

Housing Needs Assessment
Comanche County

Prepared For:

Oklahoma Housing Finance Agency
Oklahoma Department of Commerce
100 NW 63rd Street, Ste. 200
Oklahoma City, OK 73116

Effective Date of the Analysis:

July 8, 2015

This "Statewide Affordable Housing Market Study" was financed in whole or in part by funds from the U.S. Department of Housing and Urban Development as administered by the Oklahoma Department of Commerce and Oklahoma Housing Finance Agency.





December 31, 2015

Mr. Dennis Shockley, Executive Director
Oklahoma Housing Finance Agency
100 NW 63rd Street, Ste. 200
Oklahoma City, OK 73116

SUBJECT: Housing Needs Assessment
 Comanche County
 IRR - Tulsa/OKC File No. 140-2015-0029

Dear Mr. Shockley:

As per our Agreement with Oklahoma Housing Finance Agency (OHFA), we have completed a residential housing market analysis (the "Analysis") for use by OHFA and the Oklahoma Department of Commerce (ODOC). Per our Agreement, OHFA and ODOC shall have unrestricted authority to publish, disclose, distribute and otherwise use, in whole or in part, the study and reports, data or other materials included in the Analysis or otherwise prepared pursuant to the Agreement and no materials produced in whole, or in part, under the Agreement shall be subject to copyright in the United States or any other country. Integra Realty Resources – Tulsa/OKC will cause the Analysis (or any part thereof) and any other publications or materials produced as a result of the Agreement to include substantially the following statement on the first page of said document:

This "Statewide Affordable Housing Market Study" was financed in whole or in part by funds from the U.S. Department of Housing and Urban Development as administered by the Oklahoma Department of Commerce and Oklahoma Housing Finance Agency.

Attached hereto, please find the Comanche County Residential Housing Market Analysis. Analyst Derrick Wilson personally inspected the Comanche County area during the month of July 2015 to collect the data used in the preparation of the Comanche County Market Analysis. The University of Oklahoma College of Architecture Division of Regional and City Planning provided consultation, assemblage and analysis of the data for IRR-Tulsa/OKC.

Mr. Dennis Shockley
Oklahoma Housing Finance Agency
December 31, 2015
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This market study is true and correct to the best of the professional's knowledge and belief, and there is no identity of interest between Owen S. Ard, MAI, David A. Puckett, or Integra Realty Resources – Tulsa/OKC and any applicant, developer, owner or developer.

If you have any questions or comments, please contact the undersigned. Thank you for the opportunity to be of service.

Respectfully submitted,

Integra Realty Resources - Tulsa/OKC

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Introduction and Executive Summary

This report is part of a Statewide Affordable Housing Market Study commissioned by the Oklahoma Department of Commerce (ODOC) in partnership with the Oklahoma Housing Finance Agency (OHFA), as an outgrowth of the 2013 tornado outbreak in Oklahoma. It was funded by the U.S. Department of Housing and Urban Development (USHUD) through the Community Development Block Grant – Disaster Recovery program (CDBG-DR). This study was conducted by a public/private partnership between Integra Realty Resources – Tulsa/OKC, the University of Oklahoma College of Architecture, Division of Regional and City Planning, and DeBruler Inc. IRR-Tulsa/OKC, The University of Oklahoma, and DeBruler Inc. also prepared a prior statewide study in 2001, also commissioned by ODOC in partnership with OHFA.

This study is a value-added product derived from the original 2001 statewide housing study that incorporates additional topics and datasets not included in the 2001 study, which impact affordable housing throughout the state. These topic areas include:

- Disaster Resiliency
- Homelessness
- Assessment of Fair Housing
- Evaluation of Residential Lead-Based Paint Hazards

These topics are interrelated in terms of affordable housing policy, housing development, and disaster resiliency and recovery. Homeless populations are more vulnerable in the event of a disaster, as are many of the protected classes under the Fair Housing Act. Lead-based paint is typically more likely to be present in housing units occupied by low-to-moderate income persons, and can also present an environmental hazard in the wake of a disaster. Effective affordable housing policy can mitigate the impact of natural and manmade disasters by encouraging the development and preservation of safe, secure, and disaster-resilient housing for Oklahoma’s most vulnerable populations.

Housing Market Analysis Specific Findings:

1. The population of Comanche County is projected to grow by 0.05% per year over the next five years, underperforming the State of Oklahoma.
2. Comanche County is projected to need a total of 276 housing units for ownership and 212 housing units for rent over the next five years.
3. Median Household Income in Comanche County is estimated to be \$47,514 in 2015, compared with \$47,049 estimated for the State of Oklahoma. The poverty rate in Comanche County is estimated to be 15.60%, compared with 14.72% for Oklahoma.
4. Homeowner and rental vacancy rates in Comanche County are higher than the state averages.
5. Home values are lower, while rental rates in Comanche County are higher than the state averages.
6. Average sale price for homes in Lawton was \$118,967 in 2015, with a total of 1,334 transactions. Average days on market is reported to be 86 days.
7. Approximately 37.49% of renters and 18.64% of owners are housing cost overburdened.

Disaster Resiliency Specific Findings:

1. Tornadoes (1959-2014): Number: 56 Injuries:122 Fatalities: 8 Damages (1996-2014): \$210,000.00
2. Social Vulnerability: Above the state score; at the census tract level the central portion of the county, Lawton area has elevated scores.
3. Floodplain: 20 floods from 01/01/1993 to 03/07/2007 that resulted in \$20,000 in property damage from flash floods. No injuries or deaths were reported.

Homelessness Specific Findings

1. Comanche County is located in the Southwest Oklahoma Continuum of Care.
2. There are an estimated 239 homeless individuals in this area, 177 of which are identified as sheltered.
3. There are at least 8 homeless households comprised of children only.
4. There is also a high homeless veteran population (25) in this region.
5. Investment should be made for more temporary and permanent housing for homeless veterans.

Fair Housing Specific Findings

1. Units at risk for poverty: 200
2. Units in mostly non-white enclaves: 182
3. Units near elevated number of persons with disabilities: 225
4. Units further than 15 miles from a hospital: 123
5. Units located in a food desert: 151
6. Units that lack readily available transit: 24

Lead-Based Paint Specific Findings

1. We estimate there are 7,074 occupied housing units in Comanche County with lead-based paint hazards.
2. 3,206 of those housing units are estimated to be occupied by low-to-moderate income households.
3. We estimate that 1,490 of those low-to-moderate income households have children under the age of 6 present.

Report Format and Organization

The first section of this report comprises the housing market analysis for Comanche County. This section is divided into general area information, followed by population, household and income trends and analysis, then followed by area economic conditions. The next area of analysis concerns the housing stock of Comanche County, including vacancy rates, construction activity and trends, and analyses of the homeowner and rental markets. This section is followed by five-year forecasts of housing need for owners and renters, as well as specific populations such as low-to-moderate income households, the elderly, and working families.

The next section of this report addresses special topics of concern:

-
- Disaster Resiliency
 - Homelessness
 - Fair Housing
 - Lead-Based Paint Hazards

This last section is followed by a summary of the conclusions of this report for Comanche County.

General Information

Purpose and Function of the Market Study

The purpose of this market study is to evaluate the need for affordable housing units in Comanche County, Oklahoma. The analysis will consider existing supply and projected demand and overall market trends in the Comanche County area.

Effective Date of Consultation

The Comanche County area was inspected and research was performed during July, 2015. The effective date of this analysis is July 8, 2015. The date of this report is December 31, 2015. The market study is valid only as of the stated effective date or dates.

Scope of the Assignment

1. The Comanche County area was inspected during July, 2015. The inspection included visits to all significant population centers in the county and portions of the rural county areas.
2. Regional, city and neighborhood data is based on information retained from national, state, and local government entities; various Chambers of Commerce, news publications, and other sources of economic indicators.
3. Specific economic data was collected from all available public agencies. Population and household information was collected from national demographic data services as well as available local governments. Much data was gathered regarding market specific items from personal interviews.
4. Development of the applicable analysis involved the collection and interpretation of verified data from local property owners/managers, realtors, and other individuals active within the area real estate market.
5. The analyst's assemblage and analysis of the defined data provided a basis from which conclusions as to the supply of and demand for residential housing were made.

Data Sources

Specific data sources used in this analysis include but are not limited to:

1. The 2000 and 2010 Decennial Censuses of Population and Housing
2. The 2009-2013 American Community Survey (ACS)
3. U.S. Census Bureau Residential Construction Branch, Manufacturing and Construction Division
4. The United States Department of Labor, Bureau of Labor Statistics, including the Local Area Unemployment Statistics and the Quarterly Census of Employment and Wages programs
5. The U.S. Department of Housing and Urban Development, including the Comprehensive Housing Affordability Strategy (CHAS), and the 2013 PITture of Subsidized Households
6. Continuum of Care Assistance Programs

7. The National Oceanic and Atmospheric Administration
8. Nielsen SiteReports (formerly known as Claritas)
9. The Oklahoma State Department of Health
10. The Oklahoma Department of Human Services
11. The Federal Reserve Bank of Kansas City, Oklahoma City Branch
12. The Federal Reserve Bank of New York

Comanche County Analysis

Area Information

The purpose of this section of the report is to provide a basis for analyzing and estimating trends relating to Comanche County. The primary emphasis is concentrated on those factors that are of significance to residential development users. Residential and commercial development in the community is influenced by the following factors:

1. Population and economic growth trends.
2. Existing commercial supply and activity.
3. Natural physical elements.
4. Political policy and attitudes toward community development.

Location

Comanche County is located in southwestern Oklahoma. The county is bordered on the north by Kiowa and Caddo counties, on the west by Kiowa and Tillman Counties, on the south by Tillman and Cotton counties, and on the east by Grady and Stephens counties. The Comanche County Seat is Lawton, which is located in the central part of the county. This location is approximately 191 miles southwest of Tulsa and 89 miles southwest of Oklahoma City.

Comanche County has a total area of 1,084 square miles (1,069 square miles of land, and 14 square miles of water), ranking 15th out of Oklahoma's 77 counties in terms of total area. The total population of Comanche County as of the 2010 Census was 124,098 persons, for a population density of 116 persons per square mile of land.

Access and Linkages

The county has above average accessibility to state and national highway systems. Multiple major highways intersect within Comanche. These are I-44, US-62, US-277, OK-36, OK-7, OK-17, OK-115, OK-49, OK-65, OK-36, and OK-58. The nearest interstate highway is I-44, which dissects the county north/south. The county also has an intricate network of county roadways.

Public transportation is provided by Lawton Area Transit System, which operates a fixed route and demand-response service. Additionally, the Family Area Network Transit (FANT) operates a demand-response service within the county. The local market perceives public transportation as average compared to other communities in the region of similar size. However, the primary mode of transportation in this area is private automobiles by far.

Lawton-Fort Sill Regional Airport is located just south of Lawton. Its primary concrete runway measures 8,599 feet in length and can accommodate large aircraft. The nearest full-service commercial airport is the Will Rogers World Airport, located approximately 81.6 miles northeast.

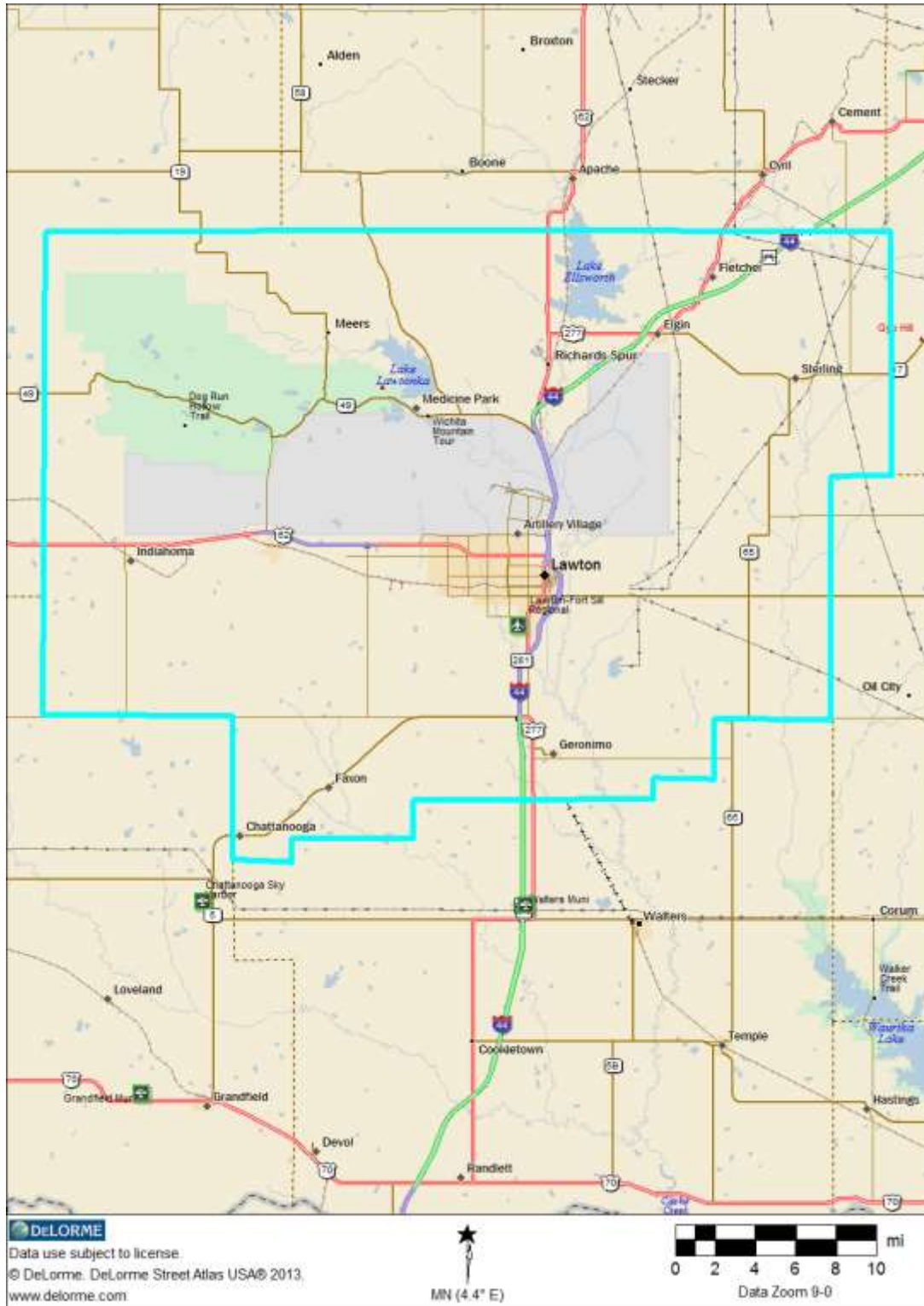
Educational Facilities

All of the county communities have public school facilities. Lawton is served by Lawton Public Schools which operates four high schools, four middle schools, and nineteen elementary schools. Lawton is home to Cameron University, a public university with over 5,000 students. Cameron University offers more than 50 degrees through two-year, four-year and graduate programs.

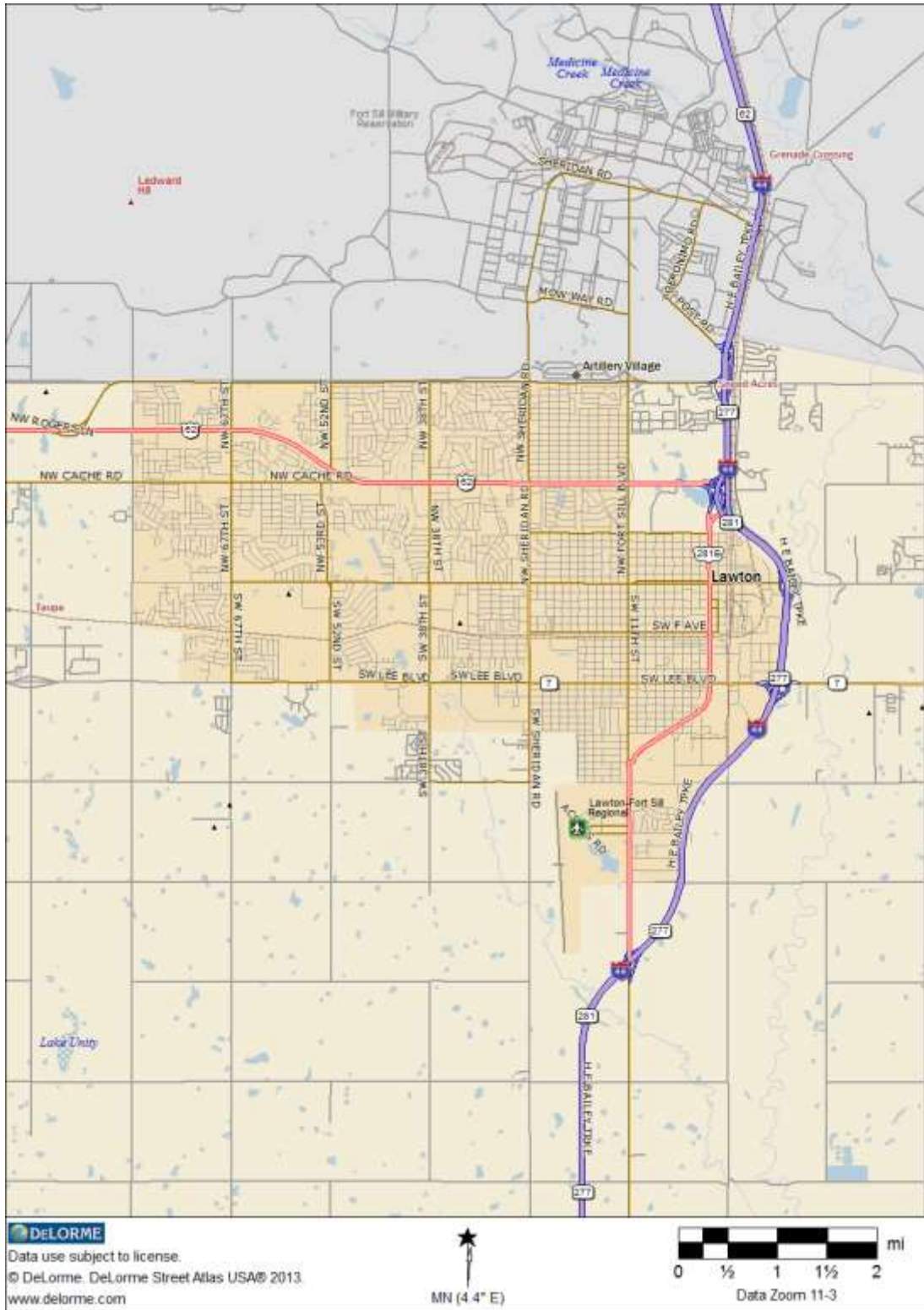
Medical Facilities

Medical services are provided by Comanche County Memorial Hospital, an acute-care hospital offering surgical, emergency, and in and outpatient's services. The smaller county communities typically have either small outpatient medical services or doctor's officing in the community.

Comanche County Area Map



Lawton Area Map



Demographic Analysis

Population and Households

The following table presents population levels and annualized changes in Comanche County and Oklahoma. This data is presented as of the 2000 Census, the 2010 Census, with 2015 and 2020 estimates and forecasts provided by Nielsen SiteReports.

Population Levels and Annual Changes							
	2000	2010	Annual	2015	Annual	2020	Annual
	Census	Census	Change	Estimate	Change	Forecast	Change
Lawton	92,757	96,867	0.43%	96,053	-0.17%	95,814	-0.05%
Comanche County	114,996	124,098	0.76%	123,949	-0.02%	124,270	0.05%
State of Oklahoma	3,450,654	3,751,351	0.84%	3,898,675	0.77%	4,059,399	0.81%

Sources: 2000 and 2010 Decennial Censuses, Nielsen SiteReports

The population of Comanche County was 124,098 persons as of the 2010 Census, a 0.76% annualized rate of change from the 2000 Census. As of 2015, Nielsen SiteReports estimates the population of Comanche County to be 123,949 persons, and projects that the population will show 0.05% annualized growth over the next five years.

The population of Lawton was 96,867 persons as of the 2010 Census, a 0.43% annualized rate of change from the 2000 Census. As of 2015, Nielsen SiteReports estimates the population of Lawton to be 96,053 persons, and projects that the population will show -0.05% annualized decline over the next five years.

The next table presents data regarding household levels in Comanche County over the same periods of time. This data is presented both for all households (family and non-family) as well as family households alone.

Households Levels and Annual Changes							
Total Households	2000	2010	Annual	2015	Annual	2020	Annual
	Census	Census	Change	Estimate	Change	Forecast	Change
Lawton	31,778	34,901	0.94%	35,149	0.14%	35,369	0.12%
Comanche County	39,808	44,982	1.23%	45,546	0.25%	46,034	0.21%
State of Oklahoma	1,342,293	1,460,450	0.85%	1,520,327	0.81%	1,585,130	0.84%
Family Households	2000	2010	Annual	2015	Annual	2020	Annual
	Census	Census	Change	Estimate	Change	Forecast	Change
Lawton	22,521	22,508	-0.01%	22,724	0.19%	22,907	0.16%
Comanche County	28,858	30,303	0.49%	30,747	0.29%	31,138	0.25%
State of Oklahoma	921,750	975,267	0.57%	1,016,508	0.83%	1,060,736	0.86%

Sources: 2000 and 2010 Decennial Censuses, Nielsen SiteReports

As of 2010, Comanche County had a total of 44,982 households, representing a 1.23% annualized rate of change since the 2000 Census. As of 2015, Nielsen SiteReports estimates Comanche County to have 45,546 households. This number is expected to experience a 0.21% annualized rate of growth over the next five years.

As of 2010, Lawton had a total of 34,901 households, representing a 0.94% annualized rate of change since the 2000 Census. As of 2015, Nielsen SiteReports estimates Lawton to have 35,149 households. This number is expected to experience a 0.12% annualized rate of growth over the next five years.

Population by Race and Ethnicity

The next table presents data regarding the racial and ethnic composition of Comanche County based on the U.S. Census Bureau's American Community Survey.

2013 Population by Race and Ethnicity				
Single-Classification Race	Lawton		Comanche County	
	No.	Percent	No.	Percent
Total Population	97,147		124,591	
White Alone	59,223	60.96%	80,932	64.96%
Black or African American Alone	20,151	20.74%	21,263	17.07%
Amer. Indian or Alaska Native Alone	4,568	4.70%	6,779	5.44%
Asian Alone	2,472	2.54%	2,657	2.13%
Native Hawaiian and Other Pac. Isl. Alone	664	0.68%	686	0.55%
Some Other Race Alone	2,388	2.46%	2,647	2.12%
Two or More Races	7,681	7.91%	9,627	7.73%
Population by Hispanic or Latino Origin	Lawton		Comanche County	
	No.	Percent	No.	Percent
Total Population	97,147		124,591	
Hispanic or Latino	13,272	13.66%	14,638	11.75%
<i>Hispanic or Latino, White Alone</i>	7,332	55.24%	8,048	54.98%
<i>Hispanic or Latino, All Other Races</i>	5,940	44.76%	6,590	45.02%
Not Hispanic or Latino	83,875	86.34%	109,953	88.25%
<i>Not Hispanic or Latino, White Alone</i>	51,891	61.87%	72,884	66.29%
<i>Not Hispanic or Latino, All Other Races</i>	31,984	38.13%	37,069	33.71%

Source: U.S. Census Bureau, 2009-2013 American Community Survey, Tables B02001 & B03002

In Comanche County, racial and ethnic minorities comprise 41.50% of the total population. Within Lawton, racial and ethnic minorities represent 46.59% of the population.

Population by Age

The next tables present data regarding the age distribution of the population of Comanche County. This data is provided as of the 2010 Census, with estimates and forecasts provided by Nielsen SiteReports.

Comanche County Population By Age								
	2010	Percent	2015	Percent	2020	Percent	2000 - 2015	2015 - 2020
	Census	of Total	Estimate	of Total	Forecast	of Total	Ann. Chng.	Ann. Chng.
Population by Age	124,098		123,949		124,270			
Age 0 - 4	9,426	7.60%	9,156	7.39%	8,987	7.23%	-0.58%	-0.37%
Age 5 - 9	8,651	6.97%	8,722	7.04%	8,766	7.05%	0.16%	0.10%
Age 10 - 14	8,094	6.52%	8,145	6.57%	8,398	6.76%	0.13%	0.61%
Age 15 - 17	4,963	4.00%	4,829	3.90%	5,038	4.05%	-0.55%	0.85%
Age 18 - 20	7,234	5.83%	6,912	5.58%	6,885	5.54%	-0.91%	-0.08%
Age 21 - 24	9,629	7.76%	9,186	7.41%	8,495	6.84%	-0.94%	-1.55%
Age 25 - 34	20,493	16.51%	20,490	16.53%	18,981	15.27%	0.00%	-1.52%
Age 35 - 44	15,247	12.29%	15,278	12.33%	16,506	13.28%	0.04%	1.56%
Age 45 - 54	16,101	12.97%	14,599	11.78%	13,349	10.74%	-1.94%	-1.77%
Age 55 - 64	11,558	9.31%	12,903	10.41%	13,371	10.76%	2.23%	0.72%
Age 65 - 74	7,074	5.70%	7,842	6.33%	9,106	7.33%	2.08%	3.03%
Age 75 - 84	4,239	3.42%	4,361	3.52%	4,687	3.77%	0.57%	1.45%
Age 85 and over	1,389	1.12%	1,526	1.23%	1,701	1.37%	1.90%	2.20%
<i>Age 55 and over</i>	<i>24,260</i>	<i>19.55%</i>	<i>26,632</i>	<i>21.49%</i>	<i>28,865</i>	<i>23.23%</i>	<i>1.88%</i>	<i>1.62%</i>
<i>Age 62 and over</i>	<i>14,780</i>	<i>11.91%</i>	<i>16,074</i>	<i>12.97%</i>	<i>17,804</i>	<i>14.33%</i>	<i>1.69%</i>	<i>2.07%</i>
Median Age	31.9		32.3		33.2		0.25%	0.55%

Source: Nielsen SiteReports

As of 2015, Nielsen estimates that the median age of Comanche County is 32.3 years. This compares with the statewide figure of 36.6 years. Approximately 7.39% of the population is below the age of 5, while 12.97% is over the age of 62. Over the next five years, the population age 62 and above is forecasted to grow by 2.07% per year.

Lawton Population By Age								
	2010	Percent	2015	Percent	2020	Percent	2000 - 2015	2015 - 2020
	Census	of Total	Estimate	of Total	Forecast	of Total	Ann. Chng.	Ann. Chng.
Population by Age	96,867		96,053		95,814			
Age 0 - 4	7,747	8.00%	7,313	7.61%	7,077	7.39%	-1.15%	-0.65%
Age 5 - 9	6,734	6.95%	7,022	7.31%	6,955	7.26%	0.84%	-0.19%
Age 10 - 14	5,982	6.18%	6,183	6.44%	6,639	6.93%	0.66%	1.43%
Age 15 - 17	3,614	3.73%	3,551	3.70%	3,778	3.94%	-0.35%	1.25%
Age 18 - 20	6,198	6.40%	5,721	5.96%	5,715	5.96%	-1.59%	-0.02%
Age 21 - 24	8,601	8.88%	7,533	7.84%	6,879	7.18%	-2.62%	-1.80%
Age 25 - 34	17,480	18.05%	17,586	18.31%	15,612	16.29%	0.12%	-2.35%
Age 35 - 44	11,627	12.00%	12,020	12.51%	13,472	14.06%	0.67%	2.31%
Age 45 - 54	11,608	11.98%	10,465	10.90%	9,783	10.21%	-2.05%	-1.34%
Age 55 - 64	8,126	8.39%	9,069	9.44%	9,262	9.67%	2.22%	0.42%
Age 65 - 74	4,877	5.03%	5,290	5.51%	6,114	6.38%	1.64%	2.94%
Age 75 - 84	3,155	3.26%	3,123	3.25%	3,239	3.38%	-0.20%	0.73%
Age 85 and over	1,118	1.15%	1,177	1.23%	1,289	1.35%	1.03%	1.83%
<i>Age 55 and over</i>	<i>17,276</i>	<i>17.83%</i>	<i>18,659</i>	<i>19.43%</i>	<i>19,904</i>	<i>20.77%</i>	<i>1.55%</i>	<i>1.30%</i>
<i>Age 62 and over</i>	<i>10,470</i>	<i>10.81%</i>	<i>11,134</i>	<i>11.59%</i>	<i>12,132</i>	<i>12.66%</i>	<i>1.24%</i>	<i>1.73%</i>
Median Age	30.5		31.1		32.0		0.39%	0.57%

Source: Nielsen SiteReports

As of 2015, Nielsen estimates that the median age of Lawton is 31.1 years. This compares with the statewide figure of 36.6 years. Approximately 7.61% of the population is below the age of 5, while 11.59% is over the age of 62. Over the next five years, the population age 62 and above is forecasted to grow by 1.73% per year.

Families by Presence of Children

The next table presents data for Comanche County regarding families by the presence of children.

2013 Family Type by Presence of Children Under 18 Years

	Lawton		Comanche County	
	No.	Percent	No.	Percent
Total Families:	22,030		29,349	
Married-Couple Family:	14,226	64.58%	20,229	68.93%
With Children Under 18 Years	5,971	27.10%	8,432	28.73%
No Children Under 18 Years	8,255	37.47%	11,797	40.20%
Other Family:	7,804	35.42%	9,120	31.07%
Male Householder, No Wife Present	1,839	8.35%	2,227	7.59%
With Children Under 18 Years	1,094	4.97%	1,400	4.77%
No Children Under 18 Years	745	3.38%	827	2.82%
Female Householder, No Husband Present	5,965	27.08%	6,893	23.49%
With Children Under 18 Years	4,152	18.85%	4,654	15.86%
No Children Under 18 Years	1,813	8.23%	2,239	7.63%
Total Single Parent Families	5,246		6,054	
Male Householder	1,094	20.85%	1,400	23.13%
Female Householder	4,152	79.15%	4,654	76.87%

Source: U.S. Census Bureau, 2009-2013 American Community Survey, Table B11003

As shown, within Comanche County, among all families 20.63% are single-parent families, while in Lawton, the percentage is 23.81%.

Population by Presence of Disabilities

The following table compiles data regarding the non-institutionalized population of Comanche County by presence of one or more disabilities.

2013 Age by Number of Disabilities

	Lawton		Comanche County		State of Oklahoma	
	No.	Percent	No.	Percent	No.	Percent
Civilian Non-Institutionalized Population:	84,428		110,477		3,702,515	
Under 18 Years:	24,255		30,817		933,738	
With One Type of Disability	1,275	5.26%	1,589	5.16%	33,744	3.61%
With Two or More Disabilities	238	0.98%	339	1.10%	11,082	1.19%
No Disabilities	22,742	93.76%	28,889	93.74%	888,912	95.20%
18 to 64 Years:	51,264		67,222		2,265,702	
With One Type of Disability	4,184	8.16%	5,238	7.79%	169,697	7.49%
With Two or More Disabilities	4,090	7.98%	5,271	7.84%	149,960	6.62%
No Disabilities	42,990	83.86%	56,713	84.37%	1,946,045	85.89%
65 Years and Over:	8,909		12,438		503,075	
With One Type of Disability	1,897	21.29%	2,827	22.73%	95,633	19.01%
With Two or More Disabilities	2,213	24.84%	3,033	24.38%	117,044	23.27%
No Disabilities	4,799	53.87%	6,578	52.89%	290,398	57.72%
Total Number of Persons with Disabilities:	13,897	16.46%	18,297	16.56%	577,160	15.59%

Source: U.S. Census Bureau, 2009-2013 American Community Survey, Table C18108

Within Comanche County, 16.56% of the civilian non-institutionalized population has one or more disabilities, compared with 15.59% of Oklahomans as a whole. In Lawton the percentage is 16.46%.

We have also compiled data for the veteran population of Comanche County by presence of disabilities, shown in the following table:

2013 Population by Veteran and Disability Status

	Lawton		Comanche County		State of Oklahoma	
	No.	Percent	No.	Percent	No.	Percent
Civilian Population Age 18+ For Whom Poverty Status is Determined	59,965		79,452		2,738,788	
Veteran:	11,541	19.25%	15,197	19.13%	305,899	11.17%
With a Disability	2,997	25.97%	4,183	27.53%	100,518	32.86%
No Disability	8,544	74.03%	11,014	72.47%	205,381	67.14%
Non-veteran:	48,424	80.75%	64,255	80.87%	2,432,889	88.83%
With a Disability	9,361	19.33%	12,160	18.92%	430,610	17.70%
No Disability	39,063	80.67%	52,095	81.08%	2,002,279	82.30%

Source: 2009-2013 American Community Survey, Table C21007

Within Comanche County, the Census Bureau estimates there are 15,197 veterans, 27.53% of which have one or more disabilities (compared with 32.86% at a statewide level). In Lawton, there are an estimated 11,541 veterans, 25.97% of which are estimated to have a disability. Compared with the rest of the state, veterans in Comanche County are somewhat less likely to have disabilities.

Group Quarters Population

The next table presents data regarding the population of Comanche County living in group quarters, such as correctional facilities, skilled-nursing facilities, student housing and military quarters.

2010 Group Quarters Population

	Lawton		Comanche County	
	No.	Percent	No.	Percent
Total Population	96,867		124,098	
Group Quarters Population	10,143	10.47%	10,343	8.33%
Institutionalized Population	3,772	3.89%	3,772	3.04%
Correctional facilities for adults	3,164	3.27%	3,164	2.55%
Juvenile facilities	84	0.09%	84	0.07%
Nursing facilities/Skilled-nursing facilities	523	0.54%	523	0.42%
Other institutional facilities	1	0.00%	1	0.00%
Noninstitutionalized population	6,371	6.58%	6,571	5.30%
College/University student housing	482	0.50%	482	0.39%
Military quarters	5,768	5.95%	5,768	4.65%
Other noninstitutional facilities	121	0.12%	321	0.26%

Source: 2010 Decennial Census, Table P42

The percentage of the Comanche County population in group quarters is significantly higher than the statewide figure, which was 2.99% in 2010. This is due to persons living in military quarters (Fort Sill) as well as the Lawton Correctional Facility (a private prison).

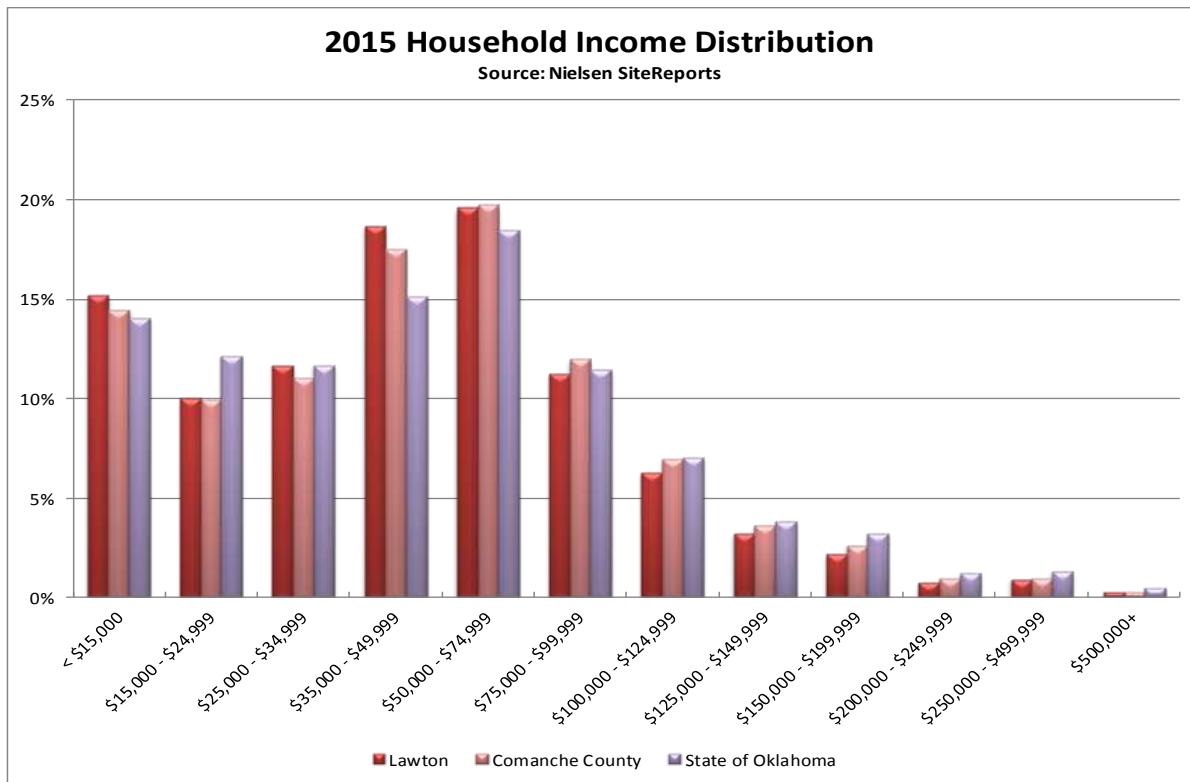
Household Income Levels

Data in the following chart shows the distribution of household income in Comanche County, as well as median and average household income. Data for Oklahoma is included as a basis of comparison. This data is provided by Nielsen SiteReports for 2015.

2015 Household Income Distribution						
	Lawton		Comanche County		State of Oklahoma	
	No.	Percent	No.	Percent	No.	Percent
Households by HH Income	35,149		45,546		1,520,327	
< \$15,000	5,326	15.15%	6,586	14.46%	213,623	14.05%
\$15,000 - \$24,999	3,530	10.04%	4,517	9.92%	184,613	12.14%
\$25,000 - \$34,999	4,096	11.65%	5,024	11.03%	177,481	11.67%
\$35,000 - \$49,999	6,555	18.65%	7,966	17.49%	229,628	15.10%
\$50,000 - \$74,999	6,876	19.56%	8,981	19.72%	280,845	18.47%
\$75,000 - \$99,999	3,958	11.26%	5,449	11.96%	173,963	11.44%
\$100,000 - \$124,999	2,207	6.28%	3,177	6.98%	106,912	7.03%
\$125,000 - \$149,999	1,141	3.25%	1,651	3.62%	57,804	3.80%
\$150,000 - \$199,999	769	2.19%	1,196	2.63%	48,856	3.21%
\$200,000 - \$249,999	269	0.77%	438	0.96%	18,661	1.23%
\$250,000 - \$499,999	322	0.92%	440	0.97%	20,487	1.35%
\$500,000+	100	0.28%	121	0.27%	7,454	0.49%
Median Household Income	\$45,578		\$47,514		\$47,049	
Average Household Income	\$58,248		\$60,801		\$63,390	

Source: Nielsen SiteReports

As shown, median household income for Comanche County is estimated to be \$47,514 in 2015. By way of comparison, the median household income of Oklahoma is estimated to be \$47,049. For Lawton, median household income is estimated to be \$45,578. The income distribution can be better visualized by the following chart; as can be seen, Comanche County's income distribution is very similar to the rest of the state.



Household Income Trend

Next we examine the long-term growth of incomes in Comanche County, from the results of the 2000 Census (representing calendar year 1999), through the current 2015 estimates provided by Nielsen SiteReports. This data is then annualized into a compounded annual growth rate to estimate nominal annual household income growth over this period of time. We then compare the rate of annual growth with the rate of inflation over the same period of time (measured using the Consumer Price Index for all urban consumers, South Region, Size Class D, from May 1999 through May 2015). Subtracting the annual rate of inflation from the nominal rate of annual income growth yields a “real” rate of income growth which takes into account the effect of increasing prices of goods and services.

	1999 Median HH Income	2015 Median HH Income	Nominal Growth	Inflation Rate	Real Growth
Lawton	\$32,521	\$45,578	2.13%	2.40%	-0.27%
Comanche County	\$33,867	\$47,514	2.14%	2.40%	-0.26%
State of Oklahoma	\$33,400	\$47,049	2.16%	2.40%	-0.23%

Sources: 2000 Decennial Census, Summary File 3, Table P53; Nielsen SiteReports; CPI All Urban Consumers, South Region, Size Class D

As shown, both Comanche County and the State of Oklahoma as a whole saw negative growth in “real” median household income, once inflation is taken into account. It should be noted that this trend is not unique to Oklahoma or Comanche County, but rather a national trend. Over the same



period, the national median household income increased from \$41,994 to \$53,706 (for a nominal annualized growth rate of 1.55%) while the Consumer Price Index increased at an annualized rate of 2.26%, for a “real” growth rate of -0.72%.

Poverty Rates

Overall rates of poverty in Comanche County and Oklahoma are shown in the following table. This data is included from the 2013 American Community Survey, as well as the 2000 Census to show how these rates have changed over the last decade. We also include poverty rates for single-parent families by gender of householder.

	2000 Census	2013 ACS	Change (Basis Points)	2013 Poverty Rates for Single-Parent Families	
				Male Householder	Female Householder
Lawton	16.33%	18.61%	227	13.07%	45.83%
Comanche County	15.60%	17.35%	175	18.86%	45.66%
State of Oklahoma	14.72%	16.85%	213	22.26%	47.60%

Sources: 2000 Decennial Census Table P87, 2009-2013 American Community Survey Tables B17001 & B17023

The poverty rate in Comanche County is estimated to be 17.35% by the American Community Survey. This is an increase of 175 basis points since the 2000 Census. Within Lawton, the poverty rate is estimated to be 18.61%. It should be noted that increasing poverty rates over this period of time is a national trend: between the 2000 Census and the 2013 American Community Survey, the poverty rate of the United States increased from 12.38% to 15.37%, an increase of 299 basis points.

Economic Conditions

Employment and Unemployment

The following table presents total employment figures and unemployment rates for Comanche County, with figures for Oklahoma and the United States for comparison. This data is as of May 2015.

Employment and Unemployment						
	May-2010 Employment	May-2015 Employment	Annual Growth	May-2010 Unemp. Rate	May-2015 Unemp. Rate	Change (bp)
Comanche County	49,155	47,064	-0.87%	5.8%	4.5%	-130
State of Oklahoma	1,650,748	1,776,187	1.48%	6.8%	4.4%	-240
United States (thsds)	139,497	149,349	1.37%	9.3%	5.3%	-400

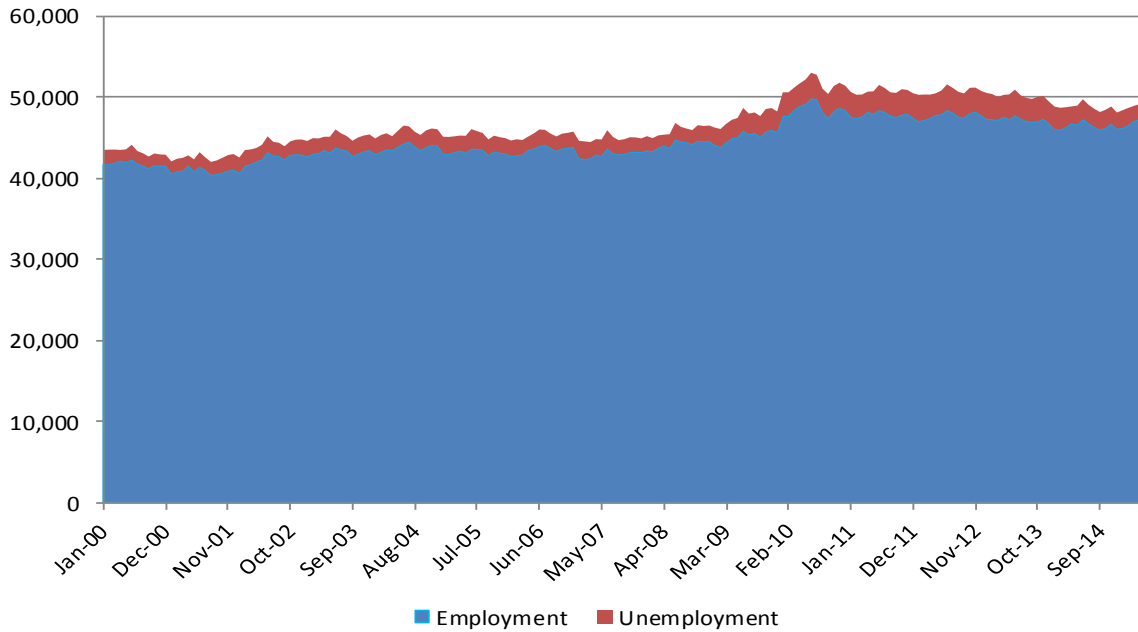
Sources: Bureau of Labor Statistics, Local Area Unemployment Statistics and Current Population Survey

As of May 2015, total employment in Comanche County was 47,064 persons. Compared with figures from May 2010, this represents annualized employment decline of -0.87% per year. The unemployment rate in May was 4.5%, a decrease of -130 basis points from May 2010, which was 5.8%. Over the last five years, both the statewide and national trends have been improving employment levels and declining unemployment rates, and Comanche County has underperformed both the state and nation in these statistics.

Employment Level Trends

The following chart shows total employment and unemployment levels in Comanche County from January 2000 through May 2015, as reported by the Bureau of Labor Statistics, Local Area Unemployment Statistics program.

**Employment and Unemployment in Comanche County
January 2000 through May 2015**



Source: Bureau of Labor Statistics, Local Area Unemployment Statistics

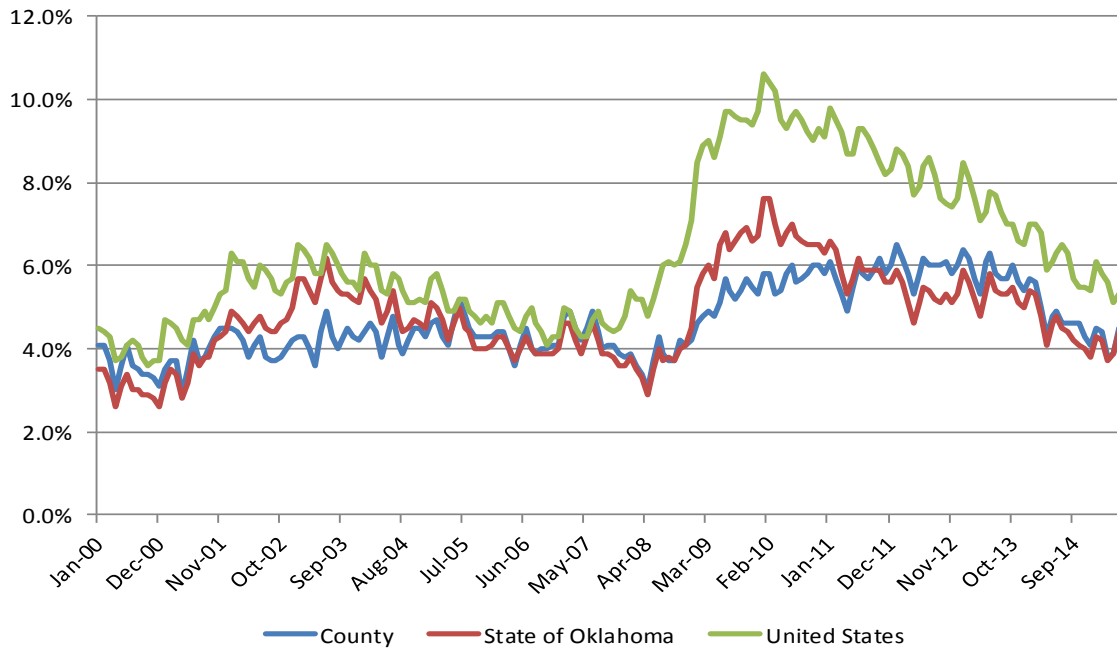
As shown, total employment levels have generally trended upward from 2000 through the 1st quarter of 2010, after which point total employment has been stable to modestly declining. It is notable that the national economic downturn of 2008 had no observable effect on total employment levels in Comanche County. Employment levels have grown slightly in the previous several months, to their current level of 47,064 persons. The number of unemployed persons in May 2015 was 2,202, out of a total labor force of 49,266 persons.

Unemployment Rate Trends

The next chart shows historic unemployment rates for Comanche County, as well as Oklahoma and the United States for comparison. This data covers the time period of January 2000 through May 2015, and has not been seasonally adjusted.



**Unemployment Rates in Comanche County, Oklahoma and the United States
January 2000 through May 2015**



Sources: Bureau of Labor Statistics, Local Area Unemployment Statistics and Current Population Survey

As shown, unemployment rates in Comanche County increased moderately from 2000 through 2003, and then generally declined until the 4th quarter of 2008 as the effects of the national economic recession were felt. Unemployment rates began to decline again in 2013 (well after other areas of the state and nation began to see recovery), to their current level of 4.5%. On the whole, unemployment rates in Comanche County typically exhibit relatively little volatility, likely due to the influence of Fort Sill. Compared with the United States, unemployment rates in Comanche County and Oklahoma are and have historically been well below the national average.

Employment and Wages by Industrial Supersector

The next table presents data regarding employment in Comanche County by industry, including total number of establishments, average number of employees in 2014, average annual pay, and location quotients for each industry compared with the United States. This data is furnished by the Bureau of Labor Statistics, Quarterly Census of Employment and Wages program.

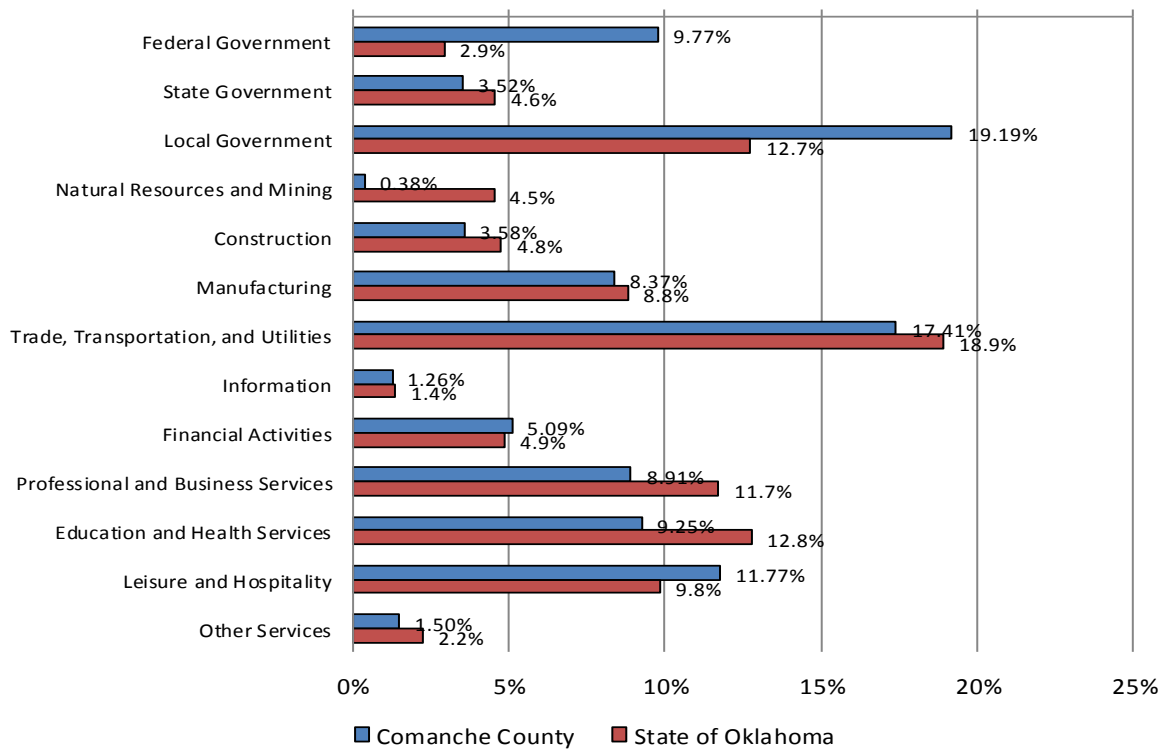


Employees and Wages by Supersector - 2014

Supersector	Establishments	Avg. No. of Employees	Percent of Total	Avg. Annual Pay	Location Quotient
Federal Government	51	4,147	9.77%	\$54,918	4.89
State Government	17	1,494	3.52%	\$36,160	1.06
Local Government	69	8,150	19.19%	\$38,456	1.90
Natural Resources and Mining	22	163	0.38%	\$48,839	0.25
Construction	234	1,519	3.58%	\$39,419	0.80
Manufacturing	58	3,555	8.37%	\$63,132	0.94
Trade, Transportation, and Utilities	563	7,392	17.41%	\$27,426	0.91
Information	33	534	1.26%	\$35,659	0.63
Financial Activities	283	2,162	5.09%	\$35,882	0.91
Professional and Business Services	366	3,785	8.91%	\$37,508	0.64
Education and Health Services	293	3,926	9.25%	\$33,517	0.61
Leisure and Hospitality	263	4,997	11.77%	\$14,647	1.10
Other Services	137	636	1.50%	\$24,343	0.48
Total	2,389	42,459		\$36,483	1.00

Source: U.S. Bureau of Labor Statistics, Quarterly Census of Employment and Wages

Employment Sectors - 2014



Source: U.S. Bureau of Labor Statistics, Quarterly Census of Employment and Wages



Among private employers, the largest percentage of persons (17.41%) are employed in Trade, Transportation, and Utilities. The average annual pay in this sector is \$27,426 per year. The industry with the highest annual pay is Manufacturing, with average annual pay of \$63,132 per year.

The rightmost column of the previous table provides location quotients for each industry for Comanche County, as compared with the United States. Location quotients (LQs) are ratios used to compare the concentration of employment in a given industry to a larger reference, in this case the United States. They are calculated by dividing the percentage of employment in a given industry in a given geography (Comanche County in this instance), by the percentage of employment in the same industry in the United States. For example, if manufacturing in a certain county comprised 10% of total employment, while in the United States manufacturing comprised 5% of total employment, the location quotient would be 2.0:

$$10\% (\text{county manufacturing } \%) / 5\% (\text{U.S. manufacturing } \%) = 2.0$$

Location quotients greater than 1.0 indicate a higher concentration of employment compared with the nation, and suggest that the industry in question is an important contributor to the local economic base. Quotients less than 1.0 indicate that the industry makes up a smaller share of the local economy than the rest of the nation.

Within Comanche County, among all industries the largest location quotient is in Federal Government, with a quotient of 4.89. Among private employers, the largest is Leisure and Hospitality, with a quotient of 1.10.

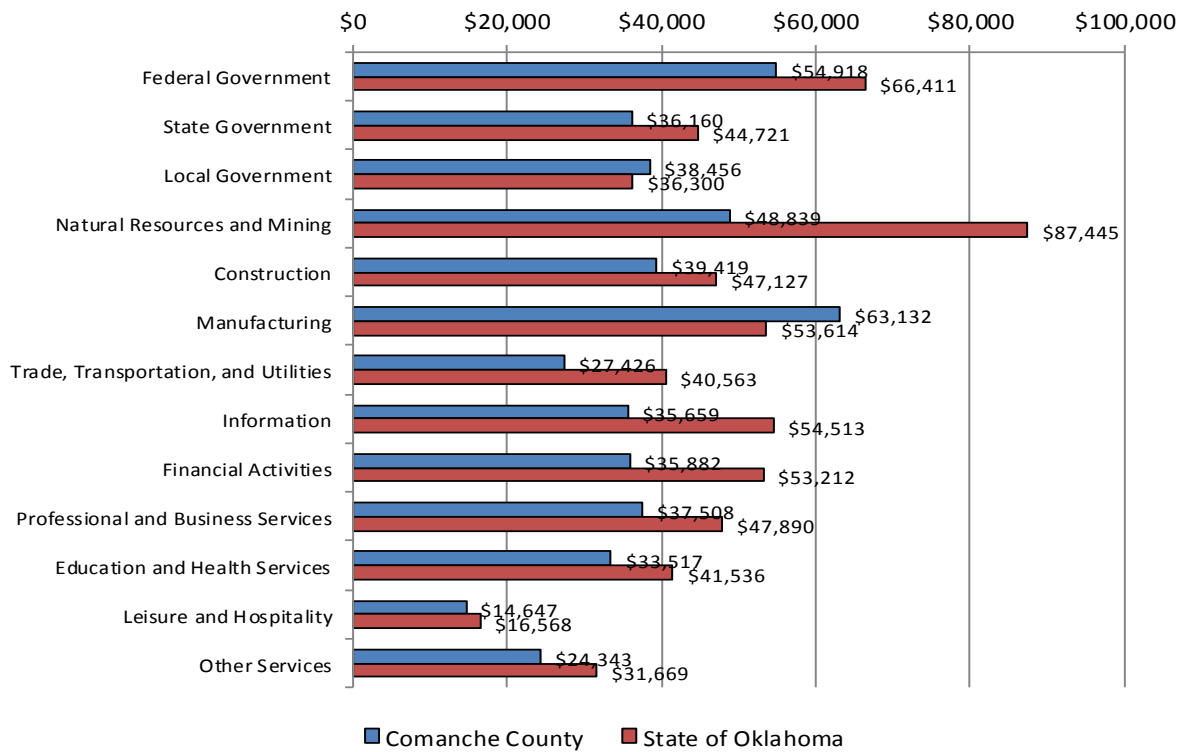
The next table presents average annual pay in Comanche County by industry, in comparison with Oklahoma as a whole and the United States.

Comparison of 2014 Average Annual Pay by Supersector

Supersector	Comanche County	State of Oklahoma	United States	Percent of State	Percent of Nation
Federal Government	\$54,918	\$66,411	\$75,784	82.7%	72.5%
State Government	\$36,160	\$44,721	\$54,184	80.9%	66.7%
Local Government	\$38,456	\$36,300	\$46,146	105.9%	83.3%
Natural Resources and Mining	\$48,839	\$87,445	\$59,666	55.9%	81.9%
Construction	\$39,419	\$47,127	\$55,041	83.6%	71.6%
Manufacturing	\$63,132	\$53,614	\$62,977	117.8%	100.2%
Trade, Transportation, and Utilities	\$27,426	\$40,563	\$42,988	67.6%	63.8%
Information	\$35,659	\$54,513	\$90,804	65.4%	39.3%
Financial Activities	\$35,882	\$53,212	\$85,261	67.4%	42.1%
Professional and Business Services	\$37,508	\$47,890	\$66,657	78.3%	56.3%
Education and Health Services	\$33,517	\$41,536	\$45,951	80.7%	72.9%
Leisure and Hospitality	\$14,647	\$16,568	\$20,993	88.4%	69.8%
Other Services	\$24,343	\$31,669	\$33,935	76.9%	71.7%
Total	\$36,483	\$43,774	\$51,361	83.3%	71.0%

Source: U.S. Bureau of Labor Statistics, Quarterly Census of Employment and Wages

Average Annual Pay - 2014



Source: U.S. Bureau of Labor Statistics, Quarterly Census of Employment and Wages

In comparison with the rest of Oklahoma, Comanche County has higher average wages in manufacturing and local government, and lower average wages in natural resources and mining, information, financial activities, and education and health services.

Working Families

The following table presents data on families by employment status, and presence of children.



Families by Employment Status and Presence of Children						
	Lawton		Comanche County		State of Oklahoma	
	No.	Percent	No.	Percent	No.	Percent
Total Families	22,030		29,349		961,468	
With Children <18 Years:	11,217	50.92%	14,486	49.36%	425,517	44.26%
Married Couple:	5,971	53.23%	8,432	58.21%	281,418	66.14%
Both Parents Employed	3,043	50.96%	4,604	54.60%	166,700	59.24%
One Parent Employed	2,781	46.58%	3,611	42.82%	104,817	37.25%
Neither Parent Employed	147	2.46%	217	2.57%	9,901	3.52%
Other Family:	5,246	46.77%	6,054	41.79%	144,099	33.86%
Male Householder:	1,094	20.85%	1,400	23.13%	36,996	25.67%
Employed	956	87.39%	1,208	86.29%	31,044	83.91%
Not Employed	138	12.61%	192	13.71%	5,952	16.09%
Female Householder:	4,152	79.15%	4,654	76.87%	107,103	74.33%
Employed	2,965	71.41%	3,278	70.43%	75,631	70.62%
Not Employed	1,187	28.59%	1,376	29.57%	31,472	29.38%
Without Children <18 Years:	10,813	49.08%	14,863	50.64%	535,951	55.74%
Married Couple:	8,255	76.34%	11,797	79.37%	431,868	80.58%
Both Spouses Employed	3,103	37.59%	4,588	38.89%	167,589	38.81%
One Spouse Employed	3,122	37.82%	4,165	35.31%	138,214	32.00%
Neither Spouse Employed	2,030	24.59%	3,044	25.80%	126,065	29.19%
Other Family:	2,558	23.66%	3,066	20.63%	104,083	19.42%
Male Householder:	745	36.70%	827	27.17%	32,243	25.58%
Employed	379	50.87%	424	51.27%	19,437	60.28%
Not Employed	366	49.13%	403	48.73%	12,806	39.72%
Female Householder:	1,813	70.88%	2,239	73.03%	71,840	69.02%
Employed	976	53.83%	1,251	55.87%	36,601	50.95%
Not Employed	837	46.17%	988	44.13%	35,239	49.05%
<i>Total Working Families:</i>	<i>17,325</i>	<i>78.64%</i>	<i>23,129</i>	<i>78.81%</i>	<i>740,033</i>	<i>76.97%</i>
<i>With Children <18 Years:</i>	<i>9,745</i>	<i>56.25%</i>	<i>12,701</i>	<i>54.91%</i>	<i>378,192</i>	<i>51.10%</i>
<i>Without Children <18 Years:</i>	<i>7,580</i>	<i>43.75%</i>	<i>10,428</i>	<i>45.09%</i>	<i>361,841</i>	<i>48.90%</i>

Source: 2009-2013 American Community Survey, Table B23007

Within Comanche County, there are 23,129 working families, 54.91% of which have children under the age of 18 present. This compares with 51.10% in Oklahoma as a whole.

Major Employers

Major employers in the Comanche County area are presented in the following table, as reported by the Lawton-Fort Sill Economic Development Corporation.

Major Employers in Comanche County

Company

Fort Sill
Goodyear Tire & Rubber Co.
Hallitburton
Lawton Public Schools
Comanche County Memorial Hospital
Raytheon
Republic Paper
Boeing
Silverline Plastics
Duncan Regional Hospital
Wilco manufacturing
Northrop Grumman
Walmart/Sam's
City of Lawton
Cameron University
Lockheed Martin
Southwestern medical Center
City of Duncan
The GEO Group
Comanche Nation
Great Plains Technology Center
CGI
Bar-S Foods
Comanche County

Source: Lawton Fort Sill Economic Development

Commuting Patterns**Travel Time to Work**

The next table presents data regarding travel time to work in Comanche County.

Workers 16 Years and Over by Commuting Time to Work

	Lawton		Comanche County		State of Oklahoma	
	No.	Percent	No.	Percent	No.	Percent
Commuting Workers:	40,881		52,533		1,613,364	
Less than 15 minutes	20,652	50.52%	22,828	43.45%	581,194	36.02%
15 to 30 minutes	16,799	41.09%	22,751	43.31%	625,885	38.79%
30 to 45 minutes	2,096	5.13%	4,853	9.24%	260,192	16.13%
45 to 60 minutes	671	1.64%	991	1.89%	74,625	4.63%
60 or more minutes	663	1.62%	1,110	2.11%	71,468	4.43%

Source: 2009-2013 American Community Survey, Table B08303

Within Comanche County, the largest percentage of workers (43.45%) travel fewer than 15 minutes to work. Although Comanche County has an active labor market, it also has a small percentage of the population that work outside of the county in surrounding towns.

Means of Transportation

Data in the following table presents data regarding means of transportation for employed persons in Comanche County.

Workers 16 Years and Over by Means of Transportation to Work

	Lawton		Comanche County		State of Oklahoma	
	No.	Percent	No.	Percent	No.	Percent
Total Workers Age 16+	44,457		56,988		1,673,026	
Car, Truck or Van:	37,049	83.34%	48,253	84.67%	1,551,461	92.73%
<i>Drove Alone</i>	32,221	86.97%	41,855	86.74%	1,373,407	88.52%
<i>Carpooled</i>	4,828	13.03%	6,398	13.26%	178,054	11.48%
Public Transportation	444	1.00%	447	0.78%	8,092	0.48%
Taxicab	95	0.21%	95	0.17%	984	0.06%
Motorcycle	150	0.34%	194	0.34%	3,757	0.22%
Bicycle	73	0.16%	73	0.13%	4,227	0.25%
Walked	2,036	4.58%	2,235	3.92%	30,401	1.82%
Other Means	1,034	2.33%	1,236	2.17%	14,442	0.86%
Worked at Home	3,576	8.04%	4,455	7.82%	59,662	3.57%

Source: 2009-2013 American Community Survey, Table B08301

As shown, the vast majority of persons in Comanche County commute to work by private vehicle, with a disproportionately high percentage of persons working from home compared with the rest of the state.

Housing Stock Analysis

Existing Housing Units

The following table presents data regarding the total number of housing units in Comanche County. This data is provided as of the 2000 Census, the 2010 Census, with a 2015 estimate furnished by Nielsen SiteReports.

Total Housing Units					
	2000 Census	2010 Census	Annual Change	2015 Estimate	Annual Change
Lawton	36,433	39,409	0.79%	40,036	0.32%
Comanche County	45,416	50,739	1.11%	51,705	0.38%
State of Oklahoma	1,514,400	1,664,378	0.95%	1,732,484	0.81%

Sources: 2000 and 2010 Decennial Censuses, Nielsen SiteReports

Since the 2010, Nielsen estimates that the number of housing units in Comanche County grew by 0.38% per year, to a total of 51,705 housing units in 2015. In terms of new housing unit construction, Comanche County underperformed Oklahoma as a whole between 2010 and 2015.

Housing by Units in Structure

The next table separates housing units in Comanche County by units in structure, based on data from the Census Bureau's American Community Survey.

2013 Housing Units by Units in Structure						
	Lawton		Comanche County		State of Oklahoma	
	No.	Percent	No.	Percent	No.	Percent
Total Housing Units	39,910		50,967		1,669,828	
1 Unit, Detached	27,287	68.37%	36,354	71.33%	1,219,987	73.06%
1 Unit, Attached	1,356	3.40%	1,460	2.86%	34,434	2.06%
Duplex Units	1,747	4.38%	1,878	3.68%	34,207	2.05%
3-4 Units	1,470	3.68%	1,549	3.04%	42,069	2.52%
5-9 Units	3,299	8.27%	3,390	6.65%	59,977	3.59%
10-19 Units	1,858	4.66%	1,880	3.69%	57,594	3.45%
20-49 Units	1,148	2.88%	1,151	2.26%	29,602	1.77%
50 or More Units	601	1.51%	601	1.18%	30,240	1.81%
Mobile Homes	1,091	2.73%	2,643	5.19%	159,559	9.56%
Boat, RV, Van, etc.	53	0.13%	61	0.12%	2,159	0.13%
Total Multifamily Units	10,123	25.36%	10,449	20.50%	253,689	15.19%

Source: 2009-2013 American Community Survey, Table B25024

Within Comanche County, 71.33% of housing units are single-family, detached. 20.50% of housing units are multifamily in structure (two or more units per building), while 5.31% of housing units comprise mobile homes, RVs, etc.

Within Lawton, 68.37% of housing units are single-family, detached. 25.36% of housing units are multifamily in structure, while 2.87% of housing units comprise mobile homes, RVs, etc.

Housing Units Number of Bedrooms and Tenure

Data in the following table presents housing units in Comanche County by tenure (owner/renter), and by number of bedrooms.

2013 Housing Units by Tenure and Number of Bedrooms

	Lawton		Comanche County		State of Oklahoma	
	No.	Percent	No.	Percent	No.	Percent
Total Occupied Housing Units	34,473		44,251		1,444,081	
Owner Occupied:	17,063	49.50%	25,044	56.60%	968,736	67.08%
No Bedroom	38	0.22%	74	0.30%	2,580	0.27%
1 Bedroom	160	0.94%	335	1.34%	16,837	1.74%
2 Bedrooms	2,466	14.45%	3,606	14.40%	166,446	17.18%
3 Bedrooms	11,299	66.22%	16,117	64.35%	579,135	59.78%
4 Bedrooms	2,793	16.37%	4,418	17.64%	177,151	18.29%
5 or More Bedrooms	307	1.80%	494	1.97%	26,587	2.74%
Renter Occupied:	17,410	50.50%	19,207	43.40%	475,345	32.92%
No Bedroom	343	1.97%	378	1.97%	13,948	2.93%
1 Bedroom	3,514	20.18%	3,732	19.43%	101,850	21.43%
2 Bedrooms	5,620	32.28%	6,255	32.57%	179,121	37.68%
3 Bedrooms	6,388	36.69%	7,142	37.18%	152,358	32.05%
4 Bedrooms	1,516	8.71%	1,621	8.44%	24,968	5.25%
5 or More Bedrooms	29	0.17%	79	0.41%	3,100	0.65%

Source: 2009-2013 American Community Survey, Table B25042

The overall homeownership rate in Comanche County is 56.60%, while 43.40% of housing units are renter occupied. In Lawton, the homeownership rate is 49.50%, while 50.50% of households are renters.

Housing Units Tenure and Household Income

The next series of tables analyze housing units by tenure, and by household income.

Comanche County Owner/Renter Percentages by Income Band in 2013

Household Income	Total Households	Total Owners	Total Renters	% Owners	% Renters
Total	44,251	25,044	19,207	56.60%	43.40%
Less than \$5,000	1,585	473	1,112	29.84%	70.16%
\$5,000 - \$9,999	1,952	636	1,316	32.58%	67.42%
\$10,000-\$14,999	2,598	766	1,832	29.48%	70.52%
\$15,000-\$19,999	2,549	981	1,568	38.49%	61.51%
\$20,000-\$24,999	2,528	1,113	1,415	44.03%	55.97%
\$25,000-\$34,999	5,468	2,507	2,961	45.85%	54.15%
\$35,000-\$49,999	7,126	3,563	3,563	50.00%	50.00%
\$50,000-\$74,999	9,134	5,978	3,156	65.45%	34.55%
\$75,000-\$99,999	5,155	3,772	1,383	73.17%	26.83%
\$100,000-\$149,999	4,131	3,442	689	83.32%	16.68%
\$150,000 or more	2,025	1,813	212	89.53%	10.47%
Income Less Than \$25,000	11,212	3,969	7,243	35.40%	64.60%

Source: 2009-2013 American Community Survey, Table B25118

Within Comanche County as a whole, 64.60% of households with incomes less than \$25,000 are estimated to be renters, while 35.40% are estimated to be homeowners.

Lawton Owner/Renter Percentages by Income Band in 2013

Household Income	Total Households	Total Owners	Total Renters	% Owners	% Renters
Total	34,473	17,063	17,410	49.50%	50.50%
Less than \$5,000	1,245	242	1,003	19.44%	80.56%
\$5,000 - \$9,999	1,699	476	1,223	28.02%	71.98%
\$10,000-\$14,999	2,216	548	1,668	24.73%	75.27%
\$15,000-\$19,999	2,044	603	1,441	29.50%	70.50%
\$20,000-\$24,999	2,051	790	1,261	38.52%	61.48%
\$25,000-\$34,999	4,630	1,881	2,749	40.63%	59.37%
\$35,000-\$49,999	5,873	2,584	3,289	44.00%	56.00%
\$50,000-\$74,999	7,068	4,222	2,846	59.73%	40.27%
\$75,000-\$99,999	3,556	2,350	1,206	66.09%	33.91%
\$100,000-\$149,999	2,833	2,262	571	79.84%	20.16%
\$150,000 or more	1,258	1,105	153	87.84%	12.16%
Income Less Than \$25,000	9,255	2,659	6,596	28.73%	71.27%

Source: 2009-2013 American Community Survey, Table B25118

Within Lawton, 71.27% of households with incomes less than \$25,000 are estimated to be renters, while 28.73% are estimated to be homeowners.

Housing Units by Year of Construction and Tenure

The following table provides a breakdown of housing units by year of construction, and by owner/renter (tenure), as well as median year of construction.

2013 Housing Units by Tenure and Year of Construction

	Lawton		Comanche County		State of Oklahoma	
	No.	Percent	No.	Percent	No.	Percent
Total Occupied Housing Units	34,473		44,251		1,444,081	
Owner Occupied:	17,063	49.50%	25,044	56.60%	968,736	67.08%
Built 2010 or Later	195	1.14%	371	1.48%	10,443	1.08%
Built 2000 to 2009	1,040	6.10%	3,187	12.73%	153,492	15.84%
Built 1990 to 1999	1,533	8.98%	2,846	11.36%	125,431	12.95%
Built 1980 to 1989	2,408	14.11%	3,557	14.20%	148,643	15.34%
Built 1970 to 1979	4,158	24.37%	5,541	22.13%	184,378	19.03%
Built 1960 to 1969	2,972	17.42%	3,615	14.43%	114,425	11.81%
Built 1950 to 1959	2,881	16.88%	3,242	12.95%	106,544	11.00%
Built 1940 to 1949	1,196	7.01%	1,474	5.89%	50,143	5.18%
Built 1939 or Earlier	680	3.99%	1,211	4.84%	75,237	7.77%
Median Year Built:		1972		1975		1977
Renter Occupied:	17,410	50.50%	19,207	43.40%	475,345	32.92%
Built 2010 or Later	303	1.74%	372	1.94%	5,019	1.06%
Built 2000 to 2009	2,638	15.15%	2,929	15.25%	50,883	10.70%
Built 1990 to 1999	1,201	6.90%	1,418	7.38%	47,860	10.07%
Built 1980 to 1989	2,096	12.04%	2,397	12.48%	77,521	16.31%
Built 1970 to 1979	3,820	21.94%	4,229	22.02%	104,609	22.01%
Built 1960 to 1969	3,044	17.48%	3,168	16.49%	64,546	13.58%
Built 1950 to 1959	2,230	12.81%	2,310	12.03%	54,601	11.49%
Built 1940 to 1949	941	5.40%	1,027	5.35%	31,217	6.57%
Built 1939 or Earlier	1,137	6.53%	1,357	7.07%	39,089	8.22%
Median Year Built:		1974		1974		1975
Overall Median Year Built:		1972		1975		1976

Sources: 2009-2013 American Community Survey, Tables B25035, B25036 & B25037

Within Comanche County, 15.50% of housing units were built after the year 2000. This compares with 15.22% statewide. Within Lawton the percentage is 12.11%.

74.86% of housing units in Comanche County were built prior to 1990, while in Lawton the percentage is 79.96%. These figures compare with the statewide figure of 72.78%.

Substandard Housing

The next table presents data regarding substandard housing in Comanche County. The two most commonly cited figures for substandard housing are a lack of complete plumbing, and/or a lack of a complete kitchen. We have also included statistics regarding homes heated by wood, although this is a less frequently cited indicator of substandard housing since some homes (particularly homes for seasonal occupancy) are heated by wood but otherwise not considered substandard.

The Census Bureau definition of inadequate plumbing is any housing unit lacking any one (or more) of the following three items:

1. Hot and cold running water

2. A flush toilet
3. A bathtub or shower

Inadequate kitchens are defined by the Census Bureau as housing units lacking any of the three following items:

1. A sink with a faucet
2. A stove or range
3. A refrigerator

2013 Substandard Housing Units

	Occupied	Inadequate Plumbing		Inadequate Kitchen		Uses Wood for Fuel	
	Units	Number	Percent	Number	Percent	Number	Percent
Lawton	34,473	159	0.46%	426	1.24%	50	0.15%
Comanche County	44,251	168	0.38%	495	1.12%	190	0.43%
State of Oklahoma	1,444,081	7,035	0.49%	13,026	0.90%	28,675	1.99%

Sources: 2009-2013 American Community Survey, Tables B25040, B25048 & B25052

Within Comanche County, 0.38% of occupied housing units have inadequate plumbing (compared with 0.49% at a statewide level), while 1.12% have inadequate kitchen facilities (compared with 0.90% at a statewide level). It is likely that there is at least some overlap between these two figures, among units lacking both complete plumbing and kitchen facilities.

Vacancy Rates

The next table details housing units in Comanche County by vacancy and type. This data is provided by the American Community Survey.

2013 Housing Units by Vacancy

	Lawton		Comanche County		State of Oklahoma	
	No.	Percent	No.	Percent	No.	Percent
Total Housing Units	39,910		50,967		1,669,828	
Total Vacant Units	5,437	13.62%	6,716	13.18%	225,747	13.52%
For rent	2,118	38.96%	2,194	32.67%	43,477	19.26%
Rented, not occupied	165	3.03%	165	2.46%	9,127	4.04%
For sale only	517	9.51%	635	9.46%	23,149	10.25%
Sold, not occupied	172	3.16%	259	3.86%	8,618	3.82%
For seasonal, recreational, or occasional use	183	3.37%	311	4.63%	39,475	17.49%
For migrant workers	13	0.24%	20	0.30%	746	0.33%
Other vacant	2,269	41.73%	3,132	46.63%	101,155	44.81%
Homeowner Vacancy Rate	2.91%		2.45%		2.31%	
Rental Vacancy Rate	10.76%		10.17%		8.24%	

Source: 2009-2013 American Community Survey, Tables B25001, B25003 & B25004

Within Comanche County, the overall housing vacancy rate is estimated to be 13.18%. The homeowner vacancy rate is estimated to be 2.45%, while the rental vacancy rate is estimated to be 10.17%.

In Lawton, the overall housing vacancy rate is estimated to be 13.62%. The homeowner vacancy rate is estimated to be 2.91%, while the rental vacancy rate is estimated to be 10.76%.

Building Permits

The next series of tables present data regarding new residential building permits issued in Lawton, and unincorporated areas of Comanche County. This data is furnished by the U.S. Census Bureau Residential Construction Branch, Manufacturing and Construction Division. Please note that average costs reported only represent physical construction costs for the housing units, and do not include land prices, most soft costs (such as finance fees), or builder's profit.

Lawton				
New Residential Building Permits Issued, 2004-2014				
Year	Single Family Units	Avg. Construction Cost	Multifamily Units	Avg. Multifamily Construction Cost
2004	0	N/A	0	N/A
2005	260	\$152,246	320	\$23,101
2006	215	\$158,635	248	\$21,785
2007	208	\$151,502	576	\$59,167
2008	149	\$178,682	20	\$37,000
2009	222	\$156,392	290	\$64,655
2010	195	\$176,669	18	\$77,389
2011	159	\$177,629	20	\$46,275
2012	139	\$175,343	12	\$49,583
2013	74	\$198,128	0	N/A
2014	46	\$209,539	16	\$65,000

Source: United States Census Bureau Building Permits Survey

In Lawton, building permits for 3,187 housing units were issued between 2004 and 2014, for an average of 290 units per year. 52.31% of these housing units were single family homes, and 47.69% consisted of multifamily units.

New Construction Activity

For Ownership:

Although a large number of single-family homes have been built in Lawton over the past 10 years, the number has gradually slowed in the more recent years due to deployments of troops from Fort Sill, as well as construction on unplatted rural acreages and rural subdivisions outside of the City of Lawton. As the city has grown, the plats of land within the city limits have decreased, promoting new home construction to be outside the city borders. Eastlake Villas is a subdivision within the city limits that has continued to construct new housing. Additionally, the economy of Lawton has recently seen a

downturn, as the energy industry has fluctuated, causing layoffs and a general halt to many projects within the Comanche County and Lawton area. Many of the homes being built within the city have been focused in the south, as well as other outlying areas of the city. However, the majority of new home construction in Lawton has been of larger, more expensive homes; the average price of homes constructed in Lawton since 2005 is \$173,476. This is above what could be afforded by a household earning at or less than median household income for Comanche County, which is estimated to be \$47,514 in 2015.

For Rent:

New rental housing has been limited in recent years, as a large number of rental units were introduced to the Lawton market in the years from 2005 to 2009. Legend Park apartment complex was completed in two phases in 2010 and 2012 and comprised of 1, 2, and 3 bedroom units. The affordable apartment market has grown as well over the past 10 years, as Savannah House Apartments, a LIHTC property was constructed in 2006 and 60 affordable units, targeting families earning less than 50% and 60% of Area Median Income. Additional developments have been introduced to the Lawton market and have been met with success. Though the rental market has recently seen high vacancy rates, the fluctuation in population due to Fort Sill deployments will bring the rental market back to typical occupancy percentages.

Homeownership Market

This section will address the market for housing units for purchase in Comanche County, using data collected from both local and national sources.

Housing Units by Home Value

The following table presents housing units in Comanche County by value, as well as median home value, as reported by the Census Bureau's American Community Survey.

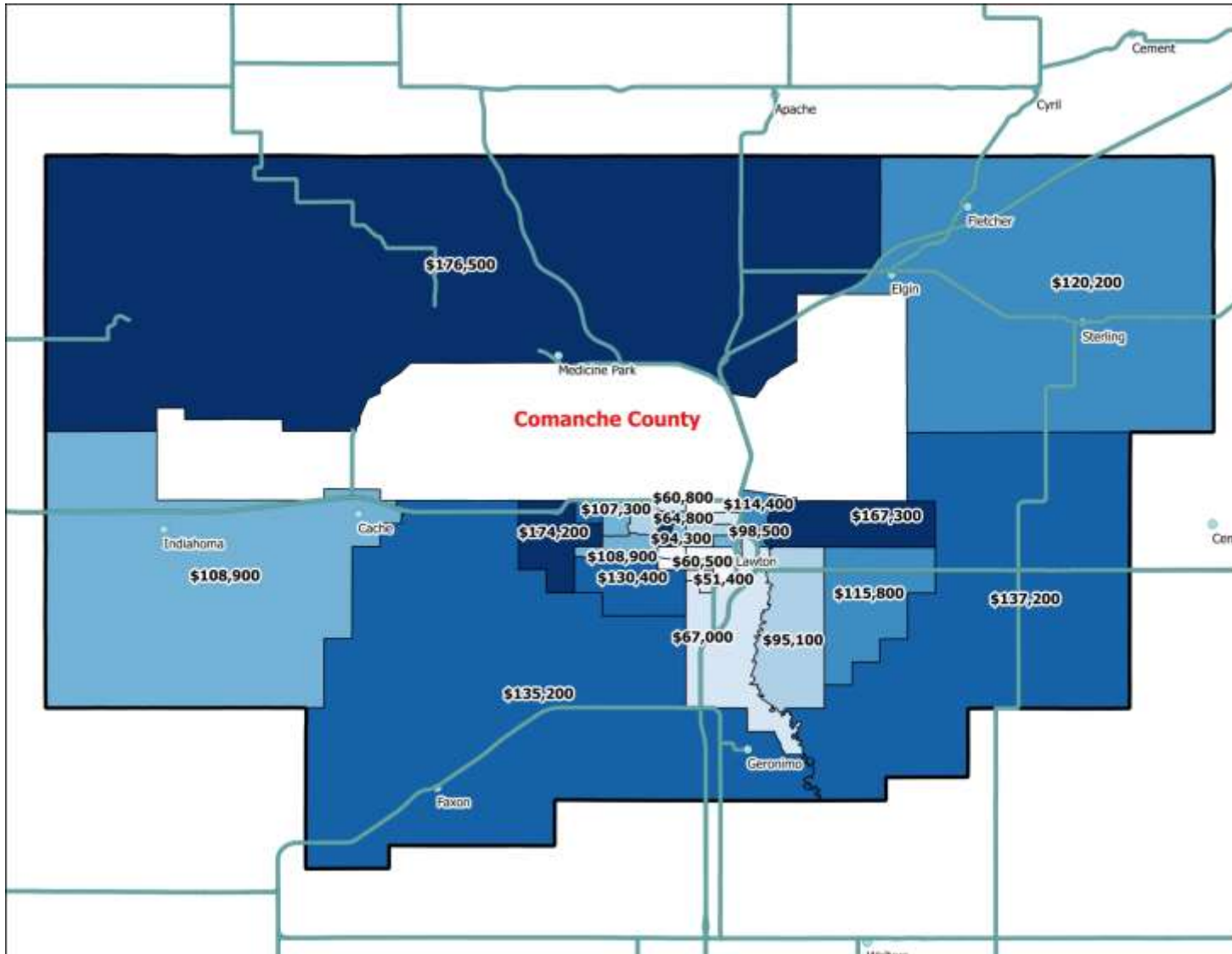
	Lawton		Comanche County		State of Oklahoma	
	No.	Percent	No.	Percent	No.	Percent
Total Owner-Occupied Units:	17,063		25,044		968,736	
Less than \$10,000	209	1.22%	406	1.62%	20,980	2.17%
\$10,000 to \$14,999	170	1.00%	305	1.22%	15,427	1.59%
\$15,000 to \$19,999	144	0.84%	266	1.06%	13,813	1.43%
\$20,000 to \$24,999	266	1.56%	378	1.51%	16,705	1.72%
\$25,000 to \$29,999	145	0.85%	234	0.93%	16,060	1.66%
\$30,000 to \$34,999	195	1.14%	394	1.57%	19,146	1.98%
\$35,000 to \$39,999	280	1.64%	334	1.33%	14,899	1.54%
\$40,000 to \$49,999	872	5.11%	1,179	4.71%	39,618	4.09%
\$50,000 to \$59,999	737	4.32%	964	3.85%	45,292	4.68%
\$60,000 to \$69,999	836	4.90%	1,171	4.68%	52,304	5.40%
\$70,000 to \$79,999	1,134	6.65%	1,514	6.05%	55,612	5.74%
\$80,000 to \$89,999	1,693	9.92%	2,092	8.35%	61,981	6.40%
\$90,000 to \$99,999	1,505	8.82%	1,767	7.06%	51,518	5.32%
\$100,000 to \$124,999	2,416	14.16%	3,251	12.98%	119,416	12.33%
\$125,000 to \$149,999	1,967	11.53%	2,542	10.15%	96,769	9.99%
\$150,000 to \$174,999	1,445	8.47%	2,113	8.44%	91,779	9.47%
\$175,000 to \$199,999	1,090	6.39%	1,641	6.55%	53,304	5.50%
\$200,000 to \$249,999	960	5.63%	2,039	8.14%	69,754	7.20%
\$250,000 to \$299,999	479	2.81%	1,290	5.15%	41,779	4.31%
\$300,000 to \$399,999	334	1.96%	788	3.15%	37,680	3.89%
\$400,000 to \$499,999	56	0.33%	162	0.65%	13,334	1.38%
\$500,000 to \$749,999	46	0.27%	117	0.47%	12,784	1.32%
\$750,000 to \$999,999	44	0.26%	54	0.22%	3,764	0.39%
\$1,000,000 or more	40	0.23%	43	0.17%	5,018	0.52%
Median Home Value:	\$103,600		\$111,700		\$112,800	

Sources: 2009-2013 American Community Survey, Tables B25075 and B25077

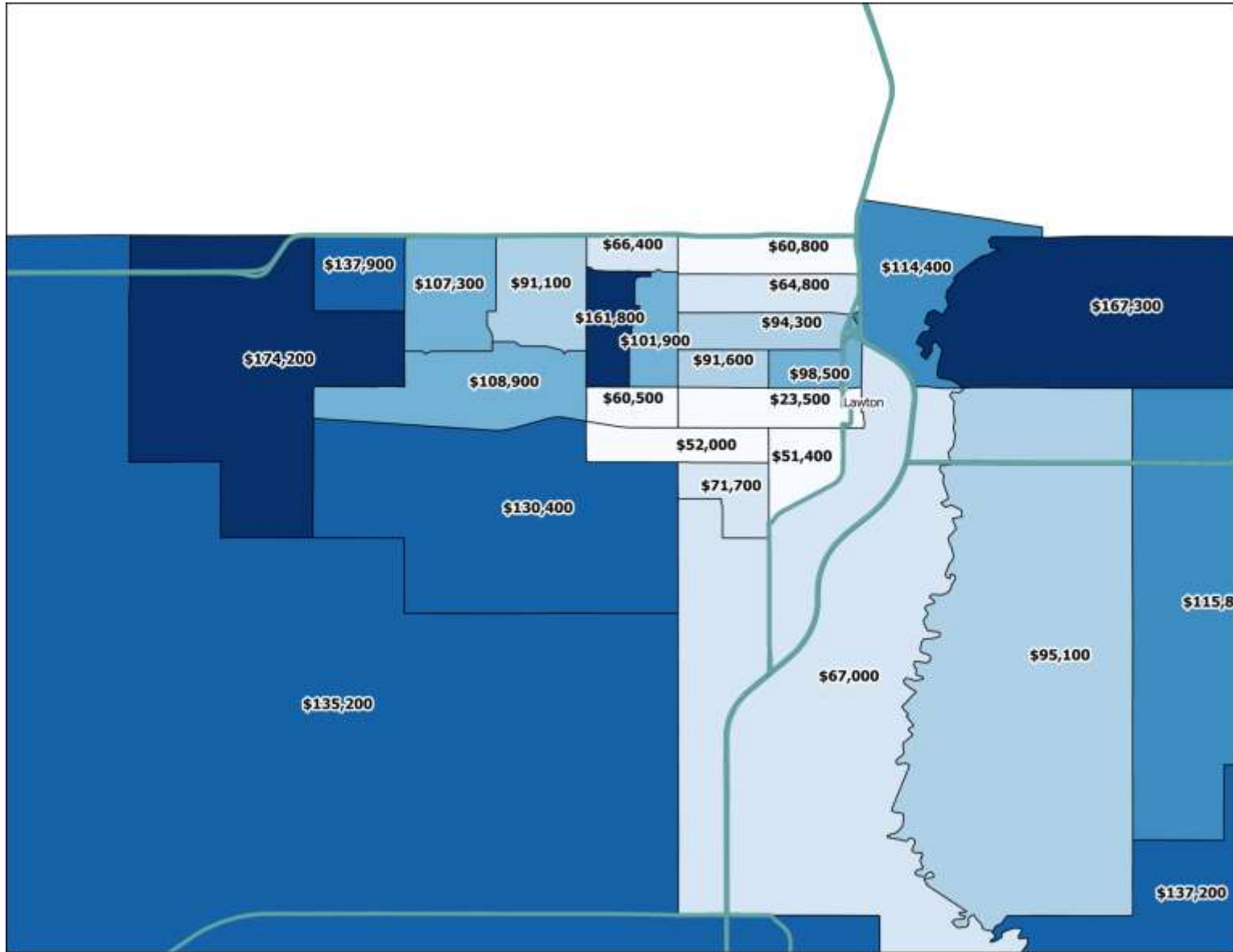
The median value of owner-occupied homes in Comanche County is \$111,700. This is -1.0% lower than the statewide median, which is \$112,800. The median home value in Lawton is estimated to be \$103,600.

The geographic distribution of home values in Comanche County can be visualized by the following map.

Comanche County Median Home Values by Census Tract



Median Home Values by Census Tract – Lawton Detail



Home Values by Year of Construction

The next table presents median home values in Comanche County by year of construction. Note that missing data fields indicate the Census Bureau had inadequate data to estimate a median value that age bracket.

2013 Median Home Value by Year of Construction

	Lawton Median Value	Comanche County Median Value	State of Oklahoma Median Value
Total Owner-Occupied Units:			
Built 2010 or Later	\$172,700	\$176,300	\$188,900
Built 2000 to 2009	\$186,800	\$201,600	\$178,000
Built 1990 to 1999	\$177,500	\$168,600	\$147,300
Built 1980 to 1989	\$135,000	\$131,900	\$118,300
Built 1970 to 1979	\$111,800	\$112,100	\$111,900
Built 1960 to 1969	\$89,100	\$91,200	\$97,100
Built 1950 to 1959	\$77,000	\$78,500	\$80,300
Built 1940 to 1949	\$74,900	\$74,800	\$67,900
Built 1939 or Earlier	\$63,200	\$73,300	\$74,400

Note: Dashes indicate the Census Bureau had insufficient data to estimate a median value.

Source: 2009-2013 American Community Survey, Table 25107

Lawton Single Family Sales Activity

The following table presents sales data for home in Lawton as reported by the local multilist service.

Lawton Single Family Sales Activity

All Bedroom Types

Year	2011	2012	2013	2014	2015
# of Units Sold	1,438	1,417	1,318	1,408	1,334
Total Sales Volume	\$186,606,746	\$183,326,621	\$168,406,735	\$168,486,308	\$158,702,198
Average Sales Price	\$129,768	\$129,377	\$127,774	\$119,664	\$118,967
Avg. Days on Market	86	96	95	92	86

Source: Lawton MLS

Between 2011 and year-end 2015, the average sale price declined by 1.7% per year. Total sales volume declined during this period as well. The total number of homes sold over this period fluctuated somewhat, but is nonetheless lower in 2015 than in 2011. Marketing time increased from 2011 to 2012, but has since settled at an average of 86 days.

Foreclosure Rates

The next table presents foreclosure rate data for Comanche County, compiled by the Federal Reserve Bank of New York. This data is effective as of May 2014.

Foreclosure Rates	
Geography	% of Outstanding Mortgages in Foreclosure, May 2014
Comanche County	3.2%
State of Oklahoma	2.1%
United States	2.1%
Rank among Counties in Oklahoma*:	10
* Rank among the 64 counties for which foreclosure rates are available	
Source: Federal Reserve Bank of New York, Community Credit Profiles	

According to the data provided, the foreclosure rate in Comanche County was 3.2% in May 2014. The county ranked 10 out of 64 counties in terms of highest foreclosure rates in Oklahoma. This rate compares with the statewide and nationwide foreclosure rates, both of which were 2.1%.

With the 10th highest foreclosure rate in Oklahoma, it is likely that foreclosures in the area have had a negative impact on the local market, depressing sale prices and making it more difficult for potential buyers to receive financing.

Rental Market

This section will discuss supply and demand factors for the rental market in Comanche County, based on publicly available sources as well as our own surveys of landlords and rental properties in the area.

Gross Rent Levels

The following table presents data regarding gross rental rates in Comanche County. Gross rent is the sum of contract rent, plus all utilities such as electricity, gas, water, sewer and trash, as applicable (telephone, cable, and/or internet expenses are not included in these figures).

2013 Rental Units by Gross Rent						
	Lawton		Comanche County		State of Oklahoma	
	No.	Percent	No.	Percent	No.	Percent
Total Rental Units:	17,410		19,207		475,345	
With cash rent:	16,375		17,816		432,109	
Less than \$100	73	0.42%	73	0.38%	2,025	0.43%
\$100 to \$149	12	0.07%	15	0.08%	2,109	0.44%
\$150 to \$199	49	0.28%	71	0.37%	4,268	0.90%
\$200 to \$249	292	1.68%	318	1.66%	8,784	1.85%
\$250 to \$299	271	1.56%	326	1.70%	8,413	1.77%
\$300 to \$349	250	1.44%	314	1.63%	9,107	1.92%
\$350 to \$399	265	1.52%	290	1.51%	10,932	2.30%
\$400 to \$449	566	3.25%	651	3.39%	15,636	3.29%
\$450 to \$499	726	4.17%	760	3.96%	24,055	5.06%
\$500 to \$549	1,147	6.59%	1,226	6.38%	31,527	6.63%
\$550 to \$599	1,062	6.10%	1,161	6.04%	33,032	6.95%
\$600 to \$649	1,240	7.12%	1,350	7.03%	34,832	7.33%
\$650 to \$699	1,077	6.19%	1,132	5.89%	32,267	6.79%
\$700 to \$749	1,074	6.17%	1,184	6.16%	30,340	6.38%
\$750 to \$799	1,046	6.01%	1,113	5.79%	27,956	5.88%
\$800 to \$899	1,966	11.29%	2,096	10.91%	45,824	9.64%
\$900 to \$999	1,769	10.16%	1,918	9.99%	34,153	7.18%
\$1,000 to \$1,249	2,334	13.41%	2,505	13.04%	46,884	9.86%
\$1,250 to \$1,499	643	3.69%	718	3.74%	14,699	3.09%
\$1,500 to \$1,999	412	2.37%	494	2.57%	10,145	2.13%
\$2,000 or more	101	0.58%	101	0.53%	5,121	1.08%
No cash rent	1,035	5.94%	1,391	7.24%	43,236	9.10%
Median Gross Rent		\$754		\$752		\$699

Sources: 2009-2013 American Community Survey, Tables B25063 and B25064

Median gross rent in Comanche County is estimated to be \$752, which is 7.6% greater than Oklahoma's median gross rent of \$699/month. Median gross rent in Lawton is estimated to be \$754.

Median Gross Rent by Year of Construction

The next table presents data from the American Community Survey regarding median gross rent by year of housing unit construction. Note that dashes in the table indicate the Census Bureau had insufficient data to provide a median rent figure for that specific data field.

2013 Median Gross Rent by Year of Construction

	Lawton Median Rent	Comanche County Median Rent	State of Oklahoma Median Rent
Total Rental Units:			
Built 2010 or Later	\$1,046	\$1,028	\$933
Built 2000 to 2009	\$842	\$847	\$841
Built 1990 to 1999	\$814	\$792	\$715
Built 1980 to 1989	\$739	\$725	\$693
Built 1970 to 1979	\$725	\$729	\$662
Built 1960 to 1969	\$743	\$737	\$689
Built 1950 to 1959	\$705	\$706	\$714
Built 1940 to 1949	\$824	\$838	\$673
Built 1939 or Earlier	\$647	\$641	\$651

Note: Dashes indicate the Census Bureau had insufficient data to estimate a median gross rent.

Source: 2009-2013 American Community Survey, Table 25111

The highest median gross rent in Comanche County is among housing units constructed after 2010 in Lawton, which is \$1,046 per month. In order to be affordable, a household would need to earn at least \$41,840 per year to afford such a unit.

Lawton Rental Survey Data

The next two tables show the results of our rental survey of Lawton. The data is divided between market rate properties, and affordable properties.

Lawton Rental Properties - Market Rate							
	Year Built	Bedrooms	Bathrooms	Size (SF)	Rate	Rate/SF	Vacancy
Timbers	1969	2	1	880	\$700	\$0.795	11.00%
Timbers	1969	2	1	980	\$725	\$0.740	11.00%
Sheridan Square Apartments	1986	N/A	1	440	\$465	\$1.057	4.00%
Sheridan Square Apartments	1986	1	1	600	\$570	\$0.950	4.00%
Sheridan Square Apartments	1986	2	2	828	\$680	\$0.821	4.00%
Sheridan Square Apartments	1986	2	2	885	\$765	\$0.864	4.00%
Sheridan Square Apartments	1986	2	2	904	\$770	\$0.852	4.00%
Pine Terrace	1982	1	1	565	\$509	\$0.901	7.00%
Pine Terrace	1982	2	1	783	\$589	\$0.752	7.00%
Pine Terrace	1982	2	1	829	\$659	\$0.795	7.00%
Pine Terrace	1982	3	1	947	\$709	\$0.749	7.00%
Crosby Park Apartments	1970	1	1	690	\$485	\$0.703	8.00%
Crosby Park Apartments	1970	1	1	791	\$520	\$0.657	8.00%
Crosby Park Apartments	1970	2	1	890	\$580	\$0.652	8.00%
Crosby Park Apartments	1970	2	1	991	\$620	\$0.626	8.00%
Crosby Park Apartments	1970	2	1	1,100	\$710	\$0.645	8.00%
Bellaire Apartments	1975	1	1	600	\$510	\$0.850	18.00%
Bellaire Apartments	1975	2	1	825	\$545	\$0.661	18.00%
Bellaire Apartments	1975	3	1	875	\$595	\$0.680	18.00%
Bellaire Apartments	1975	4	1	1,100	\$795	\$0.723	18.00%
The Bristol	2007	1	1	676	\$653	\$0.966	18.00%
The Bristol	2007	2	1	1,003	\$703	\$0.701	18.00%
The Bristol	2007	2	2	996	\$713	\$0.716	18.00%
The Bristol	2007	2	2	1,016	\$732	\$0.720	18.00%
The Bristol	2007	3	2	996	\$713	\$0.716	18.00%
The Bristol	2007	3	2	1,141	\$813	\$0.713	18.00%
The Bristol	2007	3	2	1,233	N/A	N/A	18.00%
St. James Apartments	2007	1	1	865	\$760	\$0.879	8.00%
St. James Apartments	2007	2	2	1,187	\$999	\$0.842	8.00%
St. James Apartments	2007	2	2	1,227	\$1,050	\$0.856	8.00%
The Bristol	2007	3	2	1,233	\$589	\$0.478	15.00%
Summit Village Apartments	2008	2	2	899	\$729	\$0.811	18.00%
Summit Village Apartments	2008	2	2	936	\$699	\$0.747	18.00%
Summit Village Apartments	2008	2	1	972	\$669	\$0.688	18.00%
Summit Village Apartments	2008	3	2	1,026	\$829	\$0.808	18.00%
Summit Village Apartments	2008	3	2	953	\$729	\$0.765	18.00%
Summit Village Apartments	2008	3	2	1,178	\$859	\$0.729	18.00%
Ross Estates	2009	1	1	700	\$695	\$0.993	N/A
Ross Estates	2009	2	1	960	\$720	\$0.750	N/A
Summit Ridge Apartments	2005	2	1	899	\$765	\$0.851	20.00%
Summit Ridge Apartments	2005	2	2	936	\$789	\$0.843	20.00%
Summit Ridge Apartments	2005	2	2	972	\$809	\$0.832	20.00%
Legend Park	N/A	1	1	789	\$799	\$1.013	22.00%
Legend Park	N/A	1	1	786	\$819	\$1.042	22.00%
Legend Park	N/A	1	1	803	\$829	\$1.032	22.00%
Legend Park	N/A	2	2	1,073	\$1,019	\$0.950	22.00%
Legend Park	N/A	2	2	1,146	\$1,019	\$0.889	22.00%
Legend Park	N/A	2	2	1,152	\$1,019	\$0.885	22.00%
Legend Park	N/A	2	2	1,145	\$1,009	\$0.881	22.00%
Legend Park	N/A	2	2	1,152	\$1,019	\$0.885	22.00%
Legend Park	N/A	2	2	1,181	\$1,029	\$0.871	22.00%
Legend Park	N/A	3	2	1,329	\$1,179	\$0.887	22.00%
Legend Park	N/A	3	2	1,330	\$1,149	\$0.864	22.00%
Lawton Pointe Apts	2006	2	1	700	\$389	\$0.556	28.00%
Lawton Pointe Apts	2006	3	1	1,000	\$550	\$0.550	28.00%

Lawton Rental Properties - Affordable

Name	Type	Year Built	Bedrooms	Bathrooms	Size (SF)	Rate	Rate/SF	Vacancy
Garrett's Landing	LIHTC - Family	2005	1	1	660	\$455	\$0.689	8.00%
Garrett's Landing	LIHTC - Family	2005	2	2	830	\$545	\$0.657	8.00%
Garrett's Landing	LIHTC - Family	2005	3	2	1,050	\$777	\$0.740	8.00%
Savannah House Apartments	LIHTC - Elderly	2006	1	1	660	\$449	\$0.680	2.00%
Savannah House Apartments	LIHTC - Elderly	2006	2	2	830	\$499	\$0.601	2.00%

The previous rent surveys encompass over fifteen different properties. These properties are located throughout the community and provide a good indication of availability and rental structure of multifamily property. Concessions such as free rent or no deposit were not evident in the competitive market survey. These inducements appear to have phased out over the market and appear only sporadically at individual complexes to induce leasing activity in a particular unit type. Review of historical rental data indicates the comparable rental rates have increased in a predominant range. Occupancy levels in the Lawton area have continued to increase to its present level. Rental rates also increased during the same period. The area should continue to show good rental rate and occupancy support due to proximity to employment centers. Alternatively, the fluctuating oil and gas prices could have an impact on the continued success of properties in the Lawton area.

Based on the number of units identified as rentals by the 2010 Census, it is reasonable to assume that a significant number of single-family residences are rentals as well as smaller complexes (under 20 units) not surveyed by this analyst. Increased rental rates and increased population in Lawton further supports the demand for new apartments and housing in Lawton and Comanche County. Although the continued success of available units and growth of business has increased the demand for housing in Lawton, the fluctuating oil and gas industry could have an impact on the housing and apartment market.

Rental Market Vacancy – Lawton

The rentals included in this report had occupancies of at least 80% (with the exception of Legend Park and Lawton Pointe Apartments), and some were 93% or higher. The affordable properties reported occupancies within the 92% range or higher. Historically, the Lawton multifamily market was stable and well occupied but rents were comparatively low and static. The stability of the apartment market has always been tied to the deployment of Ft. Sill. Over the past several years, existing complexes have noticeably increased rental rates. Most well maintained complexes report stable occupancy. Occupancy levels have recently dropped in all market-rate family complexes due to recent turnover at Ft. Sill. Property managers of these properties are expecting increases in occupancy levels in January, 2016, as new military units are installed in the area. It is the opinion of this analyst that well located, well maintained, and well managed existing developments should continue to have good market support going forward.



Timbers



Sheridan Square Apartments



Pine Terrace



Crosby Park Apartments



Bellaire Apartments



The Bristol



St. James Apartments



Summit Village Apartments



Ross Estates



Summit Ridge Apartments



Savannah House Apartments



Legend Park



Lawton Pointe Apts



Garrett's Landing

Summary of HUD Subsidized Properties

The following tables present data for housing units and households subsidized by the United States Department of Housing and Urban Development, for Comanche County, the State of Oklahoma, and the United States. This data is taken from HUD's "PITture of Subsidized Households" data for 2013, the most recent year available.

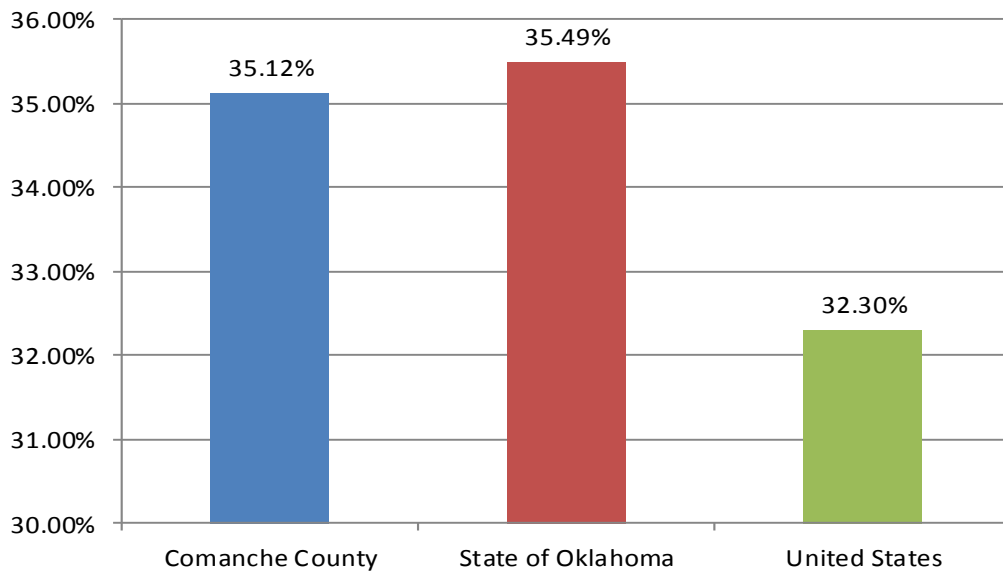
HUD Programs in Comanche County

Comanche County	# Units	Occupancy Rate	Avg.		Federal Contribution	% of Total Rent
			Household Income	Tenant Contribution		
Public Housing	365	95%	\$10,463	\$224	\$388	36.57%
Housing Choice Vouchers	694	96%	\$11,979	\$332	\$452	42.33%
Mod Rehab	0	N/A	N/A	N/A	N/A	N/A
Section 8 NC/SR	311	90%	\$6,943	\$164	\$623	20.79%
Section 236	0	N/A	N/A	N/A	N/A	N/A
Multi-Family Other	186	90%	\$9,341	\$214	\$475	31.07%
Summary of All HUD Programs	1,556	94%	\$10,267	\$257	\$475	35.12%
State of Oklahoma						
Public Housing	13,088	96%	\$11,328	\$215	\$371	36.71%
Housing Choice Vouchers	24,651	93%	\$10,766	\$283	\$470	37.57%
Mod Rehab	158	89%	\$7,272	\$129	\$509	20.17%
Section 8 NC/SR	4,756	93%	\$10,730	\$242	\$465	34.24%
Section 236	428	89%	\$8,360	\$192	\$344	35.82%
Multi-Family Other	7,518	91%	\$7,691	\$176	\$448	28.18%
Summary of All HUD Programs	50,599	94%	\$10,360	\$242	\$440	35.49%
United States						
Public Housing	1,150,867	94%	\$13,724	\$275	\$512	34.91%
Housing Choice Vouchers	2,386,237	92%	\$13,138	\$346	\$701	33.04%
Mod Rehab	19,148	87%	\$8,876	\$153	\$664	18.78%
Section 8 NC/SR	840,900	96%	\$12,172	\$274	\$677	28.80%
Section 236	126,859	93%	\$14,347	\$211	\$578	26.74%
Multi-Family Other	656,456	95%	\$11,135	\$255	\$572	30.80%
Summary of All HUD Programs	5,180,467	94%	\$12,892	\$304	\$637	32.30%

Source: U.S. Dept. of Housing and Urban Development, Picture of Subsidized Households - 2013

Among all HUD programs, there are 1,556 housing units located within Comanche County, with an overall occupancy rate of 94%. The average household income among households living in these units is \$10,267. Total monthly rent for these units averages \$733, with the federal contribution averaging \$475 (64.88%) and the tenant's contribution averaging \$257 (35.12%).

Percentage of Total Rent Paid by Tenant - HUD Subsidized Properties



Source: 2013 HUD Picture of Subsidized Households

The following table presents select demographic variables among the households living in units subsidized by HUD.



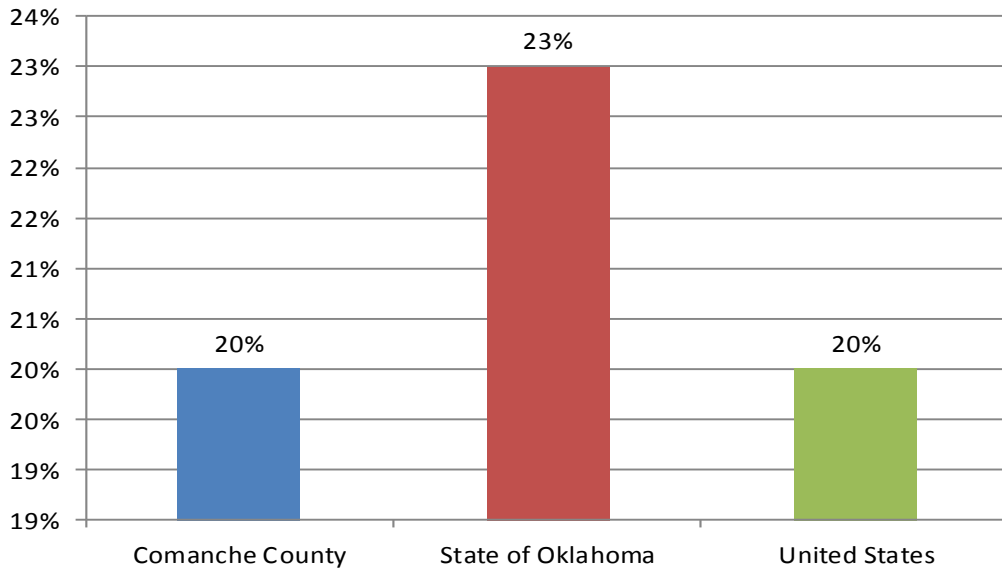
Demographics of Persons in HUD Programs in Comanche County

Comanche County	# Units	% Single Mothers	% w/ Disability	% Age 62+	% Age 62+ w/ Disability	% Minority
Public Housing	365	27%	27%	30%	49%	44%
Housing Choice Vouchers	694	53%	23%	13%	88%	71%
Mod Rehab	0	N/A	N/A	N/A	N/A	N/A
Section 8 NC/SR	311	54%	12%	16%	51%	58%
Section 236	0	N/A	N/A	N/A	N/A	N/A
Multi-Family Other	186	46%	12%	25%	40%	72%
Summary of All HUD Programs	1,556	47%	20%	19%	60%	63%
State of Oklahoma						
Public Housing	13,088	33%	22%	28%	63%	44%
Housing Choice Vouchers	24,651	46%	25%	17%	77%	60%
Mod Rehab	158	46%	17%	13%	67%	42%
Section 8 NC/SR	4,756	14%	32%	52%	28%	25%
Section 236	428	32%	22%	24%	32%	33%
Multi-Family Other	7,518	42%	12%	22%	25%	47%
Summary of All HUD Programs	50,599	38%	23%	25%	53%	50%
United States						
Public Housing	1,150,867	36%	20%	31%	48%	71%
Housing Choice Vouchers	2,386,237	44%	22%	22%	68%	67%
Mod Rehab	19,148	28%	27%	24%	69%	71%
Section 8 NC/SR	840,900	18%	21%	56%	19%	45%
Section 236	126,859	25%	13%	47%	16%	59%
Multi-Family Other	656,456	31%	13%	44%	16%	63%
Summary of All HUD Programs	5,180,467	36%	20%	33%	40%	64%

Source: U.S. Dept. of Housing and Urban Development, Picture of Subsidized Households - 2013

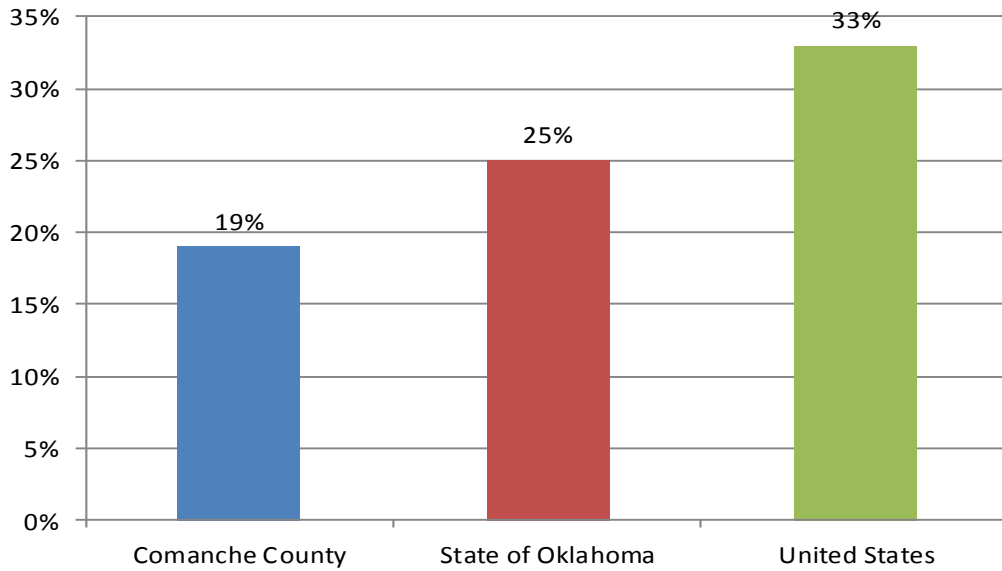
47% of housing units are occupied by single parents with female heads of household. 20% of households have at least one person with a disability. 19% of households have either a householder or spouse age 62 or above. Of the households age 62 or above, 60% have one or more disabilities. Finally, 63% of households are designated as racial or ethnic minorities.

Percentage of Households with Disabilities - HUD Subsidized Properties



Source: 2013 HUD Picture of Subsidized Households

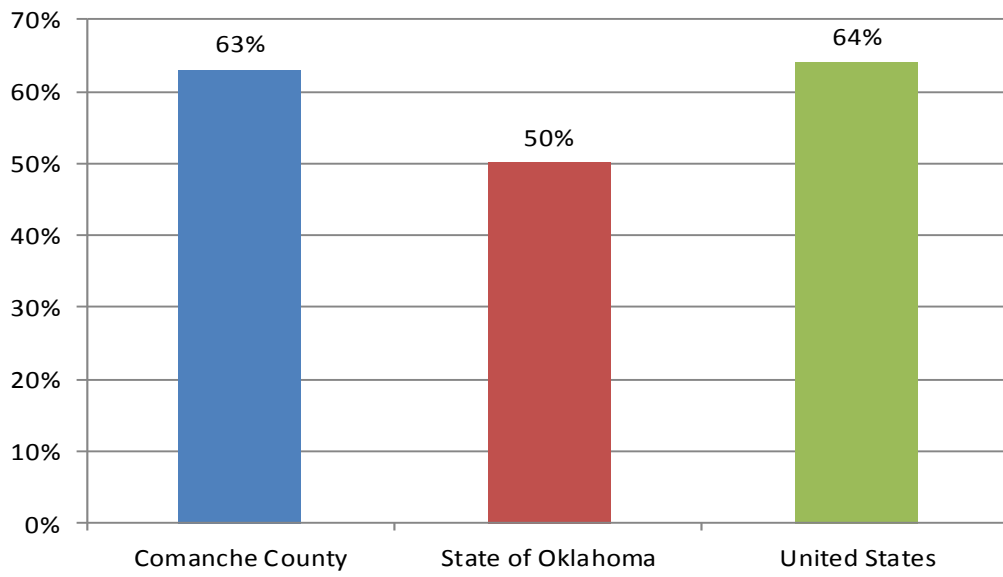
Percentage of Households Age 62+ - HUD Subsidized Properties



Source: 2013 HUD Picture of Subsidized Households



Percentage of Minority Households - HUD Subsidized Properties



Source: 2013 HUD Picture of Subsidized Households



Projected Housing Need

Consolidated Housing Affordability Strategy (CHAS)

This section will analyze data from the U.S. Department of Housing and Urban Development's Consolidated Housing Affordability Strategy (CHAS) dataset for Comanche County. This data is typically separated into household income thresholds, defined by HUD Area Median Family Income (HAMFI). HUD Area Median Family Income (HAMFI) is equivalent to Area Median Income (AMI) for the purposes of this report. This data is considered the best indicator of housing need available which separates need into household income thresholds as defined by HUD.

Cost Burden by Income Threshold

The next table presents CHAS data for Comanche County regarding housing cost burden as a percentage of household income. Renter costs are considered to be the sum of contract rent and any utilities not paid by the landlord (such as electricity, natural gas, and water, but not including telephone service, cable service, internet service, etc.). Homeowner costs include mortgage debt service (or similar debts such as deeds of trust or contracts for deed), utilities, property taxes and property insurance.

Households are considered to be cost overburdened if their housing costs (renter or owner) are greater than 30% of their gross household income. A household is "severely" overburdened if their housing costs are greater than 50% of their gross household income.

Comanche County : CHAS - Housing Cost Burden by HAMFI				
Household Income / Cost Burden	Owners		Renters	
	Number	Percent	Number	Percent
Income < 30% HAMFI	1,400		3,440	
Cost Burden Less Than 30%	195	13.93%	560	16.28%
Cost Burden Between 30%-50%	220	15.71%	330	9.59%
Cost Burden Greater Than 50%	735	52.50%	2,200	63.95%
Not Computed (no/negative income)	250	17.86%	355	10.32%
Income 30%-50% HAMFI	1,600		3,050	
Cost Burden Less Than 30%	685	42.81%	760	24.92%
Cost Burden Between 30%-50%	385	24.06%	1,350	44.26%
Cost Burden Greater Than 50%	530	33.13%	935	30.66%
Not Computed (no/negative income)	0	0.00%	0	0.00%
Income 50%-80% HAMFI	3,295		3,985	
Cost Burden Less Than 30%	1,955	59.33%	2,290	57.47%
Cost Burden Between 30%-50%	1,135	34.45%	1,565	39.27%
Cost Burden Greater Than 50%	205	6.22%	125	3.14%
Not Computed (no/negative income)	0	0.00%	0	0.00%
Income 80%-100% HAMFI	2,525		2,295	
Cost Burden Less Than 30%	1,835	72.67%	1,895	82.57%
Cost Burden Between 30%-50%	555	21.98%	370	16.12%
Cost Burden Greater Than 50%	135	5.35%	30	1.31%
Not Computed (no/negative income)	0	0.00%	0	0.00%
All Incomes	25,585		18,735	
Cost Burden Less Than 30%	20,570	80.40%	11,350	60.58%
Cost Burden Between 30%-50%	3,000	11.73%	3,730	19.91%
Cost Burden Greater Than 50%	1,765	6.90%	3,294	17.58%
Not Computed (no/negative income)	250	0.98%	355	1.89%

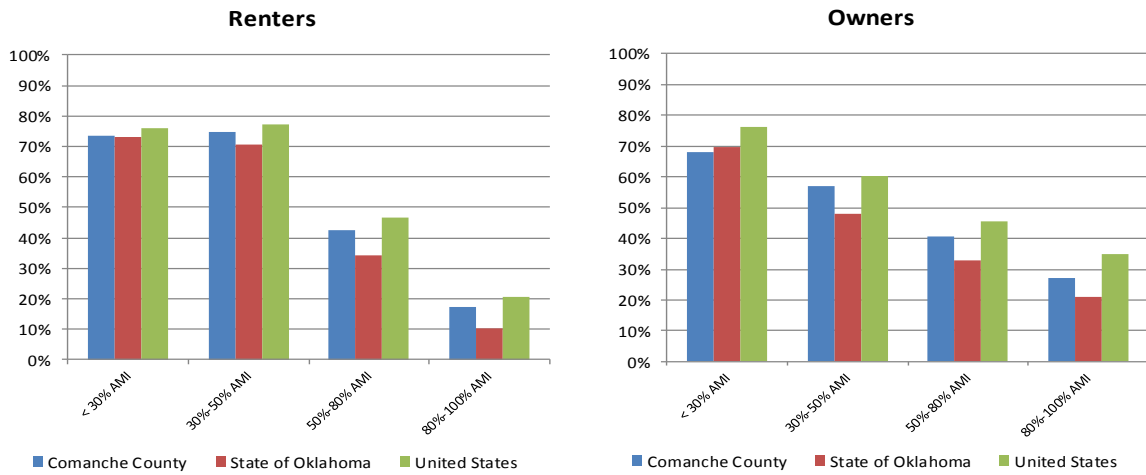
Source: 2008-2012 HUD Comprehensive Housing Affordability Strategy, Table 8

The next table summarizes the data from the previous table for households with cost burden greater than 30% of gross income, followed by a chart comparing these figures for Comanche County with the State of Oklahoma as a whole, and the United States.

Comanche County : Households by Income by Cost Burden				
Household Income Threshold	Owners		Renters	
	Total	% w/ Cost > 30% Income	Total	% w/ Cost > 30% Income
Income < 30% HAMFI	1,400	68.21%	3,440	73.55%
Income 30%-50% HAMFI	1,600	57.19%	3,050	74.92%
Income 50%-80% HAMFI	3,295	40.67%	3,985	42.41%
Income 80%-100% HAMFI	2,525	27.33%	2,295	17.43%
All Incomes	25,585	18.62%	18,735	37.49%

Source: 2008-2012 HUD Comprehensive Housing Affordability Strategy, Table 8

Households by Income Threshold: Percentage with Housing Cost Over 30% of Income



Source: 2008-2012 HUD Comprehensive Housing Affordability Strategy, Table 6

Substandard Conditions / Overcrowding by Income Threshold

The following table summarizes data regarding substandard housing conditions and overcrowding, separated by owner/renter and HAMFI income threshold. Substandard housing conditions are defined by HUD as any housing unit lacking either complete plumbing or a complete kitchen.

A housing unit without “complete plumbing” is any housing unit lacking one or more of the following features (they do not need to all be present in the same room):

1. Hot and cold running water
2. A flush toilet
3. A bathtub or shower

A lack of a complete kitchen is any housing unit lacking any one or more of the three following items:

1. A sink with a faucet
2. A stove or range
3. A refrigerator

Households are considered to be “overcrowded” if the household has more than 1.0 persons per room (note that this definition is “room” including bedrooms, living rooms and kitchens, as opposed to only “bedrooms”), and is “severely overcrowded” if the household has more than 1.5 persons per room.



Comanche County : CHAS - HAMFI by Substandard Conditions / Overcrowding

Household Income / Housing Problem	Owners		Renters	
	Number	Percent	Number	Percent
Income < 30% HAMFI	1,400		3,440	
Between 1.0 and 1.5 Persons per Room	50	3.57%	125	3.63%
More than 1.5 Persons per Room	0	0.00%	0	0.00%
Lacks Complete Kitchen or Plumbing	10	0.71%	55	1.60%
Income 30%-50% HAMFI	1,600		3,050	
Between 1.0 and 1.5 Persons per Room	45	2.81%	10	0.33%
More than 1.5 Persons per Room	0	0.00%	4	0.13%
Lacks Complete Kitchen or Plumbing	4	0.25%	120	3.93%
Income 50%-80% HAMFI	3,295		3,985	
Between 1.0 and 1.5 Persons per Room	80	2.43%	110	2.76%
More than 1.5 Persons per Room	4	0.12%	55	1.38%
Lacks Complete Kitchen or Plumbing	4	0.12%	110	2.76%
Income 80%-100% HAMFI	2,525		2,295	
Between 1.0 and 1.5 Persons per Room	70	2.77%	30	1.31%
More than 1.5 Persons per Room	0	0.00%	85	3.70%
Lacks Complete Kitchen or Plumbing	15	0.59%	105	4.58%
All Incomes	25,585		18,735	
Between 1.0 and 1.5 Persons per Room	455	1.78%	400	2.14%
More than 1.5 Persons per Room	44	0.17%	229	1.22%
Lacks Complete Kitchen or Plumbing	99	0.39%	495	2.64%

Source: 2008-2012 HUD Comprehensive Housing Affordability Strategy, Table 3

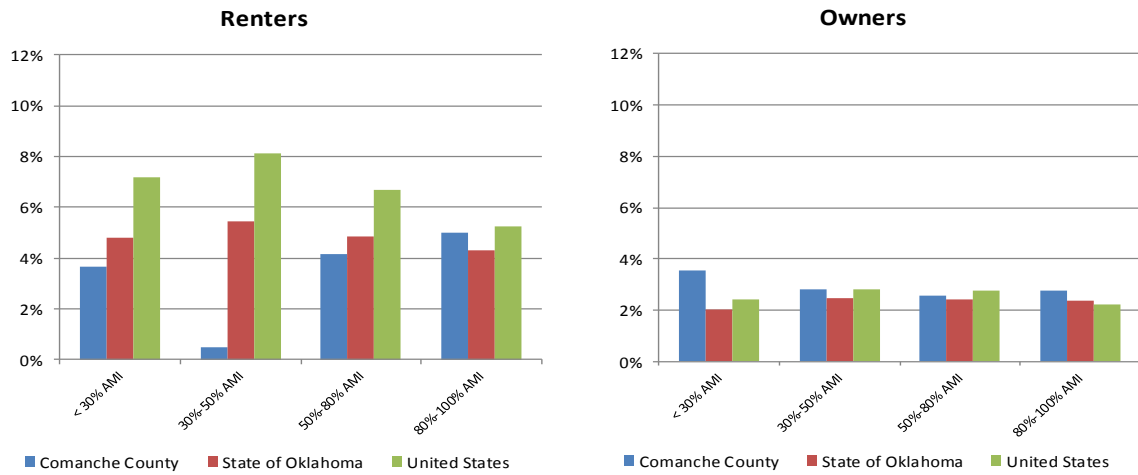
The next table summarizes this data for overcrowding (i.e. all households with greater than 1.0 persons per room), with a chart comparing this data between Comanche County, Oklahoma and the nation.

Comanche County : Households by Income by Overcrowding

Household Income Threshold	Total	Owners		Renters	
		% > 1.0 Persons per Room	Total	% > 1.0 Persons per Room	Total
Income < 30% HAMFI	1,400	3.57%	3,440	3.63%	3,440
Income 30%-50% HAMFI	1,600	2.81%	3,050	0.46%	3,050
Income 50%-80% HAMFI	3,295	2.55%	3,985	4.14%	3,985
Income 80%-100% HAMFI	2,525	2.77%	2,295	5.01%	2,295
All Incomes	25,585	1.95%	18,735	3.36%	18,735

Source: 2008-2012 HUD Comprehensive Housing Affordability Strategy, Table 3

Households by Income Threshold: Percentage with More than 1.0 Persons per Room



Source: 2008-2012 HUD Comprehensive Housing Affordability Strategy, Table 3

The table following summarizes this data for substandard housing conditions, with a comparison chart between Comanche County, the state and the nation.

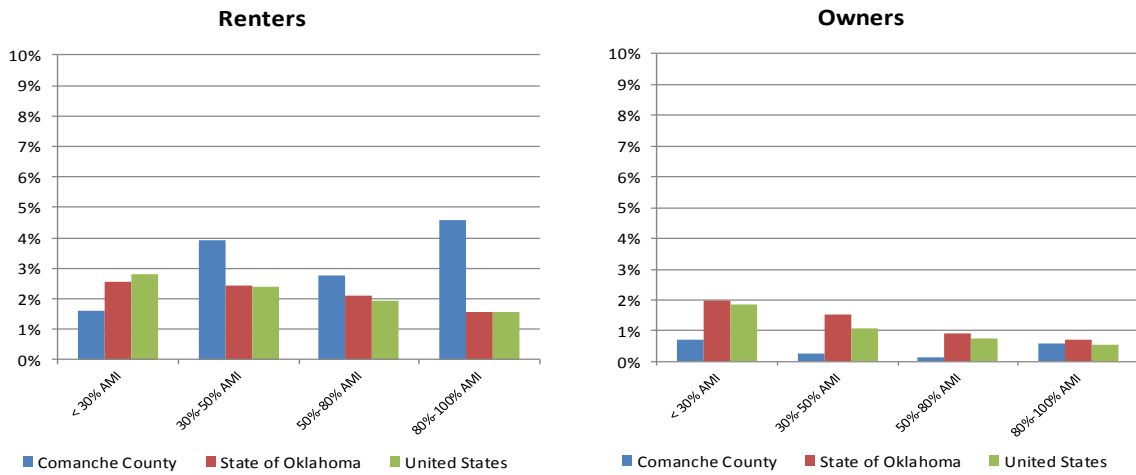
Comanche County : Households by Income by Substandard Conditions

Household Size/Type	Total	Owners		Renters	
		% Lacking Kitchen or Plumbing	Total	% Lacking Kitchen or Plumbing	Total
Income < 30% HAMFI	1,400	0.71%	3,440	1.60%	
Income 30%-50% HAMFI	1,600	0.25%	3,050	3.93%	
Income 50%-80% HAMFI	3,295	0.12%	3,985	2.76%	
Income 80%-100% HAMFI	2,525	0.59%	2,295	4.58%	
All Incomes	25,585	0.39%	18,735	2.64%	

Source: 2008-2012 HUD Comprehensive Housing Affordability Strategy, Table 3



Households by Income Threshold: Percentage Lacking Complete Plumbing and/or Kitchen



Source: 2008-2012 HUD Comprehensive Housing Affordability Strategy, Table 3

Cost Burden by Household Type

The following table provides a breakdown of households by HAMFI, and by household type and size, and by housing cost burden. The categories of household type provided by HUD are:

- Elderly Family: Households with two persons, either or both age 62 or over.
- Small Family: 2 persons, neither age 62 or over, or families with 3 or 4 persons of any age.
- Large Family: families with 5 or more persons.
- Elderly Non-Family (single persons age 62 or over, or unrelated elderly individuals)
- Non-Elderly, Non-Family: all other households.



Comanche County : CHAS - Housing Cost Burden by Household Type / HAMFI						
	Total	Owners		Total	Renters	
		No. w/ Cost > 30% Income	Pct. w/ Cost > 30% Income		No. w/ Cost > 30% Income	Pct. w/ Cost > 30% Income
Income < 30% HAMFI	1,400	955	68.21%	3,440	2,525	73.40%
Elderly Family	130	100	76.92%	20	20	100.00%
Small Family (2-4 persons)	450	320	71.11%	1,400	1,110	79.29%
Large Family (5 or more persons)	95	85	89.47%	310	245	79.03%
Elderly Non-Family	450	265	58.89%	390	195	50.00%
Non-Family, Non-Elderly	275	185	67.27%	1,320	955	72.35%
Income 30%-50% HAMFI	1,600	910	56.88%	3,050	2,290	75.08%
Elderly Family	150	70	46.67%	40	25	62.50%
Small Family (2-4 persons)	420	250	59.52%	1,380	1,115	80.80%
Large Family (5 or more persons)	110	80	72.73%	260	225	86.54%
Elderly Non-Family	675	310	45.93%	275	190	69.09%
Non-Family, Non-Elderly	245	200	81.63%	1,095	735	67.12%
Income 50%-80% HAMFI	3,295	1,345	40.82%	3,985	1,689	42.38%
Elderly Family	695	150	21.58%	75	4	5.33%
Small Family (2-4 persons)	1,100	610	55.45%	2,170	1,045	48.16%
Large Family (5 or more persons)	350	150	42.86%	435	65	14.94%
Elderly Non-Family	755	220	29.14%	280	155	55.36%
Non-Family, Non-Elderly	395	215	54.43%	1,025	420	40.98%
Income 80%-100% HAMFI	2,525	694	27.49%	2,295	402	17.52%
Elderly Family	535	65	12.15%	25	14	56.00%
Small Family (2-4 persons)	1,035	300	28.99%	1,235	155	12.55%
Large Family (5 or more persons)	255	109	42.75%	200	4	2.00%
Elderly Non-Family	400	85	21.25%	105	35	33.33%
Non-Family, Non-Elderly	300	135	45.00%	725	194	26.76%
All Incomes	25,585	4,768	18.64%	18,735	7,024	37.49%
Elderly Family	4,635	500	10.79%	315	67	21.27%
Small Family (2-4 persons)	12,140	1,950	16.06%	8,715	3,470	39.82%
Large Family (5 or more persons)	2,135	484	22.67%	1,725	549	31.83%
Elderly Non-Family	3,355	939	27.99%	1,245	579	46.51%
Non-Family, Non-Elderly	3,325	895	26.92%	6,735	2,359	35.03%

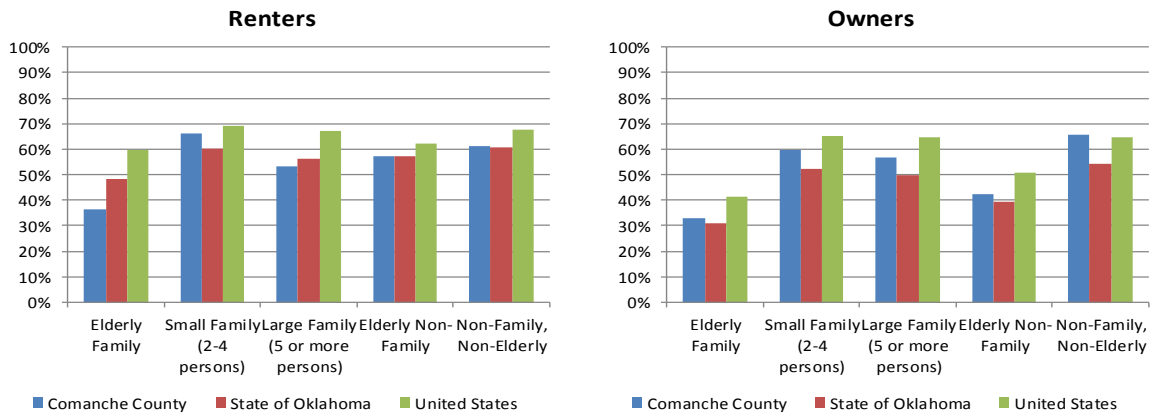
Source: 2008-2012 HUD Comprehensive Housing Affordability Strategy, Table 7

Comanche County : Households under 80% AMI by Cost Burden

Household Size/Type	Total	Owners		Renters	
		No. w/ Cost > 30% Income	Pct. w/ Cost > 30% Income	No. w/ Cost > 30% Income	Pct. w/ Cost > 30% Income
Income < 80% HAMFI	6,295	3,210	50.99%	10,475	62.09%
Elderly Family	975	320	32.82%	135	36.30%
Small Family (2-4 persons)	1,970	1,180	59.90%	4,950	66.06%
Large Family (5 or more persons)	555	315	56.76%	1,005	53.23%
Elderly Non-Family	1,880	795	42.29%	945	57.14%
Non-Family, Non-Elderly	915	600	65.57%	3,440	61.34%

Source: 2008-2012 HUD Comprehensive Housing Affordability Strategy, Table 7

Households Under 80% of AMI: Percentage Housing Cost Overburdened



Source: 2008-2012 HUD Comprehensive Housing Affordability Strategy, Table 7

Housing Problems by Household Type

The next set of tables presents data by household type and whether or not the household is experiencing **any** housing problems. Housing problems are defined by HUD as any household meeting any of the three following criteria:

1. Housing costs greater than 30% of income (cost-overburdened).
2. Living in a housing unit lacking complete plumbing or a complete kitchen (substandard housing unit).
3. Living in a housing unit with more than 1.0 persons per room (overcrowding).



Comanche County : CHAS - Housing Problems by Household Type and HAMFI						
Income, Household Size/Type	Total	Owners		Total	Renters	
		No. w/ Housing Problems	Pct. w/ Housing Problems		No. w/ Housing Problems	Pct. w/ Housing Problems
Income < 30% HAMFI	1,400	970	69.29%	3,440	2,535	73.69%
Elderly Family	130	100	76.92%	20	20	100.00%
Small Family (2-4 persons)	450	320	71.11%	1,400	1,115	79.64%
Large Family (5 or more persons)	95	95	100.00%	310	245	79.03%
Elderly Non-Family	450	270	60.00%	390	190	48.72%
Non-Family, Non-Elderly	275	185	67.27%	1,320	965	73.11%
Income 30%-50% HAMFI	1,600	915	57.19%	3,050	2,360	77.38%
Elderly Family	150	65	43.33%	40	30	75.00%
Small Family (2-4 persons)	420	250	59.52%	1,380	1,150	83.33%
Large Family (5 or more persons)	110	85	77.27%	260	230	88.46%
Elderly Non-Family	675	310	45.93%	275	185	67.27%
Non-Family, Non-Elderly	245	205	83.67%	1,095	765	69.86%
Income 50%-80% HAMFI	3,295	1,420	43.10%	3,985	1,884	47.28%
Elderly Family	695	150	21.58%	75	4	5.33%
Small Family (2-4 persons)	1,100	610	55.45%	2,170	1,115	51.38%
Large Family (5 or more persons)	350	220	62.86%	435	185	42.53%
Elderly Non-Family	755	225	29.80%	280	160	57.14%
Non-Family, Non-Elderly	395	215	54.43%	1,025	420	40.98%
Income Greater than 80% of HAMFI	19,290	1,965	10.19%	8,255	950	11.51%
Elderly Family	3,660	210	5.74%	180	30	16.67%
Small Family (2-4 persons)	10,170	830	8.16%	3,765	380	10.09%
Large Family (5 or more persons)	1,580	440	27.85%	720	205	28.47%
Elderly Non-Family	1,475	150	10.17%	300	50	16.67%
Non-Family, Non-Elderly	2,405	335	13.93%	3,295	285	8.65%
All Incomes	25,585	5,270	20.60%	18,730	7,729	41.27%
Elderly Family	4,635	525	11.33%	315	84	26.67%
Small Family (2-4 persons)	12,140	2,010	16.56%	8,715	3,760	43.14%
Large Family (5 or more persons)	2,135	840	39.34%	1,725	865	50.14%
Elderly Non-Family	3,355	955	28.46%	1,245	585	46.99%
Non-Family, Non-Elderly	3,320	940	28.31%	6,735	2,435	36.15%

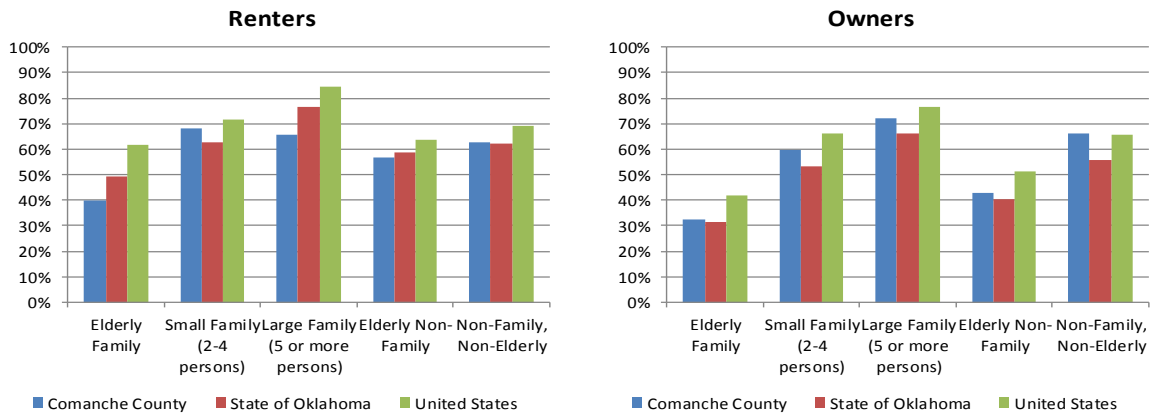
Source: 2008-2012 HUD Comprehensive Housing Affordability Strategy, Table 16

Comanche County : Households under 80% AMI by Housing Problems

Household Size/Type	Total	Owners		Renters	
		No. w/ Housing Problems	Pct. w/ Housing Problems	No. w/ Housing Problems	Pct. w/ Housing Problems
Income < 80% HAMFI	6,295	3,305	52.50%	10,475	64.72%
Elderly Family	975	315	32.31%	135	40.00%
Small Family (2-4 persons)	1,970	1,180	59.90%	4,950	68.28%
Large Family (5 or more persons)	555	400	72.07%	1,005	65.67%
Elderly Non-Family	1,880	805	42.82%	945	56.61%
Non-Family, Non-Elderly	915	605	66.12%	3,440	62.50%

Source: 2008-2012 HUD Comprehensive Housing Affordability Strategy, Table 7

Households Under 80% of AMI: Percentage with Housing Problems



Source: 2008-2012 HUD Comprehensive Housing Affordability Strategy, Table 7

Housing Problems by Race / Ethnicity

Data presented in the following tables summarizes housing problems (as previously defined), by HAMFI threshold, and by race/ethnicity, for Comanche County. Under CFR 91.305(b)(1)(ii)(2), racial or ethnic groups have disproportionate need if “the percentage of persons in a category of need who are members of a particular racial or ethnic group in a category of need is at least 10 percentage points higher than the percentage of persons in the category as a whole.”



Comanche County : CHAS - Housing Problems by Race / Ethnicity and HAMFI						
Income, Race / Ethnicity	Total	Owners		Total	Renters	
		No. w/ Housing Problems	Pct. w/ Housing Problems		No. w/ Housing Problems	Pct. w/ Housing Problems
Income < 30% HAMFI	1,400	970	69.3%	3,440	2,540	73.8%
White alone, non-Hispanic	935	655	70.1%	1,810	1,255	69.3%
Black or African-American alone	150	100	66.7%	824	755	91.6%
Asian alone	45	45	100.0%	195	115	59.0%
American Indian alone	104	90	86.5%	215	175	81.4%
Pacific Islander alone	0	0	N/A	4	0	0.0%
Hispanic, any race	115	60	52.2%	180	90	50.0%
Other (including multiple races)	54	20	37.0%	210	155	73.8%
Income 30%-50% HAMFI	1,600	915	57.2%	3,050	2,360	77.4%
White alone, non-Hispanic	1,020	600	58.8%	1,460	1,195	81.8%
Black or African-American alone	225	170	75.6%	860	685	79.7%
Asian alone	100	60	60.0%	55	25	45.5%
American Indian alone	110	15	13.6%	200	65	32.5%
Pacific Islander alone	0	0	N/A	0	0	N/A
Hispanic, any race	95	45	47.4%	370	305	82.4%
Other (including multiple races)	50	25	50.0%	105	80	76.2%
Income 50%-80% HAMFI	3,295	1,420	43.1%	3,980	1,885	47.4%
White alone, non-Hispanic	2,105	805	38.2%	2,565	1,215	47.4%
Black or African-American alone	440	315	71.6%	640	310	48.4%
Asian alone	80	60	75.0%	40	40	100.0%
American Indian alone	300	65	21.7%	90	50	55.6%
Pacific Islander alone	0	0	N/A	30	0	0.0%
Hispanic, any race	225	85	37.8%	500	225	45.0%
Other (including multiple races)	150	90	60.0%	120	45	37.5%
Income 80%-100% HAMFI	2,525	780	30.9%	2,290	595	26.0%
White alone, non-Hispanic	1,810	615	34.0%	1,065	265	24.9%
Black or African-American alone	260	95	36.5%	425	125	29.4%
Asian alone	45	0	0.0%	45	0	0.0%
American Indian alone	95	0	0.0%	275	45	16.4%
Pacific Islander alone	40	30	75.0%	0	0	N/A
Hispanic, any race	225	35	15.6%	320	55	17.2%
Other (including multiple races)	49	4	8.2%	165	110	66.7%
All Incomes	25,585	5,270	20.6%	18,725	7,735	41.3%
White alone, non-Hispanic	17,930	3,470	19.4%	10,660	4,125	38.7%
Black or African-American alone	3,200	930	29.1%	3,894	1,910	49.0%
Asian alone	530	165	31.1%	490	200	40.8%
American Indian alone	1,029	225	21.9%	920	390	42.4%
Pacific Islander alone	130	30	23.1%	34	0	0.0%
Hispanic, any race	1,875	295	15.7%	1,990	730	36.7%
Other (including multiple races)	903	159	17.6%	750	390	52.0%

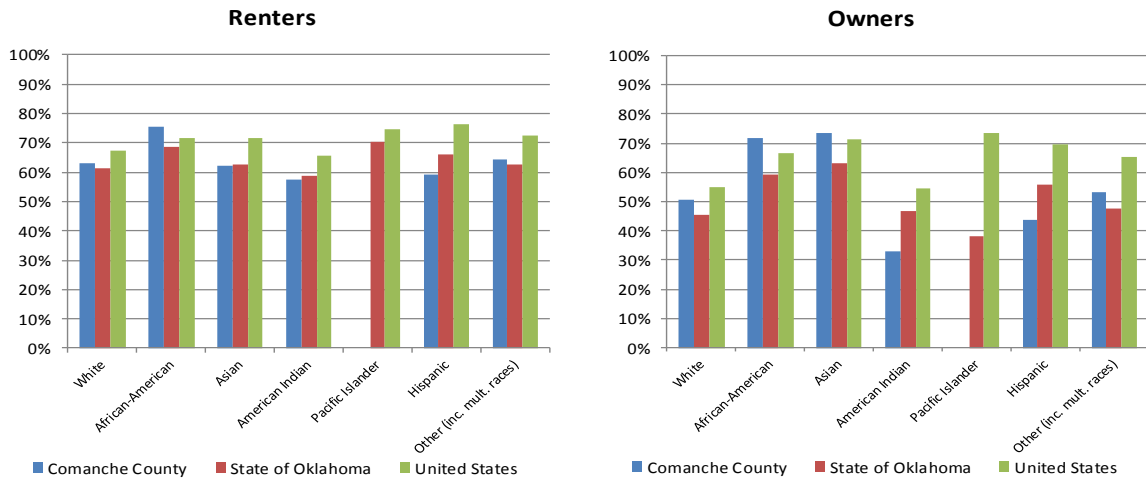
Source: 2008-2012 HUD Comprehensive Housing Affordability Strategy, Table 1

Comanche County : Households under 80% AMI by Race/Ethnicity

Household Size/Type	Total	Owners		Renters	
		No. w/ Housing Problems	Pct. w/ Housing Problems	No. w/ Housing Problems	Pct. w/ Housing Problems
Income < 80% HAMFI	6,295	3,305	52.50%	10,470	64.80%
White alone, non-Hispanic	4,060	2,060	50.74%	5,835	62.81%
Black or African-American alone	815	585	71.78%	2,324	75.30%
Asian alone	225	165	73.33%	290	62.07%
American Indian alone	514	170	33.07%	505	57.43%
Pacific Islander alone	0	0	N/A	34	0.00%
Hispanic, any race	435	190	43.68%	1,050	59.05%
Other (including multiple races)	254	135	53.15%	435	64.37%

Source: 2008-2012 HUD Comprehensive Housing Affordability Strategy, Table 7

Households Under 80% of AMI: Percentage with Housing Problems by Race



Source: 2008-2012 HUD Comprehensive Housing Affordability Strategy, Table 7

CHAS Conclusions

The previous data notes many areas of need (and severe need) among the existing population of Comanche County. The greatest needs are among households with incomes less than 30% of Area Median Income. Several other areas of note:

- Among households with incomes less than 50% of Area Median Income, there are 3,050 renter households that are cost overburdened, and 1,600 homeowners that are cost overburdened.
- Among **elderly** households with incomes less than 50% of Area Median Income, there are 45 renter households that are cost overburdened, and 280 homeowners that are cost overburdened.



- 75.3% of African American renters with incomes less than 80% of Area Median Income have one or more housing problems, and 71.78% of African American homeowners with incomes less than 80% of Area Median Income have one or more housing problems.
- 73.3% of Asian homeowners with incomes less than 80% of Area Median Income have one or more housing problems.

Overall Anticipated Housing Demand

Future demand for housing units in Comanche County can be estimated from population and household growth. Population estimates are based on known factors such as noted increases in the city employment base and indications from demographic services. In this case we have considered data from both the U.S. Census Bureau and Nielsen SiteReports. The estimates of changes in households and population were presented in a previous section of this report. The anticipated future demand is estimated for Lawton, as well as Comanche County as a whole. The calculations are shown in the following tables.

Lawton Anticipated Demand

Households in Lawton grew at an annually compounded rate of 0.94% from 2000 to 2010. Nielsen SiteReports estimates households have grown 0.14% per year since that time, and that households will grow 0.12% per year through 2020. Though these forecasts are accurate, continual population fluctuation caused by deployment of troops from Fort Sill, as well as the price drop in the oil and gas industry could negatively impact the overall demand in the market. For these reasons, we believe a reasonable forecast of future household growth in Lawton is 0.12% per year, based on past performance and the previously noted factors.

The percentage of owner households was estimated at 49.50% with renter households estimated at 50.50%, based on data from the U.S. Census Bureau. The estimated number of additional units needed to service increasing demand can be estimated by applying this percentage to the anticipated growth in households. It should be noted that this is an estimate of rental and owner requirements and should be relied upon only as a guideline for possible new demand. The calculations are shown below.

Future Housing Demand Estimates for Lawton						
Year	2015	2016	2017	2018	2019	2020
Household Estimates	35,149	35,193	35,237	35,281	35,325	35,369
Owner %: 49.50%	17,398	17,419	17,441	17,463	17,485	17,506
Renter %: 50.50%	17,751	17,774	17,796	17,818	17,840	17,863
						109
						111

Based on an estimated household growth rate of 0.12% per year, Lawton would require 109 new housing units for ownership, and 111 units for rent, over the next five years. Annually this equates to 22 units for ownership per year, and 22 units for rent per year. As previously stated above, the estimated demand does not take into account for the continual population fluctuation caused by deployment of troops from Fort Sill, as well as the price drop in the oil and gas industry and the impact on the local economy.

Comanche County Anticipated Demand

Households in Comanche County grew at an annually compounded rate of 1.23% from 2000 to 2010. Nielsen SiteReports estimates households have grown 0.25% per year since that time, and that households will grow 0.21% per year through 2020. Though these forecasts are accurate, continual

population fluctuation caused by deployment of troops from Fort Sill, as well as the price drop in the oil and gas industry could negatively impact the overall demand in the market. For these reasons, we believe a reasonable forecast of future household growth in Comanche County is 0.21% per year, based on past performance and the previously noted factors.

The percentage of owner households was estimated at 56.60% with renter households estimated at 43.40%, based on data from the U.S. Census Bureau. The estimated number of additional units needed to service increasing demand can be estimated by applying this percentage to the anticipated growth in households. It should be noted that this is an estimate of rental and owner requirements and should be relied upon only as a guideline for possible new demand. The calculations are shown below.

Future Housing Demand Estimates for Comanche County						
Year	2015	2016	2017	2018	2019	2020
Household Estimates	45,546	45,643	45,741	45,838	45,936	46,034
Owner %: 56.60%	25,777	25,832	25,887	25,942	25,998	26,053
Renter %: 43.40%	19,769	19,811	19,854	19,896	19,938	19,981
					276	276
					212	212

Based on an estimated household growth rate of 0.21% per year, Comanche County would require 276 new housing units for ownership, and 212 units for rent, over the next five years. Annually this equates to 55 units for ownership per year, and 42 units for rent per year.



Housing Demand – Population Subsets

This section will address 5-year forecasted needs and trends for population special population subsets for Comanche County. These forecasts are based on the previously forecasted overall trends for the next five years.

Housing Needs by Income Thresholds

The first table will address future housing needs and trends for households in Comanche County by income threshold: households within incomes below 30%, 50%, 60% and 80% of Area Median Income, by tenure (owner/renter). These forecasts are primarily based on HUD Consolidated Housing Affordability Strategy data presented previously. Households with incomes below 60% of Area Median Income (AMI) are estimated at 120% of the households at 50% of AMI. Note that these figures are cumulative and should not be added across income thresholds.

Comanche County: 2015-2020 Housing Needs by Income Threshold

	Owner	Renter	Owners	Renters	Total
	Subset %	Subset %			
Total New Demand: 2015-2020	100.00%	100.00%	276	212	488
Less than 30% AMI	5.47%	18.36%	15	39	54
Less than 50% AMI	11.73%	34.64%	32	73	106
Less than 60% AMI	14.07%	41.57%	39	88	127
Less than 80% AMI	24.60%	55.91%	68	118	186

Elderly Housing Needs

The next table will address future housing needs and trends for households with elderly persons (age 62 and up). Like the previous table, this data is based on the overall trends previously defined, and the 2008-2012 CHAS data previously discussed (specifically CHAS Table 16). It is further broken down by income threshold and tenure.

Comanche County: 2015-2020 Housing Needs Age 62 and Up

	Owner	Renter	Elderly	Elderly	Elderly
	Subset %	Subset %	Owners	Renters	Total
Total New Elderly (62+) Demand: 2015-2020	31.23%	8.33%	86	18	104
Elderly less than 30% AMI	2.27%	2.19%	6	5	11
Elderly less than 50% AMI	5.49%	3.87%	15	8	23
Elderly less than 60% AMI	6.59%	4.64%	18	10	28
Elderly less than 80% AMI	11.16%	5.76%	31	12	43

Housing Needs for Persons with Disabilities / Special Needs

The following table will address future trends and needs for households with at least one household member with at least one disability as identified by HUD CHAS Table 6 (hearing or vision impairments, ambulatory limitations, cognitive limitations, self-care limitations, or independent living limitations). As with the previous tables, this data is also further broken down by income threshold and tenure.

Comanche County: 2015-2020 Housing Needs for Persons with Disabilities

	Owner Subset %	Renter Subset %	Disabled Owners	Disabled Renters	Disabled Total
Total New Disabled Demand (2015-2020)	33.03%	27.98%	91	59	150
Disabled less than 30% AMI	2.33%	8.73%	6	18	25
Disabled less than 50% AMI	5.65%	14.34%	16	30	46
Disabled less than 60% AMI	6.78%	17.20%	19	36	55
Disabled less than 80% AMI	10.71%	19.65%	30	42	71

Housing Needs for Veterans

This section will address housing needs for households with at least one veteran. This data is not available through HUD's Consolidated Housing Affordability Strategy, so we have instead relied on data from the U.S. Census Bureau, specifically the 2009-2013 American Community Survey, Table C21007. This data is further broken down by tenure, poverty status, and disability status.

Comanche County: 2015-2020 Housing Needs for Veterans

	Owner Subset %	Renter Subset %	Veteran Owners	Veteran Renters	Veteran Total
Total New Demand (2015-2020)	100.00%	100.00%	276	212	488
Total Veteran Demand	19.13%	19.13%	53	41	93
Veterans with Disabilities	5.26%	5.26%	15	11	26
Veterans Below Poverty	1.28%	1.28%	4	3	6
Disabled Veterans Below Poverty	0.46%	0.46%	1	1	2

Housing Needs for Working Families

The final table addresses housing needs for working families. Working families are in this case defined as families (households with at least two members related by blood or marriage) with at least one person employed. Like the forecasts for veteran needs, this data cannot be extracted from the HUD CHAS tables, so we have again relied on the Census Bureau's American Community Survey (table B23007 in this instance). The data is further broken down by the presence of children (below the age of 18).

Comanche County: 2015-2020 Housing Needs for Working Families

	Owner Subset %	Renter Subset %	Owners	Renters	Total
Total New Demand (2015-2020)	100.00%	100.00%	276	212	488
Total Working Families	52.27%	52.27%	144	111	255
Working Families with Children Present	28.70%	28.70%	79	61	140

Population Subset Conclusions

Based on population and household growth over the next five years, a total of 488 housing units will be needed in Comanche County over the next five years. Of those units:

- 127 will be needed by households earning less than 60% of Area Median Income

- 28 will be needed by households age 62 and up, earning less than 60% of Area Median Income.
- 55 will be needed by households with disabilities / special needs, earning less than 60% of Area Median Income
- 6 will be needed by veterans living below the poverty line
- 140 will be needed by working families with children present

This data suggests a need in Comanche County for housing units that are both affordable and accessible to persons with disabilities / special needs, and working families with children.

Special Topics

Comanche County Disaster Resiliency Assessment

The purpose of this section is to assess at the county level key components of disaster resiliency. Housing location and quality as well as planning activities can help reduce impacts from disaster events and allow for faster recovery. Disasters can include tornadoes, extreme weather, high winds, as well as man-made events. These events may largely be inevitable, but the ability to reduce damage and casualties as well recovery can be improved with good planning.

C.0 Comprehensive Plans & Hazard Mitigation Plans

The main city in Comanche County is Lawton, OK. There are two smaller cities in Comanche County including the City of Cache and the City of Elgin.

Lawton had a population of 96,867 in 2010 Census and it has a comprehensive plan. Cache had a population of 2,796, and Elgin had a population of 2,156 in the 2010 Census. Several towns exist within the county that are too small to warrant creation of a comprehensive plan. Overall, the county population was 124,098 in the 2010 Census. Of these smaller communities, the towns are Fletcher (1,177), Sterling (793), Medicine Park (382), Geronimo (1,268), Indiahoma (344), Faxon (136). Unincorporated areas are Meers, Bethel and Pumpkin Center.

The other key plan for a city to manage, mitigate and plan for recovery related to disasters is a **Hazard Mitigation Plan (HMP)**. Often in low density counties, the Hazard Mitigation Plan is done at the county level, though some cities may augment the county plan with a city plan. The Comanche County Hazard Mitigation Plan was adopted August 11th, 2003 and is intended to be reviewed and revised on a five-year cycle. The formal adoption of the Resolution by local jurisdictions was approved on October 8th, 2008. The Comanche County HMP is focused on the unincorporated areas of the County. Should municipalities within the county desire to be included with the county HMP, they may request to be included and must provide the appropriate information. Indian tribes, as sovereign nations, are also not included in this HMP. Additionally, the Comanche County Conservation District and the USDA-Natural Resources Conservation Service have a joint Natural Resource Long Range Plan.

The City of Lawton's updated HMP was approved September 11th, 2012 and is on a five-year cycle for updating.

The Conservation District in Comanche County has a Long Range Plan that addresses drought, flood protection and other natural resources. This information was used in the Comanche County HMP.

C.2.1.1. Historical Data on Natural Disasters and Other Hazards

Data on historical damages and casualties is typically collected as part of a **Hazard Mitigation Plan** preparation to determine the appropriate planning measures and actions to take before and after an event.

The HMP for Comanche County identifies four Hazard Mitigation Goals that are as follows:

Goal 1. Protection from loss of lie and personal injury.

Goal 2. Protection of critical facilities and infrastructure.

Goal 3. Protection of personal property and reduction of economic injury due to hazards.

Goal 4. Minimize the costs of disaster response.

For each of the specific actions identified within the HMP, a lead agency (and in some instances, a specific position is called out) is designated to accomplish each item. The identified actions within each hazard area are as follows:

Action Item #	Lead/Responsible Department	Mitigation Strategy	Priority/Rank
1	Comanche County Emergency Manager	Educate the public about various dangers associated with natural hazards.	1
DF 1	Comanche County Emergency Management	Identify vulnerable structures, or potentially vulnerable new structures, susceptible to flooding from dam failures.	13
DF 2	Comanche County Emergency Management	Provide dam monitoring equipment	13
DR 1	Conservation District – USDA / NRCS	Drill additional water wells ensuring that an adequate water supply is available.	15
DR 2	Comanche County	Build reservoirs to contain rain and runoff water for agricultural uses.	14
EQ 1	Comanche County Emergency Manager	Develop detailed fault maps of Comanche County to determine areas most likely to be affected by earthquakes.	8
EQ 2	Comanche County, Cotton Electric Coop.	Work with Utility companies to retrofit commercial power facilities, or address specific needs of new infrastructure to be more earthquake resistant.	8
EH 1	Comanche County Memorial Hospital	Provide cooling stations to allow citizens to come in out of the heat to cool down.	7
EH 2	Comanche County Emergency Manager	Installing Protective Film on windows in all county windows to reduce heat gain.	9
F 1	Comanche County Flood Plain Manager	Elevate those structures in the floodplain that are thought to be at risk of receiving damage or being destroyed from a flooding event.	15
F 2	Comanche County Flood Plain Manager	Update and provide continual administration to insure NFIP compliance is maintained.	12
F 3	Comanche County Flood Plain Manager	Raise the roadbed and construct new bridges and approaches along three county road segments that are impassable during floods.	16
HS 1	Comanche County Emergency Manager	Public Education – Promote the use of hail resistant shingles and building materials for retrofit or new construction to the public using brochures and the media.	12
HS 2	Comanche County	Provide new shelters for county owned vehicles to	

	Emergency Manager	protect from hail damage.	
HS 3	Comanche County Emergency Manager	Install Protective Film on windows in all county buildings.	9
L 1	Comanche County Emergency Management	Purchase Lightning Prediction Systems for Comanche County Critical Facilities.	8
L 2	Comanche County Emergency Management	Install lightning protection and suppression systems protecting radios and other essential equipment at existing and new critical facilities throughout the county.	12
T-HW 1	Comanche County Emergency Management	Develop emergency operation plan to implement mitigation, response and recovery phases of an event. This plan would reduce the loss of life and lower property damage.	4
T-HW 2	Comanche County Emergency Management	Educate the public in the benefits of installing residential and commercial storm shelters and safe rooms.	3
T-HW 3	Comanche County Emergency Management	Obtain mobile communications equipment for spotters and Emergency Response Teams.	5
T-HW 4	Comanche County Emergency Management	Purchase and install NOAA Weather Radio receivers in schools, hospitals, nursing homes and other public facilities.	3
T-HW 5	Comanche County Emergency Management	Install 20 new residential and commercial storm shelters to reduce the loss of life.	15
T-HW 6	Comanche County Emergency Manager	Promote the benefits of Tie Downs to secure existing and future mobile homes and other mobile structures helping reduce damage from high winds or tornadoes.	6
T-HW 8	Comanche County Emergency Management	Review the Comanche County Severe Weather Response Plan and Warning System on an annual basis.	
WF 1	Comanche County Emergency Manager	Purchase of two tanker fire trucks to protect Comanche County from wildfires.	
WF 2	Comanche County Emergency Manager	Provide dry hydrants for wildfire protection.	
WF 3	Comanche County Emergency Manager	Implement the Fire Wise program to provide wildfire protection by making the public aware of the need for defensible space.	
WS 1	Comanche County Emergency Manager	Purchase and install generators to power critical facilities in Comanche County such as the Comanche County Court House, County Barns, rural water districts, sewer systems, public shelters, nursing	

		homes, etc.	
WS 2	Comanche County Emergency Management	Work with Comanche County 911 database, senior citizens, and the public in creating a database of citizens with special needs who may be adversely affected by extreme cold events. The database would include a map showing the location of at risk residents with contact information so their welfare can be verified.	

For this county the Hazard Mitigation Plan contains the following historic data on disasters and damages in the county:

Dam Failure Risk

There are 14 dams in Comanche County. Seven are designated as “high hazard” by the Oklahoma Water Resources Board meaning there are no occupied dwellings immediately downstream. There is no history of failure of the dams in Comanche County.

Drought

12 drought events were reported in **Comanche County, Oklahoma** HMP for the reporting period of **01/01/1950** to **010/31/2006** that resulted in 4 injuries, \$31.695M in property damage and \$557.340M in crop damage.

Earthquake

All of **Comanche County, Oklahoma** is equally susceptible to earthquake. Earthquake is not limited to certain areas of the County or certain communities. Comanche County has numerous pipelines, producing oil and gas wells and large buildings that are not constructed to earthquake codes. This creates the possibility of a major catastrophe in the event of a major earthquake.

Earthquakes centered within Comanche County are rare. The few events that have been recorded are largely unfelt and are seismically rated at or below a level 2. Records maintained by the Oklahoma Geological Survey and dating back to 1897 indicate that nine occurrences of seismic activity have been recorded in Comanche County. On April 9, 1952, a large earthquake centered near El Reno (in Canadian County) affected most of Oklahoma and extending as far north as Iowa.

Expansive Soils

Expansive soils in **Comanche County, Oklahoma** have shale as the parent material and are found in the upland western two thirds the County. The expansive soil area amounts to about 20% of the County.

Extensive damage from expansive soils can occur to highways and streets. Homes, buildings and other structures can have damage resulting in sticking doors, uneven floors and cracks in the foundation, floors, walls, and ceilings. Since this hazard develops gradually and seldom presents a threat to life, problems may not be recognized as being related to expansive soils or may be considered only nuisances and therefore never reported. **No records of specific incidences of structure loss due to expansive soils in Comanche County were found.**

Extreme Heat

Extreme Heat events are regional in nature. The entire County is equally affected by extreme heat. **7 TEMPERATURE EXTREMES** event(s) were reported in **Comanche County, Oklahoma** between **01/01/1950** and **03/31/2007**. Excessive heat on 7/4/2001 resulted in 8 deaths. From Heat event 7/16/2006 (not Extreme Heat event), 10 deaths, 100 injuries were reported. And on 8/1/2006 8 deaths and \$10,000 in property damage occurred related to Heat event. These events are recorded for Oklahoma and are not county specific. \$10,000 in property damage was also reported.

In Comanche County young children, elderly people and those who are sick or overweight are more likely to become victims to extreme heat. Other conditions that can limit the ability to regulate temperature include fever, dehydration, heart disease, mental illness, poor circulation, sunburn, prescription drug use and alcohol use. Another segment of the population at risk is those whose jobs consist of strenuous labor outside. Livestock and crops can also become stressed, decreasing in quality or in production during times of extreme heat.

Extreme high temperatures can cause water shortages, increase fire danger, and prompt excessive demands for energy. Another secondary hazard is air pollution in summer months resulting from consistent high temperatures and reduced airflows.

Flood

There are two types of floods, both which can occur in Comanche County. First, flash floods, which result from localized heavy rain falls. Second, riverine floods occur after extended periods of rain over several days or weeks. Riverine floods generally can be forecast in advance, and proper precautions taken to save lives and mitigate some though certainly not all, property losses.

Comanche County, Oklahoma experienced 20 floods from **01/01/1993** to **03/07/2007** that resulted in \$20,000 in property damage from flash floods. No injuries or deaths were reported.

Hailstorm

Due to Oklahoma's rapidly changing climate, large-scale hailstorms are especially prevalent. All parts of Delaware County are equally vulnerable to hailstorms. **111 HAIL** large event(s) were reported in **Comanche County, Oklahoma** between **05/24/1957** and **04/24/2006** with hail size of at least **1.5 inch(es)** and **413 HAIL** events between **01/01/1957** and **10/31/2006** with hail size of at least **0.5 inches**.

Since most hail losses are insured or go unreported, no loss figures are estimated for those events. Crops are especially vulnerable to hail damage.

Lightning

Comanche County, Oklahoma reported **28 lightning** events from **01/01/1950** to **03/31/2007** that resulted in **32 injuries** and \$915,000 in property damage.

July 23, 1994, 9:35 a.m. – Lightning damaged computers and telephone lines at Fort sill. Damage was estimated at \$5,000.

May 3, 1995, 3:30 a.m. – Lightning struck a stone tower at the Wichita Mountain Wildlife Refuge. The strike blew the battlement apart and set fire to the roof beams. Damage was estimated at \$5,000.

July 16, 1995, 9:15 p.m. – Lightning struck the support pole of a tent on Fort Sill Army Base, injuring all 26 occupants. Most injuries were cuts and bruises from the collapse of the tent.

September 12, 1995, 10:00 p.m. – Lightning struck an apartment building in Lawton, igniting and damaging the roof. Damage was estimated at \$50,000.

June 16, 1996, 8:00 p.m. – Lightning struck the side of an apartment building in Lawton, broke a two-foot hole in the wall. Damage was estimated at \$500.

June 11, 1998, 12:30 a.m. – Lightning and set fire to two buildings at an old amusement park in Cache. Damage was estimated at \$25,000.

August 10, 1998, 5:33 p.m. – Lightning truck two oil tanks three miles east of Sterling setting them ablaze. Damage was estimated at \$10,000.

October 22, 2000, 5:15 p.m. – Lightning struck an insulator in Lawton causing a power outage to 1,100 homes. Damage was estimated at \$13,000.

Lightning struck an air conditional unit causing some curtains to catch fire. Significant fire and smoke damage occurred to the master bedroom. Damage was estimated at \$13,000.

January 16, 2001, 9:00 a.m. – Lightning struck the ground near a group of 34 soldiers training at the East Range at Fort Sill, sending five of them to the hospital for treatment.

Severe Winter Storms

All parts of Comanche County are susceptible to severe winter storms. Comanche County has not experienced loss of life or significant impacts to crops due to severe winter storms. The county has experienced property and economic damage. Fortunately, Comanche County is not affected by blizzard as often as other parts of the state. During times of more than average accumulation structures can collapse due to the added weight of snow and ice. Ice dams can cause additional roof damage.

Over the past 57 years (1950 - 2007), the National Climatic Data Center has recorded that Comanche County has experienced 22 significant winter storm events. Some examples of past winter storm events in Comanche County include the following:

January 5-7, 1988 - Significant snowfall amounts were reported across Oklahoma. The storm totals exceeded six inches over virtually the entire state, except a few areas near the Red River and the far western Oklahoma Panhandle.

November 24, 1996 - Ice accumulated up to 1/2 inch thick mainly southeast of a line from Shawnee in Pottawatomie to Chickasha, in Grady County to Frederick in Tillman County. Power was out to a large portion of the area due to icing of power lines and tree limbs. It took as long as three days to restore power to some customers.

December 20, 1998 - Light-freezing rain produced a thin layer of ice on most roads. Across the entire state, there were 13 fatal traffic accidents and 100 injury-related traffic accidents.

January 30, 2002 - Ice accumulations of one to two inches. The worst damage occurred in a 60-mile wide band, extending from near Ponca City, in Kay County southwestward toward Lawton in Comanche County and Hobart in Kiowa County. Dozens of towns were left completely without power

for days, with some residents without power for weeks. The damage was catastrophic in places, with thousands of utility poles, along with thousands of trees, were brought down by the weight of the ice

December 4, 2002 – A winter storm affected the northwest half of Oklahoma during the afternoon and evening of the 3rd and early morning of the 4th. The precipitation started as freezing rain and sleet across portions of west central and northwest Oklahoma, including Harper, Ellis, Woodward, Woods, Alfalfa, and major Counties, and then quickly changed to snow. Total accumulations were between four and eight inches. The highest totals were nine inches in Arnett (Ellis County), eight inches in Mutual (Woodward County) and eight inches in Buffalo (Harper County). Southeast of this area, a mixture of freezing rain, sleet, and snow fell, with ice accumulations ranging from a trace to one half inch, and snow accumulation between two and three inches. The greatest amount of ice fell from about Stillwater (Payne County), southwestward to about Guthrie (Logan County), Bethany (Oklahoma County), Weatherford (Custer County), and Elk City (Beckham County). Nearly 50,000 residences were without power during the peak of the winter storm.

Ice and Snow Events

22 SNOW & ICE events were reported in **Comanche County, Oklahoma** between **01/01/1993** and **03/31/2007** that resulted in 28 deaths, 103 injuries, and \$10,000 in property damage.

Temperature Extremes

7 TEMPERATURE EXTREMES were reported in **Comanche County, Oklahoma** between **01/01/1994** and **03/31/2007**.

January 18, 1996 – Extreme cold resulted in 2 deaths.

July 22, 1998 – Excessive heat resulted in 3 injuries.

July 16, 2006 – A high heat event resulted in 10 deaths and 100 injuries.

August 1, 2006 – Heat caused 8 deaths and \$10,000 in property damage.

Tornado & Wind

Tornadoes and high winds are combined in profile because of similarities in potential damage and mitigation measures. All of Comanche County is equally susceptible to tornado and high wind damages. Due to the County wide probability every structure has equal probability to be struck by a tornado or high wind. According to NOAA data, this area of the United States is the most tornado prone in the county. The area has a reported concentration of more than 11 tornadoes per 1,000 square miles.

47 Significant TORNADO(s) (F2 or intensity of greater) were reported in **Comanche County, Oklahoma** between **01/01/1950** and **03/31/2007**, resulting in **3 deaths, 111 injuries**, and \$31.949 million in property damage.

April 10, 1979 – Red River Valley Tornadoes – The thunderstorm system that produced the Vernon tornado crossed the Red River and left a 50-mile-long skipping track of tornado damage through Oklahoma. Just after 5:00 p.m., another tornado (F4) spawned by the same thunderstorm system crashed into Lawton. Lawton officials sounded the siren system to warn the people of the approaching storm. As a result of the early warning, the casualty list of three dead and 109 injured

was relatively small despite the destruction of several hundred homes and businesses. Damage was estimated at \$25 million.

May 25, 1997 – A tornado was reported by spotters just north of Fletcher near the Caddo/Comanche County line.

October 4, 1998 – A tornado was seen by an Oklahoma Highway Patrol Officer five miles north of Medicine Park in Comanche County touching down briefly in an open field with no known damage.

May 3, 1999 – 14 tornadoes reported in a seven-hour period.

- Beginning north of fort sill in Comanche County, the tornadoes traveled across Comanche, Caddo, Grady, and McClain Counties into the Oklahoma City metropolitan area and beyond. The first tornado of the outbreak touched down on US 62, two miles north of Interstate 44 in Comanche County at 3:51 p.m.
- The second tornado formed approximately three miles west of Elgin in Comanche County. No damage was observed.
- The third tornado touched down in a rural area three miles east of Apache in Caddo County. As the tornado moved northward to near Anadarko in Caddo County, one house was destroyed near the community of Stecker in Caddo County, with its roof ripped off and several walls knocked down. Three persons inside the house were injured. Damage was estimated at \$50,000.
- The fourth tornado was seen three miles northwest of Cyril in Caddo County just west of SH 8. No damage was reported.
- The fifth tornado formed two miles south of Anadarko in Caddo County. No damage was reported.
- The sixth tornado developed about three miles north-northeast of Cement near the Caddo/Grady County border, and quickly intensified to a strong tornado with associated damage rated at the high end of the F3 scale. Damage was estimated at \$75,000.
- The most notable tornado was rated F5 and formed over Grady into the Oklahoma metropolitan area after 6 p.m. Bridgecreek (Grady County), Oklahoma City (Oklahoma County), Moore (Oklahoma County), Del City (Oklahoma County), and Midwest City (Oklahoma County) suffered tremendous damage.

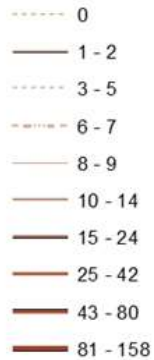
For all the county profiles for this study we are providing maps of the historic tornadoes mapped over the developed social vulnerability index. This is in addition to the data prepared and summarized from the HMP in this section.

Social Vulnerability - Impacts on Housing & Disaster Resiliency

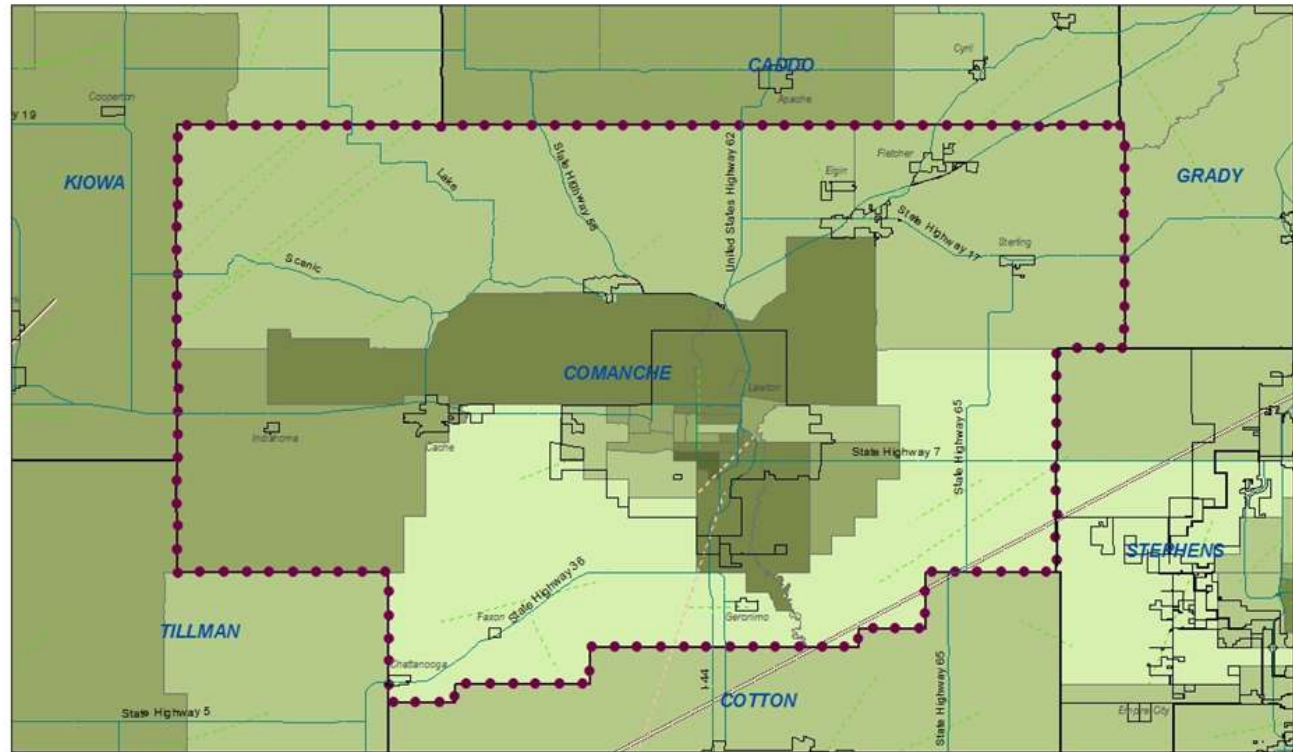
Tornado Events 1950 - 2014

Comanche County

of fatalities associated with event



Social Vulnerability Index



19XX or 20XX Year of Event

Oklahoma Municipal Boundaries

Selected County Boundary

COUNTY NAME



0 3.25 6.5 13 Miles

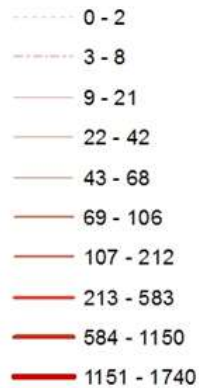
Sources: Shannon Van Zandt, Texas A&M, Hazard Planning materials, and 2009-2013 American Community Survey, Tables B11003, B01001, B17001, B08301, B25044, B25001, B25042, B02001, B03002, B26001, B25036, B17001, B25043, S1501, B23025 & B06007

Social Vulnerability - Impacts on Housing & Disaster Resiliency

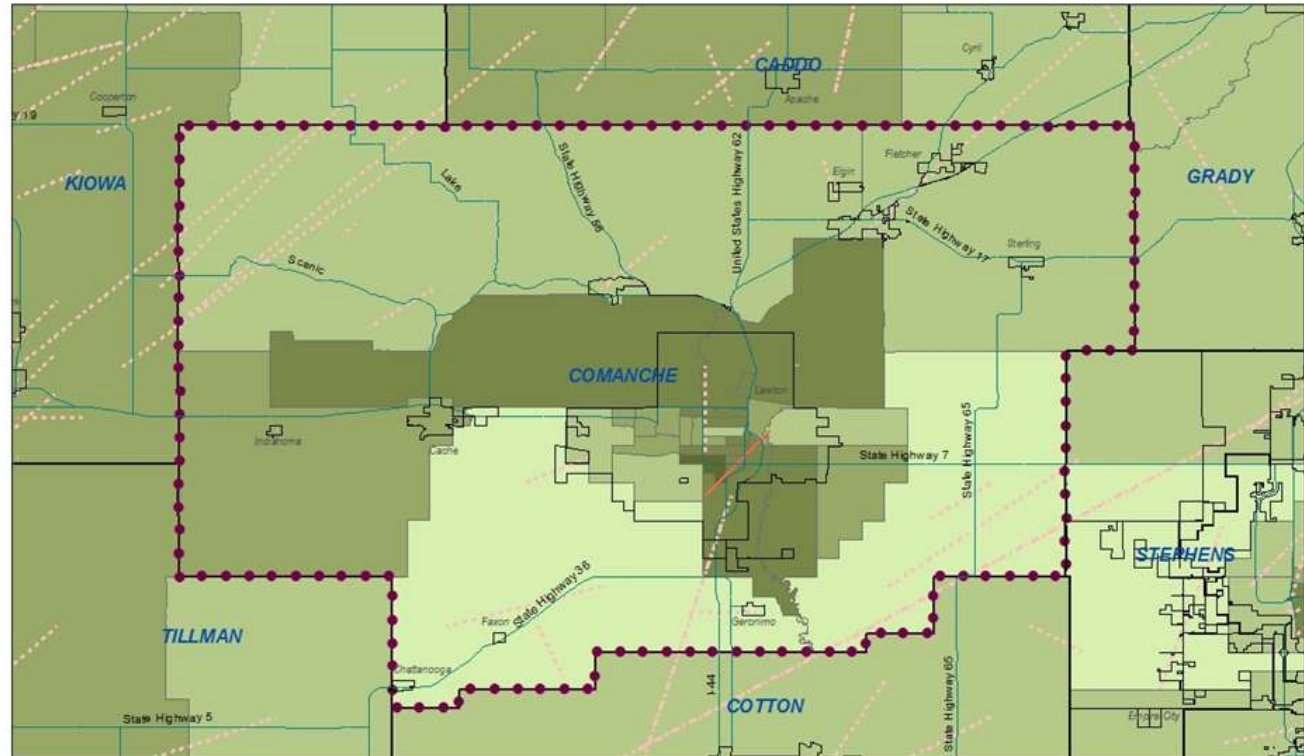
Tornado Events 1950 - 2014

Comanche County

of injuries associated with event



Social Vulnerability Index



19XX or 20XX Year of Event

Selected County Boundary

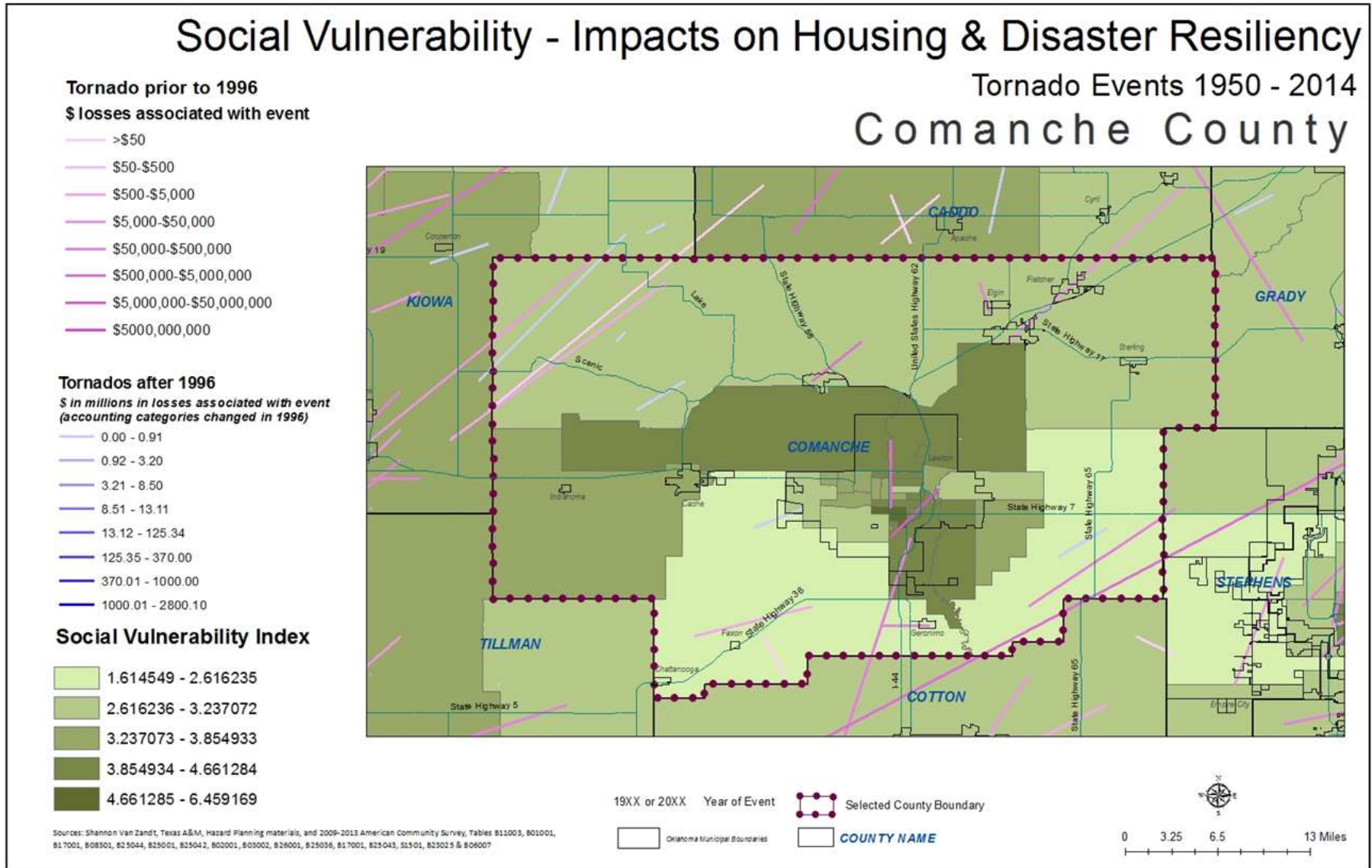
Oklahoma Municipal Boundaries

COUNTY NAME



0 3.25 6.5 13 Miles

Sources: Shannon Van Zandt, Texas A&M, Hazard Planning materials, and 2009-2013 American Community Survey, Tables B11003, B01001, B17001, B08501, B25044, B25001, B25042, B02001, B03002, B26001, B25036, B17001, B25043, S1501, B23025 & B06007



High Wind Events

292 HIGH WINDS event(s) were reported in **Comanche County**, Oklahoma between **01/01/1950** and **03/31/2007** resulting in **1 death, 12 injuries**, and **\$33.184 million** in property damage.

The probability of a tornado or high wind even occurring in Comanche County is highly likely.

Wild and Forest Fires

1 WILD & FOREST FIRE was reported in the **Comanche County, Oklahoma** HMP during the reporting period of **01/01/1950** to **10/31/2006** that resulted in \$200,000 in property damage. No deaths or injuries were reported.

C.2.1.2; C.2.1.6; C.2.1.7;C.2.1.8 Shelters from Disaster Event

Most jurisdictions have elected to not have public shelters in order to discourage people from leaving safe places and ultimately be caught on the road trying to reach a public shelter.

Of the mitigation strategies or “Action Items” identified, the following items pertain to storm shelters.

Action Item #T-HW 2. Educate the public in the benefits of installing residential and commercial storm shelters and safe rooms.

Action Item #T-HW 5. Install 20 new residential and commercial storm shelters to reduce the loss of life.

Action Item #WS 2. Work with Comanche County 911 database, senior citizens, and the public in creating a database of citizens with special needs who may be adversely affected by extreme cold events. The database would include a map showing the location of at risk residents with contact information so their welfare can be verified.

The HMP shows the rating system used to prioritize the above Action Items. The scoring resulted in education about storm shelters (**Action Item #T-HW 2**) as the third most important item. Of particular interest is **Action Item #WS 2** that calls for creating a database of citizens with special needs and mapping the location of at risk residents with contact information so their welfare can be verified. Such a database could also be used to map the locations of storm shelters so that emergency personnel can check those locations after a tornado or high wind event to verify the welfare of residents. This item was ranked in the eleventh ranking group in priority.

C.2.1.3 Public Policy and Governance to Build Disaster Resiliency

The State of Oklahoma has not granted to counties broad regulatory powers to enact and enforce building codes, building inspections, subdivision regulations and growth management initiatives. Comanche County does have power to regulate all platting of land, all construction of dwelling units or commercial or industrial structures and all future development within a delineated floodplain area, except land held in trust by the United States for Native Americans.

C.2.1.4 Local Emergency Response Agency Structure

The Hazard Mitigation Plan prioritized mitigation actions and addressed how the actions will be implemented and administered, including the responsible department, existing and potential resources and timeframe to complete each action.

C.2.1.5 Threat & Hazard Warning Systems

The identified Threat & Hazard Warning Systems for Comanche County include:

- Sirens
- Phone notification
- Emergency Broadcast System
- Other

The City of Lawton and Comanche County have implanted an emergency notification system through the phone. CodeRED employs intranet mapping capable of geographic targeting of calls, couple with a telephone calling system capable of delivering a pre-recorded message directly to homes and businesses at the rate of up to 60,000 calls per hour.

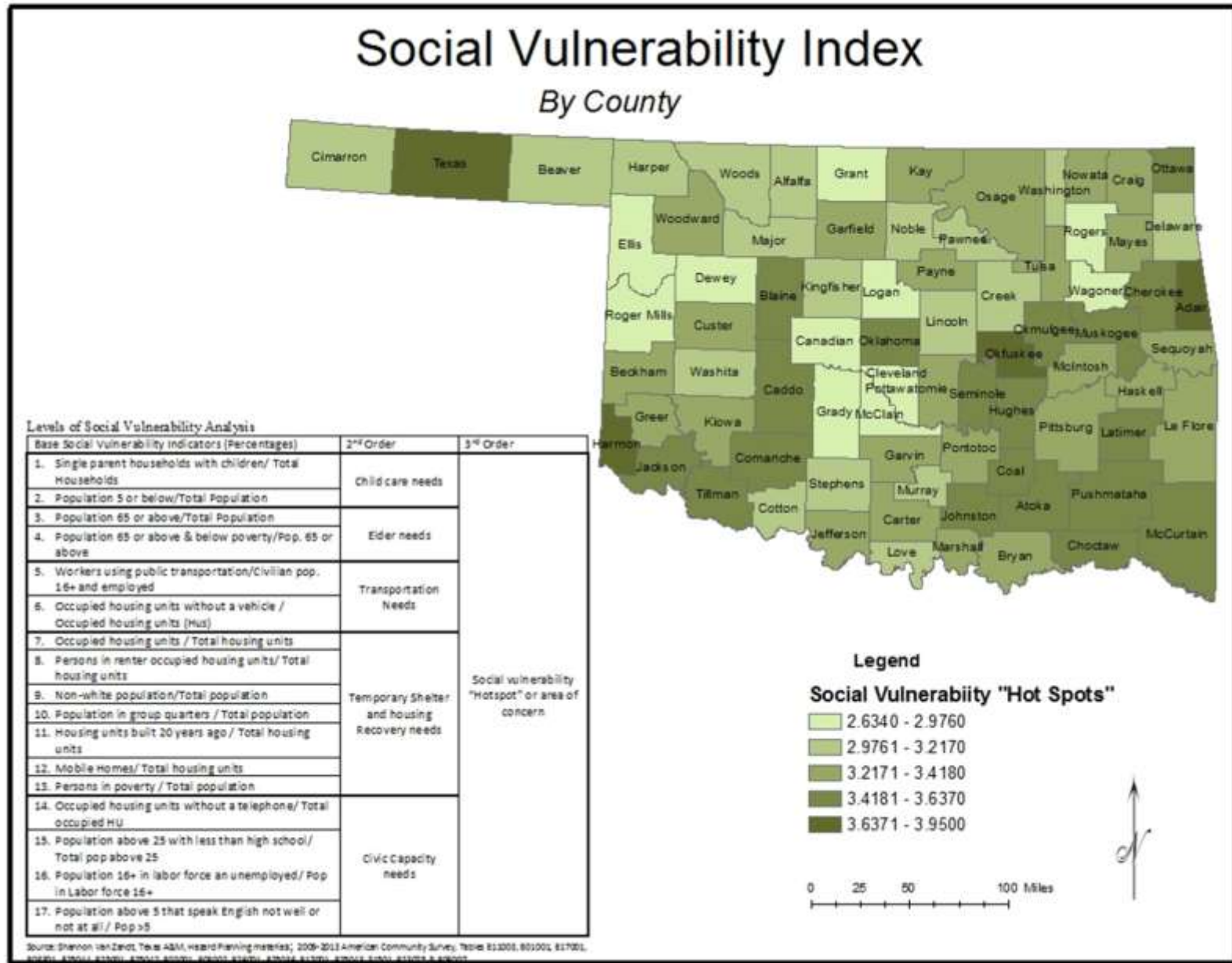
The City of Lawton HMP includes numerous mitigation measures regarding strengthening public storm shelters, continuing their Safe Room Rebate Program, evaluating and constructing school safe rooms, and constructing safe rooms for first responders. With the city's 2012 HMP update, the Steering Committee and the City GIS Department planned for mapping critical structures in the city including hazmat storage facilities, dialysis facilities, day care centers, storm shelters, and nursing homes. It appears that the storm shelters mentioned are six shelters that may be located in schools. Recommend the system be updated to include locations of private storm shelters as well.

Social Vulnerability

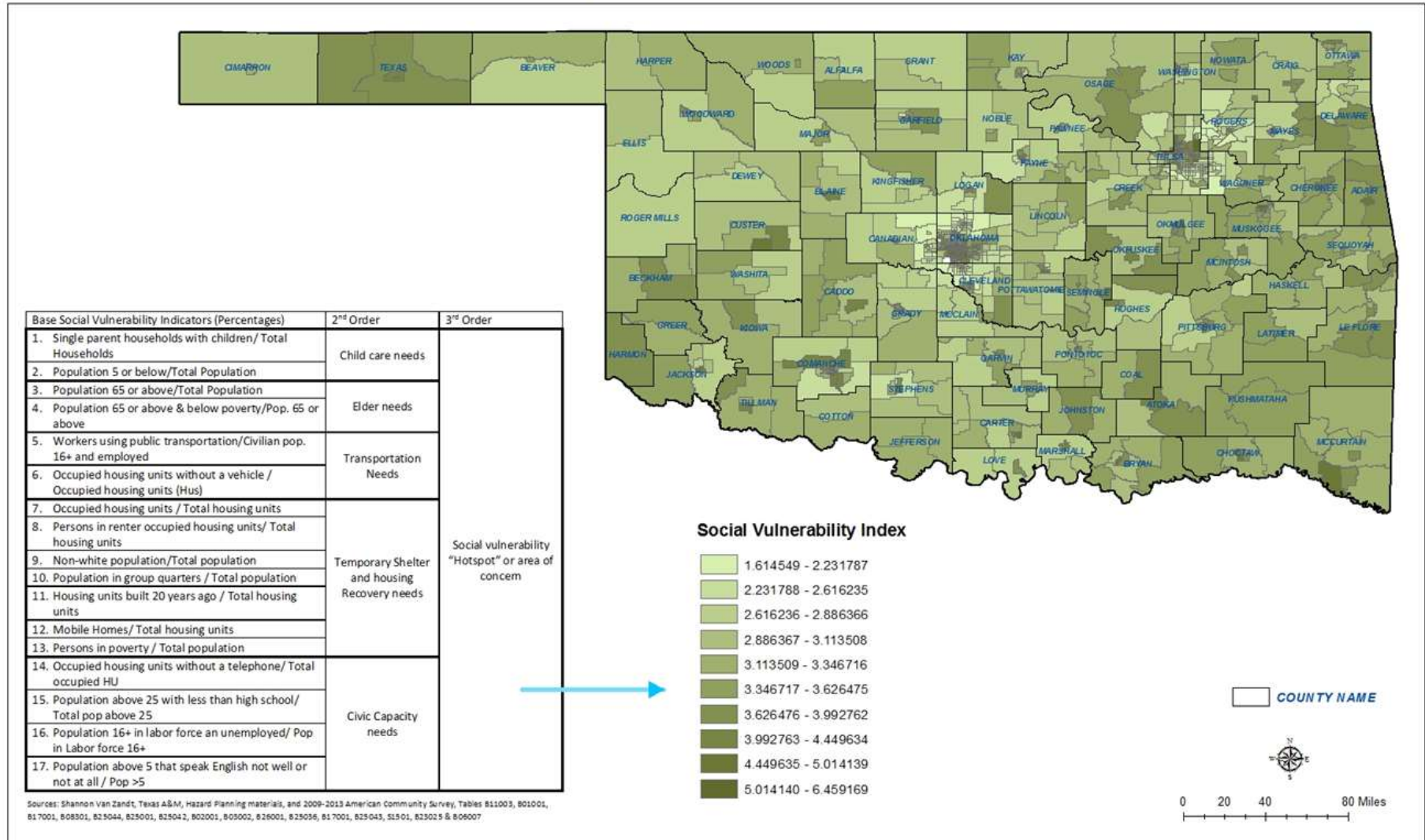
Based on the research work done by the Texas A&M University Hazard Reduction and Recovery Center, an added component is being included in this section. Social vulnerability can place households at a further disadvantage during and after a disaster. This analysis is assessing for the county the levels of social vulnerability based on demographic indicators to highlight 'hotspots' or counties that have higher social vulnerability. That combined with Hazard Mitigation Plans – or lack thereof – can highlight places where additional work is needed to reduce impacts on households.

Social Vulnerability Analysis - Comanche County		
Base Social Vulnerability Indicators (%)	2nd Order	3rd Order
1.) Single Parent Households	20.63%	0.282
2.) Population Under 5	7.62%	(Child Care Needs)
3.) Population 65 or Above	10.44%	0.193
4.) Population 65 or Above & Below Poverty Rate	8.88%	(Elder Needs)
5.) Workers Using Public Transportation	0.78%	0.078
6.) Occupied Housing Units w/o Vehicle	7.02%	(Transportation Needs)
7.) Housing Unit Occupancy Rate	86.82%	2.771 (Temporary Shelter and Housing Recovery Needs)
8.) Rental Occupancy Rate	43.40%	
9.) Non-White Population	41.50%	
10.) Population in Group Quarters	7.84%	
11.) Housing Units Built Prior to 1990	74.86%	
12.) Mobile Homes, RVs, Vans, etc.	5.31%	
13.) Poverty Rate	17.35%	
14.) Housing Units Lacking Telephones	2.35%	0.244 (Civic Capacity Needs)
15.) Age 25+ With Less Than High School Diploma	11.00%	
16.) Unemployment Rate	8.06%	
17.) Age 5+ Which Cannot Speak English Well or Not At All	2.99%	
		3.569 Social Vulnerability 'Hotspot' or Area of Concern

Sources: Shannon Van Zandt, Texas A&M, Hazard Planning materials, and 2009-2013 American Community Survey, Tables B11003, B01001, B17001, B08301, B25044, B25001, B25042, B02001, B03002, B26001, B25036, B17001, B25043, S1501, B23025 & B06007



Social Vulnerability - Impacts on Housing & Disaster Resiliency



Social Vulnerability - Impacts on Housing & Disaster Resiliency

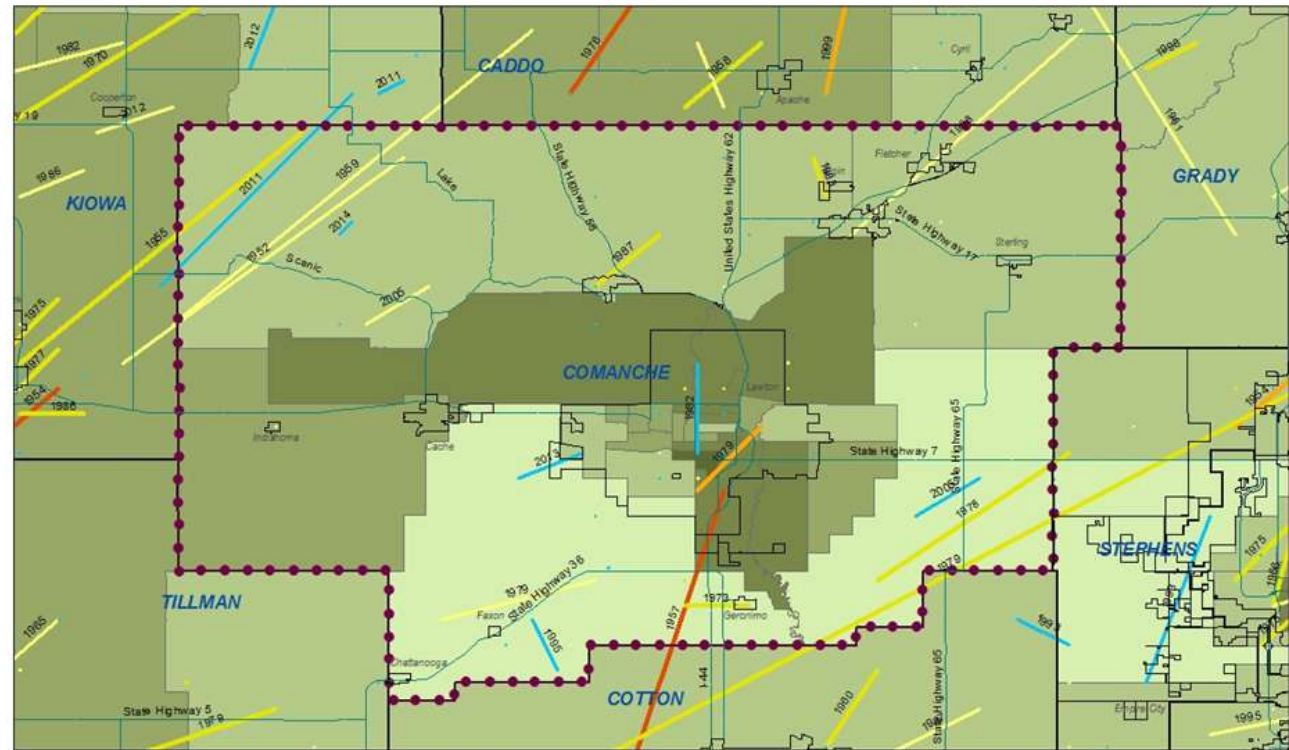
Tornado Events 1950 - 2014

Comanche County

Tornado Magnitude



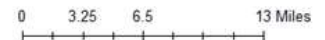
Social Vulnerability Index



19XX or 20XX Year of Event Selected County Boundary

Oklahoma Municipal Boundaries

COUNTY NAME



Sources: Shannon Van Zandt, Texas A&M, Hazard Planning materials, and 2009-2013 American Community Survey, Tables S11003, S01001, S17001, S08301, S25044, S25041, S25042, S02001, S03002, S26001, S25036, S17001, S25043, S1501, S25025 & S06007

Social vulnerability combined with the devastating impacts of a natural or man-made disaster can compound a household's ability to recover and in fact can place those individuals at an even greater gap or disadvantage prior to the event (Shannon Van Zandt, Texas A&M, Hazard Planning)

This county falls above average per this index for social vulnerability when comparing as a county to other counties in the state. The area most vulnerable by census tract is in the central portion of the county, Lawton area. This is the heavily populated portion of the county. The social vulnerability assessment is intended to focus attention to those that may have additional difficulties during an event as well as part of recovery.

Recommendations for this county:

- Continue to update and maintain the county HMP and include attention to areas within the county that in addition to physical vulnerability may have compounding social vulnerability factors.
- Efforts to strengthen building codes related to tornadoes and natural disasters should be considered.
- Planning for shelters from disaster events for multifamily, HUD and LIHTC units, in addition to all housing in the community should be incorporated with any effort to increase housing.
- Elevating the priority of creating a database and map of storm shelter locations.

Homelessness

By Continuum of Care

Oklahoma is comprised of eight Continuums of Care (CoC). These entities manage the provision of services to the homeless, among other functions. By definition, CoCs involve nonprofit homeless providers; victim service providers; faith-based organizations; governments; businesses; advocates; public housing agencies; school districts; social service providers; mental health agencies; hospitals; universities; affordable housing developers; law enforcement and other organizations that serve the homeless and those at risk of becoming homeless (Continuum of Care Network pamphlet, 2015). These entities are governed by a community plan that helps them deliver services to the homeless and/or to prevent a return to the homeless. CoCs provide a variety of services aimed at outreach, engagement and assessment, including emergency shelter, rapid re-housing, transitional housing, and permanent housing, among others (Continuum of Care Network pamphlet, 2015).

The data below describes the characteristics of those receiving or eligible for the CoC in which Comanche County is located. This data is collected by the CoCs on last day of January each year and reported on an annual basis. It is currently the best source of data available at the State level of understanding the demographics of these populations.

OK 506 Southwest Oklahoma

OK 506 represents the southwest region of Oklahoma, including Roger Mills, Beckham, Washita, Kiowa, Tillman, Cotton, Jefferson, Stephens, Garvin, McClain, Grady, Caddo, Comanche, Greer, Harmon, and Jackson counties. This region of Oklahoma has a small homeless population generally. However, there are at least 8 homeless households comprised of children only. While these households are sheltered, additional analysis would be useful to understand the trend that may be leading to homeless youth in this region. There is also a high homeless veteran population (25) in this region. There may be a correlation between the number of homeless veterans in this CoC and the presence of a military base in Comanche County, as well as a Veterans' Hospital in the area. Given the presence of these services in this area, investment should be made for more temporary and permanent housing for homeless veterans. There are Veterans' Hospitals in this CoC where veterans can receive services. This may play a big role on why there is a significant amount of homeless veterans in this CoC.

<i>OK 506 Southwest OK Regional</i>	Emergency Shelter(sheltered)		Unsheltered	Total
Households without children	43	48	59	150
Households with at least 1 adult & 1 child	16	10	1	27
Households with only children	8	0	0	8
total homeless households	67	58	60	185
Persons in households without children	43	48	59	150
persons age 18-24	0	21	2	23
persons over age 24	43	27	57	127
Persons in households with at least 1 adult & 1 child	45	33	3	81
children under age 18	26	22	1	49
persons age 18-24	5	2	0	7
persons over 24	14	9	2	25
persons in households with only 1 children	8	0	0	8
Total homeless persons	96	81	62	239
Subpopulations	Sheltered		Unsheltered	Total
Chronically Homeless	10		20	30
Chronically Homeless Individuals	10		20	30
Chronically Homeless Persons in Families	0		0	0
Severely Mentally Ill	14		10	24
Chronic Substance Abuse	8		6	14
Veterans	5		20	25
HIV/AIDS	0		0	0
Victims of Domestic Violence	19		0	19

CoC Number: OK-506**CoC Name: Southwest Oklahoma Regional CoC****Summary of all beds reported by Continuum of Care:**

	Family Units ¹	Family Beds ¹	Adult-Only Beds	Child-Only Beds	Total Yr-Round Beds	Seasonal	Overflow / Voucher	Subset of Total Bed Inventory		
								Chronic Beds ²	Veteran Beds ³	Youth Beds ³
Emergency, Safe Haven and Transitional Housing	27	170	127	10	307	0	15	n/a	5	10
Emergency Shelter	16	134	92	10	236	0	15	n/a	4	10
Transitional Housing	11	36	35	0	71	n/a	n/a	n/a	1	0
Permanent Housing	0	0	9	0	9	n/a	n/a	0	0	0
Permanent Supportive Housing*	0	0	9	0	9	n/a	n/a	0	0	0
Grand Total	27	170	136	10	316	0	15	0	5	10

CoC beds reported by Program Type:**Emergency Shelter for Families⁴**

Provider Name	Facility Name	Family Units ¹	Family Beds ¹	Adult-Only Beds	Child-Only Beds	Seasonal	Overflow / Voucher	Total Beds	Subset of Total Bed Inventory		
									Chronic Beds ²	Veteran Beds ³	Youth Beds ³
Family Promise	Emergency Shelter	1	14	0	0	0	0	14	n/a	1	0
Total		1	14	0	0	0	0	14	n/a	1	0

COC Conclusion

Each of the CoC's represents a unique area. It's important to note that the Point In Time data serves as a baseline. It is likely that the homeless population is much larger than counted. Generally, the State's homeless population is over the age of 24. In some areas of the State, there is a disproportionately high rate of homeless youth. More detailed exploration is necessary to understand the reasons which led them to this State and the needs of homeless youth. Domestic violence victims comprise a significant portion of the homeless population in the State. In some areas, the presence of social service providers for this subpopulation has reduced homeless rates. The same is true with respect to homeless veterans. As anticipated, the majority of the homeless population across the state can be classified as: mentally ill, chronically homeless, and chronic substance abusers. The needs of these difficult to house homeless must remain a priority across the State.

A Snap Shot of Homelessness in the State

Point in Time data was last collected on January 29, 2015 across the State. On that date, counts revealed a homeless populations of more than 3,000 residents. The majority of those counted (2,603 individuals) were classified as households without children. The majority of this group lives in emergency shelters (1,652) or transitional housing (376) with 575 classified as unsheltered.

The number of households with children is seemingly small totaling 343. The vast majority of those in this classification live at emergency shelters (201) or transitional housing (104) with only 38 classified as unsheltered. Homeless service providers in Oklahoma City and Tulsa emphasized that this group was likely undercounted across the State because they are less visible than other categories of homeless. They emphasized that emergency shelters, as presently designed, do not meet the needs of families with children in terms of both privacy and safety.

The Point in Time data reveals less than 100 households comprised of only children. Of these 74 counted households, 35 live in emergency shelters and 39 are unsheltered. This population is likely significantly undercounted as youth who are homeless typically seek to avoid identification for fear of being returned to their homes. These young people often have specific needs for supportive services that are difficult to deliver because the population remains unseen. Homeless advocates in the State hold up Tulsa as a good example of the State for serving homeless youth. OKC's Be the Change is also a leader in identifying and providing needed service to homeless youth in the metropolitan region. The problem of homeless youth is not just isolated to large urban areas. Mid-sized and smaller cities also look for innovative ways to service. Cities like El Reno and Enid have their own drop in centers for homeless youth. Social networks in smaller cities fill similar functions.

Oklahoma City public schools also tracks homeless students within the district. There are homeless students attending 78 elementary and middle schools in Oklahoma City. This data suggests that the majority of the city's homeless students are African American or Hispanic. There are 664 homeless African American students, 724 homeless Hispanic students, and 254 homeless Caucasian students. There are ten high schools in OKC that have reported having homeless students. Douglass and Capitol Hill high schools have the highest homeless student populations. Douglass has 50 homeless African American students. Capitol Hill has 49 homeless Hispanic students. The majority of these students can be classified as "couch homeless" or doubled up, meaning that they are finding

shelter with extended family members, friends, and other non-relatives for a brief amount of time due to hardship.

The majority of Oklahoma's homeless population is over 24 years old. This classification system is not particularly useful in helping to assess the number and needs of the elderly population, which is reported to be a substantial subset of this population.

The Point in Time data categorizes the homeless population into two categories: Hispanic/Latino and Non-Hispanic/Non-Latino. The lion's share of homeless in Oklahoma are Non-Hispanic/Non-Latino (3,528). In Oklahoma City, 62% of the homeless served are classified as Caucasian. Twenty-five percent of the homeless population is African American. Seven percent of the homeless in OKC identify as Native American. Less than one percent of those identified as homeless in OKC are Asian. By contrast, a relative small fraction of the State's homeless population is Hispanic/Latino. The Point in Time data identified a relatively small Hispanic homeless population, including less than 250 individuals. This follows OKC counts that identify 7% of the city's homeless population as Hispanic. Homeless advocates in OKC indicate that social networks, including churches and extended families, keep the number of homeless in the Hispanic population proportionately lower than their Non-Hispanic/Non-Latino counterparts. However, these individuals likely classify as "couch homeless" and are in a continued state of being vulnerable to becoming homeless.

The PIC data indicates that there are more homeless males (2,237) than females (1,535). This follows national trends. Care should be taken when interpreting this data, as women are less likely to participate in Point in Time counts. There is a growing population of homeless in Oklahoma that identifies as transgender. PIC data identified 5 individuals identifying as transgender. This population is likely much higher and will continue to grow due to family and national attitudes about this population. Transgender populations may require special housing accommodations, especially in the emergency shelter context, to provide for their social and emotional needs.

Another group of homeless individuals that merits special consideration in the distribution of resources is those identified as having special needs. This classification includes persons with "physical, mental or behavioral disabilities, persons with HIV/AIDS and/or persons with alcohol or drug addictions. The Point in Time data estimates that there are nearly 1300 homeless persons with special needs in OKC alone.

The Point in Time data is coarse and does not do an effectively track homeless populations with specific needs, such as those persons who are homeless and living with HIV/AIDS. This special population of homeless is likely growing in Oklahoma. According to the Oklahoma State Department of Health there were an estimated 5,375 cases of persons living with HIV/AIDS by the end of 2013. There were a total of 437 newly diagnosed HIV/AIDS cases in 2013 for the state of Oklahoma. The vast majority of populations living with HIV/AIDS (nearly 72%) reside in urban areas. In OKC alone, the Point in Time data identified at least 25 homeless individuals living with HIV/AIDS. This is likely an undercount. Based on this information and anecdotal data from homeless service providers, special effort must be made to understand the housing, medical, and supportive services needs of homeless persons living with HIV/AIDS.

Shelter is crucial for homeless persons with HIV/AIDS in the management of this illness. However, traditional shelter setting(s) may not be suitable to house this population. Those with suppressed immune systems are vulnerable to the spread of infectious diseases which may be present in open shelters. In addition, shelter personnel may not be properly trained in handling AIDS related issues. For these reasons, as well as resources made available by the federal government, homeless persons living with HIV/AIDS are often given housing choice vouchers, created by HOPWA, so that they secure housing on the private market. This can be challenging in constrained rental markets like Norman, for example, where affordable housing options are limited. It is estimated that more than 60 individuals living in OKC with HIV/AIDS are homeless because they have been unable to find a landlord that will accept their housing choice voucher.

State Name: Oklahoma**Point-in Time Date: 1/29/2015****Summary by household type reported:**

	Sheltered		Unsheltered	Total
	Emergency Shelter	Transitional Housing*		
Households without children ¹	1,652	376	575	2,603
Households with at least one adult and one child ²	201	104	38	343
Households with only children ³	35	0	39	74
Total Homeless Households	1,888	480	652	3,020

Summary of persons in each household type:

Persons in households without children¹	1,676	397	623	2,696
Persons Age 18 to 24	214	61	110	385
Persons Over Age 24	1,462	336	513	2,311
Persons in households with at least one adult and one child²	595	293	108	996
Children Under Age 18	373	176	57	606
Persons Age 18 to 24	40	29	13	82
Persons Over Age 24	182	88	38	308
Persons in households with only children³	38	0	47	85
Total Homeless Persons	2,309	690	778	3,777

Demographic summary by ethnicity:

	Sheltered		Unsheltered	Total
	Emergency Shelter	Transitional Housing*		
Hispanic / Latino	154	43	52	249
Non-Hispanic / Non-Latino	2,155	647	726	3,528
Total	2,309	690	778	3,777

Demographic summary by gender:

Female	1,004	272	259	1,535
Male	1,302	416	519	2,237
Transgender	3	2	0	5
Total	2,309	690	778	3,777

Rural Areas

Homelessness in the rural areas of the State is much more difficult to calculate. Given the population density of the State, the majority of services that serve the homeless are concentrated in urban and semi-urban areas. Even if beds are available, many rural homeless lack knowledge about the services or a means to travel to receive the same. As a part of this study, OU students were dispatched into the 77 counties in the State to, among other issues, attempt to understand the degree to which there is rural homelessness in the State. Their qualitative inquiries yielded very little data, in part, because rural homeless is difficult to identify and often ignored. For the purposes of this report, a literature review was prepared on the topic of rural homelessness in the United States. The goals of this academic review is to assist policymakers and service providers in the State in uncovering the dimensions of this illusive population.

In the U.S., the rural homeless population is predominantly Caucasian. This population is comprised of single mothers, widowed wives and husbands, divorced and separated men and women, and young people. A study examining rural homelessness in Ohio found that nearly 40% of those who classify as homeless were divorced, separated, or widowed (First, Richard J., John C. Rife, and Beverly G. Toomey, 1994, pg. 101). Ohio's rural homeless were also relatively young. Close to 80% of homeless population in this study was between the ages of 18 and 39 years old (First et al, 1994, pg. 101). Rural homelessness is often less visible than urban homelessness because these populations commonly take shelter are at a friend's house, in their vehicles, or on abandoned properties. These populations can also be found on "...campgrounds or in hollows, desert canyons, farmers' fields, state parks, and highway rest areas" (Milbourne and Cloke, 2006, pg. 17).

The causes of rural homelessness mirror, in most ways, the plight of the urban homeless. The study of homelessness in rural Ohio revealed family problems and substance abuse issues as primary causes of rural homelessness. The incidence of homelessness resulting from situations of domestic violence is high in rural areas (Cummins et al, 1998). Substance abuse issues are a common cause for homelessness in rural America. The literature reveals that this population tends to be homeless because they have isolated themselves from family and people who want to help (First et al, 1994). In the case of both domestic violence and substance abuse, it is often difficult for these individuals to find shelter and the supportive services they require in rural areas where options are limited, if available at all. The thought of moving to an urban area to find both shelter and supportive services is sometimes not considered at all by these vulnerable populations.

Rural areas are also more prone to the kind of poverty that puts individuals and families at risk for homelessness. The number of people living at or below the poverty line in rural places is higher than anywhere else in the United States (Moore, 2001). The statement "rural homelessness is a microcosm of national economic and political developments" cannot be truer for American rural communities (Vissing, 1996, pg. 103). The disinvestment of small towns and their inability to attract long-term sustainable business development, cripples a small town's economy. In effect, this is a main contributor for why poverty is such a common theme for rural communities. As a result, the State should carefully consider its investments in rural Oklahoma. While there is a need for shelter in these places, the construction of this housing type should be weighed with long term opportunities for employment in the area.

It is not surprising that rural areas typically lack both emergency shelters and temporary housing options. Services that provide temporary housing and provide relief and support services for those who cannot find food are virtually nonexistent in rural communities across the United States (Moore, 2001). Sheltering the homeless is undercapitalized in rural areas because communities do not see a concentration of homeless individuals (Vissing, 1996, pg. 146). As a result, the homeless must satisfice where they are. For instance, for families who are homeless, some of them use a friend's house to store clothes or to seek shelter, while some receive assistance from churches (Cummins et al, 1998). Others migrate to urban areas where services are available and more accessible (Rollinson, Paul A., and John T. Pardeck, 2006).

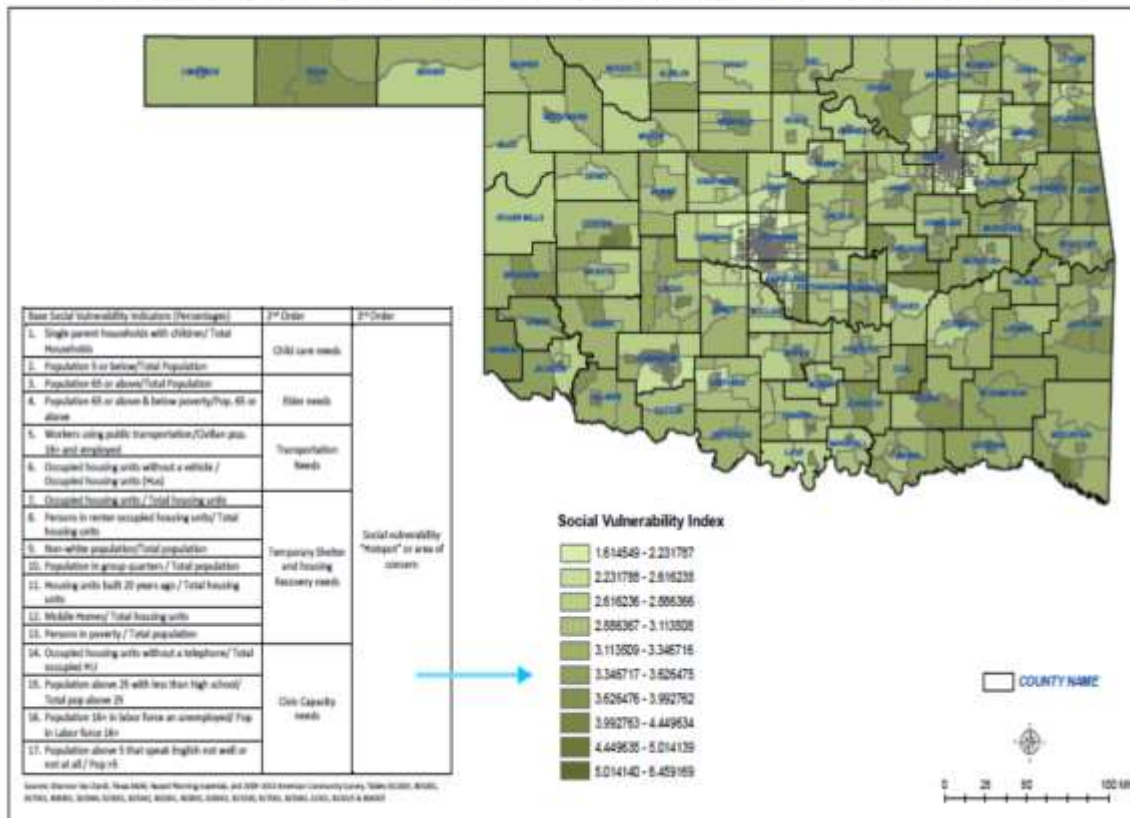
The absence of affordable housing in rural areas is a root cause of homelessness (Levinson, David, and Marcy Ross, 2007). In fact, it was noticed that many of the people were receiving monetary assistance or previously had some money saved up to spend on housing, but these measures were not enough to keep them afloat (First et al, 1994, pg. 101). Housing costs rise in rural areas typically rise as a result of competition for a limited amount of housing stock. In some rural areas, low income families are spending 70% of their household incomes on housing, sometimes substandard housing (Vissing, 1996, pg. 124). As Levinson et al explain, "housing costs are lower but so are incomes, with the result of placing a heavier rent burden in the community" (Levinson, David, and Marcy Ross, 2007, pg. 45). Renters in rural communities, as a result, are far more susceptible to becoming homeless than their urban or suburban counterparts because they do not have the financial safety net sometimes associated with homeownership (Fitchen, 1991, pg. 193).

While this brief review of the literature describes the state of homelessness across rural America, many of the lessons learned are easily translated to an Oklahoma context. The condition and supply of affordable housing units is relatively poor in many rural portions of the State. Rent burden, as more fully characterized in the Consolidated Housing Affordability Strategy (CHAS) section of this report, is high. This leaves families living and working in relatively weak economies vulnerable to homelessness. Once homeless, supportive services in these areas are relatively limited, especially for the chronically homeless, those with substance abuse problems, and victims of domestic violence. Services available to these populations in urban areas may not be attractive to individuals and families who are accustomed to life in rural communities. Where practicable, more consideration must be given to providing supportive services and temporary and permanent housing to homeless populations wishing to remain in rural areas.

At Risk For Homelessness

Poverty is the primary factor that places Oklahoma families at risk of being homeless. There are many factors experienced by those living in poverty which leave residents more or less vulnerable to homelessness. For the purposes of this study, a social vulnerability index has been constructed to measure the likelihood or risk that residents living in poverty might find themselves homeless. This index includes factors such as single headed households, concentration of young and elderly residents, the reliance on public transportation, private vehicle availability, racial composition, housing type, presence or absence of a telephone in the household, amongst other factors. This index is additive and seeks to understand the collective impact of these factors in estimating the vulnerability of a local population. While employed in more significant detail in the section of this report focusing on disaster resiliency, this tool is useful in identifying areas of the State where populations may be most vulnerable to homelessness. The index utilized in this section is different from the one crafted in the Disaster Resiliency chapter of this report in that it estimates social vulnerability at the county level, rather than by census tract. The decision to study vulnerability to homelessness at the county level was made to help policymakers understand, more generally, where resources and economic interventions are most necessary to stave off the potential effects of homelessness. This maps presents vulnerability to homelessness on the county level, depicting the most vulnerable counties in dark green.

Social Vulnerability - Impacts on Housing & Disaster Resiliency



The Oklahoma families most likely at risk are those living in public and subsidized housing. They live below the poverty line. Even those who are employed, remain vulnerable to homeless because an unexpected expense, like a medical emergency, threatens their ability to pay for their share of rent owed or utilities. A missed payment can easily lead to eviction and homeless.

Through the U.S. Department of Housing and Urban Development, Oklahoma service providers have been vested with more than 24,000 housing choice vouchers. Their spatial distribution is outlined below. Of significance is the size of the waiting lists for public housing units and housing choice vouchers in cities across the State. These individuals are the most vulnerable to being homeless.

		Authorized Vouchers	Public Housing Waiting List	Voucher waiting list
Ada	OK024	110	Unknown	Unknown
Bristow	OK033	87	Unknown	Unknown
Broken Bow	OK006	217	Unknown	Unknown
Fort Gibson	OK118	44	Unknown	Unknown
Henryetta	OK142	115	Unknown	Unknown
Hugo	OK044	178	14	56
Lawton	OK005	92	Unknown	Unknown
McAlester	OK062	73	118	36
Miami	OK027	243	126	179
Muskogee	OK099	843	Unknown	230
Norman	OK139	1,185	Unknown	313
Oklahoma City	OK002	4,219	830	8021
Oklahoma HFA	OK901	10,708	Unknown	11,155
Ponca City	OK111	134	70	148
Seminole	OK032	189	53	44
Shawnee	OK095	497	320	623
Stillwater	OK146	656	550	420
Stilwell	OK067	29	Unknown	Unknown
Tecumseh	OK148	31	90	171
Tulsa	OK073	4,808	4951	5859
Wewoka	OK096	154	Unknown	
Oklahoma		24,612		

Findings and Recommendations

There remains a significant homeless population in the urban and rural areas of Oklahoma. This population is very likely significantly undercounted in the Point In Time data. Local homeless advocates and service providers are highly aware of this undercount and are using innovative tools to find and serve the homeless. One example of these extra efforts to identify homeless populations is the data being collected by schools about the number of youth who are homeless or “couch” homeless. In this study, the research team also considered those families living at the economic margins and makes the case for the need for funding to support the housing needs of those that live a pay check or two from being homeless.

Those living with HIV/AIDS tend to underreport their status and needs. Given the cost of medical care these individuals face, the need for permanent and stable housing is critical. Housing providers must work to ensure that there are enough units for this undercounted population. Working with county health care providers, OHFA is much more likely to accurately estimate the size and needs of this population of homeless and potentially homeless persons. Special care must be taken to ascertain the barriers these individuals face when using vouchers to secure housing in the marketplace.

Victims of domestic violence require housing and supportive services across the State. CoCs with high supportive services tend to better accommodate the housing needs of these population. Cleveland County provides a good model for the State. However, many homeless victims of domestic violence live in rural areas that are underserved. Efforts must be undertaken to work with social services providers, schools, churches, and the police to help identify these individuals and to lead them to available housing and supportive services.

While not mentioned in the PIT data, estimates must be prepared to calculate the number and needs of homeless populations with felonies. In particular, there has been a rise nationally in the number of homeless sex offenders. Zoning regulations and discrimination from the private market has pushed many registered sex offenders to the periphery of many communities. This population must not be forgotten by policymakers.

The size of the homeless veteran population is decreasing as a result of national initiatives to end homelessness for veterans in Oklahoma. The needs of homeless veterans appear to be highest in areas of the State near VA facilities. Permanent housing should be constructed at a higher rate in these areas to meet demand. Care should be taken to make certain that the housing constructed is built to meet the psychological needs of veterans, particularly those suffering from PTSD.

Rural homelessness, in general, is a challenge to assess and characterize. The rate of homelessness in rural areas is most likely much higher than annual counts demonstrate. The majority of rural homeless likely find shelter out of public view. Some may shelter in their cars, in undeveloped areas or in the homes of those who allow them to stay. They are not likely to find their way to urban areas given their lack of transportation options and preferences for rural living. Programs that are developed to provide housing for the rural homeless must be developed to allow sheltering in place where possible.

Waiting lists for public housing and section 8 vouchers are high across the State. This is not uncommon to Oklahoma. However, when we are considering the size of the population that is at risk to homelessness, these waiting lists are an important factor to consider. Resources should be spent in a manner which is preventative so that these individuals' and families' needs are met before they become homeless.

The absence of affordable housing alternatives across some parts of the State is the largest threat to homelessness. In markets that are constrained by an aging housing stock or those that are rapidly growing, individuals and families who live on the economic margins are at risk for becoming homeless. Communities must work to ensure that zoning regulations promote the development of housing types serving all income levels, including the construction of affordable housing to meet the needs of the presently homeless and those at risk for becoming the same. Funding distributions should be targeted to communities with the highest needs who are willing to do what is necessary to meet the needs of the homeless and those at risk for the same.

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Fair Housing

Summary

Fair housing addresses discrimination in the provision of housing as well as discrimination in access to opportunities provided by the location of affordable housing. Recent actions by the United States Department of Housing and Urban Development (HUD) and the United States Supreme Court focus our attention on localized access to opportunity.

These findings are intended to aid the Oklahoma Housing Finance Agency (OHFA) determine the location of new affordable housing in relation to vulnerable populations and explore ways to expand the opportunities available to help communities of existing affordable housing achieve self-sufficiency.

Key Findings:

- 70% of affordable housing units are located in census tracts marked by poverty
- 62% of affordable housing is located in census tracts where a majority of the residents are not white
- 13% of affordable housing units have no access to transit services and 56% have access to limited service, on-demand transit
- 2.6% of affordable housing units have limited access to a hospital
- 7.8% of affordable housing units are located in food deserts

Recommendations:

Continued efforts to improve the quality of life for affordable housing residents and reduce discrimination associated with affordable housing will likely need to include strategies that integrate new affordable housing as well as support existing communities of affordable housing. This will likely include public policies and funding designed to integrate low-income and workforce housing into a more diverse set of communities. Additionally, those living existing affordable housing communities need increased opportunities to stay in place, become self-sufficient, and participate in determining the future of their neighborhood. OHFA may consider partnering with other state, non-profit, and for-profit agencies to explore strategies for helping communities thrive economically, socially, and environmentally.

What is Fair Housing?

Fair housing addresses discrimination in the provision of housing as well as discrimination in access to opportunities provided by the location of affordable housing. On one hand, this protects the ability of individuals to obtain housing regardless of personal characteristics such as race, skin color, national origin, gender, familial status, or disability. It also focuses attention on more subtle forms of discrimination that cluster low-income housing in ways that inhibit the ability of communities to access services and amenities that support self-sufficiency and autonomy.

Recent actions by the United States Department of Housing and Urban Development (HUD) and the United States Supreme Court focus our attention on localized access to opportunity. In 2014, HUD released the Affirmatively Furthering Fair Housing (AFFH) rule for public comment. The draft rule

“directs HUD’s program participants to take significant actions to overcome historic patterns of segregation, achieve truly balanced and integrated living patterns, promote fair housing choice, and foster inclusive communities that are free from discrimination” (HUD 2015). In 2015, the United States Supreme Court provided legal support for actions taken to remedy patterns that impede the upward mobility and opportunity of low-income individuals and communities. In the case of Texas Department of Housing and Community Affairs v. The Inclusive Communities Project the court reiterated the need to address disparate impacts in considering the location of affordable housing and reinforced the importance of AFFH (Bostic 2015). Housing discrimination from this perspective is not only felt by individual residents, it can also be the result of actions that work to limit the opportunities to improve the quality of life in local communities.

Approach

In Oklahoma, a combination of federal and state programs work to support the opportunities provided to individuals and families who rest safely and comfortably in an apartment or home. Here we use publicly available data for units that are part of the Low Income Housing Tax Credit (LIHTC) Program, the Rural Rental Housing Loans, or OHFA administered programs such as Oklahoma Affordable Housing Tax Credit (AHTC), the HOME investment partnership program, the Section 8 Housing Choice Voucher Program, and multi-family bonds. Collectively, these programs represent state efforts to assist individuals who are unable to afford housing.

Indicators of disparate impact vary but seem to contingent upon the contextual characteristics of a particular neighborhood. In an effort to help communities investigate and understand community level disparate impacts, HUD created a Fair Housing Assessment Tool (http://www.huduser.gov/portal/affht_pt.html#affh). The assessment tool includes measures on indicators of disparate impacts based on the clustering of potentially vulnerable populations, including:

- Race/Ethnicity of Residents
- National Origin of Residents
- English Proficiency of Residents
- Job Accessibility
- Transit Accessibility
- Level of Poverty
- Environmental Exposure (e.g. pollution, crime, food, health care, etc.)
- Disability

This report uses the Fair Housing Assessment Tool in conjunction with readily available data to initiate a more thorough investigation of the potential for disparate impacts in the state. The findings are intended to aid the Oklahoma Housing Finance Agency regarding future location of new fair housing in relation to vulnerable populations and the future opportunities available to help communities of existing affordable housing achieve self-sufficiency.

Data

Data for this report are compiled from a variety of sources including the United States Census, the University of Oklahoma Center for Spatial Analysis, and primary data collected as part of ongoing research efforts at the University of Oklahoma. Data are aggregated into census tracts and reported statewide as well as by county (see Appendix 1).

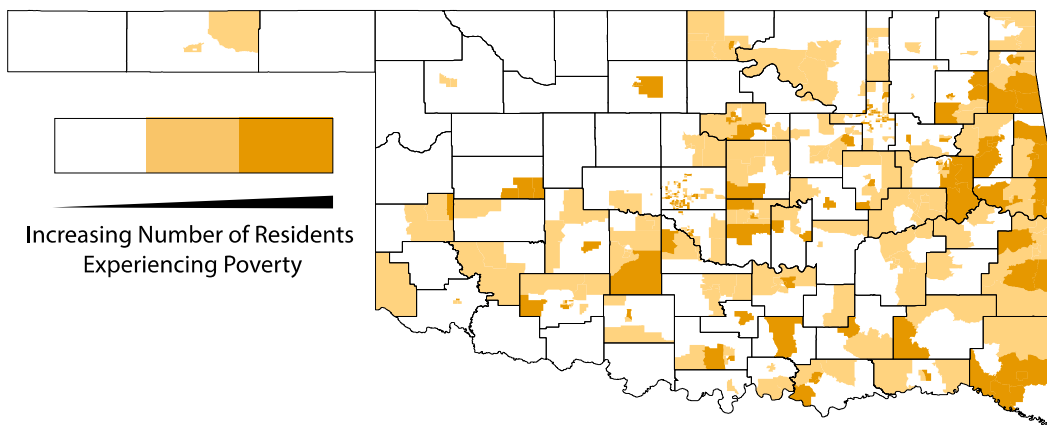
1. Urban/Rural

A majority of the affordable housing in Oklahoma is situated in rural communities. Urban communities including Edmond, Lawton, Norman, Oklahoma City, and Tulsa are home to just over 1/3 of the affordable housing units in the state.

	Total Affordable Housing Units	Situated an Urban Setting	Situated in a Rural Setting
OHFA	35,292	11,699 (33.1%)	23,593 (66.9%)
515	5,384	0	5,384 (100%)
LIHTC	23,537	8,255 (35.1%)	15,282 (64.9%)
Total	64,213	19,954 (31.1%)	44,259 (68.9%)

2. Poverty

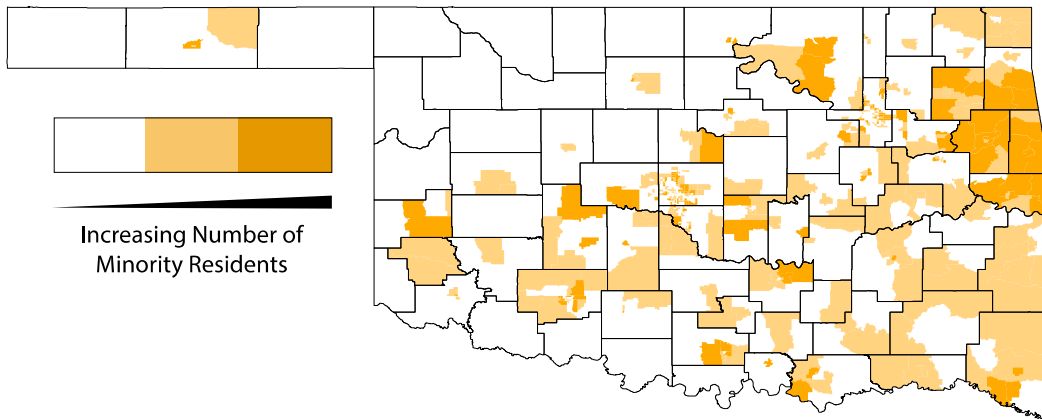
Approximately 70% of affordable housing units in Oklahoma are located in census tracts where the number of residents living in poverty is above the state average. About half of these units are located in areas of extreme poverty, where the number of individuals who are economically vulnerable exceeds 994, more than one standard deviation (411) from the mean (583).



	Total Affordable Housing Units	Situated in Poverty	Situated in Extreme Poverty
OHFA	35,292	12,295 (34.8%)	12,464 (35.3%)
515	5,384	2,093 (38.9%)	1,839 (34.2%)
LIHTC	23,537	7,483 (31.8%)	8,924 (38.0%)
Total	64,213	21,796 (33.9%)	23,227 (36.2%)

3. Non-white Enclaves

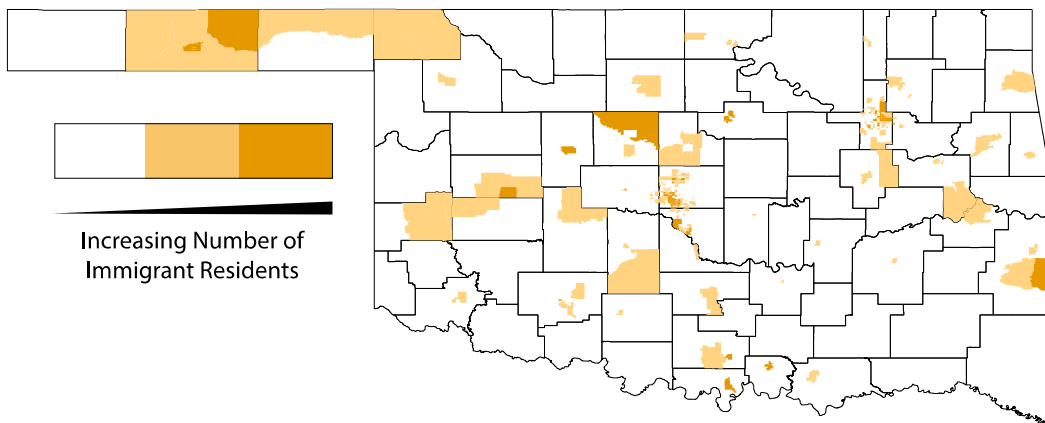
Just over 60% of affordable housing units in Oklahoma are located in census tracts where a majority of the residents are non-white. With just fewer than 24% of the total affordable housing units in census tracts heavily populated with residents who are not white – identified as census tracts where the number of non-white residents is more than 1,595 - one standard deviation (653) greater than the mean (542).



	Total Affordable Housing Units	Situated in Majority Non-White Community	Situated in Heavily Non-White Community
OHFA	35,292	12,814 (36.3%)	7,907 (22.4%)
515	5,384	2,229 (41.4%)	1,288 (23.9%)
LIHTC	23,537	10,285 (43.7%)	5,677 (24.1%)
Total	64,213	25,328 (39.4%)	14,872 (23.2%)

4. Immigrant Enclaves

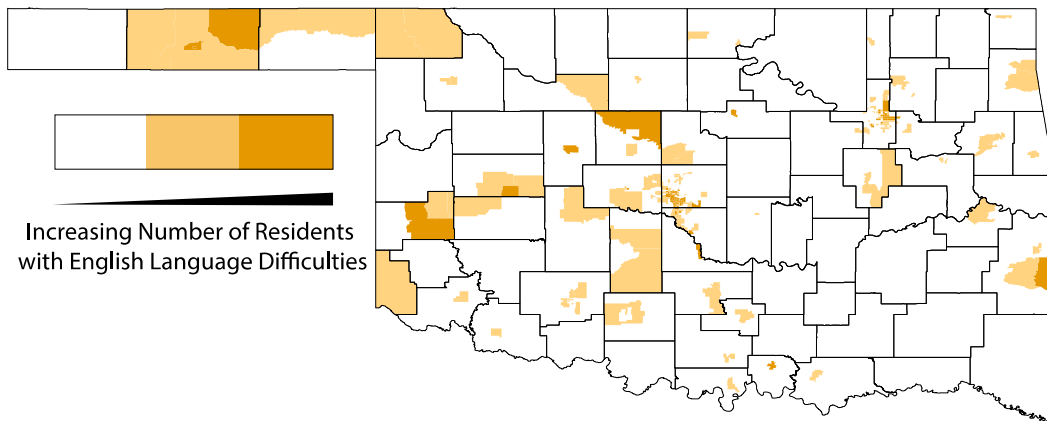
One-third of affordable housing units in Oklahoma are located in census tracts where more than the average number of residents are immigrants. About half of these units are located in areas dense with immigrants, where the number of individuals who are not citizen exceeds 349, more than one standard deviation (219) from the mean (130).



	Total Affordable Housing Units	Situated in Immigrant Enclave	Situated in Heavily Immigrant Enclave
OHFA	35,292	8,114 (23.0%)	3,358 (9.5%)
515	5,384	1,017 (18.9%)	159 (3.0%)
LIHTC	23,537	5,457 (23.2%)	3,364 (14.3%)
Total	64,213	14,588 (22.7%)	6,881 (10.7%)

5. Limited English Proficiency

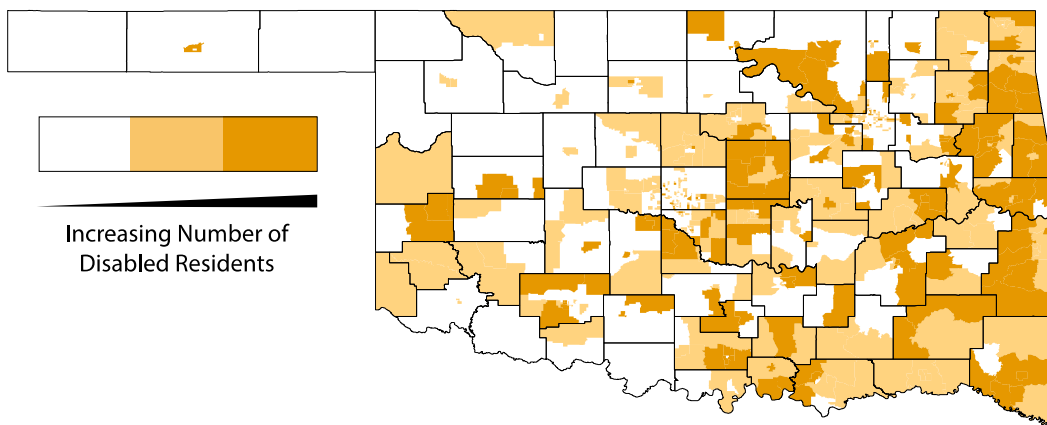
Almost 17,000 existing affordable housing units in Oklahoma are located in census tracts where more residents than average do not speak English very well. A little more than half of these units are located in areas dense with individuals with limited English proficiency, where the number of individuals who speak English less than very well exceeds 380, more than one standard deviation (240) from the mean (140).



	Total Affordable Housing Units	Community with more than average number of Limited English Speakers	Community dense with limited English Speakers
OHFA	35,292	6,250 (17.7%)	3,122 (8.8%)
515	5,384	799 (14.8%)	240 (4.5%)
LIHTC	23,537	4,034 (17.1%)	3,475 (14.8%)
Total	64,213	11,083 (17.3%)	6,837 (10.6%)

6. Disability

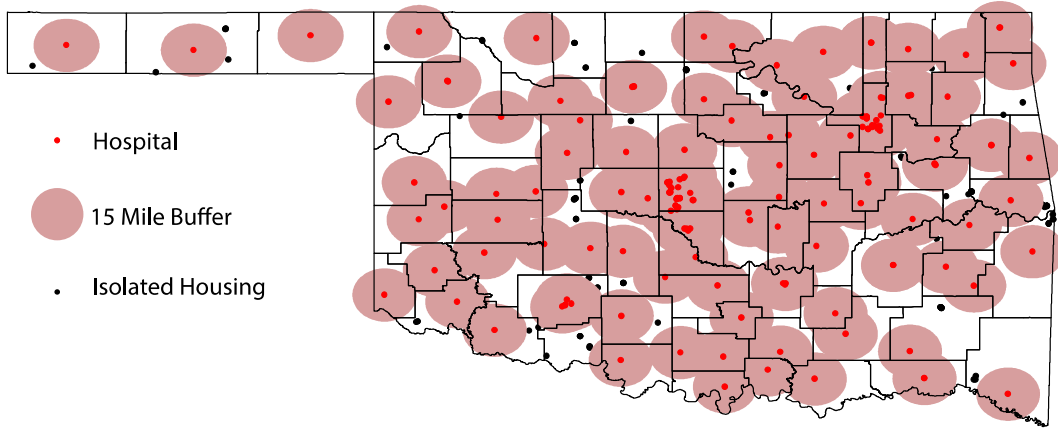
Almost 60% of existing affordable housing units in Oklahoma are located in census tracts where more residents than average have a disability. A little more than half of these units are located in areas dense with individuals with a disability, where the number of individuals who are disabled is greater than 831, more than one standard deviation (289) from the mean (542).



	Total Affordable Housing Units	Community with more than average number of Disabled Residents	Community dense with Disabled Residents
OHFA	35,292	10,098 (28.6%)	10,722 (30.4%)
515	5,384	1,686 (31.3%)	2,594 (48.8%)
LIHTC	23,537	7,074 (30.1%)	6,289 (26.7%)
Total	64,213	18,858 (29.4%)	19,605 (30.5%)

7. Hospitals

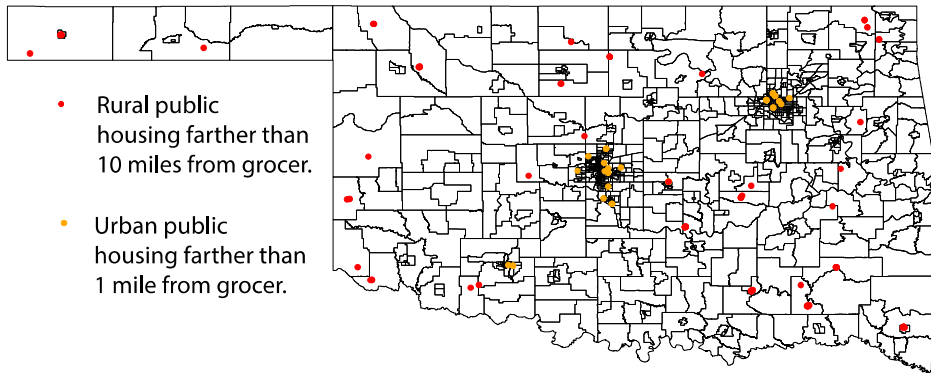
There are no affordable housing units more than 30 miles from a hospital. Approximately 2.6% of affordable housing units are farther than 15 miles from the nearest hospital. As indicated by the larger percentage of Rural Rental Housing Loan units, most of these are located in rural areas.



	Total Affordable Housing Units	More than 15 miles to nearest hospital	More than 30 miles to nearest hospital
OHFA	35,292	628 (1.8%)	0
515	5,384	500 (9.3%)	0
LIHTC	23,537	532 (2.3%)	0
Total	64,213	1,660 (2.6%)	0

8. Grocery Stores

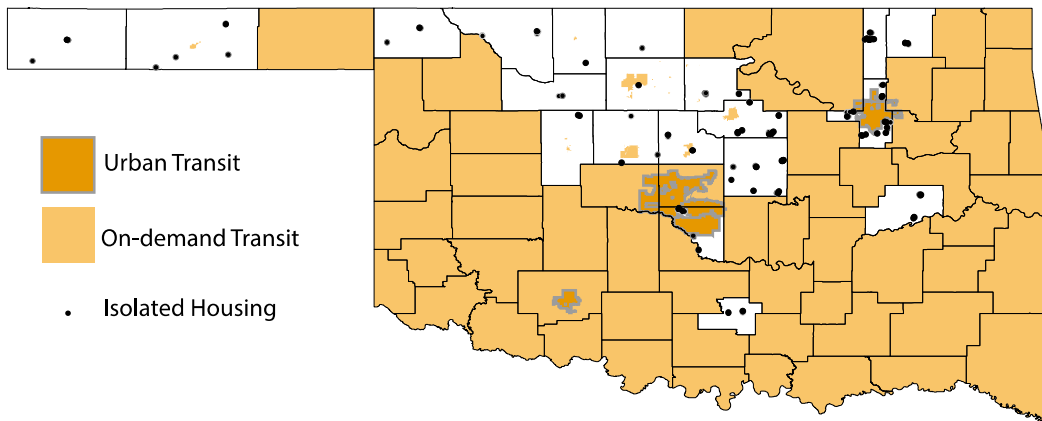
Approximately 7.8% of affordable housing units are in areas that are classified as food deserts. According to the United States Department of Agriculture, food deserts exist in urban environments further than 1 mile from a grocery store and in rural environments further than 10 miles from a grocery store (<https://apps.ams.usda.gov/fooddeserts/foodDeserts.aspx>).



	Total Affordable Housing Units	Urban > 1 Mile from nearest Grocer	Rural > 10 miles to nearest Grocer
OHFA	35,292	1,493 (4.2%)	1,097 (3.1%)
515	5,384	0	466 (8.7%)
LIHTC	23,537	1,175 (5.0%)	769 (3.3%)
Total	64,213	2,668 (4.2%)	2,332 (3.6%)

9. Transit

A little over 69% of affordable housing in Oklahoma is located in a census tract with limited or no access to transit services. This includes 8,367 affordable housing units in areas that lack public transit services all together as well as 36,363 units that are situated in areas that have on-demand transportation services that often have limited operation times and may only serve elderly and disabled populations or those going to a medical appointment.



	Total Affordable Housing Units	No Transit	Urban Transit	On-Demand Transit
OHFA	35,292	4,035 (11.4%)	11,265 (31.9%)	19,992 (56.6%)
515	5,384	767 (14.2%)	0	4,617 (85.8%)
LIHTC	23,537	3,565 (15.1%)	8,217 (34.9%)	11,755 (49.9%)
Total	64,213	8,367 (13.0%)	19,482 (30.3%)	36,363 (56.6%)

What does this mean for Oklahoma?

This report suggests a number of possible ways forward for the Oklahoma Housing Finance Agency as it continues to support quality low-income and workforce housing for residents of the state. Across a number of indicators of opportunity, affordable housing in the state clusters in ways that raise concerns about the opportunities available to affordable housing residents in comparison to other residents.

Continued efforts to improve the quality of life for affordable housing residents and reduce discrimination associated with affordable housing will likely need to include strategies that integrate new affordable housing as well as support existing communities of affordable housing. This will likely include public policies and funding designed to integrate low-income and workforce housing into a more diverse set of communities. Additionally, those living existing affordable housing communities need increased opportunities to stay in place, become self-sufficient, and participate in determining the future of their neighborhood. OHFA may consider partnering with other state, non-profit, and for-profit agencies to explore strategies for helping communities thrive economically, socially, and environmentally.

Moving ahead, Oklahoma should be wary of a narrowly focused vision focused solely on the problems of existing affordable housing and the integration of these residents into other communities. The relocation of residents harkens back to the physical and social destruction brought about by urban renewal. Such an approach pits efforts to enhance existing affordable housing through community development against efforts to build a more integrated and diverse society (Goetz 2015). Rather, Oklahoma has the opportunity to work closely with local municipalities to improve the conditions of current affordable housing communities while simultaneously advancing integration of low-income and workforce housing through the construction in new settings.

For future new development, a number of case studies and emerging scholarship on the importance of neighborhood effects provide guidance on possible ways forward for Oklahoma. For instance, in El Paso, Texas a public private partnership between the Housing Authority of the City of El Paso and private developers led to the development of a mixed income housing development. Eastside Crossings (<http://www.hacep.org/about-us/eastside-crossings>) provides 74 traditional affordable housing units, 79 affordable housing units, and 45 market rate units in partnership with the Texas Department of Housing and Community Affairs (Housing Authority of El Paso 2015). In Sacramento, partnership between private developers and the Capital Area Redevelopment Authority resulted in the adaptive reuse of a building listed on the National Register of Historic Buildings into affordable Housing (Vellinga 2015). Located in a dense, walkable, transit-oriented community, the Warehouse Artist Lofts (<http://www.rstreetwal.com>) are home to 116 units, 86 of which are affordable and 13,000 square feet of ground floor retail.

For existing affordable housing, strategies exist to help enhance localized opportunities and build a culture of community participation around housing. Across the nation, there is a need to refocus the discussion away from the deficits found in many communities to look for closely at opportunities (Lens 2015) and to think about the consequences of physical, social, and economic isolation (Clarke, Morenoff, Debbink, Golberstein, Elliott, & Lantz, 2014.).

The Oklahoma Housing Finance Agency may need to collaborate more closely with other governmental agencies to develop comprehensive strategies that not only improve existing housing but also work toward enhancing access to food, recreation, amenities, jobs, and quality schools. By doing so, OHFA could help build the social and physical resiliency of these communities so that residents would be empowered to choose for themselves whether or not they want to stay and be part of their existing community or move elsewhere in search of a better quality of life. A set of tools for doing some of this work is available through Policy Link (<http://www.policylink.org/equity-tools/equitable-development-toolkit/about-toolkit>). For those who are relocated due to circumstances that make staying in place impossible, intensive case management may be required to ensure that these residents avoid pitfalls and thrive in a new environment (Theodos, Popkin, Guernsey, & Getsinger, 2010). But evidence continues to suggest that stability, particularly in the lives of children, is an essential part of ensuring that everyone has the opportunity to succeed and thrive (HUD 2014).

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Data Sources

2014 American Community Survey Estimates

- Poverty: ACS_13_5YR_S1701 > HC02_EST_VC01 > Below poverty level; Estimate; Population for whom poverty status is determined
- Non-white enclaves: ACS_13_5YR_BO2001 > HD01_VD02 > [Total Population] - Estimate; Total: - White alone
- Immigrant enclaves: ACS_13_5YR_BO5001 > HD01_VD06 > Estimate; Total: - Not a U.S. citizen
- Limited English Proficiency: ACS_13_5YR_S1601 > HC03_EST_VC01 > Percent of specified language speakers - Speak English less than "very well"; Estimate; Population 5 years and over
- Disability: ACS_13_5YR_S1810 > HC02_EST_VC01 > with a disability; estimate; total civilian noninstitutionalized population

University of Oklahoma Center for Spatial Analysis: Data Warehouse

- Hospital locations as of 2008 derived from Oklahoma State Department of Health, Health Care Information Division.

University of Oklahoma Division of Regional and City Planning

- Grocery store locations retrieved from Internet search conducted by faculty and student research assistants at the University of Oklahoma.
- Transit locations retrieved from Oklahoma Department of Transportation (<http://www.okladot.state.ok.us/transit/pubtrans.htm>) and geocoded by faculty and student research assistants at the University of Oklahoma.

Appendix 1: County affordable housing Summaries

County	Total Units	Units at Risk for Poverty	Units in mostly Non-white Enclaves	Units in Community of Immigrants	Units in Limited English Neighborhood	Units nearer Elevated Number of Disabled	Units farther than 15 miles to Hospital	Units located in a Food Desert	Units that lack readily available Transit
Adair	676	676	676	0	0	177	0	0	0
Alfalfa	93	0	0	0	0	0	93	0	23
Atoka	145	121	0	0	0	0	24	145	24
Beaver	0	0	0	0	0	0	0	0	0
Beckham	343	87	228	0	228	315	0	28	0
Blaine	169	0	0	127	127	0	24	0	42
Bryan	1,005	538	501	0	0	501	0	0	0
Caddo	658	292	387	0	0	292	95	0	0
Canadian	1,655	0	248	0	0	0	48	24	0
Carter	1,040	373	938	189	0	972	24	24	24
Cherokee	1,359	986	412	0	0	436	0	13	0
Choctaw	433	312	0	0	0	0	0	0	0
Cimarron	69	0	0	0	0	0	8	69	69
Cleveland	2,389	1,080	194	758	648	601	0	214	718
Coal	71	0	0	0	0	71	0	0	0
Comanche	1,214	200	182	0	0	225	123	151	24
Cotton	114	0	0	0	0	0	114	0	0
Craig	290	0	0	0	0	157	0	72	0
Creek	1,359	163	163	0	0	670	0	0	0
Custer	255	78	0	0	0	172	0	0	0
Delaware	712	695	285	0	0	712	28	0	0
Dewey	75	0	0	0	0	0	16	0	0
Ellis	39	0	0	0	0	0	0	0	0
Garfield	824	683	127	0	0	0	0	52	50

County	Total Units	Units at Risk for Poverty	Units in mostly Non-white Enclaves	Units in Immigrant Enclaves	Units in Limited English Neighborhood	Units nearer Elevated Number of Disabled	Units farther than 15 miles to Hospital	Units located in a Food Desert	Units that lack readily available Transit
Garvin	557	0	0	0	0	265	0	0	0
Grady	758	71	0	0	0	621	71	0	0
Grant	8	0	0	0	0	0	8	8	8
Greer	100	0	0	0	0	0	0	0	0
Harmon	62	0	0	0	0	0	0	2	0
Harper	50	0	0	0	0	0	14	36	50
Haskell	63	0	0	0	0	0	0	0	0
Hughes	341	0	0	0	0	0	0	76	0
Jackson	322	18	18	0	18	0	30	30	0
Jefferson	36	0	0	0	0	0	0	0	0
Johnston	517	493	0	0	0	493	0	0	0
Kay	1,001	196	168	0	0	344	0	0	0
Kingfisher	153	0	0	8	8	0	8	8	40
Kiowa	143	0	0	0	0	0	0	0	0
Latimer	220	0	0	0	0	220	0	0	0
Le Flore	1,050	204	0	0	0	573	166	0	0
Lincoln	705	143	0	0	0	705	42	0	705
Logan	629	0	0	0	0	300	0	0	158
Love	62	0	0	62	0	0	0	0	0
Major	76	0	0	0	0	0	0	0	76
Marshall	134	0	109	109	109	109	0	0	0
Mayes	546	382	218	0	0	382	0	0	0
McClain	346	55	0	0	47	299	0	0	0
McCurtain	767	767	746	0	0	767	57	315	0
McIntosh	488	0	0	0	0	169	0	0	488

County	Total Units	Units at Risk for Poverty	Units in mostly Non-white Enclaves	Units in Community of Immigrants	Units in Limited English Neighborhood	Units nearer Elevated Number of Disabled	Units farther than 15 miles to Hospital	Units located in a Food Desert	Units that lack readily available Transit
Murray	224	95	0	0	0	224	0	0	224
Muskogee	1,572	642	59	0	0	44	48	0	0
Noble	387	0	0	0	0	0	42	30	345
Nowata	229	0	0	0	0	185	0	0	229
Okfuskee	214	169	0	0	0	213	0	1	0
Oklahoma	11,497	3,920	3,518	2,445	2,641	456	0	1,202	25
Okmulgee	663	303	227	0	0	127	0	0	0
Osage	1,544	538	700	0	0	1,391	42	0	0
Ottawa	409	0	0	0	0	96	0	84	0
Pawnee	65	0	0	0	0	0	37	20	0
Payne	1,797	1,209	0	120	120	648	0	0	971
Pittsburg	1,268	0	50	0	0	284	16	16	0
Pontotoc	810	311	286	0	0	336	0	0	0
Pottawatomi	1,715	1,009	587	0	0	954	0	284	0
Pushmataha	381	234	0	0	0	381	147	381	0
Roger Mills	14	0	0	0	0	0	0	14	0
Rogers	973	0	0	0	0	0	36	0	0
Seminole	426	76	75	0	0	75	0	123	0
Sequoyah	1,449	922	922	0	0	726	243	0	0
Stephens	841	0	0	0	0	310	12	0	0
Texas	816	0	372	782	782	372	60	6	75
Tillman	114	0	0	0	0	0	0	0	0
Tulsa	9,868	4,750	1,807	2,281	2,109	1,419	0	1,441	2,220
Wagoner	1,094	691	461	0	0	701	0	0	0
Washington	1,262	0	108	0	0	108	0	0	1,262
Washita	189	0	0	0	0	0	0	0	0

County	Total Units	Units at Risk for Poverty	Units in mostly Non-white Enclaves	Units in Community of Immigrants	Units in Limited English Neighborhood	Units nearer Elevated Number of Disabled	Units farther than 15 miles to Hospital	Units located in a Food Desert	Units that lack readily available Transit
Woods	65	0	0	0	0	0	2	0	65
Woodward	161	0	0	0	0	0	0	60	0

Lead-Based Paint Hazards

Findings / Health and Well-being

Lead is known to be highly toxic particularly to young children 5 years of age and under. Excessive exposure results in reduced intelligence, impaired hearing, reduced stature and a host of other negative health effects. It is well documented that a common source of lead exposure for children is lead-based paint in older housing along with the dust and soil it generates. Children are exposed to lead-based paint most commonly by directly eating paint chips or indirectly by ingesting lead-contaminated house dust or soil through normal hand-to-mouth contact.

For purposes of this analysis, the federal definition of “lead-based paint hazard” at 24 CFR Part 35.86 was applied. Under this definition, lead-based paint hazard is defined as, “...any condition that causes exposure to lead from lead-contaminated dust, lead-contaminated soil, or lead-contaminated paint that is deteriorated or present in accessible surfaces, friction surfaces, or impact surfaces that would result in adverse human health effects as established by the appropriate Federal agency.”

It is noteworthy estimates presented can only be stated as dwellings that “potentially” have LBP hazards because there are no real-time surveys or studies of residential structures built prior to 1978. However, there have been previous estimations provided in the state’s Consolidated Plan.

Statewide Findings

Using methodology which will be discussed later in this section, we have estimated the number of housing units in Oklahoma with lead-based paint hazards as defined in 24 CFR Part 35.86. Our estimates are shown in the following table.

Lead-Based Paint Hazards in Oklahoma		
	Number	Percent
Total Housing Units	1,432,730	
Total Housing Units with Lead-Based Paint Hazards	240,229	16.8%
Owner-Occupied Units w/LBP Hazards	159,861	66.5%
Renter-Occupied Units w/LBP Hazards	80,368	33.5%
Housing Units w/LBP Hazards Occupied by Low-to-Moderate Income Households	113,931	47.4%
Housing Units w/LBP Hazards with Children < 6 Years of Age Present	37,426	15.6%
Housing Units w/LBP Hazards Occupied by LMI Households and Children < 6 Years of Age Present	19,761	52.8%

Sources: American Healthy Homes Survey Table 5-1 & CHASTables 12 & 13

As shown, we estimate that there are 240,229 housing units in Oklahoma containing lead-based paint hazards, representing 16.8% of Oklahoma’s total housing stock. 66.5% of those units are owner-occupied, while 33.5% are renter-occupied. Of the 240,229 housing units containing lead-based paint hazards, 113,931 units, or 47.4%, are occupied by households with low-to-moderate incomes as defined by HUD. Among all housing units with lead-based paint hazards, 37,426 units have children under the age of six present, and 52.8% of those units, or 19,761 units total, are households with low-to-moderate incomes. Exhibits 2 through 6, found at the end of this section, graphically summarize our statewide findings at a county level.

Disaster Resiliency/ Economy and Society, Infrastructure and Environment

While communities strive to address lead-based paint hazards through education and removal when detected in connection with federally funded local housing rehabilitation initiatives, hazard detection and mitigation may have special considerations in terms of disaster resiliency.

Many disasters are accompanied by widespread damage to residential structures often times scattering building material debris across the landscape necessitating removal by heavy equipment and disposal in landfills. When building materials contaminated with lead-based paint become part of non-contaminated debris disposal, it presents an environmental hazard that can span well beyond recovery and rebuilding efforts.

Leadership and Strategy

Given the albeit large but finite number of potential housing units with lead hazards, the state and local communities may wish to consider initiatives aimed at reducing and/or eventually eliminating residential lead-based paint hazards, particularly in housing occupied by low and moderate income households with young children present. One such initiative could be the use of the state's various federal and state housing programs' competitive funding selection criteria. By designing rating criteria that specifically awards points to applicants that purposefully seek out properties within counties known to have higher percentages of lead hazards, housing developers along with those engaged in rehabilitation may be incentivized to engage in hazard mitigation.

State and local governments may wish to capitalize on the results of this study by using the data to support competitive applications to the Federal Home Loan Bank Topeka's Affordable Housing Program funding for owner occupied rehabilitation which, among other competitive rating criteria, awards points for the "Abatement of Hazardous Environmental Conditions". Similarly, this report's data may be used to document hazards and need in applications for competitive health care grants offered at the federal level.

Similar to initiatives undertaken by USHUD, the state may want to consider undertaking a real-time sample survey of homes built prior to 1978 across the state's community sizes and counties to more accurately ascertain the extent of the hazard and/or conducting real-time surveys of LBP Risk Assessors licensed by the ODEQ.

Survey of Previous Lead-based Paint Studies

Using a combination of US Census Bureau and US Department of Housing and Urban Development Comprehensive Housing Affordability Strategy data and age of housing stock built prior to 1980, the Oklahoma Department of Commerce's, "State of Oklahoma Five-Year E-Consolidated Plan FY 2014 – 2018" estimated 59% of the owner occupied and 65% of the renter occupied housing had the potential of containing lead-based paint. To address lead paint hazards, the Consolidated Plan recommended assessment of hazard presence be conducted at the point dwelling rehabilitation is undertaken and that nonprofits advise persons receiving federal rehabilitating assistance regarding the dangers of lead exposure.

At the national level, between 1998 and 2000, USHUD Office of Health Homes and Lead Hazard Control staff and the National Institute of Environmental Health Sciences conducted a real-time

random sampling of 831 permanently occupied housing units (multifamily, single family and mobile homes) taken from all 50 states and the District of Columbia. The results indicated an estimated 38 million (39% of the 96 million total housing units) of the nation's housing units had lead-based paint hazards. Of that total, 24 million had significant lead hazards with 1.2 million of those units occupied by low income families. It was further estimate that 35% of all low income housing had lead-based paint hazards. The study also noted the prevalence of lead-based paint increases with age of housing. However, most painted surfaces, even in older homes don't have lead paint. Geography was found to be related to the incidence of lead-based paint with the Northeast and Midwest having 2 times the prevalence of lead paint than the South and West. Finally, the study recommends "public-private sector resources be directed units posing the greatest risk" as a preventive measure to avoid lead poisoning.

In April 2011, the U.S. Department of Housing and Urban Development, Office of Healthy Homes and Lead Hazard Control updated its 1998-2000 nationwide report in its publication, "American Healthy Homes Survey, Lead and Arsenic Findings". This report, conducted from June 2005 through March 2006, estimated 37.1 million homes (34.9%) out of a total of 106 million total housing units have lead-based paint somewhere in the building. Of the 65.6 million homes built before 1978, 34.4 million (52%) have lead-based paint. The study reaffirmed the previous finding that the prevalence of lead-based paint is higher in the Northeast and Midwest parts of the United States than South and West. It also confirmed earlier finding that the incidence of lead-based paint increases with age of housing with 86% of the homes built prior to 1940 containing lead. An estimated 3.6 million homes with children less than 6 years of age have lead-based paint hazards of which 1.1 million are low income households. Of the 16.8 million homes with children under the age of 6, 5.7 million (34%) have lead-based paint, about the same incidence of lead-based paint in all homes.

In June 2006, the Oklahoma State Department of Health's Childhood Lead Poisoning Prevention Program (OCLPPP) received a 5-year project grant "Oklahoma Childhood Lead Poisoning Prevention Program Focusing in High Risk Groups". That program focused on communities evidencing high numbers of children 6-72 months of age who are at high risk for lead poisoning.

In order to more effectively target high-risk areas and populations, the OCLPPP identified 21 high-risk target area (HRTA) zip codes (see Exhibit #1) located within Oklahoma, Tulsa, Muskogee, Jackson, Okmulgee, Ottawa, Kay, Garfield, and Hughes counties. These 21 zip codes were narrowed from a list of 57 zip codes out of the state's approximately 700 zip codes that with populations of 5,000 or more persons; greater than or equal to 22% of housing stock built prior to 1950; and, greater than or equal to 18% of children under the age of 6 years living below the poverty level.

The 57 zip codes were further compared and evaluated based on selected characteristics such as EBL cases and proportion of minority population. Zip codes with higher EBL prevalence and/or minority populations (Hispanic/African American/American Indian) were ranked higher and given the designation as HRTA zip codes.

Comanche County Findings

The number of housing units in Comanche County containing lead-based paint hazards can be estimated by applying the percentages of housing units with such hazards reported by the American

Healthy Homes Survey, to the number of occupied homes in Comanche County, by year of construction. The following table presents the percentage of housing units in the Census Bureau South Region based on the AHHS findings.

Housing Units in the South Census Region with Lead-Based Paint Hazards by Year of Construction			
Year of Construction	No. of Housing Units (000s)	Units w/ LBP Hazards (000s)	Percent of Units w/ LBP Hazards
1978-2005	18,625	664	3.6%
1960-1977	11,724	1,311	11.2%
1940-1959	5,575	2,145	38.5%
1939 or Earlier	3,072	1,947	63.4%
Total	38,996	6,067	15.6%

Source: U.S. Dept. of Housing and Urban Development, American Healthy Homes Survey, Table 5-1

These percentages can then be applied to the number of housing units in Comanche County, by year of construction and by tenure (owner-occupied versus renter-occupied), as reported by HUD's Comprehensive Housing Affordability Strategy (CHAS) data for Comanche County.

Total Housing Units in Comanche County with Lead-Based Paint Hazards by Tenure			
Total Owner-Occupied Housing Units	Total Housing Units	Percent w/LBP Hazards	Number w/LBP Hazards
1978 or Later	10,930	3.57%	390
1960-1977	8,591	11.18%	961
1940-1959	4,710	38.48%	1,812
1939 or Earlier	1,220	63.38%	773
Total	25,450	15.46%	3,936
Total Renter-Occupied Housing Units	Total Housing Units	Percent w/LBP Hazards	Number w/LBP Hazards
1978 or Later	6,958	3.57%	248
1960-1977	7,223	11.18%	808
1940-1959	3,230	38.48%	1,243
1939 or Earlier	1,325	63.38%	840
Total	18,735	16.75%	3,138
Total Housing Units	Total Housing Units	Percent w/LBP Hazards	Number w/LBP Hazards
1978 or Later	17,887	3.57%	638
1960-1977	15,813	11.18%	1,768
1940-1959	7,940	38.48%	3,055
1939 or Earlier	2,545	63.38%	1,613
Total	44,185	16.01%	7,074

Sources: American Healthy Homes Survey Table 5-1 & CHAS Table 12

Finally, we can use the same methodology to estimate the number of housing units in Comanche County with lead-based paint hazards, occupied by households with low-to-moderate incomes, by tenure:

**Housing Units in Comanche County with Lead-Based Paint Hazards by Tenure,
Occupied by Low-Income Families**

Owner-Occupied Housing Units < 50% AMI	Total Housing Units	Percent w/LBP Hazards	Number w/LBP Hazards
1978 or Later	858	3.57%	31
1960-1977	1,103	11.18%	123
1940-1959	685	38.48%	264
1939 or Earlier	285	63.38%	181
Total	2,930	20.41%	598

Renter-Occupied Housing Units < 50% AMI	Total Housing Units	Percent w/LBP Hazards	Number w/LBP Hazards
1978 or Later	2,111	3.57%	75
1960-1977	2,304	11.18%	258
1940-1959	1,440	38.48%	554
1939 or Earlier	625	63.38%	396
Total	6,480	19.80%	1,283

Total Housing Units < 50% AMI	Total Housing Units	Percent w/LBP Hazards	Number w/LBP Hazards
1978 or Later	2,969	3.57%	106
1960-1977	3,407	11.18%	381
1940-1959	2,125	38.48%	818
1939 or Earlier	910	63.38%	577
Total	9,410	19.99%	1,881

Sources: American Healthy Homes Survey Table 5-1 & CHAS Table 12

**Housing Units in Comanche County with Lead-Based Paint Hazards by Tenure,
Occupied by Moderate-Income Families**

Owner-Occupied Housing Units 50%-80% AMI	Total Housing Units	Percent w/LBP Hazards	Number w/LBP Hazards
1978 or Later	1,016	3.57%	36
1960-1977	1,130	11.18%	126
1940-1959	905	38.48%	348
1939 or Earlier	210	63.38%	133
Total	3,260	19.75%	644

Renter-Occupied Housing Units 50%-80% AMI	Total Housing Units	Percent w/LBP Hazards	Number w/LBP Hazards
1978 or Later	1,438	3.57%	51
1960-1977	1,647	11.18%	184
1940-1959	755	38.48%	290
1939 or Earlier	245	63.38%	155
Total	4,085	16.68%	681

Total Housing Units 50%-80% AMI	Total Housing Units	Percent w/LBP Hazards	Number w/LBP Hazards
1978 or Later	2,454	3.57%	87
1960-1977	2,777	11.18%	310
1940-1959	1,660	38.48%	639
1939 or Earlier	455	63.38%	288
Total	7,345	18.04%	1,325

Sources: American Healthy Homes Survey Table 5-1 & CHAS Table 12

To conclude, we estimate that there are a total of 7,074 homes in Comanche County containing lead-based paint hazards, 3,936 owner-occupied and 3,138 renter-occupied. Of the 7,074 homes in the county estimated to have lead-based paint hazards, 1,881 are estimated to be occupied by households with low-incomes (incomes less than 50% of Area Median Income), and 1,325 are estimated to be occupied by households with moderate incomes (between 50% and 80% of Area Median Income), for a total of 3,206 housing units in Comanche County with lead-based paint hazards occupied by households with low or moderate incomes.

Lead-Based Paint Hazards in Homes with Children Present

Using the same methodology, we can estimate the number of housing units in Comanche County occupied by households with children under the age of six present. For this analysis we apply the lead-based paint hazards percentages from the American Healthy Homes Survey to the data in HUD CHAS Table 13, which details housing units by year of construction, household income, and presence of children under the age of six. The data is presented in the following table:

Housing Units in Comanche County with Lead-Based Paint Hazards with Children under Age 6 Present Occupied by Low or Moderate-Income Families			
Housing Units < 50% AMI w/ Children under 6 Present	Total Housing Units	Percent w/LBP Hazards	Number w/LBP Hazards
1978 or Later	927	3.57%	33
1940-1977	1,468	19.98%	293
1939 or Earlier	225	63.38%	143
Total	2,620	17.90%	469
Housing Units 50%-80% AMI w/ Children under 6 Present	Total Housing Units	Percent w/LBP Hazards	Number w/LBP Hazards
1978 or Later	757	3.57%	27
1940-1977	1,278	19.98%	255
1939 or Earlier	100	63.38%	63
Total	2,135	16.19%	346
Total LMI Housing Units w/ Children Present	Total Housing Units	Percent w/LBP Hazards	Number w/LBP Hazards
1978 or Later	1,685	3.57%	60
1940-1977	2,746	19.98%	548
1939 or Earlier	325	63.38%	206
Total	4,755	17.13%	815
Total Housing Units w/ Children Present	Total Housing Units	Percent w/LBP Hazards	Number w/LBP Hazards
1978 or Later	3,761	3.57%	134
1940-1977	5,140	19.98%	1,027
1939 or Earlier	520	63.38%	330
Total	9,420	15.82%	1,490

Sources: American Healthy Homes Survey Table 5-1 & CHAS Table 13

As shown, we estimate there are 1,490 housing units in Comanche County with lead-based paint hazards and children under the age of six present, and that 815 of those housing units are occupied by families with low to moderate incomes.

Research Footnotes/Sources

Oklahoma Department of Commerce, "State of Oklahoma Five-Year E-Consolidated Plan FY 2014 – 2018"

"The Prevalence of Lead-Based Paint Hazards in U.S. Housing", Environmental Health Perspectives, Volume 110, Number 10, October 2002

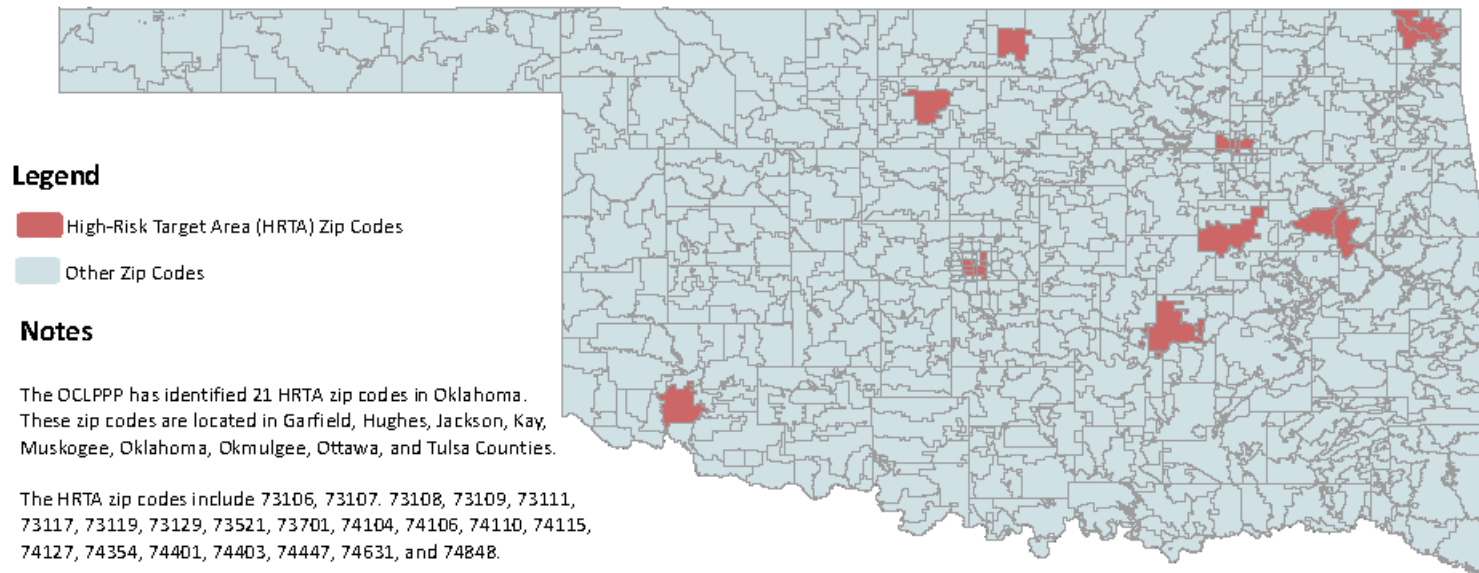
U.S. Department of Housing and Urban Development, Office of Healthy Homes and Lead Hazard Control, "American Healthy Homes Survey, Lead and Arsenic Findings", April 2011

Oklahoma State Department of Health, Oklahoma Childhood Lead Poisoning Prevention Program Focusing in High Risk Groups"

U.S. Department of Housing and Urban Development, Comprehensive Housing Affordability Strategy (CHAS), 2007-2011

Exhibit #1

Map 2: High-Risk Target Areas (HRTA) Zip Codes for Childhood Lead Poisoning



Legend

- High-Risk Target Area (HRTA) Zip Codes
- Other Zip Codes

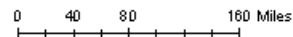
Notes

The OCLPPP has identified 21 HRTA zip codes in Oklahoma. These zip codes are located in Garfield, Hughes, Jackson, Kay, Muskogee, Oklahoma, Okmulgee, Ottawa, and Tulsa Counties.

The HRTA zip codes include 73106, 73107, 73108, 73109, 73111, 73117, 73119, 73129, 73521, 73701, 74104, 74106, 74110, 74115, 74127, 74354, 74401, 74403, 74447, 74631, and 74848.

The HRTA zip codes are identified using the following criteria:

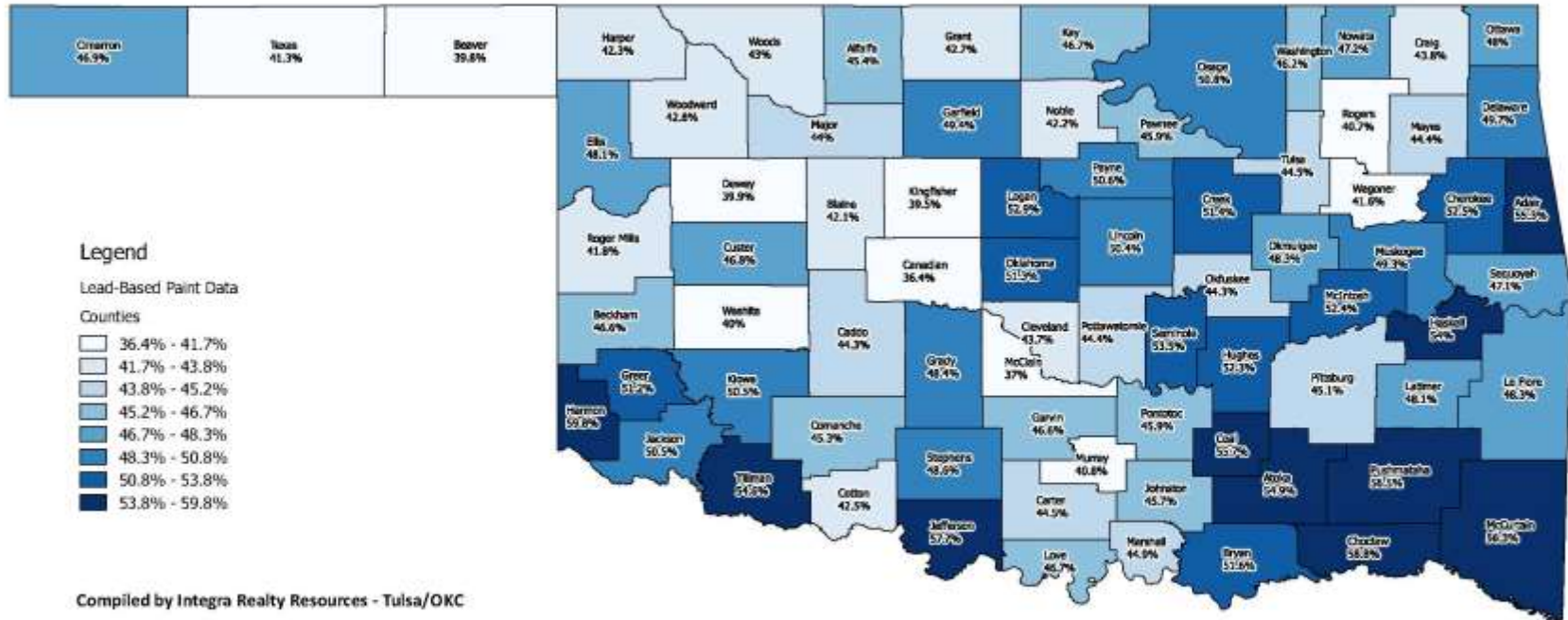
- 1- Zip codes having the highest proportion of pre-1950 housing;
- 2- Zip codes having the highest proportion of children under six years of age living in poverty;
- 3- Zip codes having high elevated blood lead level (EBLL) prevalence rate; and
- 4- Zip codes having the highest proportion of minority populations.



Childhood Lead Poisoning Prevention Program
 Screening and Special Services
 Prevention and Preparedness Service
 Oklahoma State Department of Health

Exhibit #3

Percentage of Housing Units Containing Lead-Based Paint Hazards Occupied by Low to Moderate Income Households

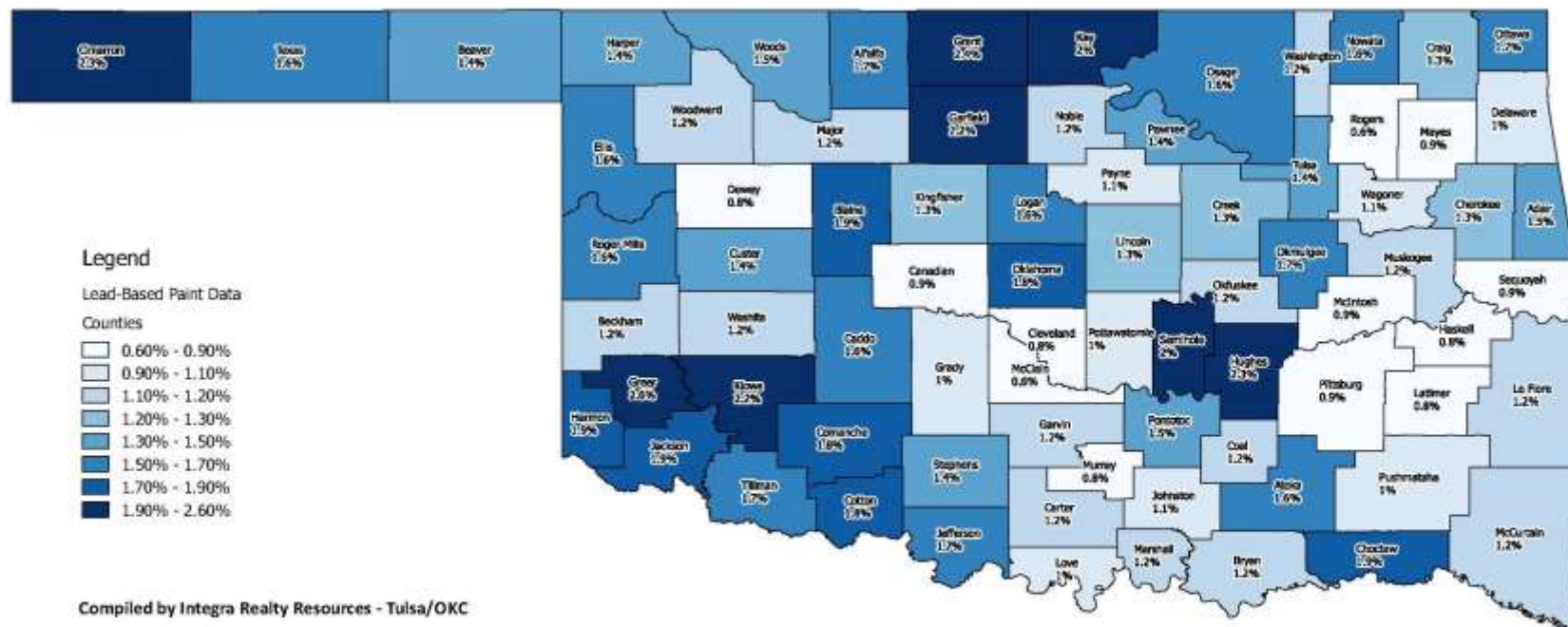


Compiled by Integra Realty Resources - Tulsa/OKC

Sources:
HUD Comprehensive Housing Affordability Strategy Data 2007-2011, Table 13
HUD American Healthy Homes Survey, Table 5-1

Exhibit #5

Percentage of Housing Units Occupied by Low to Moderate Income Households Containing Lead-Based Paint Hazards with Children Age 6 or Younger Present



Compiled by Integra Realty Resources - Tulsa/OKC

Sources:

HUD Comprehensive Housing Affordability Strategy Data 2007-2011, Table 13
 HUD American Healthy Homes Survey, Table 5-1

Conclusions

The previous analysis has attempted to describe the state of the residential housing market in Comanche County, Oklahoma. Where possible, information regarding the population centers of the county was included to assess need on a community level. Much of the information is based on demographic information from local authorities and national information services. However, personal interviews were performed with property owners and managers, real estate professionals, and community officials in an effort to substantiate information from the national organizations and understand current market conditions. Several important issues regarding housing have become apparent through this analysis and are identified below.

Comanche County has undergone steady growth over the last fifteen years, in terms of population, households and employment levels. Major drivers of growth in the area include the Fort Sill military base, as well as the continued success of Goodyear Tire & Rubber Co., which employs the largest number of residents outside of Fort Sill. New population and employment growth has been met with new housing construction, both for rent and for ownership. From the years of 2005 to 2012 Lawton saw exponential growth in the housing market. Fluctuation within the population has occurred in recent years due to deployment of troops from Fort Sill, as well as a decreasing price in oil, causing sudden drops in total population and home vacancy within the city, as well as all of Comanche County. Notable newer rental housing developments include Legend Park (360 market-rate units), Ross Estates (market-rate), Garrett's Landing (LIHTC), and Savannah House Apartments (LILHTC). There has been new construction of single family homes for ownership, although some of this construction appears reasonably affordable, the average price of homes constructed since 2010 is higher than the area median household income for Comanche County.

Due to the age of the county's housing stock, lead-based paint hazards are an issue, with an estimated 7,074 occupied housing units with such hazards, and 1,490 of those units are occupied by low- to moderate income household with children under the age of 6 present.

Comanche County showed positive population and household growth between 2000 and 2010 censuses, however the most recent estimates from both Nielsen SiteReports and the U.S. Census Bureau show declines since that time. As mentioned previously, the population of Lawton has fluctuated due to troop deployment from Fort Sill. The expectation of troops returning to the city is predicted to grow back to normal levels in the spring of 2016 as military personnel return from deployment. The population of Comanche County and Lawton are predicted to decrease over the coming years, though the aging housing supply and population fluctuation due to the military and oil and gas industry will continue to drive the need for new housing stock throughout the Lawton and outlying areas of Comanche County. Rehabilitation or replacement of older housing units, both for ownership and for rent, will be needed. Finally, approximately 18.64% of homeowners and 37.49% of renters are cost overburdened, demonstrating a need for relatively affordable housing. Comanche County is anticipated to need 276 new housing units for ownership and 212 new rental units over the next five years to meet some of the housing needs in Comanche County.

Addendum A

Acknowledgments



The Housing Needs Assessment research team extends a special thanks to the following individuals and organizations for their many contributions of data, program information and time that helped make this project possible:

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US Federal Emergency Management Agency, Harold Latham

US Department of Housing and Urban Development Oklahoma City Field Office, Jackie McBride

Oklahoma State Agencies

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Department of Human Services, Connie Schlittler

Department of Emergency Management Dara Hayes

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Continuums of Care Network

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Chambers of Commerce

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Addenda

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B.S.B.A. Degree, Marketing, University of Tulsa, Tulsa, Oklahoma (1984)

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- Advanced Income Capitalization 510
- Highest and Best Use and Market Analysis 520
- Advanced Sales Comparison and Cost Approaches 530
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Integra Realty Resources, Inc. offers the most comprehensive property valuation and counseling coverage in North America with over 60 independently owned and operated offices located throughout the United States and the Caribbean. Integra was created for the purpose of combining the intimate knowledge of well-established local firms with the powerful resources and capabilities of a national company. Integra offers integrated technology, national data and information systems, as well as standardized valuation models and report formats for ease of client review and analysis. Integra's local offices have an average of 25 years of service in the local market, and virtually all are headed by a Senior Managing Director who is an MAI member of the Appraisal Institute.

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BIRMINGHAM, AL - Rusty Rich, MAI, MRICS
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CHARLOTTE, NC - Fitzhugh L. Stout, MAI, CRE, FRICS
CHICAGO, IL - Eric L. Enloe, MAI, FRICS
CINCINNATI, OH - Gary S. Wright, MAI, FRICS, SRA
CLEVELAND, OH - Douglas P. Sloan, MAI
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COLUMBUS, OH - Bruce A. Daubner, MAI, FRICS
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Lecturer, Rutgers University Bloustein Institute (01/06-present)

Lecturer, Texas A&M University (01/04-12/04)

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Teacher of the year award by the UF Student Planning Association, April, 2010.

Best paper in the real estate valuation category by the Appraisal Institute with Kimberly Geideman and Shan Gao, Fall, 2009.

Excellence in Teach Award by the College of Architecture of Texas A & M University, September, 2005.

Student Planning Award by the Texas Chapter of the American Planning Association, Fall, 2007.

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D. Jourdan and S. Pilat, Preserving Public Housing: Federal, State and Local Efforts to Preserve the Social and Architectural Forms Associated with Housing for the Poor in the *Journal of Preservation Education and Research* (forthcoming).

Ozor, B., K. Frank, and **D. Jourdan**, Confronting Wicked Problems with Games: How Role-Play Informs Planning for Sea Level Rise in Northeast Florida (pending review).

Jourdan, D., A. Ray, and L. Thompson, Relocating from Subsidized Housing in Florida: Are Residents Moving to Opportunity in *Journal of Housing and Community Development Law* (forthcoming).

Jourdan, D., K. Hurd, W. Gene Hawkins, and K. Winson Geideman, Evidence Based Sign Regulation: Regulating Signage on the Basis of Empirical Wisdom in *The Urban Lawyer*, 45:2, Spring 2014, 327-348.

Jourdan, D. S. Van Zandt, and E. Tarleton, Coming home: Resident satisfaction regarding return to a revitalized HOPE VI community in *Cities* available at: <http://www.sciencedirect.com/science/article/pii/S0264275113000322>, 2013.

Jourdan, D., A Response to Mandelker's Free Speech Law for On Premise Signs in *Planning and Environmental Law*, 65:4, 2013, 4-10.

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Historic Preservation Law (continuing education, at Rutgers University)
Ordinance Drafting (continuing education, at Rutgers University)

PUBLICATIONS:

Refereed Journal Articles

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D. Jourdan and S. Pilat, Preserving Public Housing: Federal, State and Local Efforts to Preserve the Social and Architectural Forms Associated with Housing for the Poor in the *Journal of Preservation Education and Research* (forthcoming).

Ozor, B., K. Frank, and **D. Jourdan**, Confronting Wicked Problems with Games: How Role-Play Informs Planning for Sea Level Rise in Northeast Florida (pending review).

Jourdan, D., A. Ray, and L. Thompson, Relocating from Subsidized Housing in Florida: Are Residents Moving to Opportunity in *Journal of Housing and Community Development Law* (forthcoming).

Jourdan, D., K. Hurd, W. Gene Hawkins, and K. Winson Geideman, Evidence Based Sign Regulation: Regulating Signage on the Basis of Empirical Wisdom in *The Urban Lawyer*, 45:2, Spring 2014, 327-348.

Jourdan, D. S. Van Zandt, and E. Tarleton, Coming home: Resident satisfaction regarding return to a revitalized HOPE VI community in *Cities* available at: <http://www.sciencedirect.com/science/article/pii/S0264275113000322>, 2013.

Jourdan, D., A Response to Mandelker's Free Speech Law for On Premise Signs in *Planning and Environmental Law*, 65:4, 2013, 4-10.

Jourdan, D., Enhancing HOPE VI Revitalization Processes with Participation, in *Journal of the Community Development Society*, Vol. 39:No. 2, 2008, pp. 75-90.

Jourdan, D., Reducing Pre-Relocation Grief with Participation in a HOPE VI Grant Application Process, in *International Journal of Public Participation*, Vol. 2:No. 2, 2008, pp. 75-92.

Jourdan, D., Mending Fences: Resolving Neighbor Disputes With Squatters Settlements in Belize, in *PACE Institute for Environmental and Regional Studies Proceedings*, Vol. 4, 2004, pp. 135-149.

White, S. M. and **D. Jourdan**, Neotraditional Development: A Legal Analysis, in *Land Use Law and Zoning Digest* (1999).

Books

Jourdan, D. and E. Strauss. *Planner's Guide to Land Use Law: Planning for Wicked Problems*, NY: Routledge (under contract).

Book Chapters and Entries

Jamal, T. and **D. Jourdan**. Interdisciplinary Tourism Education in Interdisciplinary Teaching and Learning in Higher Education: theory and practice. *Interdisciplinary Learning and Teaching in Higher Education: theory and practice*. Dr Balasubramanyam Chandramohan and Dr Stephen Fallows (eds.), London: Routledge Falmer. (2008).

D. Jourdan. Grounding Theory: Developing New Theory on Intergenerational Participation in Qualitative Methods for Housing Research. *Qualitative Housing Research Methods*. Paul Maquin (ed.), London: Elsevier. (2008).

Non-Refereed Publications

Jourdan, D., Hawkins, G., Winson-Geideman, K., and R. Abrams. The Model Sign Code. International Sign Association (December, 2008).

Winson-Geideman, K., **D. Jourdan** and S. Gao. The Effects of Adaptive Reuse by the Savannah College of Art & Design on Property Value and Community Change in Savannah, Georgia. *Lincoln Land Institute Working Papers* (December, 2006).

Jourdan, D. Bomb Proof Schools. *Plan Canada*. (Fall, 2006).

Van Zandt, S., Jourdan, D., Martin, J., and C. Giusti. Final Report for Beaumont's HOPE VI Project. Prepared for the Beaumont Housing Authority (December 2012)

Jourdan, D., Enhancing HOPE VI Revitalization Processes with Participation, in *Journal of the Community Development Society*, Vol. 39:No. 2, 2008, pp. 75-90.

Jourdan, D., Reducing Pre-Relocation Grief with Participation in a HOPE VI Grant Application Process, in *International Journal of Public Participation*, Vol. 2:No. 2, 2008, pp. 75-92.

Jourdan, D., Mending Fences: Resolving Neighbor Disputes With Squatters Settlements in Belize, in *PACE Institute for Environmental and Regional Studies Proceedings*, Vol. 4, 2004, pp. 135-149.

White, S. M. and **D. Jourdan**, Neotraditional Development: A Legal Analysis, in *Land Use Law and Zoning Digest* (1999).

Books

Jourdan, D. and E. Strauss. *Planner's Guide to Land Use Law: Planning for Wicked Problems*, NY: Routledge (under contract).

Book Chapters and Entries

Jamal, T. and **D. Jourdan**. Interdisciplinary Tourism Education in Interdisciplinary Teaching and Learning in Higher Education: theory and practice. *Interdisciplinary Learning and Teaching in Higher Education: theory and practice*. Dr Balasubramanyam Chandramohan and Dr Stephen Fallows (eds.), London: Routledge Falmer. (2008).

D. Jourdan. Grounding Theory: Developing New Theory on Intergenerational Participation in Qualitative Methods for Housing Research. *Qualitative Housing Research Methods*. Paul Maquin (ed.), London: Elsevier. (2008).

Non-Refereed Publications

Jourdan, D., Hawkins, G., Winson-Geideman, K., and R. Abrams. The Model Sign Code. International Sign Association (December, 2008).

Winson-Geideman, K., **D. Jourdan** and S. Gao. The Effects of Adaptive Reuse by the Savannah College of Art & Design on Property Value and Community Change in Savannah, Georgia. *Lincoln Land Institute Working Papers* (December, 2006).

Jourdan, D. Bomb Proof Schools. *Plan Canada*. (Fall, 2006).

Van Zandt, S., Jourdan, D., Martin, J., and C. Giusti. Final Report for Beaumont's HOPE VI Project. Prepared for the Beaumont Housing Authority (December 2012)

Van Zandt, S., Jourdan, D., Martin, J., and C. Giusti. Interim Report for Beaumont's HOPE VI Project. Prepared for the Beaumont Housing Authority (December 2011).

Van Zandt, S., **Jourdan, D.**, Martin, J., and C. Giusti. Interim Report for Beaumont's HOPE VI Project. Prepared for the Beaumont Housing Authority (December 2009).

Van Zandt, S., **Jourdan, D.**, Martin, J., and C. Giusti. Interim Report for Beaumont's HOPE VI Project. Prepared for the Beaumont Housing Authority (December 2008).

Van Zandt, S., **Jourdan, D.**, Martin, J., and C. Giusti. Baseline Report for Beaumont's HOPE VI Project. Prepared for the Beaumont Housing Authority (December 2007).

Van Zandt, S., **Jourdan, D.**, Martin, J., and C. Giusti. Need and Demand for Affordable Housing in the Brazos Valley. Report to Brazos Valley Affordable Housing Corporation. (June 2006).

SPONSORED RESEARCH:

Co-PI, Tribal Climate Change and Extreme Event Response Studies to Identify Vulnerabilities, South Central Climate Science Center, 2014-2015.

PI, Oklahoma City, Sustainability Audit, May 2013-present.

PI, Shimberg Center for Housing Studies, The Lost Properties and Moving To Opportunity, October 2010 – Present.

Investigator and Collaboration Lead, Planning for Sea Level Rise: A Pilot Study to Evaluate and Improve the Development and Delivery of Habitat Vulnerability Assessments and Adaptive Conservation Designs to Coastal Decision Makers, National Estuarine Research Reserve System Science Collaborative, 2011-2014.

Co-PI, Rural Coastal Region Adaptation Planning for Sea Level Rise, Florida Sea Grant, 2012-14.

Co-PI, Development of Sea Level Rise Adaptation Planning Procedures and Tools Using NOAA Sea Level Rise Impacts Viewer, Gulf of Mexico Regional Research Competition, 2012-14.

Co-PI, Impact of Parking Supply and Demand Management on Central Business District (CBD) Traffic Congestion, Transit Performance and Sustainable Land Use, Florida Department of Transportation, January 2010 – October 2011.

A Parameterized Climate Change Projection Model for Hurricane Flooding, Wave Action, Economic Damages, and Population Dynamics, sponsored by NOAA, September 2009-September 2011, Role, Co-Principal Investigator.

HOPE VI Community Services Study for the Redevelopment of Magnolia Gardens in Beaumont, Texas, sponsored by the U.S. Department of Housing and Urban Development and the Beaumont Public Housing Authority, January 2007-December 2011, Role, Co-Principal Investigator.

Preserve America Grant for an Intergenerational Oral History for Hearne, Texas, sponsored by the National Parks Service, January 2007-December 2007, Role, Investigator.

A Hedonic Model of the Effects of Adaptive Reuse on Community Change in Savannah, Georgia, sponsored by the Lincoln Institute of Land Policy, Role, Investigator.

Legal Analysis and Policy Formulation Regarding the Use of Regional Rural Landbanking to Enhance the Development of Affordable Housing Opportunities in Brazos Valley Texas, sponsored by the Brazos Valley Affordable Housing Corporation, January 2007-August 2007, Role, Co-Principal Investigator.

Market Study of the Barriers to the Provision of Affordable Housing in Brazos Valley Texas, sponsored by the Brazos Valley Affordable Housing Corporation, January 2006-August 2006, Role, Co-Principal Investigator.

Comparative Analysis of the Effects of the Location of Big Box Retail on Housing Prices in Urban and Suburban Areas, sponsored by Texas A&M College of Architecture, December 2005-December 2006, Role, Principal Investigator.

PROFESSIONAL SERVICE AND AFFILIATIONS:

Professional Services

Chair of the Academic Advisory Council for Sign Research and Education (August 2014-present)

Chair of the Planner Outreach Subcommittee for the International Sign Association (January 2014-present)

Appointed to the Alachua County Affordable Housing Advisory Board (April 2010-2011)

University Liaison to the Florida Chapter of the American Planning Association (September 2007-September 2010)

Fellow to the Center for Children and Families at the Levin College of Law (May 2007-2012)

Member of the Law School Honor Code Committee (2009-2010)

Member of the ICCHP Committee (2009-2010)

Member of DCP Faculty Council (2009-2012)

Member of UF Historic Buildings and Structures Committee (2009-2010)

UF Commencement Marshall (2008-2010)

Ad Hoc Member of the Amicus Committee for the American Planning Association
Fellow for the Center for Heritage Conservation at Texas A&M University (2005-2007).

Professional Affiliations

American Planning Association

Oklahoma Chapter of the APA

Association of Collegiate Schools of Planning

Member of the Illinois Bar

Served as a manuscript and grant proposal reviewer for the following:

Journal of the Community Development Society

Journal of Planning History

US-China Law Review

UF Journal of Law and Public Policy

Journal of Planning Education and Research

National Science Foundation

CONFERENCE PRESENTATIONS:

International Conferences-Refereed Presentations

Jourdan, D., K. Hurd, H. G. Hawkins, and K. Winson-Geideman. Evidence-based Sign Regulation: Regulating Signage on the Basis of Empirical Wisdom. Presented at the AESOP-ACSP Conference in Dublin, Ireland, July 2013.

Nolon, J., Call, C., Murtaza, A, and **Jourdan, D.** Property Rights, Political Drama, and Smart Growth: The Challenges of Sustainable Development in 2011. Presented at the National Conference of the American Bar Association in Toronto, August 2011.

Jourdan, D., Wal-Mart in the Garden District- Does the Arbitrary and Capricious Standard of Review Lessen the Right of Citizens to Participate. Presented at the

International Association of Planning Law and Property Rights, Aalborg, Denmark, February, 2008.

Jourdan, D. and VanZandt, S, Creating Regional Landbanks to Meet Rural Affordable Housing Needs. Presented at the Joint International Conference of the Association of Collegiate Schools of Planning (ACSP) and the Association of European Planning Schools (AESOP), Chicago, IL, July 2008.

Jourdan, D., Should Children Have the Right to Speak for Themselves: The legal rights of youth to participate in national level policymaking. Presented at the International Conference on the Rights of Children, Ghent, Belgium (2006).

Jourdan, D., Grounding Theory: Developing New Theory on Intergenerational Participation. Presented at the Joint International Conference of the Association of Collegiate Schools of Planning (ACSP) and the Association of European Planning Schools (AESOP), Mexico City, Mexico (2006).

Jourdan, D., Planning to Reduce Worry. Presented at the Making Cities Livable Conference, Venice, Italy (2005).

National Conferences

Jourdan, D. Community Aesthetics and Sign Regulations: How far can a city go to prescribe aesthetics?" Presented at the National Signage Research and Education Conference in Cincinnati, OK, October, 2013.

Jourdan, D. and J. Kellaris, Collaborating with City Officials on Urban Signage, Presented at the International Sign Expo, in Las Vegas, NV, April, 2012.

Jourdan, D. Evidence-Based Sign Regulation: Regulating Signage on the Basis of Empirical Wisdom. Presented at the National Signage Research and Education Conference in Cincinnati, OK, October, 2012.

Jourdan, D., Ray, A., and Thompson, L. Relocating from Subsidized Housing in Florida: Are Residents Moving to Opportunity? Urban Affairs Association, Pittsburgh, PA, April 2012.

Frank, K., **Jourdan, D.**, Easley, G., and F. Eddleton. Leveraging community historical identity for climate change adaptation planning. Society for American City and Regional Planning History Conference, Baltimore, MD, November 17-20, 2011.

Frank, K., **Jourdan, D.**, and Obonyo, E. Sea level rise adaptation planning for rural coastal areas in Florida. Initiative on Climate Adaptation Research and Understanding through the Social Sciences: Climate Vulnerability and Adaptation (ICARUS II). May 5-8, Ann Arbor, MI, 2011.

Steiner, R., **Jourdan, D.**, Blanco, A., Mackey, J., Hanley, G., Sucar, V., and Shmaltzuyev, M., Understanding the Connection between Parking Management and Transit Usage: A Case Study of Miami and Fort Lauderdale Central Business Districts. Presented at the Association of Collegiate Schools of Planning (ACSP) Conference, Minneapolis. Oct. 13 – 16, 2011.

Steiner, R., Blanco, A. and **Jourdan, D.**, Impact of Parking Supply And Demand Management on Central Business District (CBD) Traffic Congestion. Presented at the Association of Collegiate Schools of Planning (ACSP) Conference. Minneapolis. Oct. 5 – 10, 2010.

Jourdan, D. Coming Home: The Relocation Effects of Expedited HOPE VI Revitalization Processes. Presented at the Urban Affairs Association, New Orleans, LA, 2011.

Zhao, J. and **Jourdan, D.** Zoning Variance Administration in Practice: Influencing Factors and Trends. Presented at the ACSP Conference in Minneapolis, MN, November, 2010.

Jourdan, D., Valuing Grief: A Proposal to Compensate Relocated Public Housing Residents for Intangibles. Presented at the ACSP Conference, Washington, D.C., October, 2009.

Jourdan, D., Garvin, E. and Stroud, N. Potential Legal Challenges to Form Based Codes: the Miami 21 Test Case. Presented at the IMLA Conference, Miami, FL, October, 2009.

Jourdan, D., Creating Regional Landbanks to Meet Rural Affordable Housing Needs. Presented at the Joint ACSP/AESOP Conference, Chicago, IL, July 2008.

VanZandt, S. and **Jourdan, D.** Landbanking to Meet Affordable Housing Needs. Presented at the National Conference of the American Planning Association Conference, Las Vegas, NV, April, 2008.

Jourdan, D. and Wieters, M. Serious Play: Constructing Learning to Promote Meaningful Dialogue in the Planning Classroom. Presented at the Association of Collegiate Schools of Planning National Conference, Fort Worth, TX, 2006.

Geideman, K. and **Jourdan, D.** Preserving Who's Neighborhood: The Effects of Adaptive Reuse by the Savannah College of Art & Design on Property Value and Community Change in Savannah, Georgia. Presented at the Lincoln Land Institute, Cambridge, MA, 2006.

Jourdan, D., Sentencing Goldilocks. Presented at the Association of Collegiate Schools of Planning National Conference, Kansas City, MO, 2005.

Jourdan, D., Public Housing: Is it Worth Preserving?"Presented at the Association of Collegiate Schools of Planning National Conference, Kansas City, MO, 2005.

Jourdan, D., Grieving for a Lost Home?: A Case Study of How Participation in an Intergenerational Planning Process Lessened the Pre-Relocation Grief Effects of Experienced by the Youth and Adult Residents of the McDaniel Glenn Public Housing Community in Atlanta. Presented at the Association of Collegiate Schools of Planning National, Portland, OR, 2004.

Jourdan, D., Mending Fences: Resolving Neighbor Disputes With Squatter Settlements in Belize. Presented at Pace University, NYC, April 2004.

Jourdan, D., Increasing Youth Participation in the Planning Process. Presented at the Association of Collegiate Schools of Planning National Conference, Baltimore, MD, 2002.

National Conferences – Invited Discussant and/or Moderator

Jourdan, D. Institute for Quality Communities Placemaking Conference in Norman, OK (2013) on the topic of "Healthy, Walkable Communities."

Jourdan, D. Annual Conference of the ACSP in Washington D.C. (2009) on the topic of "Comparative Jurisprudence Relating to Takings and Due Process Law."

Jourdan, D. Joint ACSP/AESOP Conference, Chicago, IL, (2008) on the topic of "Comparative Legal Jurisprudence on Property Rights."

Jourdan, D. Annual Conference of the ACSP in Fort Worth, TX (2006) on the topic of "Researching Wal-Mart."

Jourdan, D. Annual Conference of the ACSP in Kansas City, MO (2005) on the topic of "Research Wal-Mart."

Jourdan, D. Annual Conference of the ACSP in Portland, OR (2004) on the topic of "What Planners Should Know About the Law."

Jourdan, D. Sustainable Campus Planning, Annual Conference of the ACSP in Baltimore, MD (2002).

State Conferences –Presentations by Invitation

Jourdan, D. The New Urbanism: Optimizing Imagination, Creativity, Innovation, and Human Flourishing, Presented at the State Creativity Forum in Oklahoma City, OK, November, 2013.

Jourdan, D. So You Want to Take on Your Sign Code, Presented at the State Conference of the Oklahoma Chapter of the American Planning Association in Tahlequah, OK, October, 2013.

Steiner, R., Blanco, A., and **Jourdan, D.** Parking as a Smart Growth Strategy, Presented at the Florida Chapter of the American Planning Association Conference September 2011.

Silver, C. and **Jourdan, D.** Legal Aspects of Sustainable Development, Presented at the Florida Chapter of the American Planning Association Conference, September, 2011.

Jourdan, D. The Land Use Revolution: The Tea Party's Influence on Planning Process. Presented at the Annual Conference of the Utah Land Institute, Salt Lake City, Utah, November 2011.

Jourdan, D., Measuring the Winds of Change: the Introduction of Qualitative Research Methods in Planning Processes. Presented at the Annual Conference of the Texas Chapter of the American Planning Association, Corpus Christi, TX (2006).

REFERENCES AVAILABLE UPON REQUEST



K. MEGHAN WIETERS, PH.D., AICP

University of Oklahoma, Regional & City Planning, 830 Van Vleet Oval - Gould Hall RM 162
 Norman, OK 73019, kmeghanwieters@ou.edu

EDUCATION

Texas A&M University
Ph.D in Urban Regional Science **2003 – August 2009**
 Dissertation: "Integrating Walking for Transportation and Physical Activity for Sedentary Office Workers In Texas"

University of Texas at Austin
Masters of Science in Community & Regional Planning **1993-1995**
 Thesis: "Building a Community: Transit Options in the Land Development Code and Land Development Process"

Trinity University
Bachelors of Arts **1989-1993**
 Majors: Philosophy, International Studies (concentration on Latin America), Minor: Spanish

TEACHING

Assistant Professor - University of Oklahoma		Fall 2009 – to present
RCPL 5813 Environmental Planning Methods	RCPL 5013 History and Theory of Urban Planning	
RCPL 5513 Subdivision Planning	RCPL 5823 Rural and Regional Planning	
RCPL 5493 Transportation and Land Use Planning	RCPL 5990 Public Health & Built Environment	

PREVIOUS RESEARCH POSITIONS & PRACTICE

Texas A&M University	August 2006
Graduate Assistant	May 2009
Texas Transportation Institute	August 2003 –
Graduate Research Assistant	August 2006
City of Austin - Transportation, Planning & Sustainability Department	August 1998 –
Principal Planner / Senior Planner	August 2003
Capital Metropolitan Transportation Authority	April 1994 –
Land Use/Transportation Planner	August 1998

PUBLICATIONS & REPORTS

Wieters, K M. Office Workers Stuck at their Desks: Built Environment Implications on Walk Trips. Under review – *Health & Place*, April 2014.

Wieters, K M. Advantages of Online Methods in Planning Research: Capturing Walking Habits in Different Built Environments. Under Review -- *Sage Open*, February 2014

Wieters, K M, Kim, J-H, Lee, C. "Assessment of Wearable Global Positioning System Units for Physical Activity Research", *Journal of Physical Activity & Health*, September 2012 (published)

Zietsman, J, Villa, J.C., Forrest, T. L., and Storey, J. M. (2005) "Mexican Truck Idling Emissions at the El Paso - Ciudad Juarez Border Location" Report 473700-00033. Prepared for Southwest Region University Transportation Center.



Zietsman, J., Bubbosh, P., Li, L., Bochner, B., Villa, J. (2005) "National Deployment Strategy for Truck Stop Electrification". Prepared for U.S. Environmental Protection Agency.

Zietsman, J., Bynum, J., Wieters, K., and Bochner, B. (2005) "Reducing School Bus Emissions in Texas". Prepared for Texas Department of Transportation. Proceedings of the 2005 Mid-Continent Transportation Research Symposium.

Wieters, K. and J. Borowiec. (2004) "An Examination of Methods for Increasing On-Airport Revenue". Prepared for Texas Department of Transportation: Aviation Division.

Hard, Ed. et al. (2003) "TxDOT Involvement in the Local Development Process", Report 4429-1.

CONFERENCE & INVITED PRESENTATIONS

Wieters, K, M Wiens, T.O. Bowman. Walkability: A Tool for Promoting Health, Better Planning and Building Community. Presentation at "Planning Oklahoma Together" OKAPA Conference, Tahlequah, OK, October 2013.

Gibson, H and K. Wieters, Talking Green in Red States. Kansas APA Conference, Manhattan, KS October 2013

Wieters, K. Teaching, Learning and Implementing Walkability in Oklahoma City. Oklahoma Service Learning Conference, "The Art of Teaching through Science of Service", Friday November 22, 2013

Wieters, K, D Hess, P Firth. Invited panelist for Pedestrian and Bicycle University Education, Transportation Research Board 82nd Annual Meeting, January 13-17, 2013.

Wieters, K, J Fees, and B McCann. Why should we care about those silly pedestrians and bicyclists? Barriers to Adoption of Complete Streets Ordinances in Cowboy Country. Presented paper at the Association of Collegiate Schools of Planning Conference, Cincinnati, OH, 2012

Wieters, K. Office workers – Sedentary by Practice: How can we integrate physical activity as part of daily routines at work. Oklahoma Public Health Association Conference, Health Equity Caucus, April 2012

Wieters, K M, L Fithian, T McCuen, and C Barrett. Teaching How to Manage Competing Interests: Planners, Architects and Construction Science Students Developing a Subdivision Together. Presented paper at the Association of Collegiate Schools of Planning Conference, Salt Lake City, UT; 2011.

Wieters K M. Methodology in assessing walking behavior for office workers using online survey methods. Presented paper at the Association of Collegiate Schools of Planning Conference. Minneapolis, MN; 2010.

Lee C, Wieters M, Giusti C, Lord D. The Environment and Obesity among Latino Adults: A case study exploring the roles of built environments in promoting physical activity and reducing obesity among colonia residents. Inter-University Program for Latino Research. University of Notre Dame; 2010.

Wieters KM, Kim J-H, Lee C. A walk to grab a cup of coffee: Assessment of available research instruments for measuring physical activity. Presented paper at the Association of Collegiate Schools of Planning Conference Chicago, IL; 2008.

Jourdan, D., Wieters, K. "Serious Play: Constructing Learning To Promote Meaningful Dialogue In The Planning Classroom". Co-Presented paper at the Association of Collegiate Schools of Planning Conference. Milwaukee, WI; 2006.

INVITED LECTURES

University of Oklahoma
Department of Geography & Sustainability, Spring Colloquium
"Walking & Biking: Active Transportation and the Built Environment" January 2014

Kansas State University – Big 12 Fellowship

- The messiness of random sampling spatially Oct. 21, 2013
- Watershed Functions & Impacts from Development Oct. 21, 2013
- Creating an audit tool and operationalizing data Oct. 23, 2013
- Bicycle Facility Design & Planning Oct. 23, 2013
- Observational Methods Oct. 23, 2013
- Pedestrian Planning and Design: How does the environment we live in impact our lives? Oct. 2013
- Office workers – Sedentary by Practice: How can we integrate physical activity as part of daily routines at work – Formal presentation to faculty and students Oct. 2013

Department of Biostatistics and Epidemiology College of Public Health,
University of Oklahoma Health Sciences Center

- Planning, Built Environment, and Public Health: How does the environment we live in impact our lives? March 11, 2013

GRANT FUNDING

Received Ed Cline Faculty Development Award (\$1450), Spring 2014
Received Big 12 Faculty Fellowship Program Award (\$2500) June 2013
Received College of Architecture IT recipient (\$3450) July 2013
Sooner Parents Mini-Grant Funding (\$500) for student mentoring –prepared and submitted to assist RCPL Student Planning Association July 2013
Received Junior Faculty Research (\$7,000) for summer research on rural planning and physical activity opportunities. University of Oklahoma, Summer 2012
Robert Wood Johnson Active Living Research Dissertation Grant (\$25,000), Texas A&M University, 2007

SERVICE

University-Level Service

- Advisory Committee Course Management Systems (ACCMS) Spring 2013

College-Level Service

- Graduate Liaison for Regional & City Planning Division (Fall 2013 – present)
- Graduate Research & Curriculum Committee (Fall 2013 – present)
- RCPL orientation (Fall 2010- present)
- Search committee for new RCPL hires, new LA hire (Summer 2011, Summer 2012, Spring 2013, Spring 2014)
- IT Committee (member since 2012), Chair (Fall 2013-Spring 2014)
- Model Shop Committee (member since 2012-Fall 2013)
- RCPL website (2011- present)
- GHGI committee (Gould Hall Green Initiative) (Fall 2011)
- Co-hosting and arranging guest seminar: Dr. Chanam Lee – "The Built Environment and Disparities in Physical Activity", December 2012.

SERVICE

State-level / City-Level Service

- President – Health Equity Caucus, subgroup of Oklahoma Public Health Association
- APA/AICP member
- Bicycle Advisory Committee, City of Norman – Committee member (Spring 2013 – 2016)

National-Level Service

- Secretary/Treasurer of Faculty Women’s Interest Group (FWIG), committee under Association of Collegiate Schools of Planning (ACSP).
- CDC Weight of the Nation Conference planning, Built Environment & Transportation Subcommittee
- Reviewer for Journal of Physical Activity and Health

Bryce C. Lowery, PhD

Contact

University of Oklahoma
 College of Architecture - Division of Regional and City Planning
 830 Van Vleet Oval
 Gould Hall 255
 Norman, OK 73019
 (405) 325-8953
 bryce.c.lowery@ou.edu

Academic Experience

Assistant Professor	2014 - present
<i>College of Architecture – Division of Regional and City Planning</i>	
<i>University of Oklahoma – Norman, OK</i>	

Education

Doctor of Philosophy – Policy, Planning, and Development	2014
<i>Sol Price School of Public Policy</i>	
<i>University of Southern California - Los Angeles, CA</i>	
<i>Dissertation: Social Construction of the Experience Economy: The spatial ecology of outdoor advertising in Los Angeles</i>	
Jack Dyckman Award - Best Dissertation in Planning & Development	
Committee:	David Sloane, PhD Tridib Banerjee, PhD Pierrette Hondagneu-Sotelo, PhD (Sociology)
Master of Landscape Architecture	2008
<i>College of Environmental Design</i>	
<i>California State Polytechnic University - Pomona, CA</i>	
Master of Science – Environmental Policy and Behavior	2000
<i>School of Natural Resources and Environment</i>	
<i>University of Michigan - Ann Arbor, MI</i>	
Bachelor of Arts – Economics and Environmental Studies	1996
<i>Dornsife College of Letters, Arts, and Sciences</i>	
<i>University of Southern California - Los Angeles, CA</i>	

Publications

The Prospects and Problems of Integrating Sketch Maps with Geographic Information Systems (GIS) to Understand Environmental Perception: A case study of mapping youth fear in Los Angeles gang neighborhoods	2014
<i>Environment and Planning B: Planning and Design</i> 41(2): 251-271. Curtis, J.W., E. Shiao, B. Lowery, D. Sloane, K. Hennigan and A. Curtis	
The Prevalence of Harmful Content on Outdoor Advertising in Los Angeles: Land use, community characteristics, and the spatial inequality of a public health nuisance	2014
<i>American Journal of Public Health</i> 104(4): 658–664. Lowery, B.C. and D.C. Sloane	

Presentations

**From Regional Center to Sign District:
Regulating outdoor advertising in Los Angeles, 1881-2012**
Association of Collegiate Schools of Planning – Philadelphia, PA – November 1, 2014
 with David Sloane

- Do Farmers' Markets Improve the Availability of Healthy Foods for All Communities?**
A case study of 19 markets in Los Angeles.
Association of Collegiate Schools of Planning – Philadelphia, PA – October 30, 2014
 with Denise Payan, LaVonna Blair Lewis and David Sloane
- If You See Something, Say Something:**
Community response (and non-response) to outdoor advertising regulation in Los Angeles
Council of Educators in Landscape Architecture – Austin, TX – March 29, 2013
- The Spatial Ecology of Outdoor Advertising in Los Angeles:**
The unjust impact of the commercial landscape
Association of Collegiate Schools of Planning – Cincinnati, OH – November 3, 2012
 with David Sloane
- Employing Social Network Analysis to Understand the Formation of Sustainable Social Capital**
Council of Educators in Landscape Architecture - Tucson, AZ – January 15, 2009

Teaching Experience

- Assistant Professor**
University of Oklahoma – College of Architecture 2014-present
 Subdivision and Site Planning (graduate)
 Computer Mapping and GIS in Planning (graduate)
 Comprehensive Planning Studio (graduate)
- Lecturer**
University of California, Irvine – School of Social Ecology 2014
 Design and Planning Graphics (graduate)
- Teaching Assistant**
University of Southern California - Sol Price School of Public Policy 2008-2013
 Citizenship and Public Ethics (undergraduate)
 History of Planning and Development (undergraduate)
 Planning History and Urban Form (graduate)
 Smart Growth and Urban Sprawl (graduate)
 Urban Context for Policy and Planning (undergraduate)
 Urban Planning and Development (undergraduate)
 Urban Planning and Social Policy (graduate - online)
- Graduate Student Instructor**
University of Michigan - School of Natural Resources and Environment 1999-2000
 Introduction to Environmental Policy (undergraduate)
 Introduction to Natural Resource Management (undergraduate)

Other Experience

- Research Assistant** 2009 - 2014
Sol Price School of Public Policy - University of Southern California
- Editorial Assistant** – Terry L. Cooper 2011 - 2012
The Responsible Administrator;
An Approach to Ethics for the Administrative Role, 6th Edition. 2012.
- Research Associate** 2005 - 2006
Lodestar Management/Research Inc. (now Harder+Company)
- Project Coordinator** 2004 - 2005
Perinatal Advisory Council of Los Angeles County
- Community Researcher** 2002 - 2004
Children's Planning Council - Los Angeles County Board of Supervisors
- Assistant Director** 2000 - 2002
Health DATA Program - UCLA Center for Health Policy Research

Curriculum Coordinator <i>UCLA Labor, Occupational, Safety and Health Program</i>	2000
Research Coordinator <i>The Wild Thornberry's Television Series</i> <i>Klasky-Csupo Incorporated/Nickelodeon Studios</i>	1996 - 1998
<i>Activities and Service</i>	
Committee Member <i>University of Oklahoma</i> Anna Siprikova – Master of City and Regional Planning Thesis	2014 - present
Reviewer <i>American Journal of Public Health</i> <i>Council of Educators in Landscape Architecture</i>	
Member <i>American Planning Association</i> <i>American Public Health Association</i> <i>American Society of Landscape Architects</i> <i>Association of American Geographers</i> <i>Environmental Design Research Association</i>	
Member <i>Creating/Making Facilities Coordination Team</i> <i>University of Oklahoma – College of Architecture</i>	2014 - present
Member <i>Billboard and Visual Landscape Visioning Group</i> <i>City of Los Angeles</i>	2013
Area Chairperson <i>Hollywood Hills West Neighborhood Council – Area 2: Cahuenga Pass</i> <i>City of Los Angeles</i>	2010 - 2012
Vice-Chairperson	2010 - 2012
Appointee <i>Cahuenga/Ventura Corridor Specific Plan Review Board</i> <i>City of Los Angeles - Council District 4</i>	2008 - 2012
President	2011 - 2012
Member <i>Cahuenga Pass Property Owners' Association</i>	2000 - 2012

Byron DeBruler

DeBruler, Inc.

8200 NE 139th Street

Edmond, OK 73103

United States of America

Phone: 405/396-2032 Cell Phone: 405/202-1610

BACKGROUND SUMMARY

Executive Manager with extensive experience in public sector resource design, management and evaluation. Knowledge and skills include: structuring and design of state and local service programs and initiatives, developing written proposals for project financing, identifying community economic development resources and training.

EXPERIENCE

DeBruler, Inc.

Vice President, Oklahoma City, August 2001 to Present

Provide services including:

- ✓ Researching public and private resources and preparing applications for financial assistance in response to client requests for economic and community development projects.
- ✓ Technical assistance to nonprofits and units of local government regarding federal and state resources and structuring project-beneficial partnerships; preparing strategic and business plans for public and private sector entities.
- ✓ Group facilitation services.
- ✓ Technical training for nonprofits and units of local government regarding federal and state financial assistance programs. Conducting organizational assessments and developing capacity building curriculums.

Oklahoma Housing Finance Agency

Team Leader, Housing Development Team, Oklahoma City, July 1998 to July 2001

Provided direct supervision and oversight of sixteen staff engaged in the administration of multiple federal and state affordable housing program resources.

While employed by the agency:

- ✓ Reorganized state's Single Family Mortgage Revenue Bond, Low-income Housing Tax Credit, HOME Investment Partnerships and Housing Trust Fund Programs into a single work unit.
- ✓ Streamlined Low-income Housing Tax Credit Program administrative rules to provide for market responsive design flexibility.
- ✓ Streamlined affordable housing resources by developing a singular application package and process for the agency's affordable housing development resources and established e-information network.
- ✓ Facilitated the development of working partnerships between the state's nonprofit and for-profit housing development organizations and agency's mortgage revenue bond lenders.
- ✓ Financed the development of affordable housing by leveraging public sector development funds with private investments.

- ✓ Facilitated legislative task force on rural affordable housing issues and devised legislative and programmatic actions to spur rural development.
- ✓ Developed, financed and implemented the state's first statewide affordable housing market analysis in partnership with a major university center.
- ✓ Drafted enabling legislation, capitalized and implemented state's Housing Trust Fund.

Oklahoma Department of Commerce

Program Manager/Department Head, Oklahoma City, March 1988 to July 1998

- ✓ In response to market-based demand, directed a team of professional agency staff with diverse skills, in the redesign of the state's HOME Investment Partnerships Program from primarily rehabilitation services to the production of rural affordable housing units.
- ✓ Led HOME Program administrative team in the relocation of the Program from its state agency environment to the Oklahoma Housing Finance Agency, a public trust.
- ✓ Leveraged HOME Program development resources with other public and private debt capital to finance the development of rural affordable housing statewide.
- ✓ Formulated and implemented a legislative agenda to enact and capitalizing the state's Housing Trust Fund.
- ✓ Provided daily oversight and administration for several state administered federal programs including: U.S. Department of Energy State Energy Program, Community Development Block Grant, Home Investment Partnerships, Rental Rehabilitation, Solar Energy and Energy Conservation Bank, and State Appropriated Funds for regional councils of government.

City of Oklahoma City January 1984 to February 1988

Division Head, Code Inspections Division/Department of Environmental Services

Assistant Superintendent, Utility Services Division/Water Department

Administrative Assistant, Street Maintenance Division, Public Works Department

Management Intern, Personnel Department

EDUCATION

Masters of Public Administration, University of Oklahoma 1983

Bachelor of Arts Political Science, University of Oklahoma, 1979

