages citizen participation and provides Lawton's citizens with opportunities to participate in the consolidated and annual planning process, especially those impacted or affected by federal housing and community development programs, particularly low- and moderate-income citizens. Typically, there is a minimum of 30 days for residents to review and provide comments following publication of the draft plan or substantial amendment to the plan. The Citizen Participation Plan will typically be considered for adoption or substantial amendment at a minimum of two public hearings, with at least 15 days' notice. In 2020, due to the COVID-19 pandemic, the City was allowed to reduce the public notice time to five days. Public comments are usually received via mail or phone during the public review period and at public hearings.

In 2020, the two previously scheduled public hearings had to be cancelled due to the COVID-19 pandemic. A cancellation was published in the paper on April 5, 2020. A new Notice of Public Hearings for the FY 2020 Annual Action Plan was published in the paper on June 7, 2020, which opened the public comment period on June 8, 2020. Two public hearings were held on June 11, 2020 and June 23, 2020. No comments were received via mail or phone during the public review period, nor did anyone comment at either public hearing.

The Metropolitan Fair Housing Council of Oklahoma (MFHC) is the only organization that is engaged in the communication and outreach efforts related to fair housing issues in Oklahoma, including Lawton. However, MFHC does not have a contract with the City of Lawton and therefore is not required to produce reports based on the intakes. MFHC's services include:

- Homebuyer education classes (English and Spanish) for first-time homebuyers on credit stability, lending, financing, and insurance processes, preventing predatory lending, loss mitigation, and foreclosure prevention,
- Fair housing counselling and advocacy for persons who have limited English proficiency (LEP) or have Spanish as a first language,
- Fair housing training for consumers, advocates, faith-based organizations, public and private organizations as well as the housing industry on rights and remedies under fair housing laws,
- Fair housing laws and litigation training for MFHC Cooperating Attorneys, public and private attorneys involved in civil rights, consumers, advocates, and agencies involved in compliance with the Civil Rights Act of 1964, Civil Rights Act of 1968 (1988 Amendments) and other federal laws and executive orders if the agency is a recipient of federal funds, and
- Fair housing education material publication and distribution.

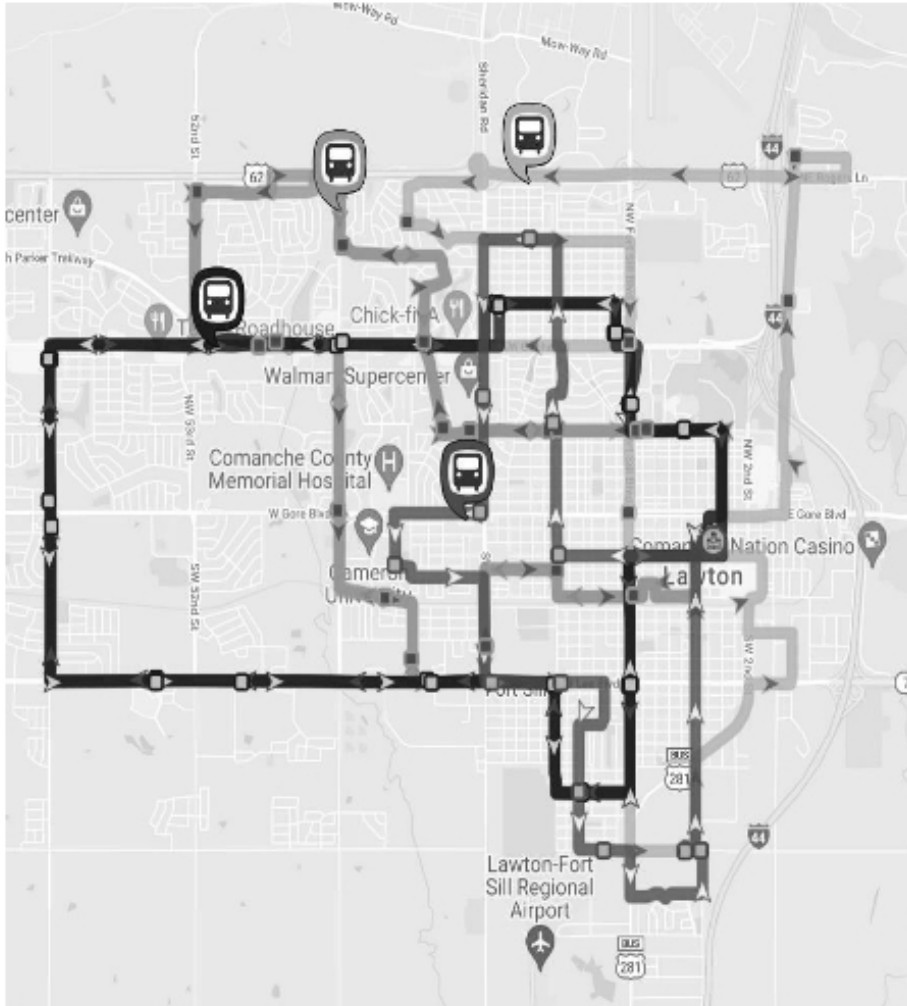
## H. PUBLIC TRANSPORTATION

Currently, the Lawton Area Transit System operates nine local fixed routes operating from 6:00 AM to 7:00 PM on weekdays, covering an area south to U.S. Highway 62, east to NW 67<sup>th</sup> Street, west to NE Lawrie Tatum Road, and north to SW Ranch Oak Boulevard just north of the Lawton-Fort Sill Regional Airport. The adult fare is \$1.50, and it is \$1.00 for students aged 6-17. Children aged 5 or under can ride for free. Passengers who have a Medicare card, are a senior (62 or older), or are disabled can fill out an application for an MD card or a Senior Card. The MD card and Senior Card allows passengers to pay half of the full adult fare (\$0.75). The Air Alert fare is 50% off the regular price. Also, Lawton Public Schools (LPS) students and staff ride for free with LPS I.D.

There is a Fort Sill shuttle service that requires appointment by calling the LATS office. Each ride is \$1.50, and the shuttle hours are the same as the fixed route. Passengers may schedule a ride up to two hours before their pickup.

Lawton Area Transit System also provides para-transit services for persons with disabilities who are unable to access fixed routes or are unable to board accessible fixed route buses because of their disability. Passengers who need the service will need to apply with a printable application form and return it to the LATS office. Applicants will receive a determination letter 21 days after LATS receives the completed application. LATS paratransit service travels anywhere that the fixed route bus system travels, including three-fourths of a mile on each side of the fixed routes. The one-way fare for paratransit service is \$3.00. Fares for companions are the same as for ADA eligible passengers except there is no charge for a personal care attendant or service animal. Paratransit trips are available Mondays through Fridays, 6:00 AM to 7:00 PM and Saturdays, 9:00 AM to 6:00 PM. However, LATS has currently temporarily suspended all the Saturday service until further notice.

Map 5-4: Lawton Area Transit System Routes





## 6 REVIEW OF PRIVATE SECTOR PRACTICES

### A. MORTGAGE APPLICATION TRENDS

RKG Associates reviewed the practices associated with access to rental housing options and home mortgage lending as part of an assessment of housing market conditions and identifying potential impediments to fair housing choices. The Fair Housing Act prohibits lenders from discriminating against members of the protected classes in granting mortgage loans, providing information on loans, imposing the terms and conditions of loans (such as interest rates and fees), conducting appraisals, and considering whether to purchase loans. The access to fair housing choice requires fair and equal access to the mortgage lending market regardless of race, color, national origin, religion, sex, familial status, disability, or any other statutorily protected basis.

An analysis of the mortgage applications and their outcomes can help the City to identify possible discriminatory lending practices and patterns in a community. The Home Mortgage Disclosure Act (HMDA) was originally enacted by Congress in 1975 and is implemented by Regulation C. It requires many financial institutions to maintain, report, and publicly disclose loan-level information about residential mortgages. Any commercial lending institution that makes five or more home mortgage loans annually must report all residential loan activity to the Federal Reserve Bank, including information on applications denied, withdrawn, or incomplete and tracked by race, sex, and income of the applicant. This information is used to determine whether financial institutions are serving the housing needs of their communities.

The latest HMDA data available for the City of Lawton is from 2019. This study has included three years of data from 2017 to 2019 for all types of applications received by lenders. This includes applications for all loan purposes (home purchase loans, home improvement loans, and refinancing loans) for all property types (i.e., site-built single-family homes with one to four units, site-built multi-family structures with 5 or more units, and manufactured housing units) in Lawton. Table 6-1 summarizes all the Lawton applications between 2017 and 2019 by result, loan purpose, loan type, property type, and applicant race/ethnicity.

#### 1. Loan Application Demand

Among the total of 9,153 mortgage applications documented between 2017 and 2019, 4,522 (49.4%) were applications approved and originated by the lender. Half (50.0%) of the applications were for home purchase loans, followed by home refinancing (38.5%) and home improvement loans (6.5%). If excluding loans for other purposes and non-applicable data, home purchase loan applications had the highest origination rate at 58.0% among all loan purposes, followed by home improvement loans at 55.4%, while refinancing loans had the lowest origination rate at 40.8%. However, 35.7% of the home improvement loans were denied, which was the highest percentage among the three major purposes, while home purchase loans had the lowest denial rate of 7.7%. Refinancing loan applications were more likely to be withdrawn or were incomplete, at a rate of 27.1%, followed by the home purchase loan applications with a rate of 8.6%. A small portion (1.3% to 2.4%) of all the applications were approved but not accepted.

The most common type of application was for conventional loans, accounting for 41.7% of all loan types. Conventional loans were the second most likely to be denied compared to the rest, with the

second highest denial rate at 20.9%, while it also had the highest origination rate of 59.1%. The second most common type of application was for loans backed by the Department of Veteran Affairs (VA) (40.6% among all types), which had one of the lowest denial rates at 12.7% and the second highest origination rate at 44.8%. However, they were more likely to be withdrawn or were incomplete, with a rate of 20.2%. Applications for loans insured by the Federal Housing Administration (FHA) were the third most common, constituting 17.3% of all applications, but they had the third most successful origination at a rate of 37.1%, and also the lowest denial rate at 11.3%. Loans backed by the Farm Services Administration or Rural Housing Service (FSA/RHS) were the least common, with only 35 applications for them accounting for 0.4%. They also had the lowest origination rate at 37.1% and the highest denial rate at 22.9%.

The vast majority (97.4%) of the applications were for site-built single-family homes with one to four units. There were only 54 applications for site-built multi-family units with five or more units in structure, but they had the most successful origination rate at 83.3%. Applications for manufactured housing units were the least successful, with most of them being either approved but not accepted, denied, withdrawn, or incomplete (Table 6-1).

**Table 6-1**  
Cumulative Mortgage Data Summary, 2017-2019  
City of Lawton, Oklahoma

	All Reported Mortgage Activities		Originated		Approved Not Accepted		Denied		Withdrawn/Incomplete	
	Count	Percent	Count	Percent	Count	Percent	Count	Percent	Count	Percent
<b>Loan Purpose</b>										
Home Purchase	4,575	50.0%	2,655	58.0%	100	2.2%	352	7.7%	395	8.6%
Home Improvement	599	6.5%	332	55.4%	8	1.3%	214	35.7%	39	6.5%
Refinancing	3,522	38.5%	1,437	40.8%	84	2.4%	790	22.4%	956	27.1%
Other/Not Applicable	457	5.0%	98	21.4%	7	1.5%	103	22.9%	30	6.6%
<b>Total</b>	<b>9,153</b>	<b>100.0%</b>	<b>4,522</b>	<b>49.4%</b>	<b>199</b>	<b>2.2%</b>	<b>1,459</b>	<b>15.9%</b>	<b>1,420</b>	<b>15.5%</b>
<b>Loan Type</b>										
Conventional	3,815	41.7%	2,255	59.1%	121	3.2%	798	20.9%	465	12.2%
FHA	1,587	17.3%	589	37.1%	21	1.3%	180	11.3%	202	12.7%
VA	3,716	40.6%	1,665	44.8%	57	1.5%	473	12.7%	749	20.2%
FSA/RHA	35	0.4%	13	37.1%	0	0.0%	8	22.9%	4	11.4%
<b>Total</b>	<b>9,153</b>	<b>100.0%</b>	<b>4,522</b>	<b>49.4%</b>	<b>199</b>	<b>2.2%</b>	<b>1,459</b>	<b>15.9%</b>	<b>1,420</b>	<b>15.5%</b>
<b>Property Type</b>										
Single Family (1-4 Units) Site-Built	8,913	97.4%	4,431	49.7%	166	1.9%	1,373	15.4%	1,395	15.7%
Multi-Family Unit (5+ Units) Site-Built	54	0.6%	45	83.3%	1	1.9%	4	7.4%	4	7.4%
Manufactured Housing Unit	186	2.0%	46	24.7%	32	17.2%	82	44.1%	21	11.3%
<b>Total</b>	<b>9,153</b>	<b>100.0%</b>	<b>4,522</b>	<b>49.4%</b>	<b>199</b>	<b>2.2%</b>	<b>1,459</b>	<b>15.9%</b>	<b>1,420</b>	<b>15.5%</b>
<b>Applicant Race/Ethnicity</b>										
White	4,519	49.4%	2,727	60.3%	119	2.6%	749	16.6%	741	16.4%
Black	1,290	14.1%	560	43.4%	31	2.4%	346	26.8%	316	24.5%
American Indian/Alaska Native	199	2.2%	99	49.7%	10	5.0%	49	24.6%	39	19.6%
Asian	160	1.7%	84	52.5%	6	3.8%	33	20.6%	31	19.4%
Native Hawaiian/Other Pacific Islander	59	0.6%	30	50.8%	2	3.4%	17	28.8%	10	16.9%
Two or More Races	23	0.3%	10	43.5%	0	0.0%	8	34.8%	5	21.7%
Some Other Race	185	2.0%	102	55.1%	2	1.1%	32	17.3%	46	24.9%
No Data/Not Applicable	2,718	29.7%	910	33.5%	29	1.1%	225	8.3%	232	8.5%
Hispanic or Latino*	611	6.7%	335	54.8%	18	2.9%	130	21.3%	108	17.7%
<b>Total</b>	<b>9,153</b>	<b>100.0%</b>	<b>4,522</b>	<b>49.4%</b>	<b>199</b>	<b>2.2%</b>	<b>1,459</b>	<b>15.9%</b>	<b>1,420</b>	<b>15.5%</b>

\* Not counted towards the totals  
Source: HUD data and RKG Associates, Inc., 2021

**2. Mortgage Lending Trends by Race/Ethnicity**

The racial and ethnic distribution of loan applications between 2017 and 2019 does not align with the 2019 racial and ethnic composition of the population in Lawton. While 57.6% of Lawton's 2019 population is White, 49.4% of all the applicants between 2017 and 2019 were White. If excluding records with no race information, White applicants accounted for 70.2%. People of All Other Races (including Two or More Races and Some Other Race) and the Hispanic population were underrepresented in the mortgage applications between 2017 and 2019, with only 3.3% and 9.5%,

respectively. In comparison, 13.6% of Lawton's 2019 population were of All Other Race and 14.3% were Hispanic.

The numbers of applications rose slightly for home purchase loans (by 4.3%) and for applicants of some other race and two or more races between 2017 and 2019 but declined for all other loan purposes and all other racial/ethnic groups during the same period. In particular, home improvement loan applications dropped by 51.3% and Native Hawaiian/Other Pacific Islander applicants and American Indian/Alaska Native applicants reduced the fastest by 4.5% and 4.3%, respectively. The total applications in 2019 increased slightly by 1.7% compared to 2017 (Table 6-2).

**Table 6-2**  
**Loan Application Type by Applicant Race/Ethnicity, 2017-2019**  
City of Lawton, Oklahoma

	Total	White	Black	American Indian /Alaska Native	Asian	Native Hawaiian /Other Pacific Islander	Two or More Races	Some Other Race	Hispanic/Latino*	No Data/Not Applicable
<b>2017</b>										
Home Purchase	1,478	713	129	28	31	9	0	0	94	568
Home Improvement	310	198	64	8	9	4	0	0	38	27
Refinancing	1,273	658	253	33	15	9	0	0	76	305
Other/Not Applicable	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>3,061</b>	<b>1,569</b>	<b>446</b>	<b>69</b>	<b>55</b>	<b>22</b>	<b>0</b>	<b>0</b>	<b>208</b>	<b>900</b>
<b>2018</b>										
Home Purchase	1,556	771	154	31	29	7	2	43	107	519
Home Improvement	138	67	22	1	4	2	1	3	16	38
Refinancing	1,051	514	205	26	17	7	7	42	63	233
Other/Not Applicable	233	67	20	6	2	0	0	8	9	130
<b>Total</b>	<b>2,978</b>	<b>1,419</b>	<b>401</b>	<b>64</b>	<b>52</b>	<b>16</b>	<b>10</b>	<b>96</b>	<b>195</b>	<b>920</b>
<b>2019</b>										
Home Purchase	1,541	796	160	38	26	9	8	43	115	461
Home Improvement	151	87	20	5	4	2	0	5	13	28
Refinancing	1,198	561	243	21	22	9	4	33	72	305
Other/Not Applicable	224	87	20	2	1	1	1	8	8	104
<b>Total</b>	<b>3,114</b>	<b>1,531</b>	<b>443</b>	<b>66</b>	<b>53</b>	<b>21</b>	<b>13</b>	<b>89</b>	<b>208</b>	<b>898</b>
<b>Total 2017-2019</b>										
Home Purchase	4,575	2,280	443	97	86	25	10	86	316	1,548
	<b>49.98%</b>	<b>49.84%</b>	<b>9.68%</b>	<b>2.12%</b>	<b>1.88%</b>	<b>0.55%</b>	<b>0.22%</b>	<b>1.88%</b>	<b>6.91%</b>	<b>33.84%</b>
Home Improvement	599	352	106	14	17	8	1	8	67	93
	<b>6.54%</b>	<b>58.76%</b>	<b>17.70%</b>	<b>2.34%</b>	<b>2.84%</b>	<b>1.34%</b>	<b>0.17%</b>	<b>1.34%</b>	<b>11.19%</b>	<b>15.53%</b>
Refinancing	3,522	1,733	701	80	54	25	11	75	211	843
	<b>38.48%</b>	<b>49.20%</b>	<b>19.90%</b>	<b>2.27%</b>	<b>1.53%</b>	<b>0.71%</b>	<b>0.31%</b>	<b>2.13%</b>	<b>5.99%</b>	<b>23.94%</b>
Other/Not Applicable	457	154	40	8	3	1	1	16	17	234
	<b>4.99%</b>	<b>33.70%</b>	<b>8.75%</b>	<b>1.75%</b>	<b>0.66%</b>	<b>0.22%</b>	<b>0.22%</b>	<b>3.50%</b>	<b>3.72%</b>	<b>51.20%</b>
<b>Total</b>	<b>9,153</b>	<b>4,519</b>	<b>1,290</b>	<b>199</b>	<b>160</b>	<b>59</b>	<b>23</b>	<b>185</b>	<b>611</b>	<b>2,718</b>
	<b>100.0%</b>	<b>49.37%</b>	<b>14.09%</b>	<b>2.17%</b>	<b>1.75%</b>	<b>0.64%</b>	<b>0.25%</b>	<b>2.02%</b>	<b>6.68%</b>	<b>29.70%</b>
<b>Change 2017-2019</b>										
Home Purchase	4.3%	11.6%	24.0%	35.7%	-16.1%	0.0%	0.0%	0.0%	22.3%	-18.8%
Home Improvement	-51.3%	-56.1%	-68.8%	-37.5%	-55.6%	-50.0%	0.0%	0.0%	-65.8%	3.7%
Refinancing	-5.9%	-14.7%	-4.0%	-36.4%	46.7%	0.0%	0.0%	0.0%	-5.3%	0.0%
Other/Not Applicable	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>1.7%</b>	<b>-2.4%</b>	<b>-0.7%</b>	<b>-4.3%</b>	<b>-3.6%</b>	<b>-4.5%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>-0.2%</b>

\* Not counted towards the totals.

Source: HUD data and RKG Associates, Inc., 2021

**B. GEOGRAPHIC DISTRIBUTION OF MORTGAGE APPLICATION APPROVAL**

The geographic analysis of Lawton's mortgage activities in this study excludes the three census tracts (Census Tracts 24.01, 24.03, 24.04) that fall into the Fort Sill base because most of the housing units in these areas target military staff and are not usually accessible to the general public. On-post housing at Fort Sill is privatized and is managed by Corvias Military Living. The three communities at Fort Sill (Buffalo Soldier Acres, Southern Plains and Old Cavalry Post) provide a variety of home styles and sizes for military personnel and their families with community amenities including a bowling alley, fitness centers, playgrounds, and a swimming pool.

The cumulative mortgage approval rate between 2017 and 2019 across the 25 remaining census tracts in the City range from 29.8% (Census Tract 16) to 56.8% (Census Tracts 1). Census Tracts 5.02 and 23.01 have each had more than 1,000 loan applications during the three years. This is not surprising as these two more sought-after census tracts are in the southwest side of the City, overlapping with wealthier communities with more access to housing and employment resources. The census tract with the least applications between 2017 and 2019 is Census Tract 16, with a total of 47 applications, followed by Census Tract 25 with 48 total applications, which are in the center of the City, overlapping with neighborhoods with more housing and economic challenges as discussed in previous sections (Table 6-3).

**Table 6-3**  
**Mortgage Application Approval, 2017-2019**  
**City of Lawton, Oklahoma (Census Tracts)**

	Total Application	Total Approval	Approval Rate
0001	199	113	56.78%
0002	101	57	56.44%
0003	553	248	44.85%
0004.01	681	326	47.87%
0004.02	454	234	51.54%
0004.03	684	371	54.24%
0005.01	834	402	48.20%
0005.02	1,122	549	48.93%
0006	263	144	54.75%
0007	205	93	45.37%
0008	94	47	50.00%
0009	243	131	53.91%
0010	197	90	45.69%
0011	147	72	48.98%
0014	55	19	34.55%
0015	71	33	46.48%
0016	47	14	29.79%
0017	70	30	42.86%
0019.01	184	89	48.37%
0019.02	59	19	32.20%
0020.01	914	438	47.92%
0020.04	631	315	49.92%
0020.05	232	116	50.00%
0023.01	1,019	525	51.52%
0025	48	21	43.75%

Sources: HMDA data and RKG Associates, Inc., 2021

However, the mortgage approval rate depends on both the number of applications and the number of approved cases in a certain neighborhood, which are associated with numerous other factors, including applicants' preference for a certain neighborhood, and the demographic and economic status of the applicants. Therefore, no single factor can explain why mortgage approval rates are higher in some neighborhoods than others. To quantify how successful mortgage applicants were in pursuing mortgage financing in each neighborhood compared to the rest of the City between 2017 and 2019, RKG developed a special matrix, and this analysis is detailed below in Part D Housing Demand and Access Index Analysis.

**C. MORTGAGE APPLICATION DENIALS**

Between 2017 and 2019, a total of 1,459 mortgage applications were denied, with a cumulative denial rate of 15.9%. HMDA data has provided detailed information for 1,227 denials categorized by the primary reasons for the denial and by applicant race/ethnicity. The most common reason for denial is credit history issues, accounting for 35.2%, followed by unqualified debt-to-income ratios, constituting 18.8%. This pattern differs among the applicants by racial and ethnic groups. Applications from the American Indian/Alaska Native (44.2%), Black (42.3%), Native Hawaiian/Other Pacific Islander (41.7%) applicants and applicants of Some Other Race (40.6%), were proportionally much more likely to be denied for credit history reasons. Applicants of Two or More Races, as well as Asian applicants were also proportionally more likely to have their applications denied for debt-to-income ratio issues than average, with their respective denial rates for this reason at 25.0% and 22.2% (Table 6-4).

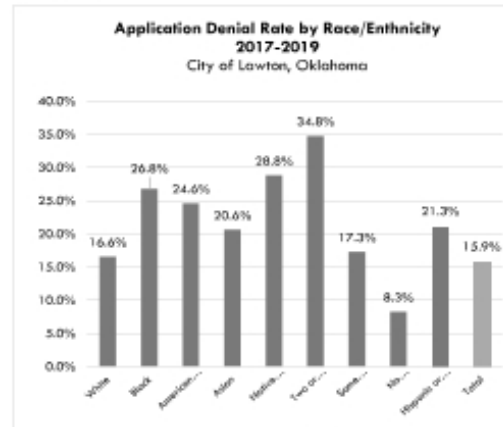
**Table 6-4**  
Primary Reason for Mortgage Application Denial by Race/Ethnicity, 2017-2019  
City of Lawton, Oklahoma

	Total	White	Black	American Indian /Alaska Native	Asian	Native Hawaiian /Other Pacific Islander	Two or More Races	Some Other Race	Hispanic or Latino*	No Data/Not Applicable
Debt-to-Income Ratio	231	128	44	7	6	2	2	2	19	40
Employment History	14	7	1	0	3	0	0	0	3	3
Credit History	432	205	121	19	6	5	3	13	39	60
Collateral	228	117	46	4	4	4	2	7	17	44
Insufficient Cash (Downpayment, Closing Costs)	21	13	5	0	1	0	0	0	2	2
Unverifiable Information	31	12	6	0	1	0	0	1	0	11
Credit Application Incomplete	133	70	26	6	3	1	0	4	13	23
Mortgage Insurance Denied	0	0	0	0	0	0	0	0	0	0
Other	137	63	37	7	3	0	1	5	17	21
<b>Total</b>	<b>1,227</b>	<b>615</b>	<b>286</b>	<b>43</b>	<b>27</b>	<b>12</b>	<b>8</b>	<b>32</b>	<b>110</b>	<b>204</b>
<b>Percent</b>										
Debt-to-Income Ratio	18.8%	20.8%	15.4%	16.3%	22.2%	16.7%	25.0%	6.3%	17.3%	19.6%
Employment History	1.1%	1.1%	0.3%	0.0%	11.1%	0.0%	0.0%	0.0%	2.7%	1.5%
Credit History	35.2%	33.3%	42.3%	44.2%	22.2%	41.7%	37.5%	40.6%	35.5%	29.4%
Collateral	18.6%	19.0%	16.1%	9.3%	14.8%	33.3%	25.0%	21.9%	15.5%	21.6%
Insufficient Cash (Downpayment, Closing Costs)	1.7%	2.1%	1.7%	0.0%	3.7%	0.0%	0.0%	0.0%	1.8%	1.0%
Unverifiable Information	2.5%	2.0%	2.1%	0.0%	3.7%	0.0%	0.0%	3.1%	0.0%	5.4%
Credit Application Incomplete	10.8%	11.4%	9.1%	14.0%	11.1%	8.3%	0.0%	12.5%	11.8%	11.3%
Mortgage Insurance Denied	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Other	11.2%	10.2%	12.9%	16.3%	11.1%	0.0%	12.5%	15.6%	15.5%	10.3%
<b>Total</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

\* Not counted towards the totals.  
Source: HMDA data and RKG Associates, Inc., 2021

While the cumulative mortgage application denial rate is 15.9%, there is a disparity of denial rates across the racial and ethnic groups of applicants. Applicants of Two or More Races have seen the highest denial rate at 34.8% across all racial and ethnic groups, followed by Native Hawaiian/Other Pacific Islander, Black, and American Indian/Alaska Native applicants, with their denial rates ranging between 24% and 29%. White applicants (excluding no data) have seen the lowest denial rate at 16.6% (Figure 6-1).

Figure 6-1



Source: HMDA Data and RKG Associates, Inc., 2021

**D. MORTGAGE DEMAND AND ACCESS INDEX ANALYSIS**

RKG Associates prepared a special analysis of housing demand and access that examined how each racial or ethnic group performed on mortgage loan applications within each census tract (excluding the Fort Sill census tracts) between 2017 and 2019. The purpose of the analysis was to identify patterns of performance differences within each group as compared to how the group performed on average across all census tracts over the two years. "Mortgage Demand and Access Index" is a statistical measure created by RKG Associates to measure and compare the relative success rate of mortgage loan applications for each racial and ethnic group based on: (1) the group's ability to pay or purchase a home, (2) the proportion of the applicants by racial and ethnic group to the total population of loan applicants, (3) the loan denial rate by racial and ethnic group, and (4) the propensity of each racial and ethnic group to buy or rent within the 25 census tracts in Lawton based on known housing tenure rates.

**1. Home Purchase Loan Application Activity**

Among the 3,027 home purchase loan applications with documented race and ethnic information of applicants (excluding records with no racial/ethnic data), 75.3% of them were submitted by White applicants, accounting for most applicants for home purchase loans, followed by Black applications, with a percentage of 14.6%. Roughly 10.4% of applications were submitted by Hispanic applicants, followed by American Indian/Alaska Native applicants, making up 3.2% of the home purchase loan applicants. Applicants in other racial and ethnic groups constitute between 0.3% and 2.9% of all home purchase loan applicants (Table 6-5).

Table 6-5

Home Purchase Loan Application by Race/Ethnicity, 2017-2019  
City of Lawton, Oklahoma

Applicant Race/Ethnicity	Number	Percent
<b>Total</b>	<b>3,027</b>	<b>100.00%</b>
White	2,280	75.32%
Black	443	14.63%
American Indian /Alaska Native	97	3.20%
Asian	86	2.84%
Native Hawaiian/Other Pacific Islander	25	0.83%
Two or More Races	10	0.33%
Same Other Race	86	2.84%
Hispanic/ Latino*	316	10.44%

Notes: Excluding "No Data/Not Applicable" Under Applicant Race/Ethnicity  
\* Not counted towards the totals.

Source: HMDA data and RKG Associates, Inc., 2021

**2. Ability-to-Pay Index**

The first factor of the Housing Demand and Access Index is the “Ability-to-Pay” Index by race and ethnicity, which is the proportion of a racial/ethnic group’s median household income on the City level compared to the citywide median of \$47,779, based on 2019 American Community Survey (ACS) estimates.

An applicant’s ability to successfully obtain mortgage financing depends on several factors but is mostly dependent on the applicants’ ability-to-pay for mortgage expenses (i.e., principal, interest, taxes, and insurance). Households with higher incomes will often have more options and access to greater housing choices and mortgage loans.

**Table 6-6**  
**Ability-to-Pay Index by Race/Ethnicity, 2019**  
**City of Lawton, Oklahoma**

Race/Ethnicity	Median HH Income	Index
<b>Total Racial and Ethnic Groups (City-Wide)</b>	<b>\$47,779</b>	<b>1.00</b>
White	\$51,423	1.07
Black	\$39,852	0.80
American Indian/Alaska Native	\$34,087	0.60
Asian	\$51,034	1.06
Native Hawaiian/Other Pacific Islander	\$63,684	1.25
Two or More Races	\$36,651	0.70
Some Other Race	\$39,375	0.79
Hispanic or Latino	\$47,515	0.99

Source: ACS 2019 Estimates and RKG Associates, Inc., 2021

The Ability-to-Pay Indices that are above 1.0 represent higher household incomes than the City median and those below 1.0 represent income levels lower than the City median. Only the White, Asian and Native Hawaiian/Other Pacific Islander population had index values higher than 1.0 (Table 6-6).

**3. Mortgage Demand Index**

The “Mortgage Demand Index” is the proportion of the number of home purchase loan applications submitted between 2017 and 2019 by each racial and ethnic group as a percentage of each group’s share of the current household population within each census tract. For example, if the percentage of the Hispanic or Latino household population in Census Tract 1 is 7.2%, and the number of home mortgage applications from this group accounted for 10.0% of the total submitted, then the Mortgage Demand Index is 1.4 ( $10.0\% \div 7.2\% = 1.4$ ) in this census tract for the Hispanic or Latino population. This index value accounts for the fact that many people tend to gravitate to various neighborhoods that they prefer or where other people in their social network, racial and ethnic groups already live. In some respects, people naturally self-select their neighborhoods based on these and many other factors – real and perceived.

**4. Mortgage Success Index**

The “Mortgage Success Index” measures the relative net success rate of home purchase loan mortgage originations to mortgage denials by race/ethnicity. For example, in Census Tract 2002, there were 58 mortgage loan applications either approved or denied with a total of 8 denials resulting in a net of 50 mortgage loan approved and originated, at a net success rate of 86%. For American Indian/Alaska Native applicants, there were four mortgage applications either approved or denied and there was no denial, so their net success rate was 100% in this census tract. Therefore, their Mortgage Success index was 1.16 ( $100\% \div 86\% = 1.16$ ).

**5. Results of Mortgage Demand and Access Index**

Once the three key indices were calculated for each census tract, an overall “Mortgage Demand and Access Index” was calculated, and the results were mapped to examine where in the City racial and ethnic groups may be having difficulty accessing mortgage financing for home purchases. This analysis does not account for access issues related to rental housing and is not considered a definitive indicator

of different peoples' ability to access mortgage loans. No single factor can explain why a given group of households was successful or unsuccessful in obtaining mortgage financing in any part of the City, but this analysis examines some of the most likely factors.

To obtain a final score for each group in each census tract, RKG weighted each index score to reflect its relative importance to each group's ability to obtain mortgage financing for home purchases. The Ability-to-Pay Index received the highest weighting factor at 50% of the final score since it is the strongest determinant of success in pursuing a mortgage loan. Income is also correlated with a household's credit score, which is another important factor leading to a favorable credit decision.

Net Mortgage Success Index was assigned a weighting factor of 35% and Mortgage Demand Index was assigned a weighting factor of 15% so that variations between the demand and success among the various race and ethnic groups can be identified. Net mortgage success is a function of a lot of factors but is mostly related to a group's ability to successfully obtain a mortgage loan to purchase a home. While some of those factors are related to a group's ability to pay, credit scores, and similar factors, excessive loan denial rates could denote something else. Conversely, a group's success rate at obtaining mortgage financing in Lawton's neighborhoods can only be judged by the demand exhibited by each group to live in these neighborhoods. If Hispanic households do not pursue mortgages to buy homes in a given census tract, it is difficult to judge why that has occurred. But if Hispanic households pursue mortgage loans in certain neighborhoods but are denied at rates exceeding their citywide denial rates, this may indicate that barriers exist.

Index values shown on the maps represent a racial or ethnic group's index value for each census tract compared to this group's citywide average. The values shown in Table 6-7 reflect the average index value for census tracts (Census Tracts 24.01, 24.03 and 24.04 that fall into the Fort Sill base are excluded) citywide by racial/ethnic group. The darker colored census tracts with values greater than 1.0 indicate that the racial or ethnic group performed better in those census tracts. The opposite is true for lighter shaded tracts. Some groups did not perform well in some census tracts because they did not seek mortgage applications for homes in those census tracts. Those are internal decisions that applicants make based on unknown factors, but they could be related to home sales prices, crime rates, perceptions of school quality, the quality of homes, or even the racial composition of the neighborhood.

**Table 6-7**  
**Housing Demand and Access Index, City-Wide Average**  
**City of Lawton, Oklahoma**

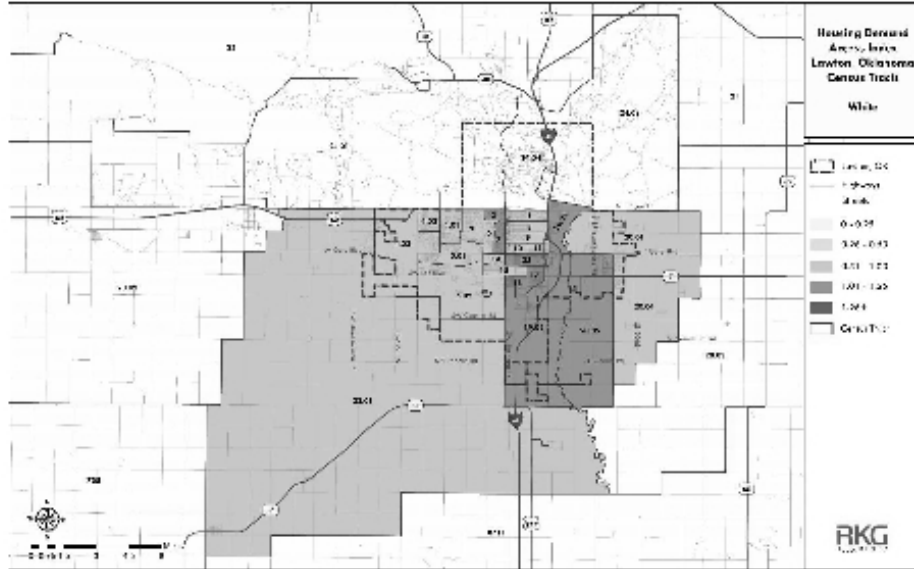
	Average
<b>Total Racial and Ethnic Groups</b>	<b>1.00</b>
White	1.10
Black	0.87
American Indian/Alaska Native	0.86
Asian	1.04
Native Hawaiian/Other Pacific Islander	0.93
Two or More Races	0.45
Some Other Race	0.86
Hispanic or Latino	1.06

Source: RKG Associates, Inc., 2021

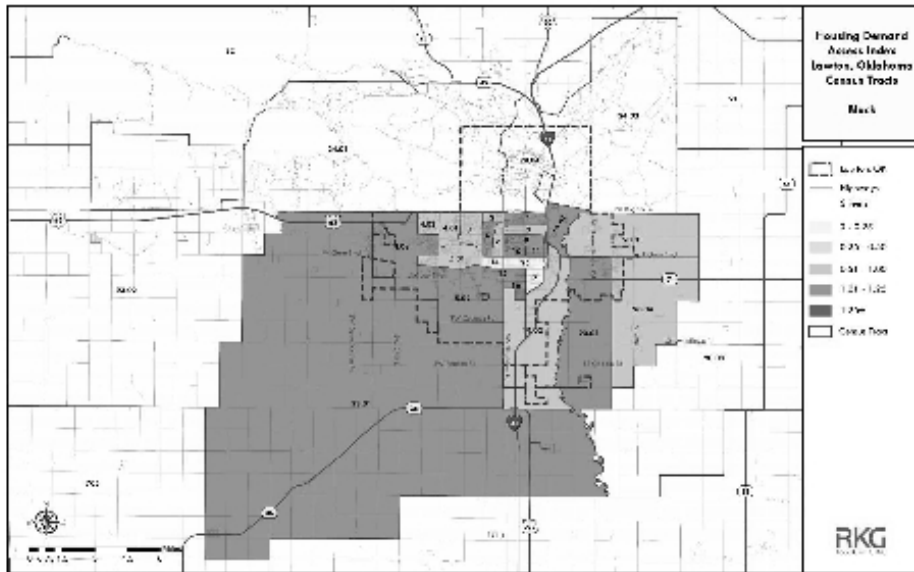
Only the White population (1.10), Hispanic population (1.06) and the Asian population (1.04) have Demand and Access Index scores above the citywide average. The remaining racial and ethnic groups all have Demand and Access Index scores below the citywide average. In particular, people of Two or More Races have the lowest Demand and Access Index score at 0.45, followed by people of Some Other Race and the American Indian/Alaska Native population with a 0.86 index score. This indicates that these minority/ethnic groups have less success in obtaining mortgage financing for home purchases compared to the White, Asian and Hispanic population in Lawton according to the Demand and Access Index. However, again, this index does not measure all the numerous factors that influence a racial/ethnic group's success in securing home mortgage loans.



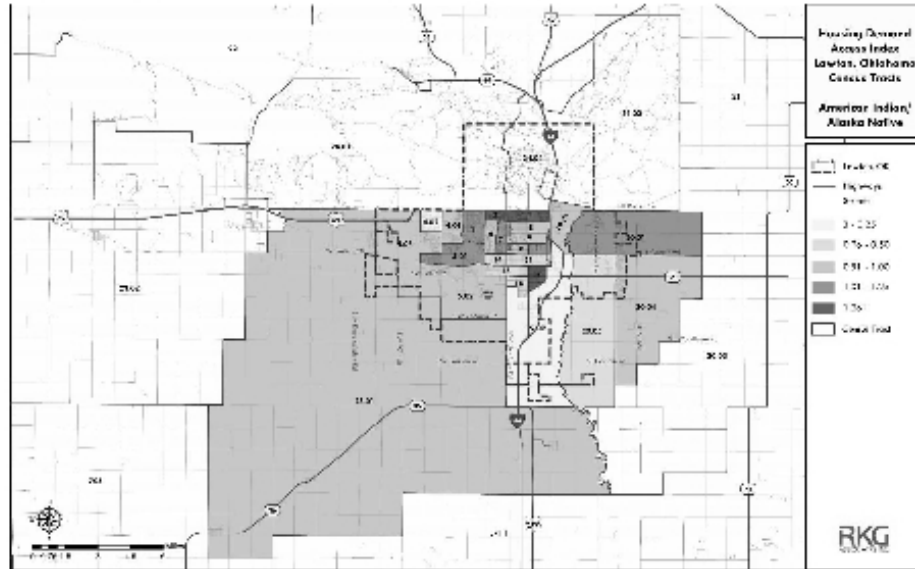
**Map 6-1: Mortgage Demand & Access Index (White)**



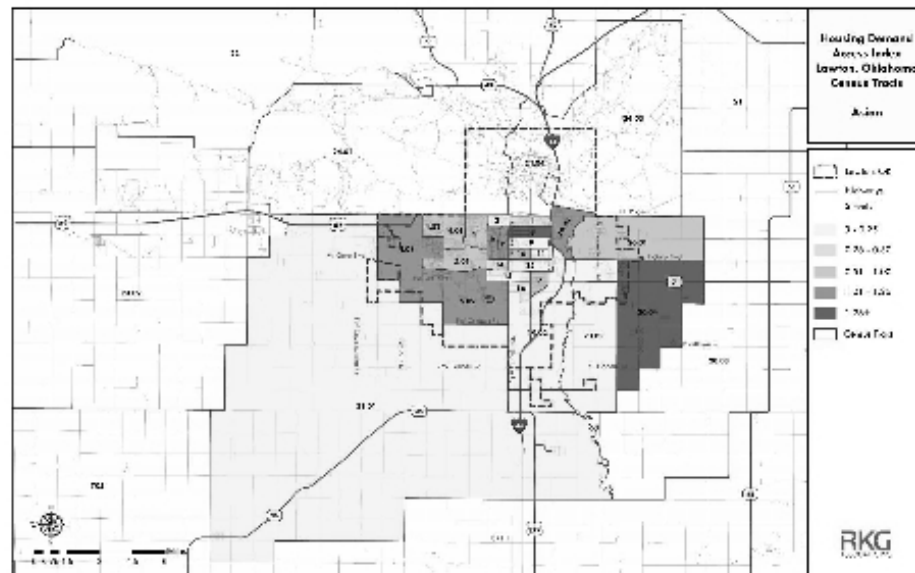
**Map 6-2: Mortgage Demand & Access Index (Black)**



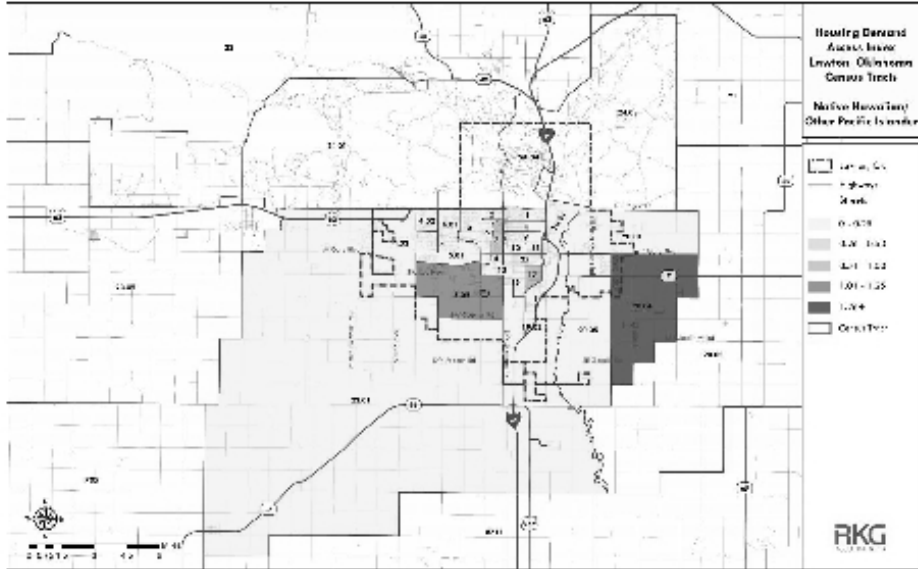
**Map 6-3: Mortgage Demand & Access Index (American Indian/Alaska Native)**



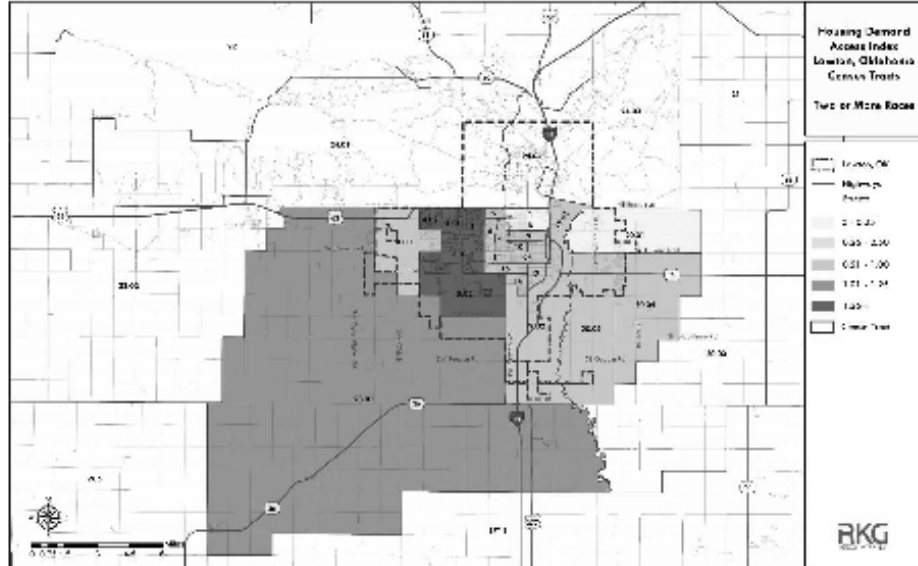
**Map 6-4: Mortgage Demand & Access Index (Asian)**



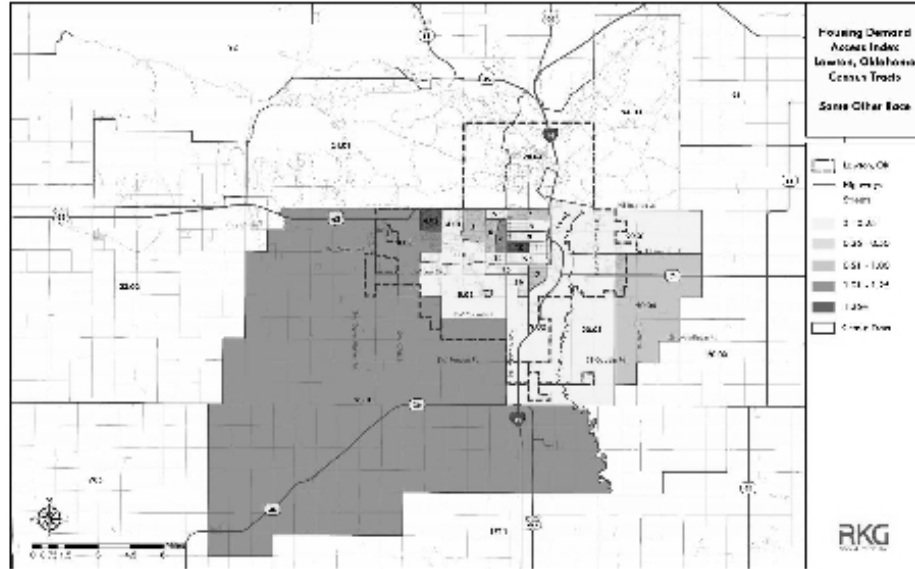
**Map 6-5: Mortgage Demand & Access Index (Native Hawaiian/Other Pacific Islander)**



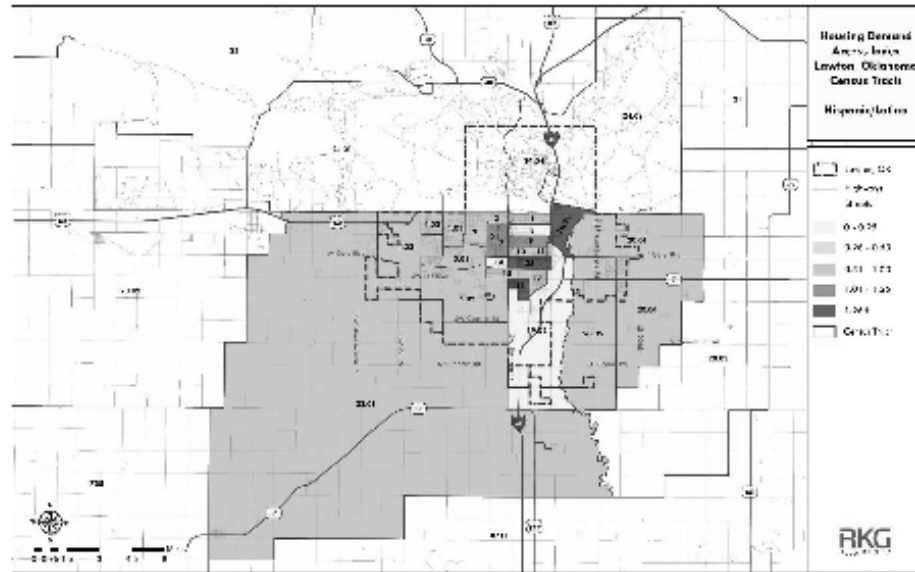
**Map 6-6: Mortgage Demand & Access Index (Two or More Races)**



**Map 6-7: Mortgage Demand & Access Index (Some Other Race)**



**Map 6-8: Mortgage Demand & Access Index (Hispanic/Latino)**



**E. HIGH-COST LENDING**

A subprime mortgage is a type of home loan issued to borrowers with low credit scores (often below 600) who are unqualified for conventional mortgages. Subprime mortgages usually come with much higher interest rates and down payments than conventional options because the borrowers often are at higher default risks. However, more expensive subprime loans are sometimes issued to some borrowers with high enough household incomes, credit scores, and available down payments to qualify for conventional loans. Historically, this is especially true for minority groups, which usually see higher percentages of subprime borrowers. The decision and practice of subprime lending targeting borrowers' racial or ethnic status constitute mortgage discrimination.

Since 2005, Housing Mortgage Disclosure Act data has included a new category of information called "rate spread." It represents the difference between the loan interest rate and the prevailing U.S. Treasury standard. Though HMDA does not require lenders to report credit score data of applicants which can be used to determine which loans are subprime, the "rate spread" data can help identify "high-cost" loans, which is a strong predictor of subprime lending and possible mortgage discrimination.

A loan is considered a high-cost loan if it meets one of the following criteria:

- A first-lien loan with an interest rate at least three percentage points higher than the prevailing U.S. Treasury standard at the time the loan application was filed. The standard is equal to the current price of comparable-maturity Treasury securities.
- A second-lien loan with an interest rate of at least five percentage points higher than the standard.

Table 6-8 shows the total cases of high-cost lending by borrowers' racial or ethnic group between 2017 and 2019 in Lawton. The citywide average high-cost lending rate for all racial/ethnic groups is 1.62%, which is calculated by comparing the number of high-cost lending cases to the total amount of originated and approved not accepted applications. The high-cost lending rate for each racial and ethnic group is generally low, between 0% and 6%. However, American Indian/Alaska Native borrowers were more likely to experience high-cost lending during the three years compared to other groups, with the highest high-cost lending rate of 5.5%, followed by borrowers of Some Other Race, with a rate at 1.9%.

**Table 6-8**  
**Cumulative High Cost Lendings by Race/Ethnicity, 2017-2019**  
**City of Lawton, Oklahoma**

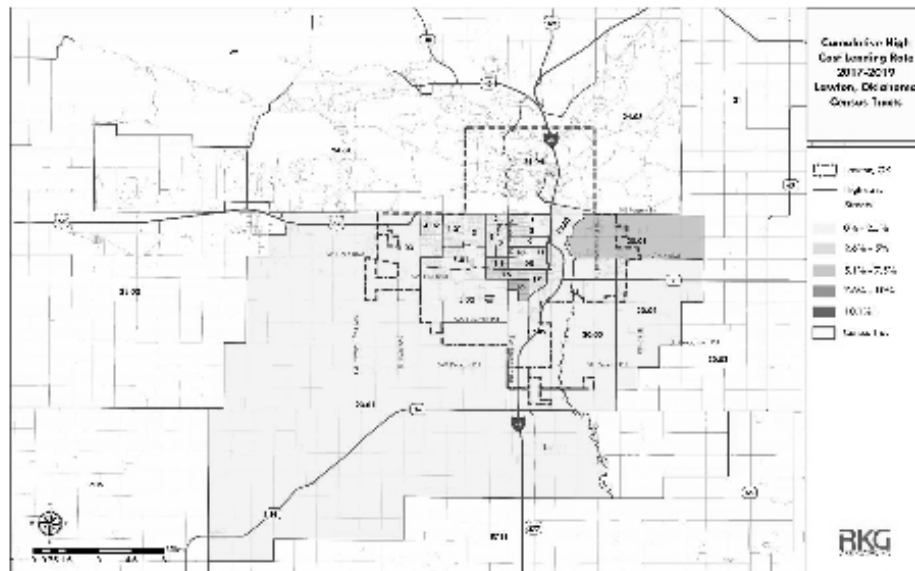
	No. of High Cost Lendings	Total Originated/ Approved Not Accepted Applications	High Cost Lending Rate
White	49	2,846	1.72%
Black	11	591	1.86%
American Indian/Alaska Native	6	109	5.50%
Asian	0	90	0.00%
Native Hawaiian/Other Pacific Islander	0	32	0.00%
Two or More Races	0	10	0.00%
Some Other Race	2	104	1.92%
No Data/Not Applicable	8	939	0.85%
Hispanic or Latino*	4	353	1.13%
<b>Total</b>	<b>76</b>	<b>4,721</b>	<b>1.61%</b>

\* Not counted towards the totals

Source: HMDA data and RKG Associates, Inc., 2021

The cumulative high-cost lending rates between 2017 and 2019 were then mapped by census tract (with the exclusion of Fort Sill census tracts). Given that the citywide average is 1.6%, the darker shades indicate census tracts that are more likely than others to experience high-cost lending practices. High-cost lending has occurred most often in Census Tract 16, at the highest rate of 7.1%, which is over four times the citywide average. This census tract also has the highest concentration of the Hispanic population and non-White population in Lawton and is also one of the neighborhoods that have a higher exposure to poverty and less access to opportunities. Census Tract 20.01 has seen the second highest high-cost lending rate at 6.1% (Map 6-8).

Map 6-8



## F. REAL ESTATE ADVERTISING AND AFFIRMATIVE MARKETING

RKG Associates also examined Realtor websites to assess if real estate brokers and sales offices are providing information supporting people's rights to fair housing choice in their advertising and marketing practices. This assessment also identified potentially discriminatory language used on real estate listing websites in Lawton's home sales and rental markets.

In general, major real estate listing services such as Century 21, Zillow/Trulia, Apartments.com, and Coldwell Banker have specific statements expressing the key principles of the Fair Housing Act and the Equal Opportunity Act. Century 21 prohibits "discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions." Also, each Century 21 Real Estate LLC franchised office is contractually required to comply, in all respects, with all laws, rules and regulations applicable to the real estate industry, including without limitation, the requirements imposed by the Fair Housing Act.

Apartments.com prohibits advertising “any preference, limitation, or discrimination because of race, color, religion, sex, handicap, familial status, or national origin, or intention to make such preference, limitation or discrimination.” Zillow/Trulia has provided a detailed article explaining the basics of the Fair Housing Law (<https://www.zillow.com/rental-manager/resources/fair-housing-guide/>). Coldwell Banker has listed the laws that protect the fair housing rights, the responsibilities of home sellers and real estate professionals, and resources to seek help when the violation of rights occurs.

However, most of Lawton’s local real estate agency websites do not have languages or statements related to fair housing. Four local Realtors have listed the logo of Equal Housing Opportunity at the bottom of their websites, but have not provided further details, though some of them have listed resources and advice for the home buying process.

**G. HOUSING MARKET OVERVIEW**

Residential sales activities, home value, and rent levels are vital indicators of the overall well-being of a community’s housing market, displaying the relations between the housing demand and supply. The RKG team obtained the residential sales data from realtor.com, and the median home value and the median monthly gross rent data from the American Community Survey 2019 5-Year Estimates to provide an overview of Lawton’s housing market.

**1. Home Value and Sales Trend**

According to the data from Realtor.com, the City of Lawton is a buyer’s market in April 2021, which means that the supply of homes is greater than the demand for homes. Also, the median days on market doubled from 22 days in February 2021 to 45 days in March 2021, a jump of 105%. However, the median list price and the median sales price have been showing an upward trend since 2018 (Figure 6-2). The median sales price rose from \$89,000 in 2018 to \$104,900 in 2021 (data as of March 2021), gaining by 17.9%, which was 3.0% annually, after a dip in 2020 which was heavily impacted by the COVID-19 pandemic. The median list price has increased by 14.3% since 2018, though flattened between 2020 and 2021, most likely still impacted by the pandemic. This means that even though the housing supply is currently greater than the demand in Lawton, home purchase interest has pushed up the list and sales prices of homes in the City, mostly likely fueled by increasing demand, especially since 2021 as the economy and the housing market have been slowly recovering from the impact of the pandemic.

Figure 6-2



Source: Realtor.com and RKG Associates, Inc., 2021  
\*Note: The 2021 data is as of March 2021

According to the 2019 American Community Survey (ACS) 5-Year Estimates, the median home value in Lawton increased by 7.1% between 2014 and 2019, or 1.4% per year (Table 6-10). This corresponds with the upward trend of the median sales and list prices of homes as discussed. It also shows that the median home value in Lawton has accelerated slower than the growth of median

household income annually between 2014 and 2019, which is a positive trend in that people's ability to purchase homes is keeping up with the appreciation of home values and the increase of gross rents in Lawton.

**Table 6-10**  
**Median Home Value, Gross Rent and Household Income, 2014-2019**  
**City of Lawton, OK**

	Median Home Value	Median Gross Rent	Median HH Income
2014	\$105,300	\$773	\$43,263
2015	\$106,100	\$787	\$42,493
2016	\$106,800	\$798	\$43,674
2017	\$112,700	\$808	\$44,335
2018	\$113,900	\$828	\$47,262
2019	\$112,800	\$832	\$47,779
Change '14-'19	\$7,500	\$59	\$4,516
Ann. % Chg. '14-'19	1.42%	1.53%	2.09%

Source: 2019 ACS 5-Year Estimates and RKG Associates, Inc., 2021

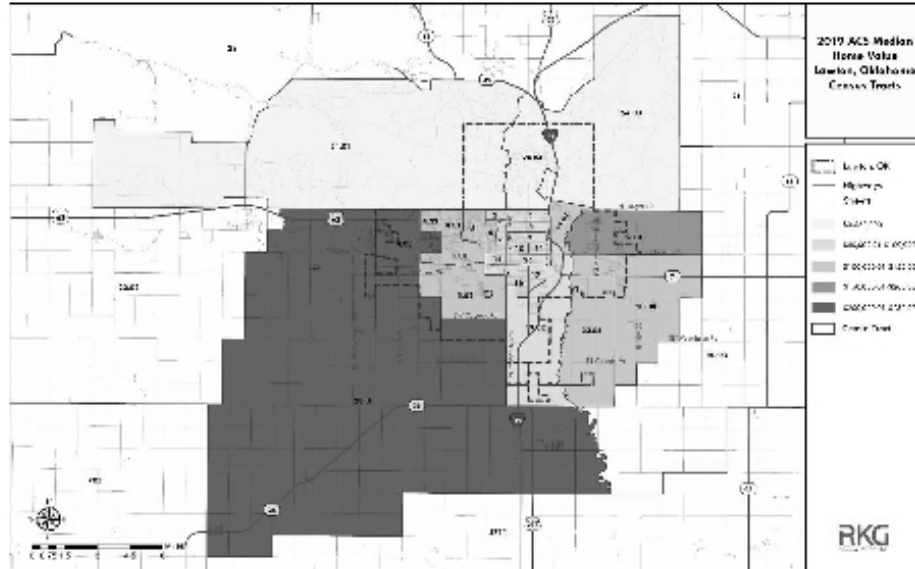
Map 6-9 and Map 6-10 display the 2019 median home values and the annual percentage changes of median home value between 2014 and 2019 by census tract in Lawton. The data was also obtained from the 2019 American Community Survey 5-Year Estimates. Note that the 2019 median home values of Census Tracts 24.01, 24.03, and 24.04 are not reported in 5-Year Estimates. This is likely because most of the housing units in these three census tracts are military housing on the Fort Sill base as discussed earlier, with most of them being rental in nature.

Apart from these three census tracts, the median values of homes are generally lower in neighborhoods around the City center and the south side of the City where there are higher levels of poverty and less access to opportunities. In comparison, the highest home values are seen in Census Tracts 23.01 and 4.03, where there have been higher household income levels and more access to socioeconomic opportunities. Census Tract 23.01 has also seen the second fastest increase of its median home value between 2014 and 2019 compared to other census tracts at 10.6% per year.

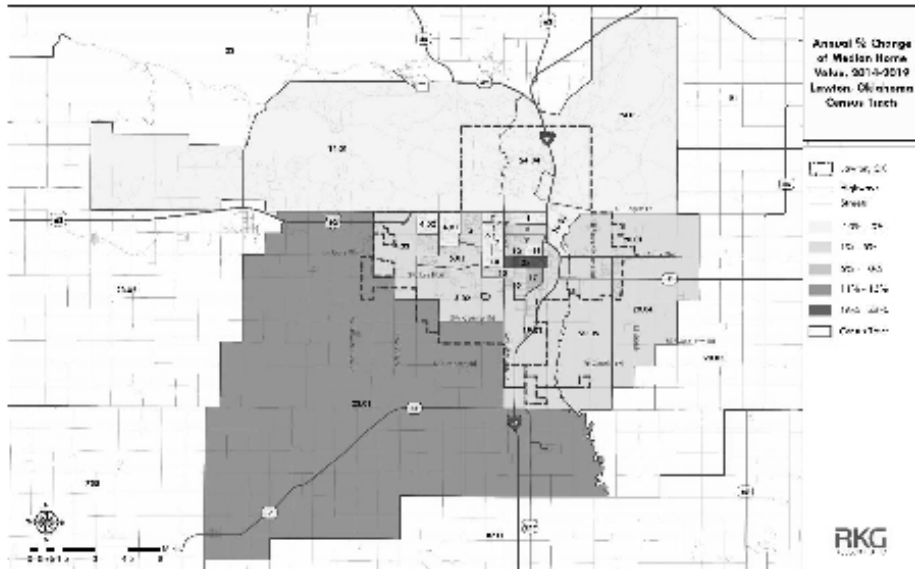
However, Census Tract 25 which has one of the lowest household incomes, a higher level of poverty and lower level of labor market engagement has also experienced the fastest increase of its median home value compared to other neighborhoods in the City, which jumped by 205% between 2014 and 2019, at 41% per year. This census tract also has two public housing projects, which are Benjamin O. Davis Highrise and Old Towne Square, and has only 228 owner-occupied households according to the 2019 American Community Survey 5-Year Estimates. As this census tract is situated between Platt College and Cameron University, it is likely that the rapid home value acceleration in this neighborhood is linked to the housing demand related to the colleges. The fast increase of median home values in Census Tract 25 should be investigated and monitored further by the City as it will likely further pressure its most vulnerable residents in terms of access to fair housing opportunities.



Map 6-9



Map 6-10



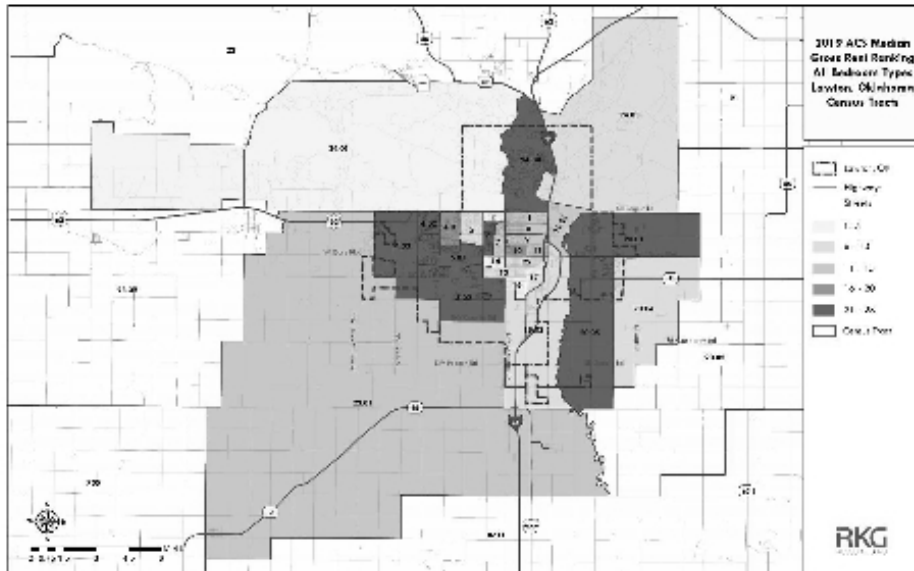
## 2. Rental Rate Overview

Table 6-10 shows that the citywide median gross rent in Lawton between 2014 and 2019 rose by 7.6%, or 1.5% annually. This is slower than the growth of the median household income in the City, which increased by 10.4% during those five years, or 2.1% per year, indicating a relatively healthy rental market in Lawton.

RKG also adopted a ranking method to show which neighborhoods in the City have higher rent rates considering all bedroom types. All census tracts with available median gross rent data were ranked and received scores from one to 28 based on their median gross rents from low to high under each bedroom type. If the median gross rent for a certain bedroom type is not available in a census tract, then it received a score of zero. The total score of all bedroom types was then summed for each census tract, which was ranked again based on its total score.

The results were mapped by census tract, with darker shades indicating higher total scores, and therefore, higher median gross rent levels considering all bedroom types. Census Tracts 4.02, 4.03, 5.01, 5.02, 6, 20.01 and 20.05 which are in the southwest, east, and southeast sides of the City most likely have the least affordable rental market according to the ACS 2019 5-Year Estimates, in addition to Census Tract 24.04 which is on the Fort Sill base (Map 6-11). This generally aligns with the neighborhoods which have seen the highest 2019 median home values and the fastest population gains between 2010 and 2019.

Map 6-11



# 7 IMPEDIMENTS TO FAIR HOUSING CHOICE

This section summarizes the impediments to fair housing choice within the City of Lawton, OK presented in this analysis and proposes recommendations to the City to address such impediments.

## A. HOUSING AND SOCIAL SERVICE ORGANIZATION INTERVIEWS

The consultant spoke with eight housing- and service-related organizations in the Comanche County service area in June 2021. The purpose of the interviews was to understand the current capacity of these organizations versus the existing housing demand and to identify impediments to fair housing. All these organizations serve areas that include the City of Lawton. Topics discussed include affordable housing development, housing-related services, and fair housing issues. The eight interviewed organizations include:

- Great Plains Improvement Foundation,
- Carter Crane Homeless Shelter,
- Lawton Support Services, Inc.,
- Marie Detty - New Directions Youth and Family Services, Inc.,
- Family Promise of Lawton,
- Roadback, Inc.,
- Lawton Housing Authority, and
- Metropolitan Fair Housing Council of Oklahoma, Inc.

### 1. Affordable Housing Development

- Housing needs from single families and individuals are equally high.
- Mental health and substance abuse is the major problem and biggest underlying cause of homelessness and other social issues in the City.
- There has been a huge influx of housing needs because of the recently available CARES Act funding.
- The major challenge for meeting housing needs is that there are no ADA compliant rooms in emergency housing or shelters in the City. There are only two ADA compliant publicly assisted units in Lawton, and they are only in LHA public housing projects.
- There is also a lack of housing units for very large families with low or moderate incomes as only Lawton Housing Authority has 4-bedroom units. Large families are more commonly seen lately.
- Currently there is no HUD funding for developing new publicly assisted housing units, and there has been no addition of new general Section 8 vouchers nationwide in years.
- The City should take a bigger role in building more affordable housing, as it has been difficult finding developers to produce affordable housing units because private developers are not usually interested. The City Council has turned down all low income housing tax credit projects in the past few years with the idea that affordable housing is not needed in Lawton, and there

was said to be a high vacancy in the City's apartment properties while there is actually a demand for affordable housing in Lawton.

- The biggest housing challenge is not enough capacity of community service organizations and housing units to serve those in need, and not enough affordable and safe rental properties to house families and individuals in the City. A lot of private rental properties available for families are limited due to their military status. For example, it is not easy to find two-bedroom units priced \$700 or below per month, not even including utilities or security deposit.
- Finding abandoned and dilapidated properties for renovation or rebuild is an important approach to increase affordable housing production.
- Need more citywide housing programs for homeless youths, and providing more affordable and safe places to live in. Cheaper housing cluster in the north and south sides of the City in lower-income neighborhoods but these areas tend to be unsafe with high crime rates.
- Homelessness among previously incarcerated persons and people who experienced substance abuse are quite common.
- There were more Black and Hispanic families that need transitional housing in 2020.
- Mental health issues are the biggest underlying problems behind homelessness and substance abuse especially among adults, such as anxiety disorder.
- There is a lack of ADA compliant emergency housing/shelter units to accommodate disabled persons.
- The funding that emergency housing projects/shelters received has been trending down in the past few years.
- The greatest need for emergency housing comes from single individuals. One organization noted there were 100 more persons that needed emergency housing in 2020 compared to 2019, most likely due to the COVID-19 pandemic.

## 2. Housing-Related Services

- In the recent increase of housing needs especially during the COVID-19 pandemic, renter households have more housing needs as there has been a high demand for rental eviction assistance, but there have just been two to three applications for mortgage assistance. The major demand is for utilities and rental deposit assistance.
- The City's Tenant Based Rental Assistance (TBRA) vouchers are all expiring at the end of June, so more funding for TBRA is needed.
- There have been challenges to find contractors for publicly assisted housing renovation. The City has new contracting rules that require contractors to have several licenses up front, so the qualification standards are higher. The new policy also requires contractors to complete the job before getting reimbursed, which is difficult for smaller nonprofit organizations to get upfront money to start projects.
- Households headed by single white female have the highest poverty level in Comanche County according to a need assessment study.
- High insurance and maintenance costs that need to come from unrestricted funds have been a challenge for one community service organization when acquiring properties for emergency housing.
- There is a need for grants or funding to pay for a full time mental health therapist at shelters in addition to case management, which would be tremendously helpful for addressing homelessness.
- Substance abuse and homelessness are more common among people aged 20 to 40.
- One organization that provides transitional housing and services related to substance abuse issues mentioned that the City can help expand their Saturday's outpatient outreach and outpatient services as they cannot reach a lot of people during normal business hours on weekdays.

- Another challenge is that it is difficult to hire people especially for entry level jobs because the availability of unemployment benefits and people are not ready to get back to work.

### 3. Fair Housing Issues

- Education and awareness outreach regarding tenants' rights, federal housing laws, and ordinances are important as they help to prevent fair housing issues before they occur.
- More funding is needed to conduct direct contact and education as a lot of the low-income population do not have direct access to the internet.
- There is also a need for self-help services and mediation/legal services for the "working poor" population who do not qualify for low-income benefits. More resources are needed to provide such services that currently do not exist.

### B. DEMAND EXCEEDS SUPPLY FOR SECTION 8 VOUCHER PROGRAM

The City of Lawton identifies the availability of funds as the primary obstacle in meeting the underserved needs of low- and moderate-income populations. The Lawton Housing Authority administers some Section 8 vouchers in Lawton, and the Oklahoma Housing Finance Agency (OHFA) administers the majority of them. Currently there are 55 people on the Lawton Housing Authority's (LHA) Section 8 waiting list which is closed due to very low turnover. The wait time for the Section 8 vouchers administered by OHFA is around two years. This indicates a continuing demand for the Section 8 program and units. In addition, LHA staff noted that there has been no increase of new Section 8 vouchers in Lawton during the past several years while demands for housing assistance has significantly increased especially since the COVID-19 pandemic, widening the supply-demand gap for affordable housing in general and the Section 8 voucher program.

Though the current federal funding for Lawton's Section 8 housing program is around \$3 million and has been slightly trending up during recent years, the City's Section 8 wait list is closed most of the time due to very low turnover and limited new availability as noted by the LHA staff. The City should continue utilizing the housing delivery system which the City has had in place for many years, including resources such as homeownership and housing rehabilitation opportunities for low- to moderate-income families, as well as leveraging private dollars and various funding sources.

### C. LIMITED CAPACITY TO INCREASE SUPPLY OF AFFORDABLE HOUSING

Though between FY2016 and FY2020, the CDBG and HOME funds that Lawton received have risen by 13.4% and 33.5% respectively, the City faces the challenge of limited organizational capacity to increase the supply of affordable housing due to a lack of nonprofit-based housing development organizations (CHDOs).

The City's CDBG and HOME funds support housing rehabilitation, repair, exterior improvement, as well as community service organizations that provide transitional and emergency housing and housing related services. However, there is a lack of focus on affordable housing development. In a city the size of Lawton (94,017 pop.), this lack of organizational depth in affordable housing development still imposes an impediment to the fair housing opportunities in Lawton. The City should consider developing a mechanism to expand partnerships with neighborhood-based and regional nonprofit developers (such as Neighborhood Housing Services Oklahoma) or religious-affiliated organizations to address these issues and to provide support for these organizations. The City can also explore the opportunity of establishing an affordable housing trust fund and an entity to administer and manage the trust fund for affordable housing development in Lawton.

**D. CONCENTRATION OF MINORITY POPULATIONS IN LOWER INCOME AREAS WITH LIMITED ACCESS TO RESOURCES AND OPPORTUNITIES**

The City's population has become more diverse since 2010, particularly the Hispanic and non-White population. The concentrations of minority population still align with neighborhoods with higher exposure to poverty, and fewer resources and access to opportunities. The Native American and the Hispanic population have lower scores for many of the HUD Indexes and socioeconomic indicators. The Hispanic population also constitutes the largest immigrant group in Lawton, with many of them having limited English proficiency.

According to RKG's census tract analysis, Census Tracts 1, 2, 6, 7, 8, 9, 11, 14, 15, 16, 17, and 25 near the City's urban core are exhibiting conditions of higher poverty, lower levels of labor market engagement, poorer environmental health, concentrations of minority households, and housing condition problems. This may be partially due to the limited affordable housing choices in other parts of the City.

The City's 2030 Land Use Plan has made it a goal to "support the provision and preservation of safe, sanitary, decent, and affordable housing for all of the citizens of the Lawton." However, there is a lack of more detailed and specific policies to promote a diversity of housing types to accommodate residents of various races, incomes, household sizes, lifestyles, ages, and levels of ability and mobility throughout the City. The City should consider updating its land use plan and comprehensive plan to include such policies and intervene with services and investments to improve conditions for minority households in this part of the community. The City should also increase quality affordable housing options in other parts of the City to allow for more fair housing choices citywide for all people.

To achieve affordable housing on a scale that is commensurate with the need, development densities are often required. Densities of 24 units per acre are typical apartment densities and should be permitted throughout the City in appropriate locations. A review of the City's zoning map confirms that while there are several R-4 zones in the center of the City, there are fewer higher density residential zones outside the center. Multi-family zoning districts are appropriate near highway interchanges with close access to employment centers and near shopping and services. The City should consider other locations to expand its higher density residential zoning through the community.

It is recommended that the City undertake the preparation of an affordable housing strategy to identify ways to expand the supply and attract potential for-profit and non-profit development partners. The City should also assist the creation of neighborhood-based CHDOs to partner with the City in this effort.

**E. LIMITED ACCESS TO RESOURCES AND OPPORTUNITIES IN PUBLICLY SUPPORTED HOUSING NEIGHBORHOODS**

The Low Poverty Index, Labor Market Engagement Index, and Environmental Health Index all show lower scores for census tracts with concentrations of publicly supported housing programs and Section 8 Voucher households compared to the rest of the City. HUD discourages its recipients from targeting its CDBG funds in a way that encourages such conditions.

As the City recognizes the need to look for new projects for their available funding, the City should consider increasing the financial support for community-based nonprofit organizations, continue to seek additional funding sources, and expand partnerships with regional nonprofit organizations to increase the capacity of employment and housing support. In addition, the City can explore alternative approaches such as zoning revisions to require and incentivize citywide developer contributions to

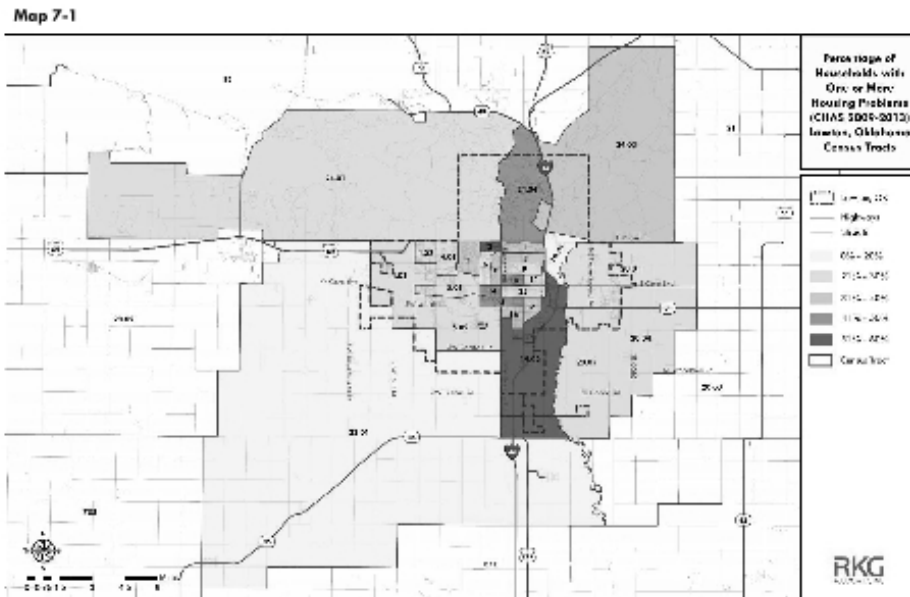
public improvements targeting low- and moderate-income neighborhoods (such as tree planting, sidewalk constructions, etc.).

## F. HOUSING CONDITION PROBLEMS IN SOME NEIGHBORHOODS

As discussed in the chapter of Demographic and Housing Condition Analysis, neighborhoods with concentrations of Section 8 Voucher households and publicly supported housing programs, as well as areas in the south side of the City have seen higher percentages of their housing units with one or more housing condition issues. These housing units are also especially susceptible to natural disasters such as tornados, which are common in the State of Oklahoma. This finding might point to the need for expanding the CDBG-funded housing rehabilitation program – not only to improve owner-occupied dwelling units but other units including rental housing occupied by low- and moderate-income households and individuals, as the stakeholder interviews reveal that there is a lack of safe and affordable rental options in the City.

Interviews with Lawton’s community service organizations also reveals that there have been challenges to find contractors for publicly assisted housing renovation projects, as the City has new contracting policies with higher qualification standards. The City should consider building partnerships with qualified contractors to ensure publicly assisted housing renovations are completely timely, as it is anecdotally observed that smaller contractors may not qualify while larger contracting firms are not usually interested in this kind of work.

Neighborhoods in and around the urban center are showing signs of blight that, if left unchecked, will negatively impact the economic vitality of the community (Map 7-1). Housing units in these areas are also more likely to be impacted by natural disasters and climate change, further increasing the risk of financial distress and homelessness, especially for the most vulnerable population. This situation can



potentially provide an opportunity for the City to leverage resources to upgrade both owner- and renter-occupied housing especially for low- and moderate-income households.

#### **G. LENDING POLICIES AND PRACTICES**

One indication of a barrier to fair housing may be the denial rate for conventional home purchase loans. Although differences in denial rates for whites and minorities may be due to legitimate factors such as income or credit history, a portion of the disparity may be attributable to the persistence of discriminatory policies among certain lenders. Another indicator may be high-cost lending practices that target minority borrowers. According to RKG's analysis, high-cost lending has occurred most often in Census Tract 16, at a rate of 7.1%, which is over four times the citywide average of 1.6%. This census tract also has the highest concentration of the Hispanic and non-White population in Lawton and is also one of the areas with a higher exposure to poverty and less access to opportunities.

The City should investigate this issue and provide legal and financial support to detect and combat potential discrimination in private lending practices. For example, the City should expand fair housing and homebuying education efforts and consider establishing a reporting system for private lending discrimination complaints.

#### **H. SHORTAGE OF AFFORDABLE HOMEOWNERSHIP HOUSING**

The City of Lawton's housing values have continued to rise during the past few years, which may make it difficult for lower-income persons to become homeowners. As of 2014, the median value of a home in the City of Lawton was \$105,300. The housing market has continued see rising home values since then, and according to American Community Survey (ACS), median home values in Lawton have rising by 7.1% to \$112,800 in 2019.

The City supports a range of services and programs that meet the needs of low- and moderate-income households, including the "First-Time Homebuyer Program" and the "Owner-Occupied Housing Rehabilitation Program." The City's 2030 Land Use Plan also states supporting "the provision and preservation of safe, sanitary, decent, and affordable housing for all of the citizens of the Lawton community" as one of its goals. Future planning and development activities should follow this principle to increase the ownership rate among low- and moderate-income households.

#### **I. SHORTAGE OF AFFORDABLE RENTAL HOUSING**

The City's monthly median gross rent rose from \$773 in 2014 to \$832 in 2019 according to ACS, at a rate of 7.6%, slightly faster than the median home value change during the same period. Rental housing shortages are common for many, if not most, jurisdictions, since the provision of housing for this income and lifestyle cohort often requires public sector subsidies which have been limited.

The City has continued to experience a surge of needs for housing assistance especially from renters since the COVID-19 pandemic. Based on the interviews with Lawton's community service organizations, there is a high demand for eviction, utilities, and rental deposit assistance. It is also anecdotally observed that there is not enough capacity for community service organizations to serve those in need, and there is a lack of affordable and safe rental properties in Lawton, especially for low- and moderate-income households, as a lot of private affordable rental properties available to families are limited to their military status. For example, it has been observed that it is difficult to find 2-bedroom units priced \$700 or below per month, excluding utilities or deposit costs.



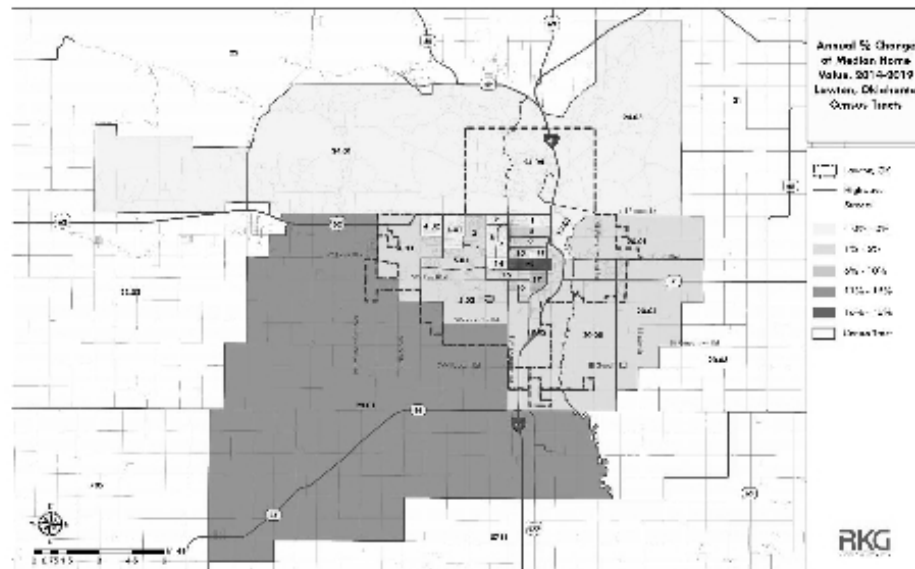
The City should consider taking a bigger role in building more affordable housing in the City, as it is observed that there is little incentive for private developers to produce affordable housing units. HOME funding should be utilized alone or in conjunction with other funding sources to purchase, rehabilitate, or construct units as rental housing for households at or below 80% of Median Family Income. More importantly, the City needs to be more supportive of developers proposing to development Low Income Housing Tax Credit (LIHTC) projects within the City. These projects typically combine market rate (not subsidized) and affordable units (investor subsidized) for people making 60% to 80% of area median incomes. LIHTC projects are syndicated development deals, usually with the involvement of the State's Housing Finance Agency, to attract investor equity to a project to make some units affordable.

### J. RISING HOME VALUES IN SOME CHALLENGED NEIGHBORHOODS

As discussed in the previous section, though Census Tract 25 has one of the lowest household incomes, a higher level of poverty and a lower level of labor market engagement, it has also experienced the fastest increase of its median home value compared to other neighborhoods in the City, which jumped by 205% between 2014 and 2019, at 41% per year. This census tract also has two public housing projects, which are Benjamin O. Davis Highrise and Old Towne Square, and has only 228 owner-occupied households according to the 2019 American Community Survey 5-Year Estimates. In addition, most of the census tracts in challenged communities with lower incomes and less access to opportunities have experienced an increase in their median home values between 2014 and 2019 (Map 7-2).

The fast increase of median home values in Census Tract 25 will likely further limit homeownership opportunities for the low- and moderate-income population. The City should continue to invest and partner with various non-profit organizations to stabilize the housing stock in this part of the City and prevent involuntary displacement.

Map 7-2



## **K. LIMITED SUPPLY OF HOUSING FOR PERSONS WITH DISABILITIES AND LARGER FAMILIES**

Disability is the second most common basis for housing discrimination complaints, accounting for 28.9% of all complaints originated in Lawton between 2016 and 2020. The most common disabilities cited were ambulatory difficulties and cognitive problems, inflicting 10.2% and 8.5% of the total population according to HUD. These needs may require increasing the provision of housing that is specifically designed to meet ADA standards to accommodate people with ambulatory or other physical disabilities, in addition to providing supportive services. Cognitive issues could be impacting elderly residents at a higher rate, or there may be housing needs related to the group of people with cognitive or learning disabilities. Lawton's population is also aging, following a national trend, with the percentage of its population aged 65 and older rising from 9.3% in 2010 to 11.0% in 2019 according to ACS. Based on the information gathered from stakeholder interviews, there is a severe shortage of housing units that meet ADA standards in publicly assisted housing projects and emergency housing/shelters that serve low- and moderate-income households and individuals.

The stakeholder interviews also reveal that there has been an increasing demand for larger housing units, such as 4-bedroom units, that are affordable to low- and moderate-income families. The existing supply of larger units is very limited, especially in publicly assisted housing projects. The household composition analysis of Lawton's public housing and Section 8 program participants also suggests that Native American/Alaska Native and Hispanic households living in Lawton's publicly assisted housing projects tend to have more adults and youths living with the heads of household, resulting in larger households. The lack of supply of larger housing units in publicly assisted housing projects further limits the access to affordable housing in a population that already have lower income levels and less access to opportunities compared to other racial/ethnic groups in the City.

The City should expand public/private partnerships to obtain property to increase the accessible, affordable housing stock with a balanced mix of bedroom types that meet ADA requirements. The City should also seek to provide accessibility modification improvements through the CDBG or HOME funds and increase support for community-based nonprofit organizations that provide housing-related services to the disabled population and larger family households. An example is that the City of Norman, in conjunction with MFHC, is currently developing a Visitability Ordinance which will incentivize developers to construct or modify units to the adopted Visitability Standards. The new Ordinance draft includes several different levels of modifications that a developer can pursue. In addition, all new constructions funded by Norman's HOME program are designed to meet these standards at the minimum. Lawton should consider similar policy approaches to provide more access to affordable housing opportunities to the disabled population and low- and moderate-income households of all sizes.

## **L. INCREASE FAIR HOUSING EDUCATION AND ENCOURAGE REAL ESTATE SALES AND PROPERTY MANAGEMENT COMPANIES TO INCLUDE FAIR HOUSING LANGUAGE IN REAL ESTATE LISTINGS**

Based on RKG's review of the real estate websites, it appears that most of Lawton's real estate firms engaged in the sale and rental of residential properties do not promote statements in accordance with fair housing laws. The National Association of Realtors requires that their members adhere to the following practices:

- Provide equal professional service without regard to the race, color, religion, gender (sex), disability (handicap), familial status, national origin, sexual orientation, or gender identity of any prospective client, customer, or of the residents of any community.

- Keep informed about fair housing law and practices, improving my clients' and customers' opportunities and my business.
- Develop advertising that indicates that everyone is welcome, and no one is excluded; expanding my client's and customer's opportunities to see, buy, or lease property.
- Inform clients and customers about their rights and responsibilities under the fair housing laws by providing brochures and other information.
- Document efforts to provide professional service, which will assist members in becoming more responsive and successful REALTORS.
- Refuse to tolerate non-compliance.
- Learn about those who are different from me and celebrate those differences.
- Take a positive approach to fair housing practices and aspire to follow the spirit as well as the letter of the law.
- Develop and implement fair housing practices for my firm to carry out the spirit of this declaration.

The City of Lawton should partner with the Metropolitan Fair Housing Council (MFHC) to provide annual reminders to Realtors and property management firms that they should promote Fair Housing practices and provide affirmative statements in their marketing materials, brochures, website, and all their real estate listings.

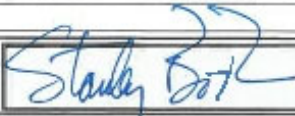
In addition, the City has seen an increase in housing discrimination complaints generated between 2017 and 2019, with complaints related to Renters' Rights and Disability issues being the most prevalent. As Lawton currently does not have a partnership with MFHC, the City should consider allocating parts of its available funding to contract MFHC to conduct direct outreach and education on Fair Housing issues, including tenant rights, for both tenants and landlords, as a lot of the low-income population do not have direct access to the internet. It is also beneficial for Lawton to contract MFHC to provide mediation/legal services for low- and moderate-income households in relation to fair housing issues.

Grantee SF-424's and Certification(s)

OMB Number: 4340-0044  
 Expiration Date: 12/31/2022

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		* 2. Type of Application <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision
		* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: <input type="text"/>		4. Applicant Identifier: <input type="text"/>
Federal Entity Identifier: <input type="text"/>		Federal Award Identifier: <input type="text"/>
<b>State Use Only:</b>		
5. Date Received by State: <input type="text"/>		7. State Application Identifier: <input type="text"/>
<b>8. APPLICANT INFORMATION:</b>		
* a. Legal Name: <input type="text" value="City of Lawton"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="BEN# 13 61052117"/>		* c. Organizational DUNS: <input type="text" value="074272855000"/>
<b>d. Address:</b>		
* Street1:	<input type="text" value="212 NW 9th Street"/>	
* Street2:	<input type="text"/>	
* City:	<input type="text" value="Lawton"/>	
* County/Parish:	<input type="text"/>	
* State:	<input type="text" value="OK: Oklahoma"/>	
* Province:	<input type="text"/>	
* Country:	<input type="text" value="USA: UNITED STATES"/>	
* Zip / Postal Code:	<input type="text" value="75501-3944"/>	
<b>e. Organizational Unit:</b>		
Department Name: <input type="text" value="Community Development"/>		Division Name: <input type="text" value="Housing &amp; Community Develop."/>
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>		
* First Name:	<input type="text" value="Christine"/>	
* Middle Name:	<input type="text"/>	
* Last Name:	<input type="text" value="James"/>	
* Suffix:	<input type="text"/>	
* Title:	<input type="text" value="Housing &amp; Community Development Administrator"/>	
Organizational Affiliation: <input type="text"/>		
* Telephone Number:	<input type="text" value="580-581-3247"/>	* Fax Number: <input type="text" value="580-581-3546"/>
* Email:	<input type="text" value="christine.james@lawtonok.gov"/>	

Application for Federal Assistance SF-424	
<b>* 8. Type of Applicant 1: Select Applicant Type:</b> <input type="text" value="C: City or Township government"/>	
<b>Type of Applicant 2: Select Applicant Type:</b> <input type="text"/>	
<b>Type of Applicant 3: Select Applicant Type:</b> <input type="text"/>	
<b>* Other (specify):</b> <input type="text"/>	
<b>* 10. Name of Federal Agency:</b> <input type="text" value="US Department of Housing and Urban Development"/>	
<b>11. Catalog of Federal Domestic Assistance Number</b> <input type="text" value="14-211"/>	
<b>CFDA Title:</b> <input type="text" value="Community Development Block Grant (CDBG) Program"/>	
<b>* 12. Funding Opportunity Number:</b> <input type="text"/>	
<b>* Title:</b> <input type="text"/>	
<b>13. Competition Identification Number:</b> <input type="text"/>	
<b>Title:</b> <input type="text"/>	
<b>14. Areas Affected by Project (Cities, Counties, States, etc.):</b> <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
<b>* 15. Descriptive Title of Applicant's Project:</b> <input type="text" value="LAWTON'S annual Act on Plan for FY 2021 includes a variety of CDBG projects, including exterior parking, public service, home rehabilitation, economic development, and infrastructure improvements."/>	
<b>Attach supporting documents as specified in agency regulations</b> <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/>	

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant: <input type="text" value="CD4"/>	* b. Program/Project: <input type="text" value="C14"/>
Attach an additional list of Program/Project Congressional Districts if needed.	
<input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
17. Proposed Project:	
* a. Start Date: <input type="text" value="07/01/2021"/>	* b. End Date: <input type="text" value="06/30/2022"/>
18. Estimated Funding (\$):	
* a. Federal	<input type="text" value="7,6070.00"/>
* c. Applicant	<input type="text"/>
* d. State	<input type="text"/>
* e. Local	<input type="text"/>
* f. Other	<input type="text" value="616,732.85"/>
* i. Program Income	<input type="text" value="1,000.00"/>
* g. TOTAL	<input type="text" value="7,350,207.85"/>
* 19. Is Application Subject to Review By State Under Executive Order 12972 Process?	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12972 Process for review on <input type="text"/>	
<input type="checkbox"/> b. Program is subject to E.O. 12972 but has not been selected by the State for review.	
<input checked="" type="checkbox"/> c. Program is not covered by E.O. 12972.	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes", provide explanation and attach	
<input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)	
<input checked="" type="checkbox"/> ** I AGREE	
** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.	
Authorized Representative:	
Prefix: <input type="text" value="M."/>	* First Name: <input type="text" value="Stanley"/>
Middle Name: <input type="text"/>	
Last Name: <input type="text" value="Lawton"/>	
Suffix: <input type="text"/>	
* Title: <input type="text" value="Mayor"/>	
* Telephone Number: <input type="text" value="550-551-1331"/>	* Fax Number: <input type="text" value="551-561-3576"/>
* Email: <input type="text" value="m.lawton@lawtonnc.gov"/>	
* Signature of Authorized Representative: 	* Date Signed: <input type="text" value="8-10-2021"/>

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0035  
Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:


1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest or persons' gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 901, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§1301 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1693, and 1695-1696), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicap; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-610), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

Previous Edition: Useless

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Standard Form 424D (Rev. 7-97)  
Prescribed by GMB Circular A-107

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11860; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation plans under Section 170(c) of the Clean Air Act of 1965, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 105 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 108(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

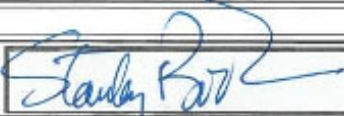
SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Mayor
APPLICANT ORGANIZATION City of Lawton	DATE SUBMITTED 8-10-2021

SF-424D (Rev. 7/01) Back



Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Change/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s) <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: <input type="text"/>	4. Applicant Identifier: <input type="text"/>	
5a. Federal Entity Identifier: <input type="text"/>	5b. Federal Award Identifier: <input type="text"/>	
State Use Only:		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
<b>8. APPLICANT INFORMATION:</b>		
* a. Legal Name: <input type="text" value="City of Lawton"/>		
* b. Employee Taxpayer Identification Number (EIN/TIN): <input type="text" value="0000000000"/>	* c. Organization's DUNS: <input type="text" value="0742728650000"/>	
d. Address:		
* Street1: <input type="text" value="212 SW 9th Street"/>	Street2: <input type="text"/>	
* City: <input type="text" value="Lawton"/>	County/Parish: <input type="text"/>	
* State: <input type="text" value="OK: Oklahoma"/>	Province: <input type="text"/>	
* Country: <input type="text" value="USA: UNITED STATES"/>	* Zip / Postal Code: <input type="text" value="73501-3344"/>	
e. Organizational Unit:		
Department Name: <input type="text" value="Community Services"/>	Division Name: <input type="text" value="Housing &amp; Community Develop."/>	
f. Name and contact information of person to be contacted on matters involving this application:		
* First Name: <input type="text" value="Christine"/>	* Last Name: <input type="text" value="James"/>	
* Middle Name: <input type="text"/>	* Suffix: <input type="text"/>	
Title: <input type="text" value="Housing &amp; Community Development Administrator"/>		
Organizational Address: <input type="text"/>		
* Telephone Number: <input type="text" value="580-581-3147"/>	* Fax Number: <input type="text" value="580-581-3346"/>	
* Email: <input type="text" value="christine.james@lawtonok.gov"/>		

Application for Federal Assistance SF-424	
<b>* 9. Type of Applicant 1: Select Applicant Type:</b> <input type="text" value="C: City or Township Government"/>	
<b>Type of Applicant 2: Select Applicant Type:</b> <input type="text"/>	
<b>Type of Applicant 3: Select Applicant Type:</b> <input type="text"/>	
<b>* Other (specify):</b> <input type="text"/>	
<b>* 10. Name of Federal Agency:</b> <input type="text" value="US Department of Housing and Urban Development"/>	
<b>11. Catalog of Federal Domestic Assistance Number:</b> <input type="text" value="14-2-3"/>	
<b>CFDA Title:</b> <input type="text" value="HOME Investment Partnerships Program (HOME) Program"/>	
<b>* 12. Funding Opportunity Number:</b> <input type="text"/>	
<b>* Title:</b> <input type="text"/>	
<b>13. Competition Identification Number:</b> <input type="text"/>	
<b>Title:</b> <input type="text"/>	
<b>14. Areas Affected by Project (Cities, Counties, States, etc.):</b> <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
<b>* 15. Descriptive Title of Applicant's Project:</b> <input type="text" value="Lawton's Annual Action Plan for FY 2021 includes a variety of HOME projects, including purchase assistance to homebuyers, homeowner rehabilitation assistance and CDBG assistance."/>	
<b>Attach supporting documents as specified in agency instructions</b> <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/>	

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant: <input type="text" value="0114"/>	* b. Program/Project: <input type="text" value="C34"/>
Attach an additional list of Program/Project Congressional Districts if needed.	
<input type="text"/>	<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>
17. Proposed Project:	
* a. Start Date: <input type="text" value="01/01/2021"/>	* b. End Date: <input type="text" value="06/30/2022"/>
18. Estimated Funding (\$):	
* a. Federal	<input type="text" value="366,400.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text" value="7,445,883.17"/>
* f. Program Income	<input type="text" value="15,490.00"/>
* g. TOTAL	<input type="text" value="4,020,000.00"/>
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?	
<input type="checkbox"/> a. Its application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/> .	
<input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the state for review.	
<input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes", provide explanation and attach:	
<input type="text"/>	<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>
21. *By signing this application, I certify (1) to the statements contained in the list of certifications* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 28, Section 1001)	
<input checked="" type="checkbox"/> ** I AGREE	
* The list of certifications and assurances on an internet site where you may view this list, is contained in the announcement or agency specific instructions.	
Authorized Representative:	
Prefix: <input type="text" value="Mr."/>	* First Name: <input type="text" value="Stanley"/>
Middle Name: <input type="text"/>	* Last Name: <input type="text" value="Booker"/>
Suffix: <input type="text"/>	
* Title: <input type="text" value="Mayor"/>	
* Telephone Number: <input type="text" value="800-551-3301"/>	Fax Number: <input type="text" value="800-551-1576"/>
* Email: <input type="text" value="stbooker@wv.gov"/>	
* Signature of Authorized Representative: 	* Date Signed: <input type="text" value="8-10-2020"/>

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4540-0008  
Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0343-0042), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

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As the duly authorized representative of the applicant, I certify that the applicant:


1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the completed work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4/28-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4901 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794) which prohibits discrimination on the basis of handicap; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 ed-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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Standard Form 424D (Rev. 7-87)  
Prescribed by GMR Circular A-117

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the official activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance at the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (i) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (ii) notification of violating facilities pursuant to EO 11734; (iii) protection of wetlands pursuant to EO 11990; (iv) evaluation of flood hazards in floodplains in accordance with EO 11888; (v) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (vi) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (vii) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (viii) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§489a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1986 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 108(g) of the Trafficking Victims Protection Act (TVPA) of 2005, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect; (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	Mayor
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Lawton	8-10-2021

SF-424J (Rev. 7-97) Back

**THE OFFICE OF THE CITY ATTORNEY**  
*Inter-Departmental Memorandum*

**TO:** Stan Booker, Mayor  
Michael Cleghorn, City Manager

**FROM:** John Ratliff  
City Attorney

**DATE:** October 29, 2021

**RE:** Certification for CDBG and HOME grants

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The attached certifications have been reviewed and approved by legal.

APPROVED as to form and legality on behalf of the City of Lawton on the 29<sup>th</sup> day of October, 2021.

  
John Ratliff  
CITY ATTORNEY

**CERTIFICATIONS**

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

**Affirmatively Further Fair Housing** --The jurisdiction will affirmatively further fair housing.

**Uniform Relocation Act and Anti-displacement and Relocation Plan** -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

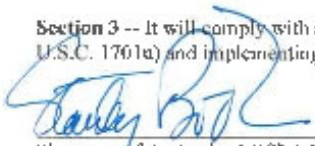
**Anti-Lobbying** --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction** --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

**Consistency with plan** --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701a) and implementing regulations at 24 CFR Part 75.



Signature of Authorized Official

11/1/2021  
Date

Mayor  
Title

### Specific Community Development Block Grant Certifications

The Benefiting Community certifies that:

**Citizen Participation** -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

**Community Development Plan** -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

**Following a Plan** -- It is following a current consolidated plan that has been approved by HUD.

**Use of Funds** -- It has complied with the following criteria:

**1. Maximum Feasible Priority.** With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

**2. Overall Benefit.** The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2021, a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

**3. Special Assessments.** It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

**Excessive Force** -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.



**Compliance with Anti-discrimination laws** -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

**Lead-Based Paint** -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

**Compliance with laws** -- It will comply with applicable laws.

  
Signature of Authorized Official

11/11/2021  
Date

\_\_\_\_\_  
Mayor  
Title

**OPTIONAL Community Development Block Grant Certification**

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 CFR 570.203(e):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

  
\_\_\_\_\_  
Signature of Authorized Official

  
\_\_\_\_\_  
Date

Mayor  
\_\_\_\_\_  
Title

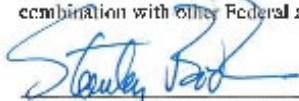
**Specific HOME Certifications**

The HOME participating jurisdiction certifies that:

**Tenant Based Rental Assistance** -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

**Eligible Activities and Costs** -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

**Subsidy layering** -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing.

  
\_\_\_\_\_  
Signature of Authorized Official

11/1/2021  
Date

\_\_\_\_\_  
Title Mayor

## Emergency Solutions Grants Certifications

The Emergency Solutions Grants Program recipient certifies that:

**Major rehabilitation/conversion/renovation** - If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

**Essential Services and Operating Costs** – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the recipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long as the recipient serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

**Renovation** – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

**Supportive Services** – The recipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal, State, local, and private assistance available for these individuals.


**Matching Funds** – The recipient will obtain matching amounts required under 24 C.F.R. 576.201.

**Confidentiality** – The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

**Homeless Persons Involvement** – To the maximum extent practicable, the recipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

**Consolidated Plan** – All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.

**Discharge Policy** The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

  
\_\_\_\_\_  
Signature of Authorized Official

11/1/2021  
\_\_\_\_\_  
Date

\_\_\_\_\_  
Mayor  
Title

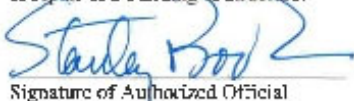
**Housing Opportunities for Persons With AIDS Certifications**

The HOPWA grantee certifies that:

**Activities** -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

**Building** -- Any building or structure assisted under that program shall be operated for the purpose specified in the consolidated plan:

1. For a period of not less than 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility;
2. For a period of not less than 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

  
Signature of Authorized Official

11/1/2021  
Date

\_\_\_\_\_  
Mayer  
Title

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**APPENDIX TO CERTIFICATIONS**

**INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:**

**Lobbying Certification**

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

## Appendix - Alternate/Local Data Sources

<b>1</b>	<b>Data Source Name</b> No Alternate Data Source
	<b>List the name of the organization or individual who originated the data set.</b> Not Applicable
	<b>Provide a brief summary of the data set.</b> Not Applicable
	<b>What was the purpose for developing this data set?</b> Not Applicable
	<b>Provide the year (and optionally month, or month and day) for when the data was collected.</b> Not Applicable
	<b>Briefly describe the methodology for the data collection.</b> Not Applicable
	<b>Describe the total population from which the sample was taken.</b> Not Applicable
	<b>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</b> Not Applicable
	<b>2</b>
	<b>Data Source Name</b> No local Data Source
<b>List the name of the organization or individual who originated the data set.</b> Not Applicable	
<b>Provide a brief summary of the data set.</b> Not Applicable	
<b>What was the purpose for developing this data set?</b> Not Applicable	
<b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b> Not Applicable	
<b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b> Not Applicable	



	<p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>Not Aplicable</p>
3	<p><b>Data Source Name</b></p> <p>Lawton Housing Authority</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>Lawton Housing Authority, Rita Love, Executive Director</p>
	<p><b>Provide a brief summary of the data set.</b></p> <p>Number of Public Housing Units available within the City of Lawton. The Lawton Housing Authority oversees public housing inthe community and knows the number of units available.</p>
	<p><b>What was the purpose for developing this data set?</b></p> <p>NA</p>
	<p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b></p> <p>NA</p>
	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>Current numbers</p>
	<p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>Complete</p>