

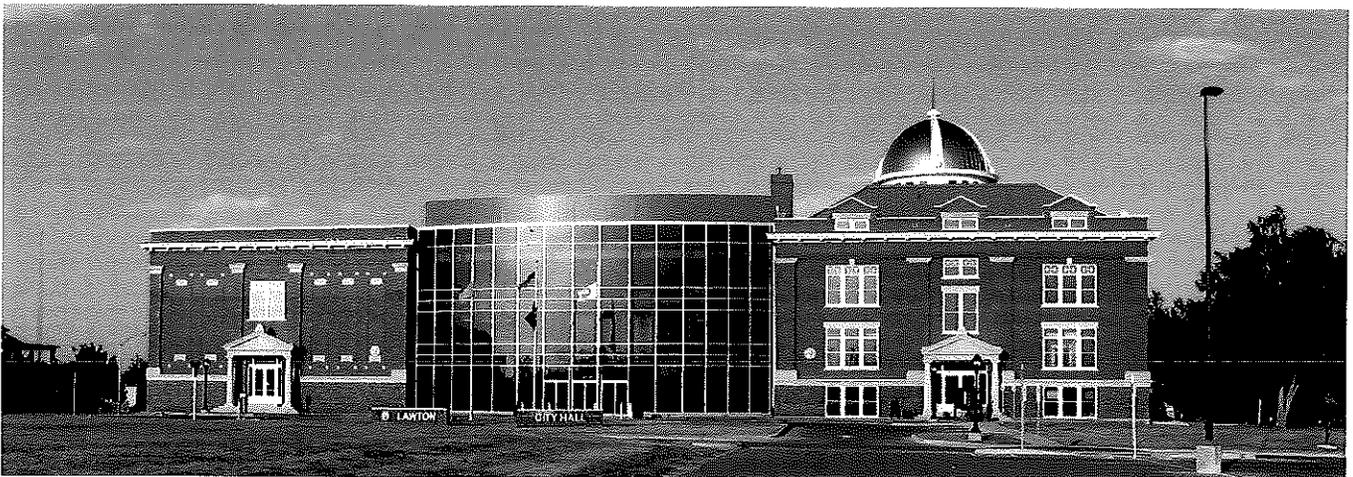
CITY OF LAWTON



CONSOLIDATED FIVE-YEAR ACTION PLAN

For

Federal Fiscal Years (FFYs) 2016-2020



Prepared by
Housing & Community Development
City of Lawton

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SECTION I
INTRODUCTION

Purpose

This Consolidated Plan implements the U.S. Department of Housing and Urban Development's (HUD) consolidated planning process under the purview of 24 CFR Part 91, et al., Consolidated Submission for Community Planning and Development Programs; Final Rule dated January 5, 1995 (updated through February 6, 2006). The Consolidated Plan integrates into a single plan four of HUD's Community Planning and Development (CPD) formula programs: Community Development Block Grants (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grants (ESG), and Housing Opportunities for Persons with AIDS (HOPWA).

The Consolidated Plan serves as Lawton's application for federal funds under HUD's formula grant programs and as a planning document for the city's community planning and development programs, as well as for the city's housing programs. It also provides a strategy for implementing the HUD programs and an action plan that is the basis for assessing the program's performance.

A Consolidated Plan approved by HUD is a prerequisite for eligibility for funding under a variety of other HUD programs. HUD approval of this consolidated plan opens opportunities for the various organizations in the city to qualify for additional funding under the following formula grant programs (Update the programs UP Sec. 91.2):

- a. The Community Development Block Grant (CDBG) Program (24 CFR Part 570);
- b. The Emergency Shelter Grants (ESG) Program (24 CFR Part 576);
- c. The HOME Investment Partnerships (HOME) Program (24 CFR Part 92); and
- d. The Housing Opportunities for Persons With AIDS (HOPWA) Program (24 CFR Part 574).

The following programs require either that the jurisdiction receiving funds directly from HUD have a consolidated plan that is approved by HUD or that the application for HUD funds contain a certification that the application is consistent with a HUD-approved consolidated plan:

- a. The HOPE I Public Housing Homeownership (HOPE I) program (24 CFR Subtitle A, Appendix A);
- b. The HOPE II Homeownership of Multifamily Units (HOPE II) program (24 CFR Subtitle A, Appendix B);
- c. The HOPE III Homeownership of Single Family Homes (HOPR III) program (24 CFR Part 572);
- d. The Supportive Housing for the Elderly (Section 202) (24 CFR Part 889);
- e. The Supportive Housing for Persons with Disabilities program (24 CFR Part 890);
- f. The Supportive Housing Program (24 CFR Part 583);
- g. The Single Room Occupancy Housing (SRO) program (24 CFR Part 882, Subpart H);
- h. The Shelter Plus Care program (24 CFR Part 582);
- i. The Community Development block Grant program – small Cities (24 CFR Part 570, Subpart F);

- j. HOME program reallocations;
- k. Revitalization of Severely Distressed Public Housing (Section 24 of the United States Housing Act of 1937, (42 U.S.C. 1437 et seq.));
- l. Hope for Youth: Youthbuild (24 CFR Part 585);
- m. The John Heinz Neighborhood Development program (24 CFR Part 594);
- n. The “Lead-Based Paint Hazard Reduction Program (42 U.S.C. 4852(o));”
- o. Grants for Regulatory Barrier Removal Strategies and Implementation (Section 1204, Housing and Community Development Act of 1992 (42 U.S.C. 12705c)); and
- p. Competitive grants under the Housing Opportunities for Persons with Aids (HOPWA) program (24 CFR Part 574).

Local applicants for the HUD programs outlined above must obtain a Certification of Consistency with the Consolidated Plan from the City of Lawton. An application will be considered consistent if the activities outlined in the proposal are identified priorities outlined in this Consolidated Plan and/or the annual Consolidated One-Year Action Plan and the targeted location is consistent with the geographic areas identified in the Consolidated Plan.

Goals and Objectives

The overall goals of the community planning and development programs covered by the Plan are to develop and sustain in Lawton a viable community by providing decent housing and a suitable living environment and by expanding economic opportunities for all citizens but principally for low- and moderate-income persons. The Plan seeks to accomplish these goals by extending and strengthening partnerships within the community among all levels of government and the private sector, including profit and non-profit organizations, in community and economic development and the development of affordable housing throughout the community.

The overall objective of the Consolidated Plan is to integrate economic, physical, environmental, community, and human development in a comprehensive, coordinated fashion to meet the needs of the community.

Consolidated Plan Development

Lead Agency

Housing and Community Development (HCD), a division of the Community Services Department, is the lead agency for coordination and development of the Consolidated Plan. For that purpose, HCD is responsible to provide community leadership, to plan and coordinate the consolidated planning process, and to develop the Consolidated Plan for submission to HUD. Points of contact for the consolidated planning process are the Assistant Director, HCD and the Federal Grants and Housing Programs Coordinator located at:

City of Lawton
Housing and Community Development (HCD)
1405 SW 11th Street
Lawton, Oklahoma 73501
Telephone (580) 581-3347

Consolidated Planning Process

This Consolidated Plan was developed in accordance with the City of Lawton Citizen Participation Plan. The principle sources of data for development of the consolidated plan were Lawton's current Consolidated Plan and a wide range of other local profit and non-profit organizations. The latest Lawton Community Needs Assessment Survey was completed in 2005. Funds were not available to assist the community in conducting another Community Needs Assessment. The results of the 2005 survey do not necessarily reflect the wants and needs of the community at this time. The HCD staff, using the Community Needs Assessment as a basis, in two (2) separate public hearing before the City Planning Commission and the Lawton City Council, developed new top ten priorities and realigned some of the standard priorities found in the Consolidated Plan which provide the basis for development of the priorities established in this Consolidated Plan. Census data for the City of Lawton was updated as appropriate with information provided by the American Community Survey (ACS) and other qualified sources. Additionally, information obtained through consultations with appropriate public and private agencies was incorporated as appropriate. Up-to-date housing data was not available and staff was forced to use the census data currently available which has not changed significantly from the last Consolidated Plan.

Consultations

Development of the Consolidated Plan resulted from consultation and coordination with appropriate public and private agencies throughout the development stages of the consolidated planning process and included issues concerning non-housing community development needs. The process included close consultation with appropriate agencies of the State of Oklahoma and Comanche County, as necessary, to address and coordinate efforts in areas and on issues of common interest or concern. Coordination between appropriate Lawton agencies and departments was emphasized.

Consultation and coordination with human and social service agencies was accomplished with particular emphasis on consultation with appropriate public and private agencies regarding the housing needs of children, elderly persons, persons with disabilities, homeless persons, and other significant categories of Lawton residents.

The Housing Authority of Lawton, the local public housing agency (PHA), and other assisted housing agencies were consulted to identify and address the needs for assisted housing and housing for homeless persons and their families. The PHA's planned grant program activities as well as the activities of other housing organizations were coordinated and integrated with community wide housing efforts and included in this plan.

Citizen Participation (Summary)

In order to have a consolidated strategy and plan which is the result of effective citizen participation process, the City of Lawton has adopted its Citizen Participation Plan for Housing and Community Development in accordance with 24 CFR Part 92.

Participation

The City of Lawton encourages citizens especially low-, very low-, and extremely low-income residents where housing and community development funds may be spent to participate in the consolidated planning process. Minorities, and non-English speaking persons, as well as persons with mobility, visual or hearing impairments may contact the City of Lawton at (580) 581-3347 to receive assistance in participating in all stages of the process.

Access to Meetings

The City of Lawton will provide adequate, timely notification so citizens can attend local meetings and public forums.

Access to Information

Citizens, public agencies, and other interested parties, including those most affected will have the opportunity to receive information, review and submit comments on any proposed submission concerning the amount of funds available, including the estimated amount proposed to benefit low-, very low-, and extremely low- income residents by public notice and through public hearings and committee meetings. As a general rule the City of Lawton's policy is to avoid, or at least minimize, the displacement of citizens as a result of the use of CDBG and HOME program funds. In exceptional circumstances where displacement is necessary, the City has adopted City Council Policy 7-2, Residential Anti-displacement and Relocation Assistance Plan, which complies with 49 CFR Part 24, Uniform Relocation Assistance and Real Property Acquisition for Federal and Federally Assisted Programs, and 24 CFR Part 42, Displacement, Relocation Assistance, and Real Property Acquisition for HUD and HUD-Assisted Programs, and the pertinent program regulations. Citizens and citizen groups can review housing and community development records from the past five years at HCD at 1405 SW 11th Street.

Technical Assistance

Technical assistance will be provided as necessary. Groups requesting technical assistance must demonstrate that they are representative of low-, very low-, and extremely low-income residents. Requests for technical assistance must be in writing and must be received at 1405 SW 11th Street.

Public Hearings

A summary of citizen participation activities and citizen's comments are provided at Appendix F of the City of Lawton Consolidated One-Year Action Plan for FFY 2010.

SECTION II
COMMUNITY PROFILE

Background

The City of Lawton was founded in August 1901 on the southwestern prairies of Oklahoma. Located just south of the Fort Sill Military Reservation, Lawton is in the heart of southwest Oklahoma approximately 95 miles southwest of Oklahoma City, the state capital. The center of Southwest Oklahoma's predominantly rural and farming area, Lawton is the County Seat of Comanche County and the state's fifth largest city in Oklahoma. The 2010 Census estimated the population of the city was 96,867 including.

Lawton provides the economic engine for Southwest Oklahoma with a local economy of just under \$4 billion dollars annually. Lawton is the major regional center for Southwest Oklahoma and serves as the prominent shopping, medical, recreational, and educational center for the region. It is also a retail and distribution center for the area's cattle, dairy, and agricultural industries. Additionally, Lawton is home to various manufacturing and processing companies. Working closely with the Lawton - Fort Sill Chamber of Commerce and Industry (LCCI) and Fort Sill, the city continually strives to expand existing industries and acquire new ones.

The major employers in the Lawton Metropolitan Statistical Area (MSA) include: Fort Sill, Goodyear Tire and Rubber Company, Comanche County Memorial Hospital, the City of Lawton, Lawton Public Schools, Wal-Mart stores, Target, Academy, Dick's Sporting Goods, Cameron University, Southwestern Medical Center, Techrizon (formerly Telos), a local defense firm, Bar S Foods, Geo Correctional Facility, Chempac, and Republic Paper Company. Fort Sill and Goodyear, the largest employers in the MSA, have the most significant economic impact on the area.

Fort Sill, a relatively large U.S. Army post, is the area's largest employer. Long known as the Field Artillery School and Training Center, it is recognized as the "Home of the Field Artillery". With the changes from the Base Realignment and Closure Commission (BRAC), Fort Sill has welcomed the Air Defense Artillery School and the 31st Air Defense Artillery Brigade to support the school from Fort Bliss in El Paso, Texas. This shift has led to the post now being known as the "Home of the Fires Center of Excellence". The post is renowned worldwide for its training and combat development functions. The Field Artillery Center and School provides basic and advanced training and schooling for officers and enlisted service members of U.S. and allied armed forces. Fort Sill is the first "Center of Excellence" to be established by the United States Army Training and Doctrine Command (TRADOC) and is now called the "Fires Center of Excellence". The 212th Field Artillery Brigade moved from Fort Sill to Fort Bliss, and the 75th Field Artillery Brigade and the 214th Field Artillery Brigade has been transformed into Fires Brigades. These new additions to Fort Sill resulted in a total gain of 3,000 troops, which brought approximately 10,000 more people to the City of Lawton. With workforce strength of over 25,000 military and civilians, Fort Sill will continue to provide the local community a combined annual payroll in excess of \$100 million. Fort Sill's overall economic impact on the Lawton MSA is approximately \$2.2 billion annually. Of major concern to the City of Lawton is the continuing trend downward in census population statistics used by HUD, when all local indicators point to a burgeoning population. Permanent housing and rental housing availability are up and traffic and sales tax revenues are up (in a down economy). Yet, our population

estimate increased by 4,110.

Goodyear Tire and Rubber Company is the community's second largest employer with 2,400 workers. Goodyear has expanded by adding approximately 250,000 square feet for modernization and production purposes. This expansion is not expected to create any new jobs in the city. Due to the harsh economy Goodyear had previously cut back production, but it is now back at pre-recession production levels. In the past two years there have been 300 new jobs, but most of these jobs were filling positions that had been lost due to normal business attrition. Goodyear's overall economic impact on the Lawton MSA increased to approximately \$1.2 billion annually.

Demographics

General

Any assessment of housing and community development needs requires analysis of the characteristics of the population based on demographic projections for the area. Measures of the size and density of future populations provide information necessary to anticipate the demand for housing, municipal services, and infrastructure. The density of population is considered low in comparison to many cities in the United States. This section addresses the size and composition of the local population and the surrounding community. Additionally, the discussion addresses the distribution of the population within the community. It will address population size, age and gender makeup, race/ethnic mix, and households, as well as low-income and racial/ethnic concentrations in the community.

Most demographic data used in this plan is from the U.S. Census Bureau's 2010-2014 American Community Survey (ACS) 5-Year Estimates or the 2014 Estimates. The demographic projections, however, are from the Oklahoma State Data Center, a division of the Oklahoma Department of Commerce (ODOC) and are approximated in five-year increments through the year 2030. These State Data Center projections have been endorsed by the Lawton City Council, Lawton Metropolitan Area Planning Commission (LMAPC), Lawton Metropolitan Area Transportation Policy Committee, Oklahoma Department of Transportation (ODOT), and the Federal Highway Administration. However, it is also instructive to look at other useful projection methods to analyze the characteristics of Lawton's population from different perspectives. In addition to these sources, this plan relies heavily on Lawton's 2030 Land Use Plan to ensure statistical consistency in the needs analysis and development of the plan.

It is important to note that Lawton annexed Fort Sill in 1998. That addition to the population impacts all of the demographic relationships in the community. The demographics that follow are based on data from the 2010 Censuses, 2010-2014 American Community Survey (ACS) 5-Year Estimates, and 2014 American Community Survey 1-Year Estimates.

Population

The Lawton Metropolitan Statistical Area (MSA) encompasses the whole of Comanche and Cotton Counties. The 2010 Population Estimates of U.S. Census Bureau's American Community Survey (ACS) estimates the population of the MSA at. The population of Lawton was estimated at 90,091, including the population from Fort Sill, which was annexed in 1998. Overall, these estimates indicate the populations of the MSA and Lawton. The Fort Sill permanent party population was 8,287 in FY 2008 according to The Perspective: Change Is Good, Fort Sill Economic Impact Book. The Oklahoma State Data Center estimates the Year 2014 population for Lawton to be 97,788 persons. The population of Comanche County as a whole is estimated at 126,512. Table 2-1 illustrates the population projections for Lawton-Fort Sill, and Comanche County according to the Oklahoma State Data Center. The projections for Lawton - Fort Sill as presented by the Oklahoma State Data Center projects steady population growth through the year 2035.

Table 2-1
"Population Projections – Lawton MSA"

Year	Comanche County
2015	126,512
2020	128,373
2025	130,233
2030	132,094
2035	133,210

Source: Oklahoma State Data Center – Oklahoma Department of Commerce

Age

The ACS estimates reveal changes in trends in the age composition of Lawton's population. Table 2-2 (on the following page) compares age by year and age group.

The ACS changed the format of the age brackets for ages five (5) to 44 years of age, expanding them from four (4) to six (6) age brackets. However, the table below is adjusted to meet the format of the 2010 Census. The 2010 Census indicated there were people between ages of 5 and 44 making up percent of the population. The ACS 1-Year estimates indicates this bracket fell to people, and the bracket comprises a lower percent of the total population, percent. The population from ages 5-44 has.

From 2000 to 2010 the age groups 45-54, 55-59 and 75 to 84 increased the most, while ages above 65 decreased from the previous census period. The age bracket for 65 and over increased approximately 8.78 percent,. Additionally, the 75 to 84 group grew at a rate of 0.9 percent compared to 20.0 percent 1990s. As the table indicates, the aging of the population persists. The aging population provides evidence that Lawton continues to be a favorable retirement community for military and local civilian residents.

Table 2-2
"Age Composition in Lawton"

Age	1990	% Change 1990 to 2008	2008	% Change 2008 to 2010	2010
0 to 4	7,354	9.7	8,069	-3.8	7,760
5 to 24	26,316	11.2	29,263	6.4	31,144
25 to 44	26,344	-6.4	24,669	18.4	29,217
45 to 54	7,076	78.6	11,512	0.3	11,545
55 to 59	3,197	26.0	4,029	12.5	4,532
60 to 64	2,858	22.8	2,206	61.7	3,568
65 to 74	4,370	-2.3	4,269	13.4	4,840
75 to 84	2,324	33.8	3,110	0.9	3,138
65 +	7,681	8.9	8,364	8.8	9,101
85 +	696	41.5	985	14.0	1,123
Median Age	29	0.00	29.8		

Source: CHAS Datebook – 1990, U.S. Bureau of the Census, Censuses 1990 and 2000; -2008 ACS 1-Year Estimates

Race/Ethnicity

The presence of Fort Sill results in a broad diversification of the racial and ethnic composition of the community to a greater extent than normally found in many other cities in Oklahoma. Table 2-3 shows the racial composition of the population according to the 2010 ACS estimate. All population tables show variations of change for each race. The percentage of Whites decreased from 70.8 percent to 60.3 percent of the population, also the percentage of Blacks or African Americans decreased from 23.1 percent to 21.4 percent.

Table 2-3
"Race Composition - Estimate"

Race	Lawton	Percentage of the Population
White	59,617	60.3
Black or African American	21,158	21.4
American Indian and Alaska Native	4,647	4.7
Asian	2,571	2.6
Native Hawaiian and Other Pacific Islander	297	0.3
Some other race alone	10,579	10.7

Source: U.S. Census Bureau, 2008 ACS 1-Year Estimates

Table 2-4 reflects the percentage changes in various population groups between the 2000 and 2010 Census.

Table 2-4
 "Changes in Race/Ethnic Composition

Race/Ethnicity	2000 Census (# of Persons)	2010 ACS (# of Persons)	Percent Change
White alone	56,897	59,617	-2.8
Black or African American alone	21,388	21,158	-1.1
American Indian and Alaskan Native	6,613	4,647	- 29.7
Asian alone	1,639	2,571	56.9
Native Hawaiian and Other Pacific Islander alone	636	297	-53.3
Some other race alone	3,675	3294	- 10.4
Two or more races	4,571	4,746	3.8
Hispanic or Latino	8,719	12,205	40.0

Source: U.S. Census Bureau, Census 2000; 2008 1-Year Estimates

Table 2-3 shows the composition of the population based on ethnicity and race. Persons of Hispanic or Latino origin increased slightly to 12.4 percent of the total population in 2010 from 10.4 percent in 2008. There was a sharp 88.65% increase in the Asian population in Lawton from 1,639 in 2000 to 3,092 in 2008, but persons of Asian origin only consist of 3.5% of the total population.

Table 2-5
 "Ethnicity Composition"

Ethnicity & Race	Lawton	Percentage
Not Hispanic or Latino:	84,663	87.4%
Hispanic or Latino:	12,205	12.6%
Total Population	88,142	100.0%

Source: U.S. Census Bureau, 2008 ACS 1-Year Estimates

Because of their association and proximity to Fort Sill, Lawton and Comanche County comprise one of the state's most diverse racial and ethnic populations. As mentioned above, 21.2 percent of Lawton's population is Black or African American – which is the largest percentage of Black or African American population for a city or county in the state. 2010 ACS figures continue to display that the City of Lawton and the surrounding county, houses the melting pot of the state.

Households

While the population increased during the decade, that increase was accompanied by a

5.6 percent increase in the number of households. There are 34,320 total households according to the 2010-2014 ACS compared to 32,423 in 2010. Between 2010 and 2014 the average household size from 2.45 to 2.60 in the 2010 Census and 2.66 in the 1990 Census. Lawton's household and family structure have also changed as reflected in the rising number of single parent heads of household and the increasing number of elderly households. The Household Population Data shown in Table 2-6 will vary slightly from the most current data due to the fact the data below was taken from the 2010-2014 ACS as opposed to the 2014 1-year ACS estimates.

Table 2-6
"Household Population Data - Lawton"

Households	Households 2000	% of Total Households	Households 2006-2008 ACS	% of Total Households
White	21,178	66.6%	21,874	67.5%
Black or African American	6,825	21.5%	6,288	19.4%
American Indian and Alaskan Native	1,059	3.3%	1,390	4.29%
Asian	663	2.1%	678	2.1%
Some other race	986	3.1%	1,007	3.1%
Two or more races	941	2.97%	1,186	3.6%
Total All Households	31,778	100.0%	32,423	100.0%
Hispanic or Latino Ethnicity	2,276	7.2%	2,839	7.0%
* No 2008 1- year ACS estimates. The number of sample cases is too small.				

Source: U.S. Census Bureau, Census 2000; 2006 – 2008 ACS 3-Year Estimates

Table 2-7 shows the change in types of family households with children under eighteen years of age living in the same housing unit. While the number of single parent families increased significantly, the number of married couple households fell significantly.

Table 2-7
"Change in Families with Children by Type Family"

	1990 Census (Households)	Percent Change	2000 Census (Households)	Percent Change	2010 ACS (Households)
Married Couple	8,916	-4.4%	8,528	79.3%	15,293
Single Parent	3,199	27.3%	4,071	8.18%	4404

Source: U.S. Census Bureau, Censuses 1990 and 2000; 2006 – 2008 ACS 3Year Estimates

Single parent heads of household with one or more persons under eighteen years of age living in the same housing unit increased significantly between the 2000 and 2010 Census and. Male single parent heads of household increased by approximately 2.7% percent, while female heads of household increased significantly by approximately 9.9% percent. However, 85.5% percent of single parents are female. Of all households in Lawton, approximately one out of six is a single parent head of household with children under eighteen years old. This represents a significant number of families, since not all households in Lawton have children. Table 2-8 illustrates the single parent composition by gender.

Table 2-8
"Changes in Single Parent Heads of Households by Gender"

	1990 Census (Households)	Percent Change	2000 Census (Households)	Percent Change	2010ACS (Households)
Male Head of Household	378	97.9%	748	127%	1698
Female Head of Household	2820	17.8%	3,323	66.2%	5,526

Source: U.S. Census Bureau, Censuses 1990 and 2000; 2006 – 2008 ACS 3-Year Estimates

Group Quarters

Group quarters include all persons not living in households. This may be institutionalized persons or persons living with other unrelated persons. Because of changes in the categorical structure between censuses, it is difficult to compare the group quarter category. Nevertheless, the total group quarter population in Lawton increased approximately 3.6% percent between 2000 and the end of 2010 following a 500 percent increase between 1990 and 2000. Much of this increase results from the increase of inmates of institution resulting from the Geo Correctional Facility and the inclusion of Fort Sill. This increase is reflected in Table 2-9.

Table 2-9
"Group Quarters Population - City of Lawton"

	1990 Census	Percent Change	2000 Census	Percent Change	2010ACS
Total	1,957	500%	9,784	3.67%	10,143

Source: U.S. Census Bureau, Census 1990 and 2000; 2006 – 2008 ACS 3-Year Estimates

One reason for the significant increase in the group quarter population may be due to the method of survey. Revision to the population categories since the 1980 Census may have resulted in the collection of more accurate data. It is clear that the presence of the Geo Correctional Facility and Fort Sill's housing for troops in Lawton significantly increased the number of persons residing in group quarters during the 2010 Census.

Education

Table 2-10 compares the educational achievements of persons 25 years of age or older in the 1990, 2000 and 2010 Censuses and the latest ACS estimates. The ACS estimate reveals a continued reduction in the number of Lawton residents who did not graduate from high school, and an increase in the number graduating from high school. Since the 2000 Census, the percent of people not graduating from high school fell by 13.46% percent, while the percentage of people with high school diplomas increased by 22.96 percent. The number of people with some college or an associate's degree increased by 9.72 percent, and people with undergraduate or advanced college increased 6.51 percent. Importantly, the significant reduction in the number of people without high school diplomas accompanied by the increased number of high school graduates indicates continued improvement in the local work force.

Table 2-10
 "Highest Educational Attainment of Persons Aged 25 or more - Lawton"

Level of Education	1990	Percent of Total Persons	2000	Percent of Total Persons	2010 ACS	Percent of Total Persons
Did Not Graduate High School	8,674	18.4%	7,764	14.6%	6719	-13.46%
High School Graduate	14,980	31.9%	16,186	30.5%	19,803	22.96%
Some College or Associates Degree	14,403	30.7%	18,886	35.6%	20,721	9.72%
College Graduate or Advanced Degree	8,917	19.0%	10,224	19.3%	10,890	6.51%
Totals	46,974		53,060		58,133	

Source: U.S. Census Bureau, Census 1990, 2000; HUD 2000 SOCDS Data; 2008 ACS 1-Year Estimates

Table 2-11 profiles the levels of education achieved for those 25 years of age or older. The data confirms that the number of Lawton residents without a high school diploma has continuously decreased since 1990, while persons with a high school education or higher increased in every educational category except for those with some college education, which fell by 7.4%. However, the reduction in the number of people with some college was partially offset by the increases in the number of people that attained associates or bachelor's degrees.

Table 2-11
 "Profile of Educational Attainment Aged 25 or Over- Lawton"

Education Completed	1990 Census	Percent	2000 Census	Percent	2008 ACS	Percent	Percent Change 2000 - 2008
Less than 9th grade	2,713	5.8%	2,114	4.0%	1,477	2.91%	-30.13%
9 th to 12 th grade, no diploma	5,961	12.7%	5,650	10.6%	3,857	7.59%	-31.73%
High school (HS) graduate (includes equivalency)	14,980	31.9%	16,186	30.5%	17,714	34.86%	9.4%
Some college, no degree	11,887	25.3%	15,807	29.8%	14,103	27.76%	-10.78%
Associate degree	2,516	5.3%	3,079	5.8%	3,370	6.63%	9.45%
Bachelor's degree	5,973	12.7%	7,011	13.2%	7,579	14.91%	8.1%
Graduate or professional degree	2,944	6.3%	3,213	6.1%	2,710	5.33%	-15.65%
HS graduate or higher	38,300	81.5%	45,296	85.4%	45,476	89.50%	.39%
Bachelor's degree or higher	8,917	19.0%	10,224	19.3%	10,289	20.25%	.63%
Totals	46,974		53,060		50,810		

Source: U.S. Census Bureau, 1990 and 2000; HUD SOCDS Census Data 2000; 2008 ACS 1-Year Estimate

The 2000 Census indicates that there were 2,114 persons with less than a ninth grade education. The ACS estimate reveals this number dropped to 1,477, a 30 percent reduction. In 2000 there were 5,650 persons who completed between one and four years of high school, but according to the ACS estimate the number of persons who completed one to three years of high school, but did not obtain high school diplomas, fell 31.73 percent to 3,857. Additionally, the 2000 Census indicated there were 16,186 people who completed four years of high school, while the 2008 ACS estimate showed there were 17,714 high school graduates.

According to the 2000 Census, there were 15,807 people who completed at least one to three years of university but had not yet graduated, compared with 14,103 persons in 2008 who

had some college but no degree. The 2000 Census also showed that there were 3,079 persons with Associate Degrees; by 2008 that number rose to 3,370, an approximate 9.45% percent increase. The 2000 Census illustrates that those who completed four years of college numbered 7,011, while those receiving Bachelor’s Degrees according to the 2008 ACS numbered 7,579, an increase of 8.1 percent. However, the 2000 Census there were 3,213 persons with five or more years of college compared to 2,710 persons with Graduate/Professional Degrees in 2008.

In general, the census data demonstrates overall progress in the educational achievements of Lawton residents. Some generalized conclusions about the levels of education in the Lawton community could be as follows:

a. The number of people completing less than four years of high school (1-3 years of high school) and the proportion of people not completing high school fell between 2000 and 2008;

b. The number of people with associate’s degrees increased by 9.45 percent between the 2000 Census and the latest ACS estimate;

c. The number of people with baccalaureate degrees increased only slightly, while the number of people with advanced degrees fell slightly between the 2000 Census and the latest ACS estimate;

d. Overall, the levels of educational achievement by Lawton’s population improved significantly at the lower levels of education ranging from those who did not graduate and those who obtained high school diplomas. Overall the City’s work force remains attractive to new prospective businesses considering Lawton. It must be noted, however, that the annexation of and subsequent organizational changes at Fort Sill also impacted these changes to some degree, primarily due to the high educational requirements for military service.

Employment

The 2010 Census showed there were 48,697 persons age 16 years and over in Lawton's labor force. This represents 4,287 workers since 2000, a 9.65 percent increase. According to the 2010 Census, 24,435 persons representing 33.4 percent of the population over 16 years of age were not in the labor force for various reasons such as age, disability, or choice. Labor force changes are reflected in Table 2-12.

Table 2-12
 “Labor Force – Lawton MSA”

	Labor Force 1990	Percent Change 1990-2000	Labor Force 2000	Percent Change 2010	Labor Force 2010
Lawton MSA	57,240	-1.4	56,461	-2.1	
Lawton	39,296	16.6	45,807		48697

Source: U.S. Census Bureau, American Community Survey 2006-2008

Labor force data for the period 2010-2013 are provided in Table 2-13. Since 2010 the unemployment rate in Comanche County has fluctuated slightly but remained at around 9-10 percent. Unemployment from 2005-2008 is also provided in the table.

Table 2-13
 "Labor Force Data-- Lawton MSA "

LABOR FORCE DATA				
YEAR	LABOR FORCE	EMPLOYED	UNEMPLOYED	UNEMPLOYMENT RATE
2010	48,697	45,078	3,619	9.3%
2011	49,714	46,177	3,537	8.9%
2012	49,808	46,090	3,718	9.3%
2013	49,255	45,246	4,009	10.0%

Source: U.S. Census Bureau, American Community Survey 2005-2009.

Table 2-14 (on the following page) shows the employed workforce population by industry from 2010-2013 and the change year over year.

The greatest job losses to the community have been in the information (-49.26%) and the wholesale trade industries. In 2008, among the most common occupations were: management, professional, and related occupations, 30 percent; sales and office occupations, 26 percent; service occupations, 20 percent; production, transportation, and material moving occupations, 12 percent; and construction, extraction, maintenance and repair occupations, 11 percent. Sixty-six percent of the people employed were private wage and salary workers; 28 percent was Federal, state, or local government workers; and 6 percent was self-employed in own not incorporated business workers. In 2006-2008, for the employed population 16 years and older, the leading industries in Lawton, OK Metro area were educational services, and health care, and social assistance, 26 percent and retail trade, 12 percent.

Comparing the numbers of persons employed between 2005 and 2008, it appears that Overall employment loss during the time period was 901 workers. There were 40,439 employed persons 16 years and over in the 2008 American Community Survey. There was approximately a 2.1 percent reduction in the workforce population since 2000. Unfortunately, this data does not take into account the soldiers and families that moved to Lawton from Fort Bliss, Texas as part of BRAC reorganization. Until those families arrived, there was not an increased demand for housing. Many jobs continue to be filled from outside the community by commuters living outside of the Lawton area or by local workers entering the work force for the first time.

Overall, employment in the agricultural sector increased from 2005. In the future, continued urban population growth in the Lawton community is expected to reduce slightly the amount of land available for agricultural uses, and therefore, agricultural employment is expected to decline.

The long range prospects for wholesale and retail employment are expected to parallel the population trend. As the local population increases wholesale and retail employment is expected to make modest increases as well.

Table 2-14
 "Employment by Industry—Lawton MSA"

Lawton Workforce 2005-2008	2005 Estimates	Percent of Workforce	2006 Estimates	Percent of Workforce	% change 2005-2006	2007 Estimates	Percent of Workforce	% change 2006-2007	2008 Estimates	Percent of Workforce	% change 2007-2008
Workforce Population Employed	41,340		40,606		-1.78%	40,318		-0.71%	40,439		0.30%
Agriculture, forestry, fishing and hunting, and mining	228	0.55%	758	1.87%	232.46%	791	1.96%	4.33%	585	1.45%	-26.04%
Construction	2,136	5.17%	2,950	7.26%	38.11%	2,628	6.52%	-10.92%	2,892	7.15%	10.05%
Manufacturing	3,601	8.71%	4,077	10.04%	13.22%	3,881	9.63%	-4.81%	3,287	8.13%	-15.31%
Wholesale Trade	473	1.14%	811	2.00%	71.46%	729	1.81%	-10.11%	504	1.25%	-30.86%
Retail Trade	4,630	11.20%	4,268	10.51%	-7.82%	4,656	11.55%	9.09%	5,327	13.17%	14.41%
Transportation and warehousing, and	1,118	2.70%	1,297	3.19%	16.01%	1,315	3.26%	1.39%	1,561	3.86%	18.71%
Information	965	2.33%	606	1.49%	-37.20%	968	2.40%	59.74%	491	1.21%	-49.28%
Finance and Insurance, and real estate and rental and leasing	2,968	7.18%	2,492	6.14%	-16.04%	1,643	4.08%	-34.07%	2,029	5.02%	23.49%
Professional, scientific, and management, and administrative and waste management	3,108	7.52%	2,635	6.49%	-15.22%	3,161	7.84%	19.96%	2,909	7.19%	-7.97%
Educational services, and health care and social assistance	10,191	24.65%	10,860	26.74%	6.56%	10,700	26.54%	-1.47%	10,065	24.89%	-5.93%
Arts, entertainment, and recreation, and accommodation, and food services	5,770	13.96%	6,416	8.41%	-40.80%	35	8.80%	3.89%	46	11.41%	30.01%
Other services, except public administration	1,587	3.84%	1,758	4.33%	10.78%	2,092	5.19%	19.00%	2,143	5.30%	2.44%
Public administration	4,565	11.04%	4,678	11.52%	2.48%	4,205	10.43%	-10.11%	4,032	9.97%	-4.11%

U.S. Census Bureau, American Community Survey, 2005-2008

The major employers in Comanche County are provided in Table 2-16 on this page and the following page.

Table 2-16
 "Major Comanche County Employers – Excluding Government and Railroad"

Major Employer	Industry/Service	Number Employed
Fort Sill	Armed Forces	9,972
Goodyear Tire & Rubber Company	Manufacturing	
Lawton Public Schools	Education Services	2,325
Comanche County Memorial Hospital	Health Services	1,801
Southwestern Medical Center	Health Services	552
Assurant Solutions	Telecommunications	530
Cameron University	Education Services	510
Fort Sill National Bank	Financial Services	488
Lawton Correctional Facility	Correctional Service	471

Comanche Nation Gamed	Gaming	369
Stanley, Incorporated	Retail	352
Bar-S Foods	Food Processing	280
Comanche County, Oklahoma	County Services	268
Affinitas	Telecommunications	200
Great Plains Technology Center	Education/Telecommunication Services	180
EZ-GO Foods	Retail	170
Chempac	Chemical Packing	145
United States Postal Office	Postal Services	133
City National Bank	Financial Services	126
USPHS Indian Hospital	Health Services	125
Republic Paperboard Company	Manufacturing	125
Southwestern Bell Communications	Utility	120
Community Access	Community Services	113
Goodwill	Retail	106
The Lawton Constitution	Newspaper	105
Lowe's	Retail	99
Burger King (RCS Enterprises)	Food Services	98
Stripes, Inc.	Retail	92
Dillard's	Retail	90
Silverline Plastics	Manufacturing	90
Southwest Blood Institute	Health Services	86
Marie Deffy Youth and Family Services	Community Services	72
Home Depot	Retail	59

Source: Oklahoma Department of Commerce

In 2006-2008, most children 18 years of age and younger who live with both parents have both parents working. See Table 2-17.

Table 2-17
 "Children in Two Parent Families by Employment Status of Parents - Lawton"

	Under 6 Yrs. Old	Percent	6 to 17 Yrs. Old	Percent
Both in Labor Force	2,080	45.97%	4,474	62.30%
Only Father in Labor Force	2,125	46.96%	2,362	32.90%
Only Mother in Labor Force	193	4.27%	171	2.40%
Neither in Labor Force	27	2.80%	172	2.40%
Total	4,525		7,179	

Source: U.S. Census Bureau, 2010-2014 ACS 5-Year Estimates

Table 2-18 reflects the employment status of single parent families with children.

Table 2-18
“Children in Single Parent Families by Employment Status of Parent - Lawton”

	Under 6 Years Old	Percent	6 to 17 Years Old	Percent
Total Single Parent Families	4,486		6,583	
Living with Father	788	17.57%	1,176	17.86%
In labor force	753	95.56%	1,064	90.48
Not in labor force	35	4.44%	112	9.52%
Living with Mother	3,698	82.43%	5,407	82.14%
In labor force	2,887	78.07%	4,431	81.95%
Not in labor force	811	21.93%	976	18.05

Source: U.S. Census Bureau, 2010-2014 ACS 5-Year Estimates

Domestic, Self-Employed & Family Businesses

There is still a trend of growth in domestic, self-employed, and family oriented businesses. The growth and expansion of small businesses are expected to increase the importance of employment in this sector. The U.S. Small Business Administration currently has 144 certified small businesses on record for Lawton MSA. Of those 144 businesses, 102 are minority or woman owned.

Great Plains Technology Center has been conducting a study concerning the trend of domestic, self-employed and family business growth that started in the 90’s. Currently, they have observed that there is still a fair upswing in the growth of home-based businesses in Lawton that does not seem to be abating. NewsCorp, a company that runs a call center in which employees work primarily from their homes, has hired 300 people from the Lawton area. Great Plains Center has also started a home-based business network that has been experiencing increasing membership. This is a new venture, and Great Plains has a membership base of 60 people already. Both home-based businesses and internet-based businesses in Lawton are expected to continue on this upward trend of growth.

Incomes

The analysis of income distribution by household, family, and per capita incomes uses the U.S. Census Bureau definitions.

Household Incomes

A household includes all persons who occupy a particular housing unit. A housing unit may be a house, an apartment, a group of rooms, or a single room occupancy used as a separate living quarter. Separate living quarters are those in which the occupants live and eat separately from others living in the building and which have direct access to the outside or have access through a common hall. The occupants may be a single person living alone, a single family, two or more families living together, or a group of unrelated individuals who share living

arrangements. Table 2-19 shows the household incomes for Lawton, Oklahoma, and the United States based on the 2000 Census and the ACS estimates.

Table 2-19
“Median Household Income”

	2010	2014	Percent Change
United States	\$ 51,914	\$53,482	3.02%
Oklahoma State	\$42,979	\$46,235	7.58%
Lawton	\$41,940	\$ 43,263	3.15%

Source: U.S. Census Bureau, 2006-2010 and 2014 ACS Estimates

The median household income in Lawton increased 22.2 percent between the 2000 Census and the latest ACS estimates compared with the state and national averages of 27.4 and 24.2 percent, respectively. Lawton’s household income growth trailed both the state and national trends.

Family Incomes

A family consists of a householder and one or more persons living in the same household who are related to the householder by birth, marriage, or adoption. All persons in a household who are related to the householder are regarded as his/her family. Not all households contain families because a household may be comprised of a group of unrelated persons or one person living alone. The family incomes for Lawton, Oklahoma, and the United States in the 2000 Census and the latest ACS estimates are shown in Table 2-20.

Table 2-20
“Median Family Income”

	2010	2014	Percent Change
United States	\$62,982	\$65,443	3.91 %
Oklahoma State	\$53,607	\$57,299	6.89%
Lawton	\$46,948	\$50,092	6.70%

Source: U.S. Census Bureau, 2006-2010 and 2010-2014 ACS 5-Year Estimates

The median family income in Lawton rose by 28.55 percent between 2000 and the end of 2008 compared with the state and national increases of 30.4 and 26.2 percent, respectively.

Per Capita Income

Table 2-21
“Per Capita Income”

	2010	2014	Percent Change
United States	\$27,334	\$28,555	4.47 %
Oklahoma State	\$23,094	\$24,695	6.93 %
Lawton	\$20,115	\$21,486	6.82%

Source: U.S. Census Bureau, 2010-2014 ACS 5-Year Estimates

Table 2-22a shows the number of families with no workers, those with one worker, and those with two or more workers, while Table 2-22b shows the household income by household size.

Table 2-22
"Household Size by Number of Workers"

Household Size by # of Workers	2005-2007 Estimates	2006-2008 Estimates	Percentage Change
Total:	32,171	32,521	1.09%
No workers	8,437	8,468	.37%
1 worker	14,183	14,240	.40%
2 workers	7,840	8,060	2.8%
3 or more workers	1,711	1,753	2.45%
1-person household	8,447	9,299	10.08%
2-person household	10,044	10,289	2.43%
3-person household	5,739	5,691	-.8%
4-or-more-person household	7,941	7,242	-8.8%

Source: U.S. Census Bureau, 2005 – 2007 and 2006 – 2008 ACS 3-Year Estimates

Poverty

The income threshold used by the Census Bureau to determine the poverty status of families and unrelated individuals is arranged in a matrix consisting of family size cross-classified by presence of children under the age of eighteen years old. The average poverty threshold for a family of four persons was \$12,674 in 1999. Between 1990 and 2000 the poverty rate in Lawton rose from 15.9 percent to 16.3 percent.

According to the 2008 American Community Survey, 6,296 Lawton households were below the poverty level, and 3,492 or 10.8 percent of all families were below the poverty level. The most dominant characteristic of families below the poverty level was that female householders with no husband present had a greater tendency to live in poverty. Approximately 75% percent of all poverty cases were single parent, female heads of household, compared with 21% percent of all married couples that live in poverty. Table 2-24 compares the 2000 and 2008 poverty levels.

Table 2-24
"City of Lawton - Poverty Level"

	2000 Census	2008 ACS	Percent Change
Above Poverty Level:			
Family Households	19,467	16,812	-13.63%
Female Household, No Husband Present	2,756	2,665	-3.3%
Below Poverty Level:			
Family Households	3,231	3,492	8.07%
Female Household, No Husband Present	2,105	2,634	25.13%

Source: U.S. Census Bureau, Census 2000; 2008 ACS 1-Year Estimates

When comparing the 2000 U.S. Census data to the 2008 ACS data, the data demonstrates that while the number of households is increasing, the number of households below the poverty level also is increasing. The same relationship holds with incomes. While per capita and median family incomes have risen, the fact that poverty has risen indicates growing income disparity in Lawton.

SECTION III
HOUSING MARKET ANALYSIS

General Housing Market Characteristics

Supply and Demand Conditions

Number and Types of Units

The 2014 American Community Survey found 40,088 housing units in the corporate limits of the City of Lawton. Table 3-1 shows the number and types in the housing supply based on the 2010-2014 American Community Survey 5-Year Estimates:

Table 3-1
"Lawton's Housing Stock"

Type of Unit	Number	Percent	Substandard	Percent Substandard
Owner Occupied	16,885	49.2%	3,630	21.4%
Rental Occupied	17,435	50.8%	7,270	41.6%
Vacant	5,768	14.4%	1,198	27.38%
Total Units	40,088		3,127	8.46%
Vacant for Sale	179	3.1%	47	11.06%
Vacant for Rent	658	11.4%	195	13.73%
Other Vacant	4,931	85.5%	1,198	46.15%
Total Vacant Units	5,768		1,440	32.43%

Sources: U.S. Census Bureau, ACS 2010-2014 5-Year Estimates; HUD 2008-2012 CHAS Data

The 2010-2014 ACS figures illustrate that while growth in the housing supply has occurred, the rate of growth has been nominal. The housing supply increased from 38,258 units in 2010 to 40,088 in 2014, a 4.7 percent increase. The increase in housing may be properly attributed to high-end new construction. The decrease in the number of vacant units is related to the demolition of dilapidated structures primarily in low-end affordable housing and the addition of the new families that moved to Lawton from the BRAC military restructuring. The housing occupancy rate increased approximately 1.3 percent between 2010 and 2014. Table 3-2 shows the 2010 Census housing data, which represents the changes over the last decade.

Table 3-2
"Changes in the Housing Stock"

	Changes in units from 2010 to 2014	Percent of Changes from 2010 to 2014
Total Units (Occupied and Unoccupied)	1,830	4.8%
Owner-Occupied	(795)	(4.7)%
Renter-Occupied	1,257	7.7%
Vacant	1,368	31.1%

Sources: U.S. Census Bureau, 2010 Census, 2010-2014 ACS

Of the 16,885 occupied units in the City of Lawton, low- and moderate-income households occupy 4,350 units as shown in Table 3.3, which is 25.7 percent of the owner-occupied units in the community. Approximately 2,445 low- and moderate-income owner-occupied units are considered substandard.

Table 3-3
 “Lawton’s Low- and Moderate-Income Owner-Occupied Housing”

Income Level	Low- and Moderate Income Owner-Occupied	Substandard	Percent Substandard
≤ 30% of AMFI*	930	645	69.3%
> 30% to 50% of AMFI*	1,070	685	64.0%
> 50% to 80% of AMFI*	2,350	1,115	47.4%
TOTAL	4,350	2,445	60.2%

Sources: U.S. Census Bureau, Census 2010; HUD2008-2012 CHAS Data
 * Area Median Family Income (AMFI)

Of the 17,435 occupied rental units in the City of Lawton, low- and moderate-income households occupy 9,595 units as shown in Table 3-4, which is 55 percent of the rental units in the community. Approximately 6,355 low- and moderate-income rental occupied units of these units are considered substandard.

Table 3-4
 “Lawton’s Low- and Moderate-Income Rental-Occupied Housing”

Income Level	Low- and Moderate Income Renter-Occupied	Substandard	Percent Substandard
< 30% of AMFI*	3,110	2,330	74.9%
> 30% to 50% of AMFI*	2,755	2,195	79.6%
> 50% to 80% of AMFI*	3,730	1,830	49.0%
TOTAL	9,595	6,355	67.8%

Sources: U.S. Census Bureau, Census 2010; HUD 2008-2012 CHAS Data
 * Area Median Family Income (AMFI)

Age of Housing

Table 3-5 shows that approximately 26,534 units, or 66.18 percent, of Lawton’s housing stock was built before 1980, of which 10,866 units (40.95%) were built before 1960. These older units generally mean higher costs for maintenance, heat, and insurance.

Within Lawton, there are particularly high concentrations of housing units constructed before 1960 in the Central Corridor located between NW 38th Street on the west, Interstate 44 on the east, Rogers Lane on the north and Bishop Road on the south. Only in census tracts 4.03, 5.02, and 20.01 was the majority of the housing stock built after 1978.

Table 3-5
"Age of Housing"

Housing Units:	40,088	Percent of Total
Built 2010 or later	897	2.2%
Built 2000 to 2009	4,360	10.9%
Built 1990 to 1999	2,848	7.1%
Built 1980 to 1989	5,449	13.6%
Built 1970 to 1979	8,907	22.2%
Built 1960 to 1969	6,761	16.9%
Built 1950 to 1959	6,081	15.2%
Built 1940 to 1949	2,489	6.2%
Built 1939 or earlier	2,296	5.7%

Sources: U.S. Census Bureau, ACS 2010-2014 5-Year Estimates

Given the age of the housing stock in the City, most housing units are in need of some level of repair or rehabilitation. Based on minimum housing quality inspections, around 27 percent of the housing units in the City are considered "substandard" within the below definition. Frequently, the code violations find serious safety issues present, but do not require substantial investment to correct (i.e., lack of smoke detectors, broken railings, broken windows, deteriorated paint, etc.). An estimated 13.2 percent of the City's housing units are in need of significant rehabilitation, at a level requiring \$20,000 or more per unit.

Condition and Quality of Housing

"Substandard" housing conditions are defined to include any housing unit with 5 or more non-life-threatening code violations or with any one of the following:

- The physical condition or use of the dwelling constitutes a public nuisance;
- Any dwelling designated unsafe for human habitation or use;
- Any dwelling noticeably capable of being considered a fire hazard or noticeably unsafe or unsecured so as to endanger life, limb or property;
- Any dwelling from which the plumbing, heating or other facilities required by law have been removed, or from which utilities have been disconnected, destroyed, removed, or rendered ineffective, or the required precautions against trespassers have not been provided;
- Any dwelling that is in a state of dilapidation, deterioration or decay; faulty construction; overcrowded; open, vacant or abandoned; damaged by fire to the extent of not providing shelter; in danger of collapse or failure and dangerous to anyone on or near the dwelling.

Lead-Based Paint Hazards

Given the age of the City's housing stock, lead-based paint is presumed to be present in most areas of the City, and particularly in the Central Corridor of Lawton. HUD estimates that 75% of pre-1978 housing units contain some lead-based paint. The likelihood, extent, and

concentration of lead-based paint increase with the age of building. Fully 85% percent of privately owned units built before 1960, and 63% of units between 1960 and 1979 contain some lead-based paint. Using 2010 Census data for numbers of households, HUD’s low-income estimates, and HUD’s national estimates of percentages of units likely to have lead paint (based on age), the City estimates that the extent of the lead-based paint hazard as shown in Table 3-6 is as follows:

Table 3-6
 “Estimate of Lead-Based Paint in Housing Stock”

Type of Housing	Estimated Number
Units Built Prior to 1980 with Lead Based Paint	16,716
Units Built Prior to 1960 with Lead Based Paint	9,236

Sources: U.S. Census Bureau, Census 2010; ACS 2010-2014 5-Year Estimate

Overcrowding

Overcrowding has not been a substantial problem in Lawton, however 28.5 percent of all large renter families/households reported overcrowding. The 2010-2014 ACS reported only 716 units (2.1% of the total housing units) in the City with more than one person per room, and housing inspections by the City of Lawton Housing Assistance Division (HAD), Neighborhood Services (NS) Division, and the Lawton Housing Authority (LHA) have not revealed significant overcrowding except as noted above.

Housing Market Trends

Household Tenure - General Information

In contrast to national (64 percent), Oklahoma (67 percent) and Comanche County (56 percent) homeownership rates from the 2010 Census, the City of Lawton is significantly below the national, state, and county homeownership rates. HUD’s goal is a 70 percent homeownership rate in a community. While 70 percent homeownership is a worthy goal, a more realistic goal for Lawton is a 60 percent homeownership rate. Only 49 percent of Lawton's households own their own homes. Lawton’s homeownership rate has never topped 55 percent in the last forty (40) years. The low homeownership rate can be attributed to the presence of the military population in Lawton, the majority of which are renters, and the high cost of housing relative to the low incomes in the area.

Lawton homeowners are aging in place. The 2010 Census indicated that over 32 percent have lived in their houses for twenty or more years, and over 76 percent are age 55 and older. The number of homeowners who are age 55 and older increased 7 percent in the past decade. 37 percent of new homeowners moved in since 2010. Lawton's homeownership rate decreased slightly (approximately 2.5 percent) in the last decade, reversing a upward trend from 1990 to 2000.

Homeownership levels are lowest (below the 50 percent average) in the Central Corridor and Downtown neighborhoods (census tracts 1, 2, 7, 8, 10, 11, 16 and 25). Other city neighborhoods saw homeownership rates holding even or increasing slightly in the last decade; some areas in the City, however, saw significant decreases in homeownership.

Household Type

Only 33 percent of Lawton's households are families with children. A bare majority of Lawton families with children (53 percent) own homes - the remaining 47 percent of families with children are renters. Families with children occupy around 20 percent of all rental properties in the city.

The census bureau designates households as either "family" or "non-family." A family household includes a householder and one or more persons who are related to the householder by birth, marriage, or adoption. A family household may also include non-relatives living with the family. A non-family household includes a householder living alone or a group of unrelated individuals.

Table 3-7
"Household Composition"

Families with Children	Families without Children	Non-family Households
11,231	10,506	12,583

Sources: U.S. Census Bureau, 2010-2014 ACS 5-Year Estimates

Table 3-8
"Homeowner Occupancy"

Census Tract	Percent of Homeowners	Occupy Same Units for 15 or More Years	Census Tract	Percent of Homeowners	Occupy Same Units for 15 or More Years
1	34.3%	26.7%	14	31.1%	22.0%
2	35.0%	20.1%	15	37.9%	16.4%
3	62.4%	33.0%	16	31.5%	25.7%
4.01	46.8%	22.7%	17	51.0%	29.7%
4.02	52.7%	28.0%	19.01	65.3%	40.7%
4.03	65.6%	32.6%	19.02	31.6%	25.2%
5.01	61.5%	34.8%	20.01	71.2%	28.8%
5.02	61.6%	21.7%	20.04	67.6%	37.5%
6	60.2%	33.4%	20.05	43.3%	27.2%
7	46.4%	24.1%	23.01	85.6%	33.0%
8	47.0%	32.5%	24.01	0.0%	0.00%
9	75.2%	32.9%	24.03	0.0%	4.0%
10	48.5%	25.5%	24.04	0.9%	0.0%
11	26.8%	19.4%	25	15.8%	8.5%

TOTAL (Citywide)	Percent of Homeowners	Occupy Same Unit (15 or More Years)
	44.9%	24.5%

Sources: U.S. Census Bureau, 2010-2014 ACS 5-Year Estimates

There is some mobility among homeowners. There is a core group of homeowners, as shown in Table 3-8 (24.5 percent citywide), who have lived in the same unit for at least 15 years. There is, of course, more mobility among renters than among homeowners. However, there is a core group of tenants (39.9 percent citywide) who have lived in the same rental unit for at least 5 years as shown in Table 3-9.

Table 3-9
"Rental Occupancy"

Census Tract	Percent of Renters	Occupy Same Units for 5 or More Years	Census Tract	Percent of Renters	Occupy Same Units for 5 or More Years
1	65.7%	38.6%	14	68.9%	26.3%
2	65.0%	45.8%	15	62.1%	40.9%
3	37.6%	31.2%	16	68.5%	38.6%
4.01	53.2%	40.0%	17	49.0%	26.9%
4.02	47.3%	39.3%	19.01	34.7%	30.1%
4.03	34.4%	37.2%	19.02	68.4%	53.1%
5.01	38.5%	30.5%	20.01	28.8%	25.8%
5.02	38.4%	40.7%	20.04	32.4%	32.4%
6	39.8%	17.0%	20.05	56.7%	38.1%
7	53.6%	39.9%	23.01	14.4%	19.9%
8	53.0%	28.8%	24.01	100%	100%
9	24.8%	21.0%	24.03	100%	64.1%
10	51.5%	30.1%	24.04	99.1%	82.2%
11	72.3%	47.6%	25	84.2%	51.4%
TOTAL (Citywide)	Percent of Renters		Occupy Same Unit (5 or More Years)		
	55.1%		39.9%		

Sources: U.S. Census Bureau, 2010-2014 ACS 5-Year Estimates

Vacancy

Within Lawton, there are particularly high concentrations of vacant housing units in the Central Corridor. There are significant concentrations (20 percent or more) of vacant housing units in census tracts 2, 8, 11, 12, 13, 17, and 19.02, which are low- and moderate-income areas. Only in census tracts 4.01, 4.02, 5.01, 5.02, 9, 19.01, 20.01, and 20.02 was the vacancy rate below 10 percent. Of the 4,578 vacancies in the city, 2,796 vacant units, or 61.1 percent, are located in low- and moderate-income areas of the city. 1,198 other vacant units, or 26.2% of the vacant units in the city, are considered substandard according to the definition previously stated.

Of the total other vacant (substandard) units, 797 vacant units, or 66.5 percent, are located in low- and moderate-income areas of the city. Considering that low- and moderate-income households occupy only 41.7 percent of housing stock in Lawton, the majority of vacant standard and substandard housing is concentrated in low- and moderate-income areas of the city.

Table 3-10
 "Vacancy Status"

Census Tract	Total Vacancies	Percent Vacancies	Homeowner Vacancy Rate	Rental Vacancy Rate
1	274	13.2%	0.0	5.4
2	148	10.5%	16.5	0.0
3	327	12.7%	3.0	11.5
4.01	175	6.0%	0.0	0.0
4.02	75	4.0%	0.0	5.3
4.03	25	1.2%	0.0	3.6
5.01	160	4.9%	0.0	0.0
5.02	188	7.6%	5.7	3.2
6	132	11.3%	9.4	6.1
7	203	15.5%	6.7	13.0
8	256	21.0%	11.2	14.9
9	66	6.7%	2.3	0.0
10	210	20.2%	0.0	20.1
11	82	8.3%	0.0	5.3
14	112	19.1%	0.0	11.5
15	294	21.9%	3.6	9.2
16	230	21.7%	14.8	13.9
17	364	25.6%	0.0	17.1
19.01	34	4.5%	0.0	0.0
19.02	169	20.8%	0.0	12.3
20.01	31	1.7%	0.0	0.0
20.04	96	5.6%	0.0	6.7
20.05	151	12.5%	0.0	23.6
23.01	230	10.0%	1.8	8.6
24.01	0	-	-	-
24.03	0	0.0%	-	0.0
24.04	386	29.3%	0.0	2.6
25	241	17.3%	7.5	8.0

TOTAL (CITYWIDE)	4,659	12.3%	3.2	8.3
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Sources: U.S. Census Bureau, Census 2010

Bedroom Mix

Table 3-11 shows the bedroom mix of housing units in the City.

Table 3-11
"Bedroom Mix"

Number of bedrooms	Number of Units	Percentage of Units
No bedroom	537	1.3%
One (1)	4,676	11.6%
Two (2)	9,950	24.8%
Three (3)	19,546	48.7%
Four (4)	4,985	12.4%
Five (5) or more	394	0.9%
Total	40,088	

Sources: U.S. Census Bureau, 2010-2014 ACS 5-Year Estimates

Rental Vacancy Rates

The last ten years has shown historically high vacancy rates in market rate facilities. However, the rental market has yet to reach a "balanced" vacancy rate - which, according to most experts, is between 3 percent and 5 percent. Even though there is a high rental vacancy rate in the City, an extremely tight affordable rental market for low-income renters still exists. The affordable rental market historically has a 6.9 percent vacancy rate. Expectations are that additional affordable units will be available with the rehabilitation and new construction of tax credit properties.

Table 3-12
"Rental Vacancy Rate"

Year	Vacancy Rate
2004	13.1%
2005	12.1%
2006	13.2%
2007	12.4%
2008	13.4%
2009	10.8%
2010	7.2%
2011	7.2%
2012	9.3%

2013	10.8%
2014	11.4%

Sources: U.S. Census Bureau, Census 1990,2000, 2010 ACS 2010-2014 5-Year Estimates

Homeowner Median Price Trends

According to the University of Oklahoma “Lawton Housing Market Analysis” and the U.S. Census data, the median value of a single-family home in Lawton rose from \$70,900 in 2000 to \$95,900 by 2010, a 35 percent increase. There have also been significant increases in median sales prices in the last four (4) years.

Table 3-13
“Homeowner Median Price Trends”

Year	Median Value
1970	\$42,600
1980	\$70,500
1990	\$61,500
2000	\$70,900
2010	\$95,900
2011	\$100,900
2012	\$105,300
2013	\$103,600
2014	\$105,300

Sources: U.S. Census Bureau, Census 1970, 1980, 1990, 2000 and 2010, ACS 2010-2014 5-Year Estimates

Based on data from the Lawton Fort Sill Chamber of Commerce, the median home sales price in Lawton has fallen 7.8 percent over the last four years, reaching \$106,000 in 2014. The monthly mortgage payment for a \$84,800 loan (assuming 20% down payment) at 4.56 percent interest for a 30-year term would be \$433.00 (exclusive of insurances and property taxes). Insurance and property taxes would add approximately \$150 more per month. Lawton still remains one of the more affordable communities compared to cities of the same size or larger in Oklahoma for homebuyers. However, the median value of a home in Lawton (\$105,300) is below the median value in Oklahoma of (\$115,000).

Rental Rate Trends

The fair market rents, Table 3-14, for the Lawton market are:

Table 3-14
“Fair Market Rents”

	Efficiency	1 Bedroom	2 Bedrooms	3 Bedrooms
2010	451	487	612	894
2011	456	492	619	904

2012	471	508	639	934
2013	479	489	662	916
2014	528	540	730	1,010
2015	519	531	718	994
2016	551	554	742	1,046

Source: HUD Fair Market Rent Data

The current market rents for the Lawton market, as indicated in Table 3-15 are based on surveys of selected rental properties (calculated as the dollar amount below which 40 percent of all standard quality units are rented). Estimated utility costs, utilizing the Lawton Housing Authority's (LHA's) utility allowance chart for heating, air conditioning, cooking, water heating, electrical lighting, water, sewer, and trash, have been added to the market rate shelter rent to provide a comparison to the fair market rents.

Table 3-15
"Market Rate Rents"

	Efficiency	1 Bedroom	2 Bedrooms	3 Bedrooms	4 Bedrooms
2000	434	415	520	695	800
2001	444	445	525	700	810
2002	454	445	535	712	830
2003	464	473	559	740	850
2004	464	485	575	745	860
2008	425	458	576	842	1012

Sources: Local Survey of Selected Properties; Lawton Housing Authority Data, National Low Income Housing Coalition

The disparity between HUD's fair market rents (FMR) and market rate rents can be seen by comparing the data in Table 3-14, Fair Market Rents, and Table 3-15, Market Rate Rents. Market Rate Rents have been rising approximately 3.7 percent per year.

Cost Burden

According to the 2010 Census, 6,481 renter households (43.9 percent of all renter households) in the City were cost burdened, i.e., spending more than 30 percent of their gross annual income for housing. Cost burdened renters in census tracts 4.01, 4.02, 4.03, 5.01, 6, 7, 8, 9, 11, 16, 19.01, 20.01 and 20.04 were the only census tracts below the City wide average (43.9 percent) with census tract 16 having the lowest (18.5 percent) percentage of cost burdened renters. City wide, 3,084 renter households were severely cost-burdened, i.e., paying 50 percent or more of their gross annual income on housing. Table 3-16 displays the percentage of renters by census tract that are cost-burdened.

The National Low Income Housing Coalition (NLIHC) estimated that the "housing wage" for Lawton in 2016- the amount that a full time (40 hours a week) worker must earn per hour in order to afford a two-bedroom unit at the area's Fair Market Rent - was \$14.27 per hour. This is 196 percent of the minimum wage (\$7.25 per hour). A unit is considered affordable if

housing costs are no more than 30 percent of the renter's monthly income. A full-time worker earning minimum wage could afford to pay a monthly rent of no more than \$377 without becoming rent-burdened - an amount which is \$174 below the fair market rent for an efficiency apartment, and \$365 below the fair market rent for a two bedroom apartment. An SSI recipient (receiving \$637 monthly) can afford monthly rent of no more than \$191, while the Fair Market Rent for a one-bedroom unit is \$554.

Table 3-16
"Cost Burdened Renters"

Census Tract	Cost-Burdened Renters Percentage	Census Tract	Cost-Burdened Renters Percentage
1	60.3%	14	68.8%
2	52.0%	15	51.6%
3	47.1%	16	18.5%
4.01	43.0%	17	55.3%
4.02	42.4%	19.01	35.8%
4.03	34.9%	19.02	44.9%
5.01	29.4%	20.01	19.0%
5.02	54.3%	20.04	29.0%
6	40.4%	20.05	44.0%
7	43.7%	23.01	60.9%
8	40.5%	24.01	-
9	42.7%	24.03	0.0%
10	50.9%	24.04	60.8%
11	43.4%	25	45.7%

Sources: U.S. Census Bureau, Census 2000

Table 3-17 below shows what rental housing is affordable to households at various income levels based on 2005 Metropolitan Statistical Area (MSA) median income figures.

Table 3-17
"Affordable Rental Housing"

	Annual Household Income	Maximum Affordable Rent	Affordable Units at Fair Market Rent
Earn minimum wage of \$7.25/hour	\$15,080	\$377	None
Earn 30% of median family income	\$16,890	\$422	None
Earn 50% of median family income	\$28,150	\$704	Efficiency or 1 bedroom
Earn 80% of median family income	\$45,040	\$1,126	All units
Earn median family income	\$56,300	\$1407	All units

Housing Stock Available to Serve Disabled Persons

Since 1990, housing available in the Lawton community to meet the needs of frail, elderly persons, and persons with disabilities has increased from 48 available units to 97 available units in 2000. Goodwill Inc., the Center for Creative Living, and Hospice are the agencies most involved with providing services required for frail, elderly citizens in the community. Goodwill also provides housing assistance to disabled, elderly, or displaced. Quality Enterprises, Inc. (formerly Grace - Harding Homes) assists with housing for adults with developmental disabilities; Great Plains Improvement Foundation, Inc. also provides housing assistance and supportive services to developmentally disabled persons. The following table, Table 3-18, shows the available housing stock to serve disabled persons.

Table 3-18
 "Housing Stock to Serve Disabled Persons"

Agency	Number of Beds	Waiting List
Goodwill, Inc.	74	15 months
Quality Enterprises	18	12 months
GPIF	5	7 months
Total	97	

Sources: HUD Subsidized Apartment Data, Agencies Inventory Data

All agencies combined maintain a waiting list of approximately 65 persons at all times and review and update the list semiannually to ensure it is current and accurate. All agencies are seeking additional funding to increase the number of housing units available for disabled persons.

Housing Stock Available to Serve Persons with HIV/AIDS and Their Families.

Currently there are no housing facilities set-aside specifically for persons with HIV/AIDS and their families. Since 1999, two organizations - Southwest AIDS Network (SWAN) and Carepoint - have been established to provide assistance to persons with HIV/AIDS and their families, which provide supportive services and assisted housing. SWAN provides assistance with prescriptions, transportation, food pantry, and medical services for approximately 55 persons per year. While this organization provides no direct housing benefit, the savings realized by persons with HIV/AIDS and their families for these expenses frees funding for housing. Carepoint, Inc., a nonprofit organization with headquarters in Oklahoma City, with HOPWA and Ryan White funding, provides assistance with housing, utilities, prescriptions, transportation, nutrition, dental and vision services. Carepoint, since 1999, has provided direct housing assistance to approximately 25 to 30 individuals and families. Carepoint will continue to provide housing assistance to approximately 8 to 10 individuals and families annually. Both agencies have a close collaboration with the local United Way supported human service providers to link their services to the local continuum of care providers, including housing providers to maximize

available services to address this need.

Housing Concentration.

The distribution of Lawton's housing mirrors the racial/ethnic concentrations and low-income concentrations addressed early in this section.

Racial/ethnic concentrations are found in census tracts 16 and 19.02. Census tract 16 has 69 percent minority population, and percentage wise is the second largest minority concentration area in the community. Census tract 19.02 has 87.7 percent minority population, and percentage wise is the largest minority concentration area in the community. The racial/ethnic population increased 10 percent in census tract 19.02 and 4 percent in census tract 16 from the 1990 census to the 2000 census. During the same period census tracts 3, 5.1, 5.02, 6, 7, 9, 10, and 13 experienced increases in their resident minority population. The trends in each of these census tracts provide evidence that some progress is being achieved in assimilating minorities throughout the community.

Low- and moderate-income concentrations are found in census tracts 1, 2, 5.02, 8, 10, 11, 12, 13, 14, 15, 16, 17, 19.01, and 19.02. Census tracts 16 and 19.02 are currently the only tracts with both minority and low-income concentrations. However, given the rate of increase in the low-income population in census tract 3, it too may soon join those two census tracts in that category.

Public and Assisted Housing

Public Housing

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

Supply and Demand for Public Housing

In the authority's housing inventory there are 319 units of public housing, 74 Section 8 Housing Choice Vouchers, and an additional 96 Housing Choice Vouchers through a

Consortium Agreement with the Tulsa, OK, Housing Authority. LHA's current inventory provides 150 general purpose units in the Lawton View Addition. 100 elderly units located in the Benjamin O. Davis HI-Rise, and 50 units located in the Pleasant Valley Addition provide housing for elderly/disabled households. Additionally, the LHA manages 19 single family two and three bedroom residences. In addition, the LHA has a HUD approved Section 5(h) Homeownership Program, with an inventory of 19 single-family houses. The LHA is also a HUD approved Housing Counseling Agency. The counseling services that are provided through the Housing Counseling program are offered to the public at no charge.

LHA currently has 74 Section 8 Housing Choice Voucher units. These baseline vouchers consist of 50 Family Unification vouchers and 24 Housing Choice vouchers. Due to the change in the method that HUD is currently using to fund the Section 8 programs, LHA projects that they will be able to fund a monthly average of 69 vouchers. The LHA was not granted any additional funds for a Section 8 Family Self-Sufficiency Coordinator during the FFY 2005 application process. It is the intent of the LHA to adopt a Section 8 Homeownership Program during the 2005-2006 program year. The current waiting list for a Section 8 voucher consists of 68 applicants with a waiting time of approximately one year.

Previously, the LHA entered into a Consortium Agreement with the Tulsa Housing Authority (THA) to administer 300 of Tulsa's excess Section 8 vouchers here in Lawton. Due to the Section 8 funding cuts, THA notified Lawton that they would discontinue funding these 300 vouchers on June 30, 2005. The process of notifying all of the current Tulsa voucher holders is underway. The Oklahoma Housing Finance Agency (OHFA) was able to accommodate many of these voucher holders into their portfolio. When THA received their Section 8 funding notice for this year, they were able to allow LHA to keep the remaining 98 Tulsa vouchers in Lawton. However, as the Tulsa voucher holders, which are currently used for Lawton's residents, drop out of the program, these vouchers will return to Tulsa. LHA has also agreed to accommodate any of the remaining Tulsa voucher holders into their portfolio, as their program funding will allow. The economic impact that this Consortium Agreement with the THA has had for Lawton has been over \$12 million a year coming into Lawton in the form of rental payments to local landlords. Based on current funding levels, OHFA and LHA cannot accommodate all the voucher holders into their portfolios. Consequently, the loss of the Tulsa vouchers will be a permanent loss of secure rental payments to local landlords in the City of Lawton. The total loss is estimated to be approximately \$3 million.

Physical Condition of Public Housing

The Capital Fund Grant is intended for use in the modernization/rehabilitation of existing dwelling units. Since the age of all of the public housing units in the authority's inventory is 35 years of age or older, the amount of money needed to upgrade and maintain these units far exceeds the amount of capital funds received each year. The estimated amount of modernization costs for all projects is in excess of \$4 million. The authority expects to receive approximately \$347,149 each year from HUD for this purpose. The focus of the next couple of years for modernization of dwelling units will be in Project OK005-1, Lawton View. The authority has begun a major rehabilitation project on these units that began in the summer of 2004. Due to limited funding only a limited number of housing units will be able to be completed each year.

LHA projects between 12 and 15 units will be able to be completed each year. If estimates and costs come in below what has been projected, then additional units will be completed. Items included in this modernization plan include central heat and air conditioning, redesign of the outside elevation of the units in order to get rid of the "public housing" look, new separate entrances and parking spaces, and fencing between units to allow each resident to have their "own" area or space. During this modernization project, LHA also will be taking the two adjoining units in 10 quadrplexes and remodeling them into one larger unit so that the LHA can better house larger families. This will also alleviate some of the concentration of large families in such small areas. This will add ten 5-bedroom units to LHA's housing inventory.

Strategy for Improving Management and Operations and the Living Environment

LHA is the recipient of federal funds. Each fiscal year, LHA receives an Operating Subsidy Fund, Capital Improvement Funds, and from time to time additional grant funds. Since the amount of federal funds received each year is subject to change depending on the amount of funding that is approved by Congress, the LHA has received notice from the Oklahoma City Field Office to prepare their 2006 Operating Budget based on 89 percent of the LHA's eligible amount. For the fiscal year of 2005-2006, the amount of Operating Subsidy that is expected to be received is \$356,028.00. The amount projected to be received in CFG funds is \$347,149.00. The authority is in the second year of a Resident Opportunity Self-Sufficiency (ROSS) Grant. The original award was for \$200,000.00. This grant will end in May of 2005.

The Operating Funds received by the authority are intended to assist in the daily operations of the business. Additional income received for operations are from rental income, interest income, and other miscellaneous income. Items that are considered as other income may be maintenance charges to residents, community room rental, management company income, and rooftop lease income. The amount of rental income for the coming year is projected to be \$425,210.00. Interest income is projected to be \$12,210.00. Other income is projected to be \$95,000.00.

The LHA received funding from HUD for FFY 2004 for a Public Housing Family Sufficiency Coordinator. This position will be responsible for identifying all residents in public housing that can use assistance in their quest for self-sufficiency. A large network of human service providers in the Lawton area works closely with the Coordinator in order to meet this goal. The LHA has developed and published a community wide Family Self-Sufficiency Directory. This directory is a listing of the many agencies in Lawton that can provide services to these participants.

The ROSS grant has been awarded to the LHA to provide self-sufficiency assistance to public housing residents. These funds are used to assist with educational opportunities, transportation, day care, and a variety of other "needs" that a client may face on their road to achieving self-sufficiency. At this time, HUD will not continue funding this program beginning in FFY 2006.

The projected operating costs of the LHA for the coming fiscal year is \$1,019,630.00. The increasing cost of utilities and insurance is placing a larger burden on the fiscal operations of

the LHA. With the current and projected levels of funding, the LHA is facing difficult decisions on the continued level of services that it will be able to provide to its clients. The staffing level and the level of employee benefits that will be provided will also face cuts. The condition and upkeep of the housing units will be in jeopardy. HUD has placed a mandate on housing authorities to convert to project based accounting by the beginning of 2006. This mandate will drastically change the organization of LHA. LHA has developed the initial model for the Project Based Accounting conversion required by HUD. The initial model will convert the management of LHA from one main cost center as LHA is currently organized, to seven or eight new cost centers. LHA's existing staff will be assigned to one of the new cost centers and will not be able to perform any work for any of the other cost centers. The one exception to this is that the new Maintenance Department Cost Center will bill each of the other cost centers on a work order basis for all services or products provided. Each Cost Center will be expected to pay for its total costs of operation. LHA has already made staffing cuts at the beginning of 2005. The level of funding that the authority receives from HUD will determine whether additional staffing cuts will be needed. It is LHA's projection that all of the new cost centers will be able to cash flow their operation except the Family Developments Cost Center. At this time, HUD has not determined how the Capital Fund Grants, the Operating Reserves, and existing grants will be split out or allocated to the new cost centers. As it stands right now, the new cost centers that are profitable will not be able to share their profits with other cost centers. If this does not change, LHA predicts that the LHA's family developments will be taken out of operation. It is unknown at this time how HUD will deal with these closed developments not only in Lawton, but also throughout the United States.

Due to the outcome of the Harvard Cost Study, commissioned by HUD and completed in 2002, it was projected that LHA should receive a 68 percent increase in their eligible Operating Subsidy. The projected increases are scheduled to start during 2006. However, due to current legislative budget negotiations, it appears very unlikely that any proposed increase to LHA's Operating Subsidy will materialize.

LHA has been fortunate to receive several different grants that allowed it to provide a variety of different services to LHA's residents. The nature and the amounts of any future grants are not known at this time. LHA expects the amount of any additional funding made available through additional grant opportunities from HUD to be greatly diminished. The level of additional services that LHA will be able to provide to its residents will depend on the ability of LHA to apply for and receive additional funding. The overall appearance and operation of the LHA will definitely be changing in the future. The authority will continue to seek out and apply for grant opportunities for the benefit of the clients they serve.

Comprehensive Grant Coordination

The strategy for the Comprehensive Grant Program establishes priorities for the following activities:

1. Activities that increase resident safety.
2. Section 504 Needs Assessment requirements for handicap accessibility.

3. Activities to protect and maintain the integrity of the authority's property.

In an effort to improve the living environment in and around housing authority property, LHA implemented a Resident Initiatives Policy designed to develop a partnership between public housing residents and the PHA. The Policy helps to develop and implement a resident initiatives agenda to create self-sufficiency opportunities and to maintain viable, safe, and drug free public housing developments in the city. The Resident Initiatives Policy establishes guidelines concerning the development, implementation, and monitoring procedures to provide effective anti-drug and anti-crime strategies to provide for resident participation/management in the authority's decision making process, to provide home ownership and economic development/self-sufficiency opportunities for public housing residents and to maintain safe, secure, and drug free public housing developments.

The PHA's Resident Programs Department is responsible for development and monitoring Drug Prevention Programs to provide alternatives to drug abuse through providing programs lead by positive community role models. The design of the programs is tailored specifically to the needs of each housing development. Programs determined to be viable to support implementation in the housing developments include scouting, drug workshops, field trips, youth sports programs, General Education Development (GED) program, vocational education programs, and community assisted non-profit organizations and local law enforcement agencies to provide positive role model program activities. The PHA implementation of the Drug Prevention Programs is accomplished in close collaboration with the United Way of Lawton - Fort Sill; local scouting organizations; the Camp Fire Program; the Oklahoma State University (OSU) Extension 4-H Program; non-profit organizations such as local Optimist Clubs, American Business Clubs (AMBUCS), and the Lions Club; and other agencies with a common goal of providing community and public housing residents, through a Continuum of Care process, viable alternatives to drugs.

The Resident Programs Department is also responsible for development of economic development and self-sufficiency initiatives for public housing residents. The department accomplishes this through the Public Housing Drug Elimination Grant, other appropriate grant programs, and community networking. Vocational education courses to develop marketable job skills and assistance in establishing resident owned businesses provide incentives for residents to become self-sufficient. Examples of self-sufficiency education and training efforts include GED classes, child development classes, nurse's aid training, and training on office administration skills, job interview training, and other training and education programs as appropriate. The programs are accomplished in close coordination and collaboration with educational institutions in the area, local transportation organizations, the Department of Human Services (DHS), the Association of Southwest Oklahoma Council of Governments (ASCOG), the Lawton Housing and Community Development (HCD) office, and other local agencies involved in job training and economic development, especially small business development. The goal of the programs is to encourage and develop self-sufficiency and move public housing residents into gainful employment.

Economic development projects oriented to the revitalization of the neighborhoods

surrounding public housing facilities are planned and coordinated with public housing programs by collaboration between the PHA and Lawton's HCD office. Specific projects designed for revitalization of the Lawton View community are addressed in Section Five, Non-Housing Community Development Needs.

Details of the Public Housing Inventory

LHA owns 319 units of conventional Public Housing, 100 of which are designated for elderly only and 50 of which are designed for disabled/elderly households and 169 of which are for families. The annual vacancy rate is approximately 14 percent.

Table 3-19
"LHA Housing Stock"

Type of Unit	Number of Units
Elderly	100
Elderly/Disabled	50
Family	169
Total	319

Source: Lawton Housing Authority data

LHA currently has a total of 189 Section 8 Certificates and Vouchers, which are utilized in the City of Lawton. These Certificates and Vouchers are broken down as follows:

Table 3-20
"LHA Section 8 Inventory"

Type of Certificate/Voucher	Number of Vouchers
Regular	120
Family Unification	50
Homeownership	19
Total	189

Source: Lawton Housing Authority data

LHA's waiting lists include 0 households for public housing and 68 households for the Section 8 program. During the past few years, the number of applicants on LHA's master Section 8 waiting list has remained relatively level at around 65 to 100.

Forty (40) percent of those on the public housing and Section 8 tenant-based assistance waiting lists are extremely low income (less than or equal to 30 percent of median).

Other Tenant-Based Rental Assisted Housing

The Oklahoma Housing Finance Agency (OHFA), out of the main office in Oklahoma City, administers the Section 8 program for the City of Lawton. In 1996, OHFA reported that there were 502 units of housing in Lawton supported in whole or in part by Section 8 housing

assistance payments.

OHFA lacks funding to provide housing assistance to all eligible families. OHFA's current waiting list for the City of Lawton consists of 414 households. It is important to note, however, that the households on the waiting list have not been screened for eligibility. On the other hand, because of the long waiting list, there are probably many households who have not signed up simply because of the length of the waiting list and the long wait for assistance.

Details of other Tenant-based Rental Assisted Housing Inventory

OHFA currently has a total of 672 active Section 8 Certificates and Vouchers, which are utilized in the City of Lawton. These Certificates and Vouchers are broken down as follows:

Table 3-21
"OHFA Section 8 Inventory"

Type of Certificate/Voucher	
Regular	582
Homeownership	37
Mainstream	41
Family Unification	12
Total	672

Source: Oklahoma Housing Finance Agency data

Waiting List

OHFA reported there are currently 14,311 people on the waiting list, statewide, for the Section 8 program. Of the total number on the waiting list, 601 are residents of the City of Lawton. During the past few years, the number of applicants on OHFA's master Section 8 waiting list has fluctuated between 2,500 to 3,500. However, this number has to be viewed in the context of the fact that OHFA has substantially increased the number of rental assistance subsidies available (from total funding commitments of 502 units in 1999 to 774 units currently). If the number of subsidies available had been static, it is fair to assume that the waiting list would have grown.

During the FFY 2004-2009 reporting period, the wait times for assisted housing programs dropped to 18 months due to an increase in available housing units, but they have risen again. OHFA reports for Section 8 vouchers, the wait time can vary between 2-5 years. All waiting lists are open.

Forty (40) percent of those on the OHFA Section 8 tenant-based assistance waiting lists are extremely low income (less than or equal to 30 percent of median).

Other Project-Based Rental Assisted Housing

Twelve (12) other housing developments in Lawton provide project-based Section 8 rental housing assistance or other rental assistance funding for low- and moderate-income households. One other housing development provides Shelter Care Plus rental housing assistance for low-income households. Table 3-21 shows the type, use, and number of units and current vacancy rates at each development.

Table 3-22
"Subsidized Housing Inventory"

Name	HUD Type	Use	Number of Units	Vacancy Rate
Ambassador Apartment	221(d)4	Family	72	4%
Cambridge Estates Apartments	221(d)4	Elderly	61	1%
Columbia Square Apartments	221(d)3	Family	64	5%
Diplomat Apartments	221(d)4	Family	72	6%
Goodwill Village	Section 202	Disabled	36	1%
Goodwill Village West	Section 811	Disabled	21	1%
Goodwill Village West II	Section 811	Disabled	17	1%
Pine Terrace Apartments	221(d)4	Family	15	0%
Sanders Heights Apartments	PD 8	Family	48	8%
Stratford Square Apartments	221(d)4	Family	62	0%
Carepoint	HOPWA	Individual/ Families	6	0%
New Beginnings	Shelter Care Plus	Disabled	5	0%
Total Other Assisted Units			479	

Source: HUD Inventory data

Table 3-22 provides a recapitulation of the total rental assisted housing available in the community.

Table 3-23
"Total Rental Assisted Housing"

Project-Based Rental Assistance	
Public Housing	319
Section 221(d)4 Elderly	61
Section 221(d)4 Family	221
Section 221(d)3 Family	64
PD8 Section 8	48
Section 202 Elderly/Disabled	36
Section 811 Disabled	38
HOPWA	6
Shelter Plus Care	5

Total Project-Based	798
Tenant-Based Rental Assistance	
Lawton Housing Authority	189
Oklahoma Housing Finance Agency (OHFA)	774
Total Tenant-Based	963
Total Units With Rental Assistance	1,761

Sources: HUD Inventory data, OHFA Inventory data, LHA Inventory data

Low- and Moderate-Income Rental Assisted Units

Of the 8,203 rental units occupied by low- and moderate-income households, 4,795 rental households in the City were cost burdened, i.e., spending more than 30 percent of their gross annual income for housing. Low- and moderate-income households, whose housing costs are generally 30 percent of their income due to Section 8 or equivalent rental assistance, occupy 1,761 rental units -or around 21.5 percent of the rental units.

An additional 222 affordable units, which are tax credit qualified units under the Low Income Housing Tax Credit (LIHTC) program, are currently under construction. 162 units are dedicated for families and 60 units are dedicated for the elderly. The LIHTC apartments are scheduled for occupancy in June 2006. The units will also be available to households receiving Section 8 rental assistance.

Expected Losses

The City is unsure of any expected losses in the future due to projected budget and funding cuts.

Ensuring No Net Loss of Assisted Housing

Approximately 300 units of privately owned rental housing in Lawton receive Project-Based Section 8. Presently, approximately 70 to 100 of those units do not have agreements ensuring their long-term affordability. In order to prevent the conversion of those units to market rate housing when their contracts expire over the next 10 years, agreements with HUD need to be reached with each property owner that preserve the future affordability. The City has designated LHA as the entity to work with HUD's multi-family office to encourage the renewal of Project-Based Section 8 contracts to ensure continued affordability.

Homeless Facilities and Services

Great Plains Improvement Foundation, Inc., through the C. Carter Crane Shelter, provides temporary shelter to the homeless. The shelter provided shelter to approximately 330 homeless persons during 2008 and anticipates providing shelter for over 400 homeless in 2009.

The number of homeless persons helped by the shelter was reduced by half because of substantial budget cuts. In addition to housing, C. Carter Crane Shelter provides food and limited clothing. Other supportive services include job counseling, referral services, referral to other social service agencies, and assistance in locating permanent housing. Additionally, GPIF manages twelve (12) transitional housing units, which support Lawton's Transitional Housing program organized and operated under the auspices of the HOME Investment Partnerships (HOME) Act.

The Salvation Army provides emergency shelter housing assistance and a variety of other services. In the past five (5) years, Salvation Army's emergency shelter provided assistance to approximately 725 individuals annually. The Salvation Army serves primarily the transient population of the community, including food, clothing, and housing assistance in the form of utility, rent, and mortgage payment assistance. Furniture, other household items, and transportation assistance are included. The Salvation Army serves a meal a day at their Lawton facility. The organization also provides group and individual counseling, character building classes, and family budgeting assistance.

Special Needs Facilities and Services

Roadback, Inc. provides detoxification, continuing treatment, vocational assistance and rehabilitation for recovering adult and adolescent alcohol and drug addicts. Roadback, Inc. operates the only non-medical detoxification unit in southwest Oklahoma. Treatment takes place in a residential setting at their five facilities. The program targets principally the indigent population, and those who cannot afford to pay for these needed services. The organization provides clients assistance in applying for food stamps, social services, and vocational training assistance. Currently Roadback, Inc. has 67 adults participating in the Halfway House programs. 37 adolescents are also involved in their program. There are a total of 270 participants in the detoxification program at their facilities, including Miller Manor, Helen Holliday Home, Pathway House, Serenity House, and Delta House. Roadback also provides outpatient for adolescents and adults, on an as needed basis, for approximately 120 clients. In addition, the organization provides a new multi-dimensional outpatient family therapy program. This program is one (1) of only three (3) in Oklahoma. The program is designed for recovering adolescents and their families to enhance the family situation for reunification. Roadback provides emergency housing for four (4) individuals at its male and female detoxification centers. Roadback provides supportive housing for seven (7) adult males at Miller Manor, fourteen (14) adult females at Helen Holiday Home, and ten (10) adolescents, male and female, at Pathway House. Additionally, the organization provides transitional housing for five (5) individuals at its Serenity House. Roadback's waiting list has 68 individuals for all of its supportive housing programs. In order to receive services, clients in most cases must wait between six (6) and twelve (12) months. All waiting lists are open.

Marie Detty Youth and Family Service Center, Inc. provides short-term shelter for youth ranging in age from 11 to 17. The purpose of the shelter intervention program is to reunify families experiencing problems. The youth receive 24 hour supervised care. While in the shelter

the youth participate in a personal responsibility program, which includes the daily living skills curriculum, educational enhancement, and growth through group, individual and family counseling. Professional, skilled counselors are available to help individuals and families overcome barriers to happiness. Marie Detty Youth and Family Service Center provides emergency housing for twenty (20) youth at its short-term shelter.

Barriers to Affordable Housing

General

An important barrier to the provision of affordable housing for low-income households in the City of Lawton is the restriction on expansion of Lawton's Public Housing Authority (PHA) services to the community. In 1974, opposition to the PHA's establishment of two public housing projects in east and west Lawton was successful in a petition drive to prevent establishment of the two projects and to prevent any future expansion of the PHA's operation. The petition drive resulted in an election on a referendum to freeze and limit the PHA to its existing scale of operations. Since passage of the referendum, the community has had no federal funding for construction of new public housing, and therefore, no new public housing has been constructed in Lawton. Part of the problem caused by the referendum's limitation on PHA activities was offset by the Housing and Community Development Act of 1974, which established the Section 8 Housing Program, which allowed, for the first time, existing housing to be used as a source of public housing. Because of the referendum, the PHA was prohibited from managing the Section 8 Housing Payments Program. Fortunately for the city, the Oklahoma Housing Finance Agency (OHFA) agreed, at the request of the Lawton City Council, to manage the Section 8 housing assistance program for the benefit of the community. The OHFA Section 8 program began to provide housing assistance to Lawton residents in 1978, and since that time it has continued to provide the assistance from its Oklahoma City Office.

The biggest obstacle to homeownership in Lawton, however, is the high cost of housing relative to the low incomes in the area. A challenge facing Lawton in its efforts to increase the rate of homeownership is a lack of grant funds available for rehabilitation to make older homes in central city neighborhoods competitive with surrounding newer homes. Most of the older homes do not appraise at a level high enough to finance the rehabilitation needed to bring the properties up to codes and livability standards. Capital grants for rehabilitation along with financial assistance for down payments and closing costs and homeownership training, are among the most significant ways that the City can support increased homeownership in Lawton.

The HUD regulations applicable to federally subsidized housing regarding lead-based paint that went into effect in September 2000 require that any loose/deteriorating paint in a housing unit with a child age six years or under must be corrected by appropriately trained maintenance people, and that the unit must subsequently pass a clearance test. This is a serious hurdle for recruiting private landlords to participate in the Section 8 program. The regulations also have the potential to increase discrimination against families with young children - a group

that already encounters great difficulty in a tight affordable housing market. Another serious impediment to overcome is the impact on costs and availability of qualified contractors and workers for the remediation of lead-based paint hazards in housing assisted with federal rehabilitation funds.

Community and economic development and affordable housing programs in Lawton are essential to address the most important long-term needs in the community.

As the federal government devotes an increasing share of resources to pressing international affairs, Lawton must develop innovative local solutions to mitigate the harmful effects of persistent housing crises on the lives of low- and moderate-income residents. An approach to developing solutions is the establishment of a housing task force to address pressing housing challenges. The City of Lawton will face a much more severe housing crisis in the future if federal housing funds continue to decline. The task force, with involvement from neighborhood groups, non-profit housing organizations, and for profit developers should examine the following issues that will affect housing:

- Alternate funding sources for the purpose of supporting affordable housing development;
- Increased use of Low Income Housing Tax Credits to increase affordable housing;
- Property tax burdens of low-income households;
- Maintenance and rehabilitation to preserve the existing housing stock;
- Assessment of current affordable housing programs;
- Development of a long-term housing strategy; and
- Existing building codes, zoning requirements, and permitting processes.

SECTION IV

HOUSING AND HOMELESS NEEDS ASSESSMENT

General

This section provides an analysis of housing for low- and moderate-income families/households and homeless families/households in the community based on data provided by the 2000 Census and other housing data concerning the Lawton community provided by the U.S. Department of Housing and Urban Development (HUD) Office of Community Planning and Development (CPD). The analysis is oriented to the housing needs of the community's low- and moderate-income households and the housing and human service needs of homeless persons/families/households. The tables (4-1, 4-2, 4-3, and 4-4) below summarize the City's priority housing needs. The principal housing problem among all groups is cost burden. The estimates are taken from the U.S. Department of Housing and Urban Development (HUD) Comprehensive Housing Affordability Strategy (CHAS) Data, Table 1C, dated May 1, 2004. It should be noted that HUD's 2004 estimates are based on 2000 census data. "Total estimated dollars" includes funds from all sources.

Housing Needs of Family/Households

The 2000 Census and HUD's CHAS Data forms the basis for this analysis of the housing needs of low- and moderate-income families/households in the Lawton community. The analysis addresses the housing conditions of low- and moderate-income renters and homeowners in the community, specifically, the problems faced by low-income families/households in providing adequate housing for their families. The analysis will discuss the problems and cost burdens experienced by many low- and moderate-income families/households.

Overall Housing Analysis

The City of Lawton has persistent housing affordability and availability crises affecting nearly every segment of the population:

- The rental vacancy rate for Lawton was at or below 12 percent from June 1996 to June 2001, rising recently to 13.5 percent (Census 2000). The overall vacancy rate for affordable (subsidized) units is 6.5 percent, significantly lower than the community vacancy rate.
- Market rate rents rose faster than the inflation rate for the third year in a row, rising approximately 3.7 percent per year.
- A recent national study found that Lawton's renters should earn a living wage of \$10.40 per hour to afford a two-bedroom apartment - an increase of 8.4% over the last two years, while area median income only increased by 1.1% during the same period. (Out of Reach, National Low Income Housing Coalition, September 2004)
- The median price of a single-family home in Lawton increased by 10% in the last three years to \$80,900.

The affordable housing shortage is forcing people to seek housing outside the city or to seek emergency temporary shelter. Although the rental market creates problems for both low- (i.e., those at 50 percent or less of median) and moderate- (i.e., those earning 51 to 80 percent of median) income households, very low-income (i.e., those at 30 percent or less of median) rental households are effectively frozen out of the private rental market entirely. According to the 2000 Census, a disproportionately higher percentage of persons with disabilities are found in the 30 percent or less of median income and are at a greater competitive disadvantage.

As noted in Section III, homeownership rates in Lawton are substantially lower than county, state and national levels, and homeownership is out of reach to most of Lawton's low-income residents. Affordability is the major problem. Limited numbers of affordable properties are on the market; 47.2 percent of Lawton's homeowners have occupied the same house for 20 or more years (Census 2000). At the 2003 median home price of \$78,200, a household's monthly mortgage payment for a \$78,200 loan (assuming no down payment) at 6.5% interest for a 30-year term would be \$494.00 (exclusive of insurances and property taxes). Insurance and property taxes would add approximately \$150 more per month. Lawton still remains one of the more affordable communities, compared to cities of the same size or larger, in Oklahoma for homebuyers. . However, the median value of a home in Lawton is well above the median value of \$67,700 in Oklahoma. Other than through Habitat for Humanity, it is virtually impossible to qualify households in the extremely low-income (0 - 30% of median) range for homeownership. Even under the Section 8 homeownership pilot, Community Housing Development Organization (CHDO) projects, and the city's first-time homebuyer program, most buyers will fall in the moderate-income (51 - 80 percent of median) range and require some type of subsidy to purchase a home.

Lawton has 8,477 units (24%) of housing stock built before 1960 and 14,712 units (42%) built between 1960 and 1978. In addition to the data in Section III of this plan, the age of the housing stock also means that preservation is a critical aspect of efforts to expand the supply of affordable housing.

On a citywide basis, the number of assisted rental units available for low- and moderate-income renters meets less than 25 percent of the demand for assisted rental housing. While there were 2,000 housing units added to Lawton between 1990 and 2000, 96 percent of those units were rentals, which were added due to annexation of Fort Sill. Of this increase, 283 owner-occupied units, or 14 percent, were upscale (\$125,000 or more) single-family homes - not rental units.

Strong economic growth in Lawton is expected to stimulate a dramatic need for additional housing, and housing availability constraints could seriously impede the ability of the city to grow to its economic development potential. Further, while the economic expansion hopefully will include high paying, highly desirable jobs, the majority of new jobs that are created will most likely be lower paying jobs in the retail and services categories - exacerbating the existing crisis in affordable housing.

General Housing Policies

All the citizens of Lawton desire to live and raise their families in homes which are safe, decent, sanitary, and affordable, at a cost that allows them to have enough money for the other necessities of life. In the face of Lawton's prosperity, thousands of Lawton's residents have been left behind through no fault of their own. They include the elderly and disabled, as well as many workers, whose wages have not kept up with housing costs and lag behind the living wage. The free market for housing is often not a fair market for low-income residents. Left unchecked, market forces will allow housing to deteriorate, push people from their homes and leave others with no homes at all.

Housing is the essence of Lawton's neighborhoods. Support for affordable housing allows elders to remain in the homes and neighborhoods they know. Homebuyer purchase and rehabilitation assistance programs allow the next generation of residents to own and modernize older homes.

The nonprofit housing organizations, such as Great Plains Improvement Foundation, Inc., LFS Habitat for Humanity, Inc., Lawton Housing Authority, etc., serve a crucial role in the development of affordable rental housing and housing for the most vulnerable populations. The City will continue to support these community-based nonprofit housing developers in their efforts in Lawton and in expanding their areas of operation.

Affordable housing is also a balance to economic development. In boom times, affordable housing growth is necessary to ensure that there is housing for the growing work force and that rising prices do not displace residents. In a troubled economy, affordable housing development, is an economic engine, which creates and retains jobs, and federal subsidies ensure that low-income residents are not made homeless. Finally, the use of affordable housing to redevelop distressed neighborhoods prevents the loss of value of the surrounding properties and encourages long-term investment by other property owners.

Lawton's housing policy is shaped around the concept of a housing tenure ladder. The ladder is an affordable housing system that combines security and mobility, one that guarantees both an "opportunity to stay put" and a "chance to move on." The rungs of the housing tenure ladder consist of a wide range of living situations, including single room occupancy (SRO), family-sized apartments, detached single-family homes, condominiums, group homes and co-housing. This housing includes a wide range of tenures, including public ownership, for-profit rental, nonprofit rentals, limited equity condominiums, and market-priced condominiums and single family houses.

The many different rungs allow residents to change their housing when their needs or circumstances change, from living situations that are precarious to those that are more secure; moving from situations that are cramped to those that are more commodious; moving from situations requiring each and every resident to "go it alone" to those that allow more cooperative sharing of residential responsibilities, burdens and risks. At each rung, the tenure of residents must be secure and opportunities must be created, with an easy process for moving from one rung to another. The City will continue to support new models of housing tenure that create

additional rungs on the housing tenure ladders, bridging the yawning gap between for-profit rental housing and market-priced homeownership.

Extremely Low-Income Family/Household (0 - 30% AMFI)

An extremely low-income family/household is one whose income is between 0 and 30 percent of the median income for the area, as determined by HUD with adjustments for smaller and larger families, except that HUD may establish income ceilings higher or lower than 30 percent of the median for the area on the basis of HUD's findings that such variations are necessary because of prevailing levels of construction costs or fair market rents, or unusually high or low family incomes adjusted for the size of family.

There are 2,784 families/households in the extremely low-income category in the community, including 322 elderly families/households, 1,375 small families/households, 247 large families/households, and 840 all other households, who rent housing. It further shows that 75.4 percent of all extremely low-income renters surveyed experienced some kind of housing problem related to physical defects or high cost. Fully 74.6 percent of families/households in this income category live under a housing cost burden that is greater than 30 percent, meaning that their gross housing costs, including utility costs, exceed 30 percent of their gross income. And, 64 percent of the families/households are under a severe cost burden which is greater than 50 percent, meaning that their gross housing costs, including utility costs, exceed 50 percent of the family's/household's gross income. Overcrowding was reported as a problem by 4 percent of extremely low-income renters. Overcrowding occurs when a housing unit, regardless of size, houses more than one person per room. Overcrowding is particularly acute for large families/households. 49 percent of large families/households reported overcrowding. The census found that 21.4 percent of all renters have extremely low-incomes.

There were 1,070 families/households in the extremely low-income category who were homeowners. 479, or 44.7 percent, of the families/households were elderly. This compares with only 11.9 percent of renters in this income category who were elderly. 68 percent of all of the homeowners in the category experienced housing problems, but 62.6 percent of the elderly families/households who are homeowners reported housing problems. 78.3 percent of small and large related homeowners in the category experienced housing problems. 68 percent of all extremely low-income homeowners have cost burdens exceeding 30 percent of their gross

Table 4-1
"Housing Needs Table (<=30%)"

Income Level	Occupancy Type	Household Type	Household Conditions	Current % of Households	Current # of Households	Priority Need Level High, Medium, Low, No Such Need	2000 DOLLARS NEEDED TO ADDRESS
Household Income <= 30% AMFI	Renters	Elderly 1 & 2 member	Number of Households	100%	322		
			Any Housing Problems	70.8	228	H	0
			Cost Burden >30%	70.8	228	H	226,800
			Cost Burden > 50%	51.2	165	H	990,000
		Small Family 2 - 4 member	Number of Households	100%	1,375		
			Any Housing Problems	77.1	1,060	H	400,000
			Cost Burden >30%	75.6	1,040	H	450,000

Owners	Large Family 5 or more member	Cost Burden > 50%	66.5	915	H	5,490,000
		Number of Households	100%	247		
		Any Housing Problems	91.9	227	H	80,000
		Cost Burden >30%	90.3	223	H	82,800
		Cost Burden > 50%	81.0	200	H	1,200,000
		Number of Households	100%	840		
		Any Housing Problems	69.6	585	H	0
		Cost Burden >30%	59.6	585	H	324,000
	All other	Cost Burden > 50%	58.9	495	H	2,970,000
		Number of Households	100%	479		
		Any Housing Problems	62.6	300	H	0
		Cost Burden >30%	62.6	300	H	288,000
	Elderly 1 & 2 member	Cost Burden > 50%	45.9	220	M	1,320,000
		Number of Households	100%	324		
		Any Housing Problems	76.9	249	H	0
		Cost Burden >30%	76.9	249	H	126,000
	Small Family 2 - 4 member	Cost Burden > 50%	66.0	214	H	1,284,000
		Number of Households	100%	22		
		Any Housing Problems	100	22	H	0
		Cost Burden >30%	100	22	H	28,800
	Large Family 5 or more member	Cost Burden > 50%	63.6	14	H	84,000
		Number of Households	100%	245		
		Any Housing Problems	65.3	160	H	0
		Cost Burden >30%	65.3	160	H	144,000
All other	Cost Burden > 50%	49.0	120	M	720,000	

Sources: U.S. Census Bureau, Census 2000, HUD 2000 CHAS data

HUD defines any housing problems as: cost burden greater than 30 percent of income and/or overcrowding and/or without complete kitchen or plumbing facilities.

income, while 76.9 percent of the elderly families/households are burdened by housing costs. 53.1 percent of homeowners reported severe cost burdens, which exceeded 50 percent, but only 45.9 percent of elderly homeowners reported a severe cost burden. In contrast to renters, only three (3) percent of extremely low-income homeowners reported overcrowded conditions. Homeowners with extremely low incomes represent only six (6) percent of all homeowners.

Low-Income Family/Household (31 - 50% AMFI)

A low-income family/household is one whose income does not exceed 50 percent of the median family income for the area, as determined by HUD with adjustments for smaller and larger families, except that HUD may establish income ceilings higher or lower than 50 percent of the median for the area on the basis of HUD's findings that such variations are necessary because of prevailing levels of construction costs or fair market rents, or unusually high or low family incomes.

Table 4-2
Housing Needs Table (30% to 50%)

Income Level	Occupancy Type	Household Type	Household Conditions	Current % of Households	Current # of Households	Priority Need Level High, Medium, Low, No Such Need	2000 Dollars Needed to Address
Household Income 30% to 50% AMFI	Renters	Elderly 1 & 2 member	Number of Households	100%	345		
			Any Housing Problems	62.6	216	H	80,000
			Cost Burden >30%	61.4	212	L	558,000
			Cost Burden > 50%	16.5	57	L	342,000
		Small Family 2 - 4 member	Number of Households	100%	1,104		
			Any Housing Problems	77.8	859	H	600,000
			Cost Burden >30%	75.1	829	H	1,944,000

		Large Family 5 or more member	Cost Burden > 50%	26.2	289	M	1,734,000
			Number of Households	100%	232		
			Any Housing Problems	63.8	148	H	1,300,000
			Cost Burden >30%	35.8	83	M	284,400
		All other	Cost Burden > 50%	1.7	4	L	24,000
			Number of Households	100%	608		
			Any Housing Problems	75.3	458	H	80,000
			Cost Burden >30%	74.7	454	H	1,238,400
			Cost Burden > 50%	18.1	110	L	660,000
	Owners	Elderly 1 & 2 member	Number of Households	100%	552		
			Any Housing Problems	45.8	253	H	302,000
			Cost Burden >30%	45.8	253	H	302,400
			Cost Burden > 50%	30.6	169	M	1,014,000
		Small Family 2 - 4 member	Number of Households	100%	335		
			Any Housing Problems	71.6	240	H	414,000
			Cost Burden >30%	71.6	240	H	414,000
			Cost Burden > 50%	37.3	125	M	750,000
		Large Family 5 or more member	Number of Households	100%	124		
			Any Housing Problems	59.7	74	H	80,000
Cost Burden >30%	56.5		70	H	162,000		
Cost Burden > 50%	20.2		25	M	150,000		
All other	Number of Households	100%	210				
	Any Housing Problems	71.4	150	H	300,000		
	Cost Burden >30%	64.3	135	H	162,000		
	Cost Burden > 50%	42.9	90	M	540,000		

Sources: U.S. Census Bureau, Census 2000, HUD 2000 CHAS data

HUD defines any housing problems as: cost burden greater than 30% of income and/or overcrowding and/or without complete kitchen or plumbing facilities.

There were 2,289 families/households, including 345 elderly families/households, 1,104 small families/households, 232 large families/households, and 608 all other households, who rent housing. 73.4 percent of all renters in the low-income category were found to have housing problems, and 62.6 percent of elderly renters had problems. 68.9 percent of the families/households in this category experienced a housing cost burden of greater than 30 percent, while 20.1 percent of the families/households lived under a severe cost burden with housing costs exceeding 50 percent of their gross incomes. 8.5 percent of low-income renters reported overcrowding, but 46.4 percent of large families/households reported overcrowded households. While low-income renters comprised 17.6 percent of all renter families/households, over 38.9 percent of renters had incomes at or below 50 percent of the median family income.

1,221 low-income families/households who were homeowners were surveyed. 45.2 percent of these homeowner families/households were elderly. 58.7 percent of all homeowners in the category had housing problems, while only 45.8 percent of elderly homeowners experienced housing problems. 57.2 percent of all homeowners in the category reported cost burdens greater than 30 percent, but once again, fewer elderly homeowners, 45.8 percent, reported cost burdens over 30 percent. 33.5 percent of the homeowners reported severe cost burdens with over 50 percent of their incomes going to housing. Only 30.6 percent of elderly homeowners in the low-income category reported severe cost burdens. Overcrowding was identified as a problem in only 3.6 percent of low-income families/households who owned their own home. Homeowners in the low-income category represent just 6.9 percent of all homeowners. Families/households with incomes at or below 50 percent of the median family income represent only 12.9 percent of total homeowners.

Moderate-Income Family/Household (51 - 80% AMFI)

A moderate-income family/household is one whose income does not exceed 80 percent of the median income for the area, as determined by HUD with adjustments for smaller and larger families, except that HUD may establish income ceilings higher or lower than 80 percent of the median for the area on the basis of HUD's findings that such variations are necessary because of prevailing levels of construction costs or fair market rents, or unusually high or low family incomes.

There were 3,130 moderate-income families/households, including 221 elderly families/households, 1,710 small families/households, 469 large families/households, and 730 all other households, who rent housing. 34.3 percent of all renters in the moderate-income category were found to have housing problems, and 38.9 percent of elderly renters had problems. 24.5 percent of the families/households in this category experienced a housing cost burden of greater than 30 percent, while 1.5 percent of the families/households lived under a severe cost burden with housing costs exceeding 50 percent of their gross incomes. 8.0 percent of moderate-income renters reported overcrowding, while 24.3 percent of large families/households reported overcrowded households. While moderate-income renters comprised 24.1 percent of all renter families/households, over 62.9 percent of renters had incomes at or below 80 percent of the median family income.

Two thousand, three hundred, sixty-six moderate-income families/households who were homeowners were surveyed. 40.5 percent of these homeowner families/households were elderly. 40 percent of all homeowners in the category had housing problems, while only 26.5 percent of elderly homeowners experienced housing problems. 35.6 percent of all homeowners in the category reported cost burdens greater than 30 percent, but once again, fewer elderly homeowners, 26.5 percent, reported cost burdens over 30 percent. 10.1 percent of the homeowners reported severe cost burdens with over 50 percent of their incomes going to housing. 9.8 percent of elderly homeowners in the moderate-income category reported severe cost burdens. Overcrowding was identified as a problem in only 4.6 percent of moderate-income families/households who owned their own home. Homeowners in the moderate-income category represent just 17 percent of all homeowners. Families/households with incomes at or below 80 percent of the median family income represent only 26.3 percent of total homeowners.

Table 4-3
Housing Needs Table (50% to 80%)

Income Level	Occupancy Type	Household Type	Household Conditions	Current % of Households	Current # of Households	Priority Need Level High, Medium, Low, No Such Need	2000 Dollars Needed to Address		
Household Income 50% to 80% AMFI	Renters	Elderly 1 & 2 member	Number of Households	100%	221				
			Any Housing	38.9	86	H	440,000		
			Cost Burden >30%	29.0	64	M	194,400		
					Cost Burden > 50%	4.5	10	M	60,000
		Small Family 2-4 member	Number of Households	100%	1,710				
			Any Housing Problems	32.2	859	H	2,100,000		
			Cost Burden >30%	26.0	445	L	1,512,000		
			Cost Burden > 50%	1.5	25	N	150,000		

Owners	Large Family 5 or more member	Number of Households	100%	469			
		Any Housing Problems	55.2	259	H	3,300,000	
		Cost Burden >30%	20	94	L	324,400	
		Cost Burden > 50%	0.9	4	N	24,000	
	All other	Number of Households	100%	730			
		Any Housing Problems	24.7	180	H	300,000	
		Cost Burden >30%	22.6	165	M	558,000	
		Cost Burden > 50%	1.4	10	L	60,000	
	Elderly 1& 2 member	Number of Households	100%	959			
		Any Housing Problems	26.5	254	H	576,000	
		Cost Burden >30%	26.5	254	M	576,000	
		Cost Burden > 50%	9.8	94	L	564,000	
		Small Family 2-4 member	Number of Households	100%	794		
			Any Housing Problems	51.5	409	H	380,000
			Cost Burden >30%	49.1	390	M	1,080,000
			Cost Burden > 50%	11.3	90	L	540,000
		Large Family 5 or more member	Number of Households	100%	314		
			Any Housing Problems	55.4	174	H	1,700,000
			Cost Burden >30%	28.3	89	M	306,000
			Cost Burden > 50%	1.3	4	L	24,000
All other	Number of Households	100%	299				
	Any Housing Problems	36.5	109	H	212,000		
	Cost Burden >30%	36.5	109	M	212,400		
	Cost Burden > 50%	16.7	50	L	300,000		

Sources: U.S. Census Bureau, Census 2000, HUD 2000 CHAS data

HUD defines any housing problems as: cost burden greater than 30% of income and/or overcrowding and/or without complete kitchen or plumbing facilities.

Middle-Income Family/Household (81 - 95% AMFI)

A middle-income family/household is one whose income is between 80 and 95 percent of the median income for the area, as determined by HUD, with adjustments for smaller and larger families, except that HUD may establish income ceilings higher or lower than 95 percent of the median for the area on the basis of HUD's findings that such variations are necessary because of prevailing levels of construction costs or fair market rents, or unusually high or low family incomes.

Out of 1,037 families/households in the middle-income category, 38 of them were elderly. 32 percent of all of these renters experienced housing problems, but 45 percent of the elderly families/households surveyed had housing problems. Overall 19 percent of those surveyed paid greater than 30 percent of their incomes for housing, while 45 percent of the elderly families/households paid more than 30 percent of their incomes on housing. None of the families/households in the middle-income category who were surveyed had to pay more than 50 percent of their incomes to house their families.

Out of 1,299 middle-income families/households surveyed, 356, or 27 percent, were elderly. 34 percent of the population in the category reported housing problems, but only 12 percent of elderly families/households did. Cost burdens in excess of 30 percent were reported by 32 percent of this homeowner population, but only 12 percent of elderly families/households reported paying over 30 percent of their incomes for housing. 3.2 percent of the population surveyed reported severe cost burdens in excess of 50 percent. No elderly families/households

reported severe cost burden.

Housing Needs of Other Persons/Families

Minority Families / Households

The data reflecting the distribution of minority renter families/households and minority homeowner families/household are from the 2000 census.

Minority families/households are 47.2 percent of the total renter population, but they comprise 48.9 percent of renter families/households with incomes at or below 50 percent of the area median family income. Not surprisingly, a large proportion of minority renters experience housing problems, particularly affordability of housing. 78.7 percent of extremely low-income minority families/households reported housing problems compared to 75 percent of all the community's extremely low-income renters. 75.1 percent of low-income minority families/households reported housing problems as compared to 84.2 percent of all the community's low-income renters. But only 30.9 percent of moderate-income minority families/households reported housing problems compared to 34.3 percent of all the community's moderate-income renters.

As homeowners, minority families/households comprise 32.8 percent of total homeowners but represent 53.6 percent of all homeowners with incomes at or below 50 percent of the area median family income. Minority homeowners, like minority renters experience housing problems, particularly affordability of housing. 64.1 percent of extremely low-income minority families/households reported housing problems compared to 68 percent of all the community's extremely low-income homeowners. 72.5 percent of low-income minority families/households reported housing problems as compared to 58.7 percent of all the community's low-income homeowners. 54.9 percent of moderate-income minority families/households reported housing problems compared to 39.9 percent of all the community's moderate-income homeowners.

Elderly Persons / Families

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

Elderly homeowners make up a significantly greater proportion of homeowners at every income level. As homeowners, elderly families/households comprise 41.8 percent of total homeowners but represent 29.1 percent of all homeowners with incomes at or below 50 percent of the area median family income. Elderly homeowners, like elderly renter's experience significant cost burdens at low levels of income. For instance, 62.2 percent of elderly homeowners at extremely low-incomes report cost burdens of over 30 percent of the area median family income, while 45.9 percent report severe cost burdens in excess of 50 percent of area median family income. Unlike the case with elderly renters, housing problems decline significantly as homeowner's incomes increase. Renters' housing problems decline as incomes increase, but at a much slower rate. At moderate-income levels, 38.9 percent of elderly families/households who rent their shelter still have housing problems, while only 26.5 percent of elderly homeowners at the same income level have housing problems.

Large Families

As can be seen from the earlier discussion, 65.1 percent of large households with incomes below 95 percent of the area median income experience housing problems. The problem is particularly acute at income levels below 50 percent of the area median family income. At extremely low-income levels (0 - 30% AMFI) 92.6% percent of all (rental and homeowners) large families/households have housing problems, 90.3 percent pay over 30 percent of their incomes for housing, and 81 percent pay in excess of 50 percent of their incomes to house their families. At low-income levels (31 - 50% AMFI), 62.4 percent of all (rental and homeowners) large families/households have housing problems, 35.8 percent have cost burdens of over 30 percent, and only 1.4 percent are severely cost burdened at over 50 percent of their family incomes to provide housing for their families.

Overcrowding is also a significant problem for large families. As discussed earlier in this section, 28.5 percent of all large renter families/households report overcrowding. The incidence of overcrowding for large families/households ranges from a high 49.0 percent at extremely low-income levels to 24.3 percent at moderate-income levels. The high percentage of overcrowding in large families/households is reflective of the overall shortage of large family housing units in Lawton. The shortage of suitable rental units is magnified by the overall shortage relative to the number of large families/households in the community.

Disabled Housing

Table 4-4
"Accessibility Housing Needs Table"

Income Level	Occupancy Type	Household Type	Household Conditions	Current % of Households	Current # of Households	Priority Need Level High, Medium, Low, No Such Need	2000 Dollars needed to address
≤ 30% AMFI	Renters	Extra Elderly 1 & 2	Number of Households	100%	95		
			Accessibility Problems	63%	60	H	297,725
		Small	Number of Households	100%	45		
			Accessibility Problems	44%	20	H	99,900

	Owners	All other	Number of Households	100%	525			
			Accessibility Problems	21%	110	H	551,250	
		Extra Elderly 1 & 2	Number of Households	100%	114			
			Accessibility Problems	40%	45	H	225,150	
		Small	Number of Households	100%	100			
			Accessibility Problems	85%	85	H	425,000	
	All other	Number of Households	100%	175				
		Accessibility Problems	19%	33	H	166,250		
	30% to 50% AMFI	Renters	Extra Elderly 1 & 2	Number of Households	100%	95		
				Accessibility Problems	42%	40	H	199,500
			Small	Number of Households	100%	80		
				Accessibility Problems	87%	70	H	348,000
All other			Number of Households	100%	250			
			Accessibility Problems	23%	58	H	287,500	
Owners		Extra Elderly 1 & 2	Number of Households	100%	155			
			Accessibility Problems	32%	50	H	250,325	
		Small	Number of Households	100%	110			
			Accessibility Problems	55%	60	H	299,750	
		All other	Number of Households	100%	179			
			Accessibility Problems	14%	25	H	125,300	
50% to 80% AMFI	Renters	Extra Elderly 1 & 2	Number of Households	100%	65			
			Accessibility Problems	31%	20	H	100,100	
		Small	Number of Households	100%	35			
			Accessibility Problems	29%	10	L	50,050	
		All other	Number of Households	100%	425			
			Accessibility Problems	11%	47	L	233,750	
	Owners	Extra Elderly 1 & 2	Number of Households	100%	230			
			Accessibility Problems	22%	50	H	249,550	
		Small	Number of Households	100%	139			
			Accessibility Problems	50%	69	M	344,720	
		All other	Number of Households	100%	275			
			Accessibility Problems	14%	39	L	192,500	

Sources: U.S. Census Bureau, Census 2000, HUD 2000 CHAS data

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

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

Disproportionate Need

Disproportionate need is indicated for the following family/household categories:

1. Large Hispanic families/households that are renters make up only 10 percent of renters, but 92.3 percent of these Hispanic families/households have housing problems.
2. Small Hispanic families/households that are renters make up 24 percent of renters, and 69.2 percent of them have housing problems.
3. Elderly homeowners are only 18.9 percent of all owners, but 42.3 percent have housing problems.

Homeless Needs (Current and Five-Year Projection)

Nature and Extent of Homelessness

Information and data to adequately assess the nature and full extent of homelessness in the Lawton-Fort Sill community is limited in quantity as well as scope. Homeless service providers generally maintain records to document services provided, but none currently maintain data regarding unmet needs such as turn-aways or referrals that the agencies cannot provide for. Within the community, all service agencies must do a better job of documenting shortcomings in services to provide information for prioritization and allocation of limited funding. This assessment is based on limited data provided from the 2000 Census and limited information made available by the C. Carter Crane Shelter; Taliaferro Community Health Center; Roadback, Inc.; New Directions, Inc; and a recent (FFY 2004) Point-in-Time survey conducted by the Oklahoma Department of Commerce (ODOC). The 2000 census shows the Lawton/Comanche County population found on the day of the survey in Lawton's emergency shelters; shelters for runaway, neglected, and homeless children; and shelters for abused women. The numbers resulted in a fifty (50) percent occupied rate for beds in shelters in Comanche County and the City of Lawton (and the southwest region of the state, as well).

The 2000 Census data shows a representative sampling by racial and ethnic groups of

individuals using these same emergency homeless related services. The data represents a one day sample of the providers and is not intended as a complete count of the homeless population. It does, however, provide a representative sample of the numbers of people by racial/ethnic groups, which are served by the service providers on a recurring basis. Again, the data reflects Lawton's role as a center for homeless services for the Lawton community and the county at large.

In an attempt to meet the needs of the homeless, a program was established and implemented in Lawton through private sector efforts. C. Carter Crane Shelter was established as a volunteer organization to administer the program. The shelter serves the temporarily homeless and deinstitutionalized homeless by providing shelter, food, clothing, and job placement services. The shelter also provides assistance in locating permanent housing and provides referrals to other social service agencies when required. Since then, the Great Plains Improvement Foundation, Inc., a community action agency (CAA), has taken control of the facility and each year writes grants for the administration of the facility. All day-to-day operations of the shelter are now under the auspices of GPIF, Inc. In addition, The C. Carter Crane director indicates that typically the facilities are used to 100 percent of capacity. The director also indicates a need for additional single room occupancy (SRO) facilities to house homeless individuals as well as the additional resources to operate the facility. Additional transitional houses are required to expand the shelter's capacity to provide housing assistance for homeless families. She estimates the shelter can effectively manage up to 20 transitional houses without additional staffing, although she admits it would further stress an already over-extended staff. The shelter is highly dependent on volunteers and in 2003 relied on volunteers to assist in delivery of over 215 homeless persons to job sites, doctor's appointments, and interviews. They facilitated over 5,759 nights (total number of beds used during the year or stated differently, a running total of each bed used in the shelter throughout the year) to clients who were in need. In addition, 66 military veterans were provided housing and linkages to services to which they are entitled. 152 working (full- and part-time) clients were given a stable environment to learn and develop good work ethics and provided shelter, laundry facilities and transportation to their employment. The agency anticipates providing shelter to a similar number of homeless people next year. It is important to note that, like many of Lawton's human service providers, C. Carter Crane serves not only the local community, but it also draws some of its homeless clientele from Comanche County at large as well as parts of other surrounding counties. To meet future homeless needs the shelter is developing plans to expand the capacity of the two shelters and has requested assistance in procuring additional transitional houses to address the needs of families, particularly large ones. While the C. Carter Crane Shelter historically has made use of HUD rental properties to make up a small part of the shortfall in housing for homeless families, there are currently none in the inventory. However, the agency has recently reapplied for that HUD program and anticipates using the program to expand the shelter's capacity for providing for the housing needs of homeless families.

The C. Carter Crane Shelter has found that homelessness is no longer the domain of the single male. More and more each year, the shelter provides a full range of its homeless services to meet the needs of families, both small and large, young and old. The director of the organization has indicated that the facilities are generally committed to 100 percent of capacity, with the greatest need being the provision of adequate housing. Two major problems have been,

first, the provision of out placement services and second, the provision of effective job placement services.

The homeless population needs not only food and shelter, but also a variety of critical support services which include child care, medical assistance, counseling, education, and job training. To meet the variety of homeless needs, C. Carter Crane works in collaboration with other community non-profit service providers such as the Salvation Army and Goodwill Industries. The Lawton Food Bank provides food to needy families/households to meet emergencies and provides limited clothing and furniture as well as referral services. The Salvation Army Corps Community Center provides homeless individuals and families assistance with lodging, utility payment subsidies, transportation, and counseling. Goodwill provides similar assistance to homeless individuals and families.

Needs of Sheltered and Unsheltered Homeless

There are 298 families with children and 2,110 individuals provided homeless services. 100 families with children, consisting of 340 individuals, and 300 individuals were unsheltered. One-third, or 100, of the individuals served were 17 years of age or younger.

Homeless Subpopulations

An analysis of the information and data supplied in the 2000 census indicates the following:

1. Severe mental illness (SMI) only - Taliaferro runs transitional housing for severely mentally handicapped.
2. Alcohol/other drug abuse only. Roadback, Inc., through its Helen Holliday and Miller Manor Shelters, provides non-medical detoxification, continuing treatment, vocational assistance, and rehabilitation in a residential setting for recovering alcohol/drug addicts. At last check, Roadback, Inc. had a population of 106 clients who were recovering adult and adolescent addicts. An accurate count of the total needs within the community is not currently documented by any government or non-profit service agency.
3. SMI and alcohol/other drug abuse - No services indicated by the census.
4. Domestic violence - New Directions Battered Woman.
5. AIDS and related diseases - The Southwest AIDS Network or SWAN assists homeless with AIDS.

Persons and Families Threatened with Homelessness

Individuals/families/households who are threatened with homelessness need a wide variety of services, including intervention type services required to resolve immediate or emergency problems. Like those who are already homeless, those threatened with homelessness

often require not only food but also support services such as child care, medical assistance, counseling, and job training.

Homeless prevention must be addressed through the collaborative efforts of all housing and service providers. Agencies most directly involved with the homeless feel that numerous individuals and families are close to becoming homeless and need assistance. The major problem is identification of those families and individuals to provide them the necessary information concerning the assistance that is available in the community. To partially address this need, the Lawton Helpline was established as the community's information and referral service, providing clients with details regarding services available to the residents of Lawton - Fort Sill. Helpline services are provided on a 24-hour 7 day-per-week crises hotline, referral service, and a Phone Alert League (PAL), which assists elderly households and homebound people to obtain the services and support available from many volunteer organizations in the community. Emergency shelter and transitional housing strategy was addressed previously. The key to success will be development of a strong, functioning Continuum of Care in this region. HCD held meetings two years ago to discuss the issues with the service providers in the region. They outlined a plan to establish a Continuum of Care for the region and establish a Homeless Management Information System (HMIS) for the region. Great Plains Improvement Foundation, Inc. stepped forward and assumed the leadership role in the continuum, holding monthly meetings at their facility with stakeholders. Funding for an HMIS was approved in the previous fiscal year and will allow more effective communication of the homeless needs, allow rapid scheduling of all types of services from job training and interviews, to setting up doctor's appointments and school enrollment. Assistance to homeless individuals and families will be accomplished through a holistic approach that addresses their specific economic, housing, and social needs within the continuum of care to provide opportunities for homeless households to achieve economic independence free of supportive assistance. Individuals/families/households in Lawton have access to a broad range of service providers within the community that are capable of meeting most of their needs, both short- and long-term. A list of key providers is included in an appendix. The greatest obstacle to providing assistance to individuals/families/households in fear of becoming homeless is education and awareness of the available services. The Lawton Helpline was established to address that need. Helpline serves as the community's information and referral service and provides clients information concerning the services available to local residents. The service includes a 24-hour, 7 day-a-week crisis hotline to provide assistance with emergency problems.

Special Needs for Supportive Housing

Only limited data is available to assess the special needs of families/households requiring supportive housing. Accurate data is difficult to obtain for a variety of reasons. Many individuals who need supportive housing accommodations are cared for by other family members, and families are generally reluctant to acknowledge the extent of problems until the situation becomes unmanageable. Only those in need who are homeless most often seek assistance and are visible to the public. Therefore, supportive housing assistance that could or would be available to many needy households is largely ignored because of the social impacts of public acknowledgment on the family unit.

A series of interviews with various service agencies was undertaken to analyze the demand for services and supportive housing required by elderly, disabled, addicted persons and their families and those with AIDS and related diseases. The analysis indicates the presence of non-homeless in need. Their numbers, however, do not appear significant when compared to the overall population affected.

Almost 200 elderly families/households were identified by the Center for Creative Living these elderly families/households require supportive housing. 58 of 198 elderly families/households were frail elderly in need of some kind of supportive housing with accommodations to fulfill their special needs.

200 families/households were identified who require supportive housing to meet the needs of individuals affected by severe mental illness (SMI).

There were 56 families/households which require supportive housing to meet the special needs of persons with physical and/or developmental disabilities. 30 families/households require accommodations for developmentally disabled family members, and 26 require accommodations for physically disabled family members.

300 families/individuals were identified which were affected by problems with alcohol or other drug addiction. In order to meet this need, an additional 100 supportive housing units is required.

There were 30 families/households affected by AIDS or AIDS related diseases which require special supportive housing.

The primary need of public housing residents is to upgrade adequate facilities to meet the needs of the disabled families/households that are served by the housing authority. The last Section 504 Needs Assessment identified a wide range of upgrades required to accommodate the disabled persons and their families currently residing in public housing.

Lead-Based Paint Hazards

Assessment of Lead-Based Paint Hazards

According to the 2000 Census, 10,094 housing units that are occupied by renters and 13,075 units that are occupied by homeowners were built prior to 1979. Even though 65.5 percent of Lawton's housing is pre-1979 construction, it is estimated that 17,380 units, or 49.1 percent Lawton's pre-1979 housing, contains some lead-based paint. Of the 23,189 pre-1979 housing units, it is estimated that low- and moderate-income homeowners occupy 4,025 housing units and low- and moderate-income renters occupy 3,100 housing units that contains some lead-based paint.

While there have been no incidences of lead poisoning or elevated blood lead levels

reported to any of the local health agencies, Fort Sill currently tests one year old well babies routinely during their annual check-up.

The City's Housing and Community Development (HCD), Lawton Housing Authority (LHA), and nonprofit housing partners test properties for lead paint hazards and mitigate lead paint hazards. HCD, LHA, and Great Plains Improvement Foundation, Inc. tested 486 low- and moderate-income housing units for the presence of lead-based paint since the inception of the lead-based rule in September 2000. Of the 486 units tested, 437, or 89.9% of the units tested positive for lead-based paint. Certified abatement contractors and/or lead-safe work practice firms, to ensure that housing is lead-based paint safe, have addressed all identified lead-based paint hazards. The City of Lawton has mitigated lead paint hazards in a total of 147 units in Lawton through January 2005. All owners of multiple unit properties and contractors working on these properties take and provide evidence that they have taken a HUD approved lead-safe work practices course. The City will continue to undertake the following activities to address lead paint hazards in the City's housing units:

- The City will support the continuation and expansion of a lead paint hazard reduction strategy for all rehabilitation activities.
- The City will require inspections of tenant-based rental assistance properties, homebuyer properties, and rehabilitation activities to identify lead-based paint hazards.
- HCD will continue to provide lead-based paint inspections, risk assessments, and clearance tests at no charge for housing activities assisted with federal funding.

Lead-Based Paint Needs

Local needs are as follows:

- Assistance to low- and moderate-income households in the testing, removal, abatement, and disposal of lead-based paint hazards in housing projects, which will be funded by CDBG or HOME funds within the period of this Consolidated Plan.
- Increase the number of certified abatement contractors and/or lead-safe work practice firms to ensure that housing is rehabilitated to lead-based paint safe housing.
- Continue implementation of the procedures for testing inhabitants of families/households who live in pre-1979 housing and individuals whose work requires exposure to lead-based paint hazards.
- Continue to inform and educate the public about the hazards of lead-based paint.
- Increased funding from local, state, and federal sources to test and remediate lead-based paint hazards.

- Coordinate with other agencies and organizations to incorporate the requirements of the lead-based paint rule in the execution of their housing activities.

SECTION V

NON-HOUSING COMMUNITY DEVELOPMENT NEEDS

General

This analysis of non-housing community development needs considers the community's needs identified in the Comanche County Community Needs Assessment Survey of 2005 and addressed in Lawton's 2030 Land Use Plan, July 22, 2008, which was developed by the Lawton Metropolitan Area Planning Commission (LMAPC) and published by the City of Lawton. It also incorporates input from citizens provided by informal survey, community meetings, and public hearings.

The most recent community needs assessment was completed in 2005. The assessment was accomplished through a partnership between the United Way of Lawton - Fort Sill, Comanche County, Lawton - Fort Sill Chamber of Commerce, and the City of Lawton. The needs assessment was developed and conducted by the Cameron University Business Research Center. The results of the Comanche County Community Needs Assessment Survey identified Lawton's top ten unmet needs for the community at large. It also identified the unmet needs for various low- and moderate-income sectors of the community, including North Central Lawton, Central Lawton, and South Central Lawton. The assessment, including a comprehensive survey/questionnaire, was mailed to citizens throughout the county, completed by respondents and returned for compilation. In addition, an HCD-generated informal survey was passed out, collected, and the results compiled and used in the overall discussion of survey results. The top ten unmet needs for the community at large are presented in Table 5-1, Top Ten Unmet Needs - All of Lawton. A review of the top 10 needs from the survey indicate some duplication in the original rankings. To alleviate the duplications, Substance Abuse – Youth (1) and Substance Abuse – Adults (2), ranked one (1) and two (2) respectively, were combined into a single category of Substance Abuse – Youth and Adults to become the number one (1) ranked need. Likewise, Obesity in Adults (3) and Obesity in Children (6), ranked three (3) and six (6) respectively, were combined to become Obesity in Adults and Children. An average of the survey scores was used to determine placement. Based on the average score, Obesity in Adults and Children became number two (2) in the overall ranking.

Table 5-1
“Top Ten Unmet Needs – Lawton”

Top Ten Unmet Needs	
1.	Substance Abuse (drug, alcohol) – Youth and Adults; to include underage drinking
2.	Obesity – Children and Adults
3.	Infrastructure Needs for Low-Income Areas
4.	Services for Schools/Families with Children with Disciplinary Problems
5.	Access to Shelter/Transitional Housing for Homeless/Feeding the Hungry
6.	Delinquency Prevention and Services to Prevent Delinquency and School Drop Outs
7.	Constructive Recreational Programs/ Social Skills Training for Youth and Children to Reduce the Threat of Violence in/out of Schools
8.	Affordable Legal Services/ Consumer Protection
9.	Crime Prevention (General)/Gangs/Gang Violence (Specific)
10.	Training for Unskilled Workers/Career Planning in Schools

Only three (3) of the top 10 needs from the 1995 survey are related to some extent to the needs identified in the 2005 survey. In 1995, sixth ranked Prevention of Drug Abuse relates

directly to the 2005 first ranked Substance Abuse – Youth and Adult. Clearly this issue has become an increased concern in the community. In 1995, Control of Delinquent Youth ranked number eight (8) and Delinquency Prevention Services for Youth ranked number nine (9). These two issues are somewhat related to fifth ranked Help for Families with Children with Disciplinary Problems and seventh ranked Students Behavior in School.

Since the 2005 community needs assessment, the issue of gangs has increased in importance as a critical issue in the community. To date, no comprehensive study of the gang problem has been conducted. However, development of a study is underway under a partnership between Comanche County and the City. The study will be conducted by Cameron University. The results of the study may shed more light on this issue as well as its relevance to the current community needs. The results are expected sometime during the late summer or fall of 2010.

The 2030 Land Use Plan was developed with extensive citizen participation from throughout the community. Local workshops and public hearings were held throughout the community to ensure citizens were afforded the opportunity to provide input as major sources of information and ideas for development of future goals, objectives, and policies for community development. These goals, objectives and policies provide the basis for the community development strategy outlined later in this consolidated plan.

Public Facilities

Senior Centers, Youth Centers, and Neighborhood Facilities

The need for senior centers, youth centers and neighborhood facilities were not addressed in the 2005 community needs assessment or the 2030 Land Use Plan. While cultural activities ranks 31 of 54 services needing improvement in the latest needs assessment, the need or demand for senior centers, youth centers and neighborhood facilities was not addressed. While maintenance and upkeep are areas of concern, particularly in low-income areas, there appears to be little demand or need for additional neighborhood centers. It must be noted, however, that the most recent Lawton Parks and Recreation Strategic Plan includes as a priority the expansion of Owens Multi-Purpose Center to provide additional space for senior programs. This project cannot begin until completion of the new city hall and relocation of the administrative offices currently in the center.

Senior and youth centers have been provided for the community. Senior centers are located in the Pleasant Valley area of the Lawton View Addition, in the Benjamin O. Davis Hi-Rise, and in the Center for Creative Living. Youth centers have been established at the Lawton Boy's Club, the YMCA, the Lawton Public Housing center in Lawton View, and at each of the city's three neighborhood centers. Responses from the 2005 Community Needs Assessment Survey and recent input from city staff, local providers, and citizens reinforce the need for these centers, particularly the need for youth centers throughout the community. As the land use study and plan are updated, new data, results and policies will be incorporated into future consolidated plans.

Parks and Recreation Facilities

The Lawton Parks and Recreation Strategic Plan is the foundational document for an ongoing effort to provide a high quality parks and recreation system for the community. Based on the plan, it appears that the number of current neighborhood parks in all areas of the city is adequate for the present population and in the aggregate they meet adopted standards for the total amount of park acreage.

Parks and recreational facilities are ranked 41 of 54 services in need of improvement in the 2005 Community Needs Assessment. The need for parks and recreation facilities is also addressed in the 2030 Land Use Plan. The plan outlines several areas of concern for the local park system, including:

- a. Insufficient acreage devoted to active recreation,
- b. Inadequate funding for maintenance of the existing parks and equipment,
- c. Parks of inadequate size for their service population,
- d. Parks without access, and
- e. Undeveloped parks.

Land for recreation use is usually owned by the City, Fort Sill or Lawton Public Schools. All of these entities provide recreational programs. To make recreation programs more effective and accessible, these parties should strengthen their planning and coordinating relationships. For example, when a neighborhood park is planned in conjunction with a school for a new subdivision, the taxpayers and the service population reap the benefits.

Map No. CP-1, C.I.P. Park Projects, shows the projects proposed in Lawton's Capital Improvements Program (CIP) for park improvements. Table 5-2 is a listing of park projects with project descriptions. Several of the parks serve at least 51 percent low- and moderate-income persons and, therefore, qualify for Community Development Block Grant (CDBG) funding. Map No. CP-2, Parks Eligible for CDBG, shows the parks that are eligible for CDBG funding. The high priority given to parks and recreation facilities in the community in the past is evident from the use of federal funds to replace playground equipment and to improve parks that serve low- and moderate-income areas.

Table 5-2
Special City-Wide Park Improvements and Rehabilitation

STAFF	LOCATION	SPECIFIC IMPROVEMENT	ESTIMATED COST
1.**	Greer Park and Tennis Courts	Repairs and Resurfacing of Eight Tennis Courts Parking Lot/Windscreen Playground Equipment and Landscaping Restroom/Utility Service Lines Total	\$50,000 \$40,000 \$20,000 \$40,000 \$150,000
2.**	City-Wide Neighborhood Park Rehabilitation and Improvements	Almor West Park - (NW 71st and Delta): (3) Playground equipment/safety resurfacing Baja Park (Great Plains)(67th & Taylor): Playground equipment /safety resurfacing	\$15,000 \$15,000

STAFF	LOCATION	SPECIFIC IMPROVEMENT	ESTIMATED COST
		Crosby Park - (Cedarwood and Highway 62) Playground equipment/safety resurfacing Crystal Hills - (78th and Delta): Playground equipment/safety resurfacing Country Club West - (63rd/Gore/Compass) Playground equipment/safety resurfacing. 33rd and Liberty Park - Playground equipment/.safety resurfacing. Basketball - 2 Harold Park - (40th & Cache Road) Playground equipment/ safety surfacing; Picnic tables/pavilion/walking trail/restrooms Total	\$15,000 \$15,000 \$15,000 \$15,000 \$250,000
3. a**	Louise D. McMahon Park Development Phase	1. Athletic Field a. Lighting - 2 fields b. Fence c. Bleachers (12 sets) d. Concrete Walkways & Pedestrian access Sub Total	\$130,000 \$10,000 \$8,000 \$5,000 \$153,000
3. b**	Louise D. McMahon Park Development Phase	2. Site Work 3. Restrooms (2) 4. Water, sewer, electric underground 5. Parking lots-road access East and west 6. Control traffic post 7. Jogging trail (1 mile) 8. Picnic/pavilion/shelter 9. Park signs 10. Tree planting/landscaping Irrigation 11. Park Maintenance/Storage Building 12. Engineering Sub-Total Total Proposed Project Cost	\$30,000 \$85,000 \$40,000 \$157,000 \$8,000 \$20,000 \$20,000 \$2,000 \$10,000 \$30,000 \$45,000 \$447,000 \$600,000
4.**	Elmer Thomas Park	1. Pavilion 2. Restrooms 3. <u>Lake Improvement*</u> Total	\$10,000 \$30,000 \$30,000 \$70,000
5.**	Grand View United Sports Complex \$250,000 has been programmed Grand View United Sports Complex	Reduced Project Request 1. Landscaping 2. Irrigation System 3. Bleachers Leaves a balance of \$50,000.00 for landscaping (trees) playground equipment and bleacher covers.	\$50,000
6.	East Park Development Land to be purchased using 1990 CIP	\$250,000 Improvement 1. Four lighted youth athletic fields 2. Concession/picnic pavilion & jogging trail 3. Playground & walking/jogging trail 4. Parking Road 5. Utility Service/Engineering 6. Trees/Landscaping 7. Sprinkler System	\$250,000

STAFF	LOCATION	SPECIFIC IMPROVEMENT	ESTIMATED COST
7.	City Wide Tree Planting Project	Planting 350 trees in various City parks and public areas in Lawton	\$25,000
**Not eligible for CDBG. Project does not serve at least 51% low and moderate income persons. *Not eligible for CDBG. Project does not serve primarily residential area.			\$1,548,000

Table 5-3
CDBG Eligible Parks

PARK NUMBER *	NAME	ALIAS	LOCATION	ADDRESS
24	Patterson		SW 28th Street form H to I Ave	1003 SW 28th Street
26	Carroll	Hidden	NW Carroll & Logan	1236 NW Carroll Drive
27	Lawton Heights	15th & Taft	NW 15th Street & Taft	2002 NW 15th Street
32	Harmon		NW 14th Street & Bell	1308 NW Bell Ave
33	Olsen		SW 12th Street & "E"	1202 SW "E" Ave
34	Lemuel Harkey	Dunbar	SW 17th & Douglas	2101 SW 17th Street
35	Verna Cook	Wonderland	SW 13th Street Garfield to Georgia	1208 SW Garfield
36	Southside		SW 13th Street & Tennessee	1308 SW Tennessee Ave
40	Ramada		NW 2nd Street & Ferris	603 NW 2nd Street
41	35th Division		NW 5th Street & Columbia	501 NW Columbia Ave
44	Mattie Beal		SW 9th Street, I to Park Ave	909 SW 9th Street
45	Woods		S of Railroad, 8th to 10th Street	901 SW "G" Ave
46	Toby Morris		SW 7th Street & "I" Ave	701 SW "I" Ave
47	Union		SW 5th Street & "I" Ave	502 SW "I" Ave
48	Mocine		SW 9th Street & Roosevelt	810 SW Roosevelt
49	George M. Lee	Ranch Oaks	SW Belmont & Chisholm Trail	601 SW Belmont Street
52	O.H. Arnold		NE Albert Johnson Sr. Ave & Dr. Louis K. James Ave.	102 NE Bell Ave
57	Lincoln		SW 6th Street & "I" Ave	602 SW "I" Ave
58	Owens Recreation Ctr		SW 11 Street Btwn Jefferson/Washington	1405 SW 11 Street
65	H.C. King Recreation Ctr		NW 20 Street & Taylor Avenue	1705 NW 20 Street
66	Airport		U.S. 281 & 3rd Street	1401 S Hwy 277
67	North Legion		NE Carver & Cherry	101 NE Cherry Ave
75	B.O. Davis	High Rise	6th Street & "F" Ave	601 SW "F"
76	Waldman		13th Street & "J" Ave	1210 SW "J" Ave
81	Estelle Jones	(New) Estelle Jones	NW 20th Street Btwn Taylor/Kingsbury	1705 NW 20th Street
83	Bridge Park		SW D Ave & Sheridan Road	

* The numbers are derived from the Parks & Recreation Department's Strategic Plan.

Child Care Centers, Health Facilities, Parking Facilities, and Other Public Facilities

Child Care Centers are located throughout the city. Their locations are market driven, and their operations are governed by state and local codes.

Health facilities include hospitals, health clinics, and doctor's offices. In 2002, Great Plains Improvement Foundation, Inc. opened the first voluntary health care clinic in the community. The mission of the clinic was to provide health care, medications, and preventive

health information to low-income residents in the community who do not have any type of health insurance. The voluntary health clinic is still in operation today under the management of Hearts that Care, a voluntary, non-profit organization, which has developed a new health care facility in central Lawton. There is no charge for the health care services. Additionally, Comanche County Memorial Hospital opened a low cost community health center that provides health care with fees based on a sliding scale.

Library facilities and school sites are other important facilities needed in the city. The land use plan seeks to fully integrate school site and park facility locations into the "neighborhood unit scheme" of development. Schools and park facilities will be co-located in future development to accommodate the city's growth.

Infrastructure Improvement

Solid Waste Disposal Improvements

The needs related to solid waste disposal are addressed in the 2030 Land Use Plan, which considers Lawton's solid waste collection system, including the landfill and recycling. The importance of the solid waste collection system is described in the plan. According to the assessment, "The visual environment and physical appearance of a community is a significant part of its character, influencing the attitudes of its residents, as well as newcomers, tourists, and industrial prospects. The entire community should be clean and appealing in its appearance so as to make it a healthy and pleasant place in which to live, work and visit." Over the next five years an emphasis will be placed on several means of controlling litter on the city's streets and highways.

The proposed C.I.P. includes the construction of a Maintenance Building (100' x 60') at the landfill. The volume of waste to be delivered to the Landfill has increased due to the volume of waste from outside of the city. This will require the construction of Subtitle "D" Cells No. 2 and 3 at the Landfill. See Map No. 3, C.I.P. Public Facilities. Lawton's current landfill has an estimated remaining life of 9 to 11 years, but since it takes up to five years to develop a new solid waste repository, construction of a new site should begin no later than 2005. (Is there an updated status for this construction?) In the interim, recycling should be explored as a means of conserving the capacity at the landfill. Co-generation should be explored as an alternative to meeting the city's long-term landfill needs.

Flood Drain Improvements

The 2030 Land Use Plan identifies floodwater drainage as a significant problem facing future development of Lawton's environs. The study addresses drainage system maintenance (debris removal), storm water management (detention), and flood plain management. It calls for establishment of a master drainage plan, continuing participation in the Community Rating System, and outreach to citizens to provide information on local flood hazards, flood insurance, and other issues of flood water management.

The Federal Emergency Management Administration (FEMA) has developed maps, which identify local special flood hazard areas, and the Flood Plain Management Plan calls for finding alternative funding sources and cost sharing programs to mitigate or eliminate flood hazards in those special flood hazard areas identified by FEMA. Flood drainage improvements are essential to support future development and growth of the Lawton community.

The proposed C.I.P. includes Storm Sewer System Construction, Repair and Improvements. The program of improvements is broken down into Major and Minor Improvements. Phase 1 of the Middle Branch of Wolf Creek is a major project in the channel from the Lawton Country Club, north to approximately NW Cache Road. See map No. CP-4, C.I.P. Major Storm Sewer System Construction, Repair and Improvements. See Table 5-3, Major Storm Sewer System Construction, Repair and Improvements. See Map No. CP-5, Minor Storm Sewer System Construction, Repair and Improvements, and Table 5-4, Minor Storm Sewer System Construction, Repair and Improvements.

Water Improvements

The 2030 Land Use Plan addresses water supply and treatment, storage and distribution, water shortages, and consumption/rainfall comparison. The study indicates that Lawton has dependable water yields of 9.4 million gallons per day (mgd) from Lake Lawtonka and 13 mgd from Lake Ellsworth. Additionally, Lawton has the rights to 20.7 mgd from Lake Waurika located approximately 40 miles southeast of Lawton. The combined yield of the three reservoirs is 43.1 mgd. The average demand for water in the year 2030 is estimated at more than 28.1 mgd, while the maximum daily demand for the year 2030 is estimated at 45 mgd. A new plant will likely be required to meet the projected need. A consulting firm was hired to perform an analysis of our water system needs for the next 20 years. (Are there results of this analysis that should be published?) In addition to a dependable water yield and treatment capacity, an efficient water distribution system is also required. The distribution of treated water in Lawton is from gravity and pumping. The current pumping capacity is 62 mgd to meet current peak demand estimated at 46.0 mgd. While the design life of any segment of the water distribution system is fifty years, the actual useful life is determined by maintenance and soil conditions. Because of the age and condition of the current water distribution system, waterline replacement has been, and continues to be, a high priority for the city. Problems with the water distribution system, however, continue to plague the city. Map No. CP-6, Major Water Distribution Repair and Improvements, shows the locations of major water system improvements that are in need of improvement within the city. Table 5-5, Major Water Distribution, Repair & Improvements show the list and comments from the proposed CIP.

Table 5-4
 "Major Storm Sewer System Construction, Repair & Improvements"

Priority	Location	Comments	Estimated Costs
1*	Squaw Creek I-44 to Lee Boulevard	Will construct a concrete channel from I-44 to Lee Boulevard and replace the culverts at Rail Road Street. This construction will reduce the maintenance costs to the City. Future FIRM revisions could reduce flood insurance rates in the area.	\$4,000,000±

Priority	Location	Comments	Estimated Costs
2**	Greer Addition NW 35th & Arlington to the Main Branch of Squaw Creek	Will construct an underground storm sewer system for NW 35th Street and Arlington to the Main Branch of Squaw Creek. This construction will relieve chronic flooding which is aggravated by extremely flat street grades.	\$1,890,000±
3*	Squaw Creek Tributary Rail Road Street west to SW 6 th Street	Will improve the existing underground storm sewer system to prevent overflows. This construction will reduce flooding in the streets and prolong the pavement life.	\$2,600,000±
4**	Prentice & Floyd, west to NW 17th Street, south to 16th Street to Cache Road	Will construct underground storm drainage system and eliminate open drainage sections along 14th to Cache to reduce flooding in the streets.	\$3,675,000±
5*	SW Jefferson from SW 24th Street to Sheridan Road and north to Lee Boulevard	Will improve storm drainage system from this area to the intersection of Lee and Sheridan. Repaving a portion of Jefferson may be necessary.	\$1,260,000±
6*	Squaw Creek Gore Blvd to Cache Road	Will concrete-line the channel and replace the Bell Avenue bridge to improve drainage.	\$2,940,000±
7**	Crosby Park Channel From Rollin Park to the Middle Branch of Wolf Creek	Will concrete-line the channel from Rollin Park to the confluence with the Middle Branch of Wolf Creek.	\$1,365,000±
8**	Lincoln to Cheyenne 28th to 23rd Street	Will replace failed sections of pipe and improve street drainage with underground storm drainage system.	\$2,100,000±
9**	Ferris Avenue to Gore Blvd NW 18th Street to Sheridan Avenue	Will add to existing storm drainage system to reduce water in the streets.	\$2,520,000±
**Not eligible for CDBG. Project does not serve at least 51% low and moderate income persons. * Not eligible for CDBG. Project does not serve a primarily residential area.			\$22,350,000±

Table 5-5
"Minor Storm Sewer System Construction, Repair & Improvements"

Priority	Location	Comments	Estimated Costs
1	200' North of Gore Boulevard from NW 31st to NW 25th Street	Will enlarge storm drainage system from 31st Street to Squaw Creek. Will also install grates to remove the water from the street. See Minor street Reconstruction Priority #2	\$525,000±
2**	Wolf Creek Tributary Euclid to NW 67th Street	Will concrete-line the channel from NW 67th Street, east to NW Euclid.	\$735,000±
3*	Squaw Creek Channel near the 1100 block of SW F Avenue	Will concrete-line the channel from the existing concrete channel to the culverts under F Avenue.	\$210,000±
4**	Cherry Avenue behind houses on the north side from NW 38th Street to NW 40th Street	Will concrete-line channel and provide pipe to existing channel between 40th and 41st Streets. Improve drainage system on 40th Street.	\$315,000±
5**	Squaw Creek from NW Atlanta Avenue to Cache Road; west to 26th Street from the Main Branch	Will concrete-line the channel from Atlanta Avenue bridge to the Cache Road bridge.	\$525,000±

Priority	Location	Comments	Estimated Costs
6**	East of Carver Street under the Railroad Crossing, east to I-44	Will concrete-line channel to improve drainage and provide erosion control from east of Carver Street at the Railroad track to I-44.	\$735,000±
7**	West Branch of Wolf Creek between NW 74th and NW 67th	Will clean the channel and install erosion protection measures at the bends.	\$630,000±
8**	Channel between NE Lake and NE Lakeview from NE Flower Mound Road to the park	Will concrete-line the channel from the Flower Mound Road culverts to the City park.	\$262,500±
9**	NW 20th Street between Lawton & Baldwin, south to the Cache Road Drainage System	Will enlarge the existing storm drainage system from NW 20th Street and Baldwin area, south to Cache Road.	\$525,000±
10**	NW 33rd/32nd Street from Brent Circle, southeast to NW 26th & Cache Road	Will enlarge the existing storm drainage system from NW 33rd/32nd Street area to NW 26th & Cache Road.	\$735,000±
11**	NW 40th and Ozmun	Will install grates and pipe to drain to the East Branch of Wolf Creek. Intersection will be improved.	\$73,500±
12**	East side of SE 40th Street north of Lee Boulevard	Will concrete-line the channel from the existing concrete channel to the culverts under Lee Boulevard	\$210,000±
13	1200 Block of SW 26th Street	Will improve concrete lining and replace piping to improve storm drainage system and carry the drainage to the Lee Boulevard system.	\$262,500±
14**	NW 68th and Compass to West Branch of Wolf Creek	Will install grates at intersection and pipe to the 67th Street drainage system. Additional grates will also be installed on the south end of the loop and drainage piped to the West Branch of Wolf Creek.	\$157,500±
15**	7500 Block of NW Stonegate Drive to Willow Creek Drive	Will concrete-line the channel from an existing culvert south of Stonegate to an existing concrete channel north of Willow Creek.	\$157,500±
16**	4900 Block of NW Pollard	Will enlarge storm drainage system to reduce street flooding.	\$52,500±
17**	SW 7700 Block of Beta in Crystal Hills - Beta to Gore	Will improve storm drainage system to reduce street flooding.	\$78,750±
18**	West end of NW Alan-a-dale Lane at intersection with NW Nottingham	Will construct a concrete-line channel from the street, to the confluence with the middle branch of Wolf Creek.	\$157,500±
19**	Skyline East - behind the 2700 Block of NE Euclid Avenue	Will construct a concrete channel to divert the drainage, and will improve storm drainage system.	\$288,750±
** Not eligible for CDBG. Project does not serve at least 51% low and moderate income persons			\$6,636,000
* Not eligible for CDBG. Project does not serve a primarily residential area			

Map No. CP-7, Minor Water Distribution Repair and Improvements, shows the locations of minor water system improvements that are in need of improvement within the city. Table 5-6, Minor Water Distribution, Repair & Improvements, show the list and comments from the proposed CIP. Map No. 8, Water Projects - CDBG Eligible, shows the locations of water lines that are eligible for CDBG funding, because they serve low- and moderate-income areas.

Table 5-6
“Major Water Distribution, Repair and Improvements”

Priority	Size (inches)	Length (feet)	Location	Estimated Cost
1**	24	4,500	NW Cache Road (NW 69 th Street to NW 82 Street)	\$800,000
2**	10	4,500	Meadowbrook (NW 53rd Street to NW 40th Street)	\$320,000
3*	12	3,500	F Avenue Sheridan to SW 19th Street SW 17th Street to SW 15th Street	\$275,000
4**	12	4,500	East Gore Boulevard I-44 to SE 20th Street	\$350,000
5**	10	2,800	NW Glenn Avenue NW 61st Street to NW 53rd Street	\$200,000
6**	10	9,00	Cherry Avenue NW 61st Street to NW 53rd Street	\$65,000
7*	12	600	SW 13th Street “A” Avenue to Gore Boulevard	\$50,000
8*	10	2,500	67th & NW Compass	\$200,000
** Not eligible for CDBG. Project does not serve at least 51% low and moderate income persons				
* Not eligible for CDBG. Project does not serve a primarily residential area				\$2,260,000

Note: Major improvements are defined as water mains of 10 inch and larger in diameter.

The water supply system's capability to sustain future growth is an important part of the Century Communities analysis and is one of the critical needs that underlie marketing efforts to attract new commerce and industry to the community.

Table 5-7
Minor Water Distribution Repair and Improvements

Code	Water Atlas No.	Pipe Segments	Size (inches)	Length (feet)	Total Breaks	Location	Estimated Cost (±)
1	40	61	8"	975		Highland Park Addn. (25th St & Franklin)	\$ 48,750
2	71		8"	1,483		Sedalia to Chisholm on Ranch Oaks	\$ 74,150
3	10	162	8"	610		2800 NW 21st Place	\$ 30,500
4**	8	11	6	1,200	22	Arrowhead(Great Plains -Cheyenne)	\$60,000
5**	8	46	6	1,200	30	Taylor (Great Plains - 67th St)	\$ 60,000
6**	27	91, 90, 87	6	1,150	19	Liberty Avenue(NW 31st St-Cul-de-sac)	\$ 57,500
7**	29	59	6	1,300	19	Compass Drive(Euclid Ave - 67th St)	\$ 65,000

Code	Water Atlas No.	Pipe Segments	Size (inches)	Length (feet)	Total Breaks	Location	Estimated Cost (±)
8**	29	68, 50	6	1,150	19	58th Street(Euclid Ave-Columbia Ave)	\$ 57,500
9**	29	58	6	350	4	Euclid Avenue(Compass - 65th Street)	\$ 17,000
10**	27	89	6	950	10	Templeton Terrace(Homestead Dr-Liberty Ave)	\$ 47,500
11**	27	85	6	400	11	Templeton Circle(Homestead Dr - Cul-de-sac)	\$ 20,000
12**	8	19	6	700	12	Black Mesa(Great Plains - Cheyenne)	\$ 35,000
13**	29	32, 33, 34, 35, 36	8	1,650	16	Columbia Avenue(53rd - 58th Street)	\$ 82,500
14**	29	51	6	300	4	Dearborn Avenue(58th - 59th Street)	\$ 15,000
15**	29	76	6	1,200	5	NW 54th Street(Euclid to Columbia)	\$ 60,000
16**	29	68, 50	6	1,200	4	NW 58th Street(Euclid to Columbia)	\$ 60,000
17**	10	104	6	550	2	38th Place(36th - 38th Street)	\$ 50,000
18**	29	77, 75, 73, 71, 69, 67	6	2,050	12	Euclid Avenue(53rd - 59th Street)	\$ 102,500
19**	10	55, 37, 38, 39, 40	6	2,000	16	Cheyenne Avenue(27th - Denver Avenue)	\$ 100,000
20**	10	52	6	1,000	14	24th Street(Cheyenne - Denver Ave)	\$ 50,000
21**	27	104	6	400	9	Tomlin Circle(Homestead Dr - Cul-de-sac)	\$ 20,000
22**	27	106	6	350	10	Tomlin Place(Homestead Dr - Cul-de-sac)	\$ 17,500
**Not eligible for CDBG. Project does not serve at least 51% low and moderate income persons							
* Not eligible for CDBG. Project does not serve a primarily residential area Total							\$ 2,032,700

Note: Minor Improvements are defined as water mains of less than 10 inch in diameter.

The land use study recommends the city adopt an Ultimate Thoroughfare Classification Map with Classification Standards. Street improvements are a great need in the City of Lawton to insure safe driving and to prevent deterioration of paving.

Street and Sidewalk Improvements

The 2020 Land Use Study discusses the need for improvements to streets and sidewalks in the community. The study also addresses the need for bike trails and improved pedestrian circulation throughout the community and provides recommendations for required improvements.

The land use study recommends that, " ... residents should promote the concept of

providing bike and pedestrian trails along ravines and drainage channels whenever possible. Sidewalks, as a portion of the street right-of-way, should be connected to the trail system through a series of comprehensive connections." The most desirable type of sidewalk in residential neighborhoods should be, "separated from vehicular traffic by a landscaped strip to buffer and reduce safety hazards." The Proposed Capital Improvements Program includes a list of Major and Minor Streets, which are in need of repair and improvement. Map No. CP-9, C.I.P. Major Streets, shows Major Street projects and Table 5-7 indicates a more detailed description of those projects. The Map No. 10 C.I.P. Minor Improvements shows the location of the streets proposed for improvement. Table 5-8 indicates a more detailed description of those projects. The Map CP-11 CDBG Streets shows local streets that are eligible for CDBG funding, because they serve low- and moderate-income areas.

Hundreds of thousands of dollars of federal funds have been used to rebuild neighborhood streets in low- and moderate-income areas. An example is the completed CDBG project for reconstruction of "J" Avenue, a neighborhood street project that includes sidewalks as part of the overall design.

Streets are an important part of the local transportation network and are another important aspect of community and economic development for the community under the Century Communities Program. The Century Communities Program analysis assesses the capability of local roads and streets to support and sustain future economic development.

Table 5-8
Major Street Repair and Improvements

Priority	Street	Location	Length	Eng/ROW Cost (±) Construction Cost (±)	Comments
1*	NE Flowermound	Gore Blvd to Rogers Lane (4 lanes w/left turn lane) First Section - Cache to Rogers Lane; Second Section - Gore to Cache Road.	2 miles	\$1,050,000 \$6,300,000	This street is an overplayed county type road. It causes an excessive amount of maintenance resources. The two bridges on the north mile have been completed under the 1990 CIP and are sized for this configuration.
2*	Gore Blvd.	SW 17th St. to SW 40th St	2 miles	\$0 \$1,260,000	This street is an overplayed county type road. It causes an excessive amount of maintenance resources. The two bridges on the north mile have been completed under the 1990 CIP and are sized for this configuration.
3*	NW 67th Street	Cache Road to US Hwy 62 (4 lanes w/left turn lane)	1 mile	\$315,000 \$2,100,000	This street is approaching level service □□□ capacity. Completion of this section of road will provide 4 lanes thorough fare from US Hwy 62 to Lee Blvd.
4*	NW 38th Street	Gore Blvd to Cache Road (4 lane w/left turn lane)	1 mile	\$3,500,000	This street has had a number of serious accidents. Site distance is a problem which will be solved with the reconstruction. Maintenance of the street has also been excessive.
5*	Sheridan Road	Gore Blvd to Rogers Lane (6 lane divided highway)	2 miles	\$3,150,000 \$1,260,000	The Transportation Policy Committee selected this street as the number one traffic congestion priority for Lawton.
6*	SE 45th Street	□ mile south of Lee Blvd to □ mile north of Gore Blvd (4 lanes w/left turn lane)	2 miles	\$1,050,000 \$6,825,000	This street is approaching the level service "C" under the current configuration and traffic load and experiences some drainage problems at Meiling Drive which will be solved with reconstruction. Construction of a bike path per the proposed Transportation Plan is included with this project.
7*	Rogers Lane	I-44 to Flower Mound Road (4 lanes w/left turn lane)	2 miles	\$1,050,000 \$6,300,000	This street exceeds level service "C" under the current configuration and traffic load. The acquisition of right-of-way will likely be the north since the south side of this

					road has been determined to be an archeological site.
8*	Sheridan Road	Lee Blvd to Bishop Road	1 mile	\$0 \$630,000	This street is heavily traveled by citizens going to Bishop School and the Faxon Highway. Recommend an overlay of this section.
9*	SW 52nd Street	Gore Blvd to Lee Blvd (4 lanes w/left turn lane)	1 mile	\$787,500 \$3,675,000	Right-of-way acquisition is complicated at Eisenhower Grade School. An old 12" water main runs the entire mile and will be replaced with this reconstruction. Construction costs include additional monies for drainage and the railroad crossing.
10*	SE Flowermound	Gore Blvd to Lee Blvd (4 lanes w/left turn lane)	1 mile	\$525,000 \$3,780,000	This street is a built up chip seal road. There will be a large box structure on the south end of the project and reconstruction will need to solve several sight distance problems.
11	Bishop Road	SW 11th St to SW 17th St	□ mile	\$210,000 \$1,050,000	This street should be reconstructed with curb and gutter and associated drainage. This street ties into 17th Street and is heavily used by the Municipal Airport, Fire Station and citizens traveling on 17th Street.
12*	NW 53rd Street	Gore Blvd to Cache Road (4 lanes)	1.25 miles	\$1,050,000 \$4,725,000	This street exceeds level service "C" under the current configuration and traffic load. This alternative would widen the driving surface to 49' (4 lanes) and fix the offset alignment with NW 52nd Street.
Total Estimated Cost Eng/ROW Cost (±)				\$12,687,500	
Total Estimated Cost Construction Cost (±)				\$37,905,000	
* Not eligible for CDBG. Project -does not serve an area containing at least 51% low and moderate-income persons.					

Note: Major improvements are defined as those projects with an estimated construction cost of \$1,000,000.00 or greater or those roads classified as major or minor arterials.

Table 5-9
Minor Street Repair and Improvements

Priority	Location	Price in \$ Length in Feet	Comments
1**	NW 31st Street Ferris to Gore	\$840,000± 2,900	This street serves Comanche County Memorial Hospital. It should be done with the Minor Drainage Improvements, Priority #1. Without this coordination storm water will continue to backup into this street. This project includes \$360,000 for storm drains and monies for utility relocation. Recommend reconstruction.
2**	NW 22nd St Cache to Baltimore	\$315,000± 1,600	The curb and paving both have considerable heaving. Recommend reconstruction.
3*	South Railroad F Avenue to Lee	\$588,000± 2,700	This street serves a good portion of the downtown industrial district. The project will analyze the need for a traffic light at Lee Boulevard. Recommend reconstruction.
4	SW 27th Street Lee to J Avenue	\$315,000± 1,400	This street serves Cleveland Elementary and the new DHS building. A sidewalk on the school side of the street will be included in this project. Recommend reconstruction.
5*	SW G Avenue 17th to Sheridan	\$630,000± 2,750	This street serves the Coliseum and the ball fields in the area. This project includes adding to the box structure at Squaw Creek. Recommend reconstruction.
6**	SW 45th Street Lee to G Avenue	\$525,000± 2,900	This street serves Country Club Heights School. Heaving on the street and curbing causes standing water. Recommend reconstruction.
7**	SW F Avenue	\$525,000±	This street serves Cameron University. The lack of curb will allow edge failure to creep into the driving lanes.

Priority	Location	Price in \$ Length in Feet	Comments
	27th to 38th Street	2,800	Recommend reconstruction.
8**	Erwin Lane Cache to Sheridan	\$336,000± 1,700	Once the Wal-Mart Super Store, to include expanded parking on the north property is complete, this street will serve as an access from Cache Road. Recommend reconstruction.
9*	E Avenue 7th to 11th Street	\$367,500+ 1,900	The existing curb and gutter and the 800 block is in very bad shape. This street serves as an access to the downtown area. Recommend reconstruction.
10*	SW Roosevelt (15th St to Sheridan)	\$997,500± 3,600	This street is badly deteriorated and needs to be reconstructed with curb and gutter. Drainage work will be required as part of this project.
11**	NW 36th St (NW Kinyon St -NW Ferris)and Ferris (35th-36th St)	\$504,000± 2,400	This street serves John Adams School. The curb has considerable heaving. This project is part of drainage improvements.
12*	NW Ashby Ave(NW 52nd-NW Robin Hood & Cedric Circle	\$420,000± 2,150	This street has numerous patches repaired by the Street Division. There is standing water in a number of places. Recommend reconstruction.
13A**	SW Jefferson Ave(SW 23rd-SW 25th)	\$446,250± 1,500	This street needs to be reconstructed due to major drainage problems.
13B**	SW Washington Ave(Sw24th- Sw25th)	\$446,250± 1,500	This street needs to be reconstructed due to major drainage problems.
14	SW G Ave 26th St to 27th St	\$173,250± 650	This is the only section of G Avenue that is in bad shape from Sheridan Rd to 27th Street. The drainage problem at 26th Street will be fixed with this project. Recommend reconstruction.
15**	NW 20th Street Cache to Taylor	\$367,500± 1,350	This project serves the H.C. King Community Center. There is standing water due to base failure. This includes a large drainage structure on the south end of the project. Recommend reconstruction
16**	Liberty Heights various locations	\$105,000± 5,000	Recommend a curb and gutter replacement program in the entire Liberty Heights Addition.
17**	Sheridan & Ferris Ave Intersection	\$210,000±	Recommend widening the west leg of this intersection to accommodate two thru eastbound lanes and a right turn lane onto Sheridan.
18**	28th Street & Cache Road Intersection	\$210,000±	Recommend widening north and south legs of this intersection to accommodate left and right turns in both directions onto Cache road.
19	A Ave (23rdPl to 27th St)	\$84,000±	Project carried over from list of CDBG Eligible projects from previous years
20	4th St (SW Lee Blvd -Hwy 281)	\$84,000±	Project carried over from list of CDBG Eligible projects from previous years
21	SW Cornel Ave (2600 Block)	\$63,000±	Project carried over from list of CDBG Eligible projects from previous years

Priority	Location	Price in \$ Length in Feet	Comments
22	E Ave (23rd Pl- 27th St)	\$84,000±	Project carried over from list of CDBG Eligible projects from previous years
Price in \$		\$8,636,250	
Length in Feet		10,000	
*Not Eligible with CDBG Funds-Project does not serve a primarily residential area.			
**Not Eligible with CDBG Funds-Project does not serve an area with at least 51% low- and moderate-income persons.			

Sewer Improvements

The 2020 Land Use Study provides a comprehensive analysis of Lawton's wastewater treatment needs. The wastewater treatment plant was originally designed for treatment of flows up to 30 mgd for a 12-hour period. Several periods have occurred in which the plant was hydraulically overloaded. On December 16, 1982 the City of Lawton received an administrative order to expand the wastewater treatment plant's capability because of non-compliance of loadings and concentration and insufficient design capacity for existing flows. Section 15.6 Federal and State Requirements (NPDES) deals with permits required by the federal and state governments. The NPDES permit authorizes the discharge of specified quantities and qualities of effluent into Nine Mile Creek. A Compliance Permit Inspection was performed by the Environmental Protection Agency (EPA) on December 15, 1993. The inspection report stated that the collection system needed the city's immediate attention, and it recommended immediate implementation of a rehabilitation program to correct infiltration problems in the collection system.

A report entitled Infiltration/Inflow Analysis for Sanitary Sewer Facilities -1971 Bond Issue, dated November 1975 by Benham-Blair and F\Affiliates, indicated possible excessive infiltration/inflow in parts of the sewer system located in the Squaw Creek and Wolf Creek basins. A subsequent study, Sanitary Sewer Evaluation Survey for Infiltration/ Inflow (SSES), was completed in 1981 by Horacek, Smith, Painter and Spitz, Inc. The purpose of the SSES was to locate and quantify specific sources of infiltration/inflow. The 1981 SSES report recommended several alternative solutions to the infiltration/inflow problem. Estimated costs to rehabilitate the system, including manholes, pipes and joints, ranged from \$19 million to \$30 million. Map No. CP-12, Sewer Projects, shows the wastewater treatment and sewer projects, and Map No. CP-13 (See maps 14 and 15 in CP), Sewer Lines - CDBG Eligible, shows the locations of sewer lines that are eligible for CDBG funding, because they serve low- and moderate-income areas.

Because of its importance to community and economic development of the community, sewer system improvements continue to be a high priority for the city. The capability of the sewer system to support and sustain economic growth in the community is a subject of analysis by the Century Communities Program.

Asbestos Removal

Asbestos removal is not a significant local public issue at this time, and currently there does not appear to be a need for an asbestos removal program.

Other Infrastructure Improvements

Modernization of the community's communications infrastructure is an important component of Lawton's future economic development. The need exists for development of a local infrastructure, which is compatible with the nation's "information superhighway" and capable of using its full capabilities to effectively support future economic growth in the region. Whether the local infrastructure is fiber-optic cable, satellite communication, or some other technology, it is essential that Lawton upgrade its existing infrastructure in order to meet and/or keep up with the dynamic technological requirements of industry as well as the demands of an increasingly "computer literate and computer dependent" society.

Public Service Improvement

Senior Services and Youth Services

Senior and youth service needs are both important to Lawton's future community and economic development. While there is a wide array of senior and youth services available in the community, the demand on those services is increasing and is expected to continue to increase in the future. The increasing elderly population, in particular, will have a significant impact on Lawton's future vitality and viability as a community, and an expanding service infrastructure is necessary to meet future needs. Steady and consistent economic development and growth will be an increasingly important part of future solutions to expanding and broadening services to meet the needs of an aging community. At the same time, economic development is also a key to providing employment opportunities and incentives for Lawton's youth to remain in the community to work, raise families, contribute to the community.

Today there are numerous organizations available to provide senior and youth services. A list of local agencies is in Appendix A. In addition to the agencies listed, Lawton has established the Lawton Commission on Aging to address issues of import to elderly citizens of the community. Also, in an effort to facilitate interagency cooperation, the United Way of Lawton - Fort Sill established and coordinates the Fourth Tuesday Forum, which provides a venue for coordination and collaboration of human services in the community. The forum is conducted each month. Its objective is to provide a forum for educating human service providers; assessing and staying abreast of the community's needs; and providing opportunities for collaboration between service providers in seeking, developing, and coordinating solutions to the community's needs.

While public transportation for the elderly (4) was identified as one of Lawton's top ten unmet needs, the informal survey of Lawton's citizens indicated that both senior and youth

services are recognized as important needs in the community. Although there are services available to meet the needs of Lawton's youth, youth services overall are currently recognized as a weakness within the community. The community needs assessment survey provides an opportunity for the elderly to voice their opinions and provides an opportunity for parents to voice their views concerning the needs of youth, but there has never been a local survey of youth themselves to assess their perspective on youth needs in the community.

Transportation Services, Accessibility Needs, and Handicapped Services

Lawton's community needs assessment survey identified lack of transportation services as three of the top 10 unmet needs: public transportation for the general public (1), public transportation for the elderly (4), and public transportation for the disabled (9). The need for public transportation services was reinforced by the 2020 Land Use Study. In its bid for a mass transit system the study states, "As transportation costs and environmental concerns continue to increase, Lawton must prepare a pro-active mass transit and land use plan rather than a reactive one. In smaller cities such as Lawton, a bus system is usually more feasible than a fixed rail system. Nevertheless, the City should plan ahead for a city/regional rail system and coordinate efforts with other municipalities and the State. All components of a mass transit plan, whether they are buses, bike trails, light rail transit, public parking facilities, or boulevards, should be interrelated without duplicating services or amenities." Lawton has a relatively short commute time to work. A round trip from home to work and back home again is estimated at only 31.5 minutes. This indicates that services and facilities of all kinds are accessible for those who have an automobile.

The informal survey conducted as part of the citizen participation process continued to assess transportation as an important unmet need that must be addressed sometime in the future. Lawton's aging population will ensure that this service becomes even more important in the future.

Substance Abuse and Health Services

The need for substance abuse services and health services were addressed in the 2005 community needs assessment. Substance abuse ranked first and second on the list of key issues facing the community, placing substance abuse at the top of the community's top 10 priorities. As a result, it is anticipated that various local public service agencies will step forward to address the issue during coming years.

While they were identified as areas of need, health care issues fell well below the top 10 needs. Numerous health care issues were addressed in the needs assessment; however, the issues did not rank highly as significant needs in the community. The issues addressed included health care for the elderly, disabled, and children, as well as mental health, dental and vision care. The rankings of these issues ranged from 21 to 40 of 53 issues addressed. The highest ranked need was health care for elderly and disabled at 21. There are numerous agencies in Lawton, which provide the services, including several agencies already funded by the CDBG Program. A list of service providers is in Appendix A.

Employment Training and Child Care Services

Employment is addressed in the 2005 needs assessment. Previously a top 10 issue in the community, employment training fell to 20th on the list of needs following the 2005 assessment. The unemployment rate has ranged from a high of 6.2 percent in 1990 to approximately 3.6 percent in 1999. Rates have stabilized around that level to the present. While unemployment per se is not significant, it is a significant problem for unskilled and displaced workers as well as unemployed homeless persons, particularly those with families. Employment service providers are listed in Appendix A. Each of these agencies participates in the United Way forum. The collaboration encouraged by the council has resulted in a continuous exchange and sharing of information concerning agency contact persons, agency resources, and consultation regarding services and resource needs of the respective agencies. Many useful and effective collaboration projects have also been implemented.

Childcare services are closely related to a family's employment situation and are particularly important to homeless and low-income workers. Therefore, childcare is considered a priority service for the latter categories.

Crime Awareness

Crime, one of Lawton's top ten unmet needs according to previous community needs assessments, fell to 16 on the most recent assessment. Citizen concerns focus on personal safety, home, and business security.

There is one police headquarters station and five police substations located in the community. Police substations are in some cases co-located with neighborhood centers in Lawton's low- and moderate-income areas, and the Housing Authority of Lawton works closely with the substations in and around public housing facilities to ensure the security of public housing facilities and residents. The local police, through the Crime Stopper and Neighborhood Watch programs, take an active role in crime awareness efforts in the local neighborhoods and schools.

As a result of the need for an aggressive crime awareness program in the community, the community's need for crime awareness education and other activities continues to be recognized as a an important quality of life issue and as a community priority. Crime awareness and community policing is also an item of interest.

Fair Housing Counseling, Tenant / Landlord Counseling, and Other Public Service Needs

Previous surveys have not addressed the need for fair housing counseling and tenant/landlord counseling in Lawton. Since no significant problems have been identified in the community related to counseling regarding fair housing and tenant/landlord issues, these counseling services currently hold a relatively low priority in the community. However, local agencies which are engaged in providing housing for the community remain vigilant for signs that may indicate a need to increase the priority of effort for these areas.

Some of the agencies providing counseling services and other public service needs are listed in Appendix A.

Historic Preservation Needs

Historic preservation needs have not been addressed as a key issue for the Lawton community, although the 2030 Land Use Plan discusses a need to preserve some of the landmarks and selected areas of the city. Currently, however, because of more pressing needs preservation is a low priority for the city.

During the early 1960's many potential historic structures in the Central Business District were demolished as part of urban renewal projects. However, several historic sites and buildings remain in or around the city, including the Comanche Reformed (Dutch) Church, the Fort Sill Indian School, Old Lawton High/Central Junior High School, Lawton Carnegie Library, and the Mattie Beal Home. Private organizations and local government agencies maintain these historic sites.

A 1992 survey of historic structures and areas in Lawton was conducted by the Department of History at the University of Oklahoma. Ninety-three sites were identified for further study and six structures were accepted onto the National Register for Historic Preservation. To date no governmental or private organization has pursued the nominations of any of the remaining structures or sites.

Lawton Historic Preservation Commission (LHPC) was created in 2003 to create appreciation of, and protection for, properties within the city which have an architectural, archaeological, cultural, or historic significance. The LHPC issues Certificates of Appropriateness and Certificates of Economic Hardship, provides for surveys of potential Historic Preservation Districts, works with other entities to facilitate the use of historic preservation as an agent of economic development, and seeks to educate the public about the benefits of historic preservation. Some interest has been expressed in establishing a historic preservation district in a part of Old Town North Addition near the Central Business District (CBD), but to date no further action has been taken.

Economic Development Needs

Commercial-Industrial Rehabilitation

The need for some commercial-industrial rehabilitation is outlined in the 2020 Land Use Study. The study indicates that Lawton. (What information is needed here to complete?) It further points out that, commercial-industrial rehabilitation is another important issue to be addressed in the analysis of the community's economic development needs. More will be said about this later in the plan along with commercial-industrial infrastructure.

Because of its importance to Lawton's future economic development, commercial-industrial rehabilitation is a high priority for the city.

Commercial-Industrial Infrastructure

Lawton's commercial-industrial infrastructure is addressed in the 2020 Land Use Study and is a focus of Lawton's Century Communities Economic Development Committee. The previous discussion on infrastructure improvement needs addressed the known weaknesses in Lawton's infrastructure. These same infrastructure shortcomings also impact the capability of the current infrastructure to meet future economic development requirements.

In 2005 the Lawton – Fort Sill Chamber of Commerce and the Comanche County Industrial Development Authority (CCIDA) were partners in an effort to develop a strategic economic development plan for Lawton and Comanche County. According to “CREATING EXCELLENCE IN ECONOMIC DEVELOPMENT: A COMPREHENSIVE ECONOMIC DEVELOPMENT STRATEGY FOR THE LAWTON, OKLAHOMA AREA”, there is a shortage of quality prepared sites and properties available for development. Without available properties for businesses to review, potential investors are unlikely to consider the area for locating their businesses. Additionally, efforts to upgrade basic infrastructure, such as roads, water and sewer lines are a necessity should Lawton wish to not only grow its economic base, but also sustain what already exists.

Because of its importance to Lawton's future economic development, commercial-industrial infrastructure improvements are a high priority for the city.

Other Commercial-Industrial Improvements

The city currently participates in the State Enterprise Zone Program. The State Enterprise Zone is shown in Map No. CP-14, State Enterprise Zone. The state's program does not require the submission of a strategic plan.

The process provides an opportunity for the city to marshal and organize its resources to permit the community to take advantage of opportunities like enterprise zones and other economic development mechanisms.

Micro-Business

There is a need in Lawton for micro-business enterprise, or "micro-enterprise," as defined by Section 807(c)(2) of the 1992 Housing and Community Development Act. Micro-businesses historically offer excellent entrepreneurial and job opportunities to the low- and moderate-income sectors of the community. The potential of micro-business projects is under study by CETES at Cameron University and is a topic of exploration by the following groups; Lawton-Fort Sill Chamber of Commerce, NSCC, and the GPTC Education Center. The effort is expected to identify unknown opportunities and potential for economic development through micro-enterprise.

Other Businesses and Technical Assistance

Little information concerning other businesses and technical assistance requirements is available currently. The results of the analysis of future opportunities will provide greater insight into the community's needs in these two areas. Determining the needs and development of solutions to those needs is a high priority for the city.

Other Economic Development Needs

Other economic development needs include bid assistance for federal contracts and establishment of Tax Increment Financing Districts. The need for bid assistance is currently addressed effectively by the Great Plains Area Vo-Tech School's Economic Development Center, but a significant void is the lack of Tax Increment Financing Districts. The analysis of the community's economic development needs will help to clarify and define the need for both the Business Incubator Program and Tax Increment Financing Districts. While the latter need is currently considered a relatively low priority, validation and clarification of the need (by the analysis) is expected to result in a higher priority.

Other Community Development Needs

Downtown Revitalization

The Lawton Urban Renewal Authority (LURA) is the lead agency for the City of Lawton for the redevelopment of Lawton's downtown area. LURA identified several broad goals in the "Lawton Downtown Revitalization Plan", dated July 12, 2005, to bring about redevelopment. A viable downtown Lawton, along 2nd Street and C Avenue, as the primary business center is hampered by a negative reputation, empty lots, and deteriorated structures. According to the plan, the area does not function to its potential as a regional business center nor reflect the character of a city with over 100 years of history. Along each side of 2nd Street, the entry corridor to the city, the area suffers from deteriorating post-World War II uses and activities evidenced in empty lots and deteriorating structures. The goal of the Lawton Downtown Revitalization Plan is to restore and expand the commercial and residential viability in downtown Lawton. Downtown redevelopment targets the area between Ferris Avenue on the north and C Avenue on the south and between 7th Street on the west to Railroad Street on the east.

LURA's downtown redevelopment plan focuses its efforts on the 2nd Street entrance to the city. The need to restore and expand the commercial and residential viability of the 2nd Street corridor is LURA's first priority. Because funding for downtown revitalization is not available for the entire project, LURA is taking a targeted approach in order to have a recognizable impact that can be used as a catalyst for continuing and expanding redevelopment efforts. Work has begun on the initial targeted area of 2nd Street between Columbia Avenue to a half block south of the Gore Boulevard intersection. This phase of the 2nd Street Enhancement Project is funded by a combination of funding through a series of Oklahoma Department of Transportation (ODOT)

Enhancement Grants, a Section 108 Guaranteed Loan, Community Development Block Grant (CDBG) and local funds.

Additionally, in partnership with the City and Lawton Economic Development Authority (LEDA), LURA is engaged in purchasing and packaging properties in its D-6 Urban Renewal Area for redevelopment. Funding is provided by LEDA with the help of a Brownfields Economic Development Initiative (BEDI) Grant, part of which will be used to help purchase brownfields properties in the area. Future redevelopment will also be assisted with funds generated by a Tax Increment Financing (TIF) District encompassing the downtown area.

LURA also identified zoning regulations as a significant barrier to appropriate redevelopment of the downtown area. Codes and regulations, which were identified as barriers to development, were revised and incorporated into a new downtown overlay district in order to improve the standards and streamline the process for redevelopment applications. The new overlay district requires a higher level of architectural and landscaping requirements, including specific review and approval of each individual site. The result is significantly improved quality to attract and encourage continued investment. Additionally, the uniform standards serve to protect future investments in the downtown area.

Energy Efficiency Improvements

The City remains committed to reducing energy costs and improving energy efficiency. The City will continue to support the demand side management programs of the American Electrical Power (AEP) and CenterPoint Energy (CE). AEP and CE continue to work closely together on efficiency projects, which create a comprehensive set of energy services for city residents.

The City will also continue to support Oklahoma's Conservation Assistance Fund, which provides businesses and individuals contributing to the program a 50 percent tax credit for every dollar donated. Conservation Assistance's grants, up to \$3,000, are provided to improve low-income homeowners' dwellings.

The City supports and collaborates with the Great Plains Improvement Foundation's (GPIF) Weatherization program to provide energy efficiency improvements (i.e. energy analysis, insulation, low cost repairs, energy efficient appliances, heating system replacement, etc.) for residential properties in the City of Lawton. In the last five program years, GPIF's Weatherization program has completed weatherization of 195 residential units within the City of Lawton, totaling nearly \$330,000 in direct costs (excluding technical assistance, administrative and other program expenses) which have been made in the City, for an average improvement of nearly \$1,700 per unit.

The City of Lawton will continue to provide energy efficiency improvements (i.e. insulation, insulated doors and windows, high efficiency heating systems) as part of its rehabilitation program to increase energy efficiency. In the last five program years, the City's Housing and Community Development (HCD) office through its Housing Assistance Division (HAD) completed 142 owner-occupied rehabilitation activities, which included energy efficiency

improvements. The HCD also completed 33 new construction activities, funded with CDBG and HOME Program funds, which complied with the Model Energy Code (MEC) for energy efficiency. The City's HCD office will continue to promote cost effective energy improvements in every housing project supported directly or indirectly with public resources.

Lead-Based Paint

Lead-based paint and its associated hazards were discussed previously. The needs and the level or degree of need were addressed in a previous section.

Planning Needs

Planning requirements are addressed in detail in the 2020 Land Use Study. It states, "Oklahoma Statute Title 19, Section 866.10 requires the City of Lawton to develop a Long-range Comprehensive Plan, and the City of Lawton Charter, Section 103, complies with such regulations, and identifies various elements and the structure of said plan." City Council Policy No. 2, Policy for Comprehensive Planning, stipulates that the Comprehensive Plan will consist of volumes:

- a. Volume 1, Land Use
- b. Volume 2, Open Space
- c. Volume 3, Arts Planning
- d. Volume 4, Transportation
- e. Volume 5, Fire Protection
- f. Volume 6, Housing
- g. Volume 7, Community Development
- h. Volume 8, Airport
- i. Volume 9, Water System
- j. Volume 10, Sewerage System
- k. Volume 11, Solid Waste
- l. Volume 12, Capital Improvements
- m. Volume 13, Library
- n. Volume 14, Police Protection
- o. Volume 15, Economic Development

The 2030 Land Use Study identified seven Areas of Special Character, which are in need of neighborhood development or redevelopment plans. Five of those areas serve low- and moderate-income neighborhoods, those in which at least 51 percent of the residents are low- and moderate-income. The five areas are:

- a. The Creamery,
- b. Central Business District,
- c. Gore Boulevard Professional Corridor / Old Town North,
- d. Airport Industrial, and

e. University Medical Area.

"Appropriate Neighborhood Planning" is needed in all of these areas. The "appropriate planning principles" were published in A Better Place to Live, "New Designs for Tomorrow's Communities," by Michael N. Corbett. Corbett outlined seven principles for neighborhood planning, including the principles of appropriate scale, boundaries, land and resources, revenue, security and safety, privacy, and diversity. According to this planning approach, diversity, as an objective in a neighborhood, can be achieved by adhering to the seven principles. In order to attain an appropriate degree of diversity and vitality, a neighborhood should incorporate the following:

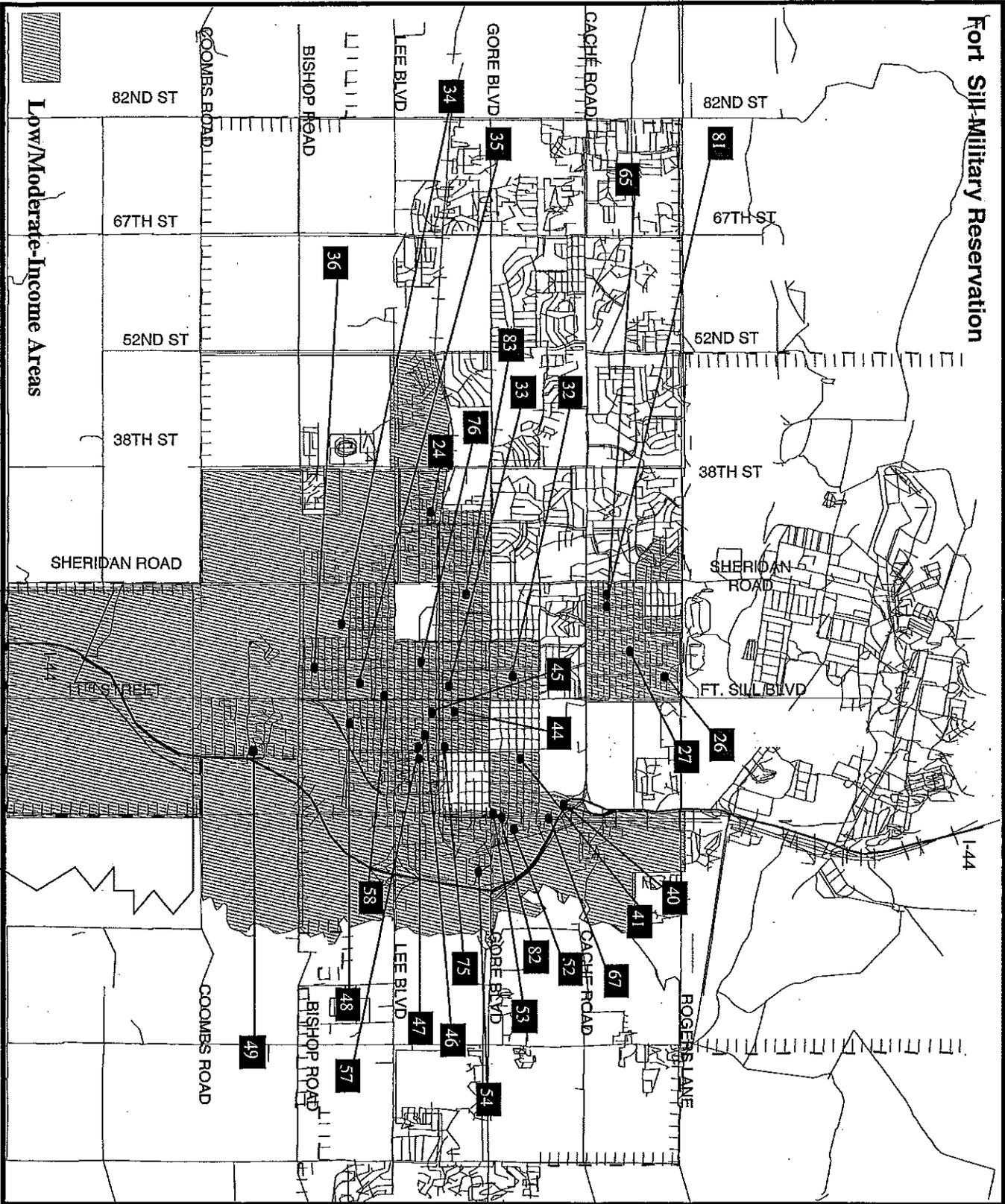
- a. Housing for various income levels,
- b. Space for field games,
- c. Natural play areas providing plenty of hiding places,
- d. A large party or meeting facility,
- e. Spaces for informal gatherings such as a well-placed bench under an appealing tree,
- f. Recreational facilities such as a swimming pool, basketball courts, and an arts and crafts center,
- g. Agricultural production,
- h. A small commercial center including a neighborhood store, restaurant, and small shops.

CONSOLIDATED PLAN-City of Lawton

CIP Park Projects

Map No. CP-1

Fort Sill-Military Reservation



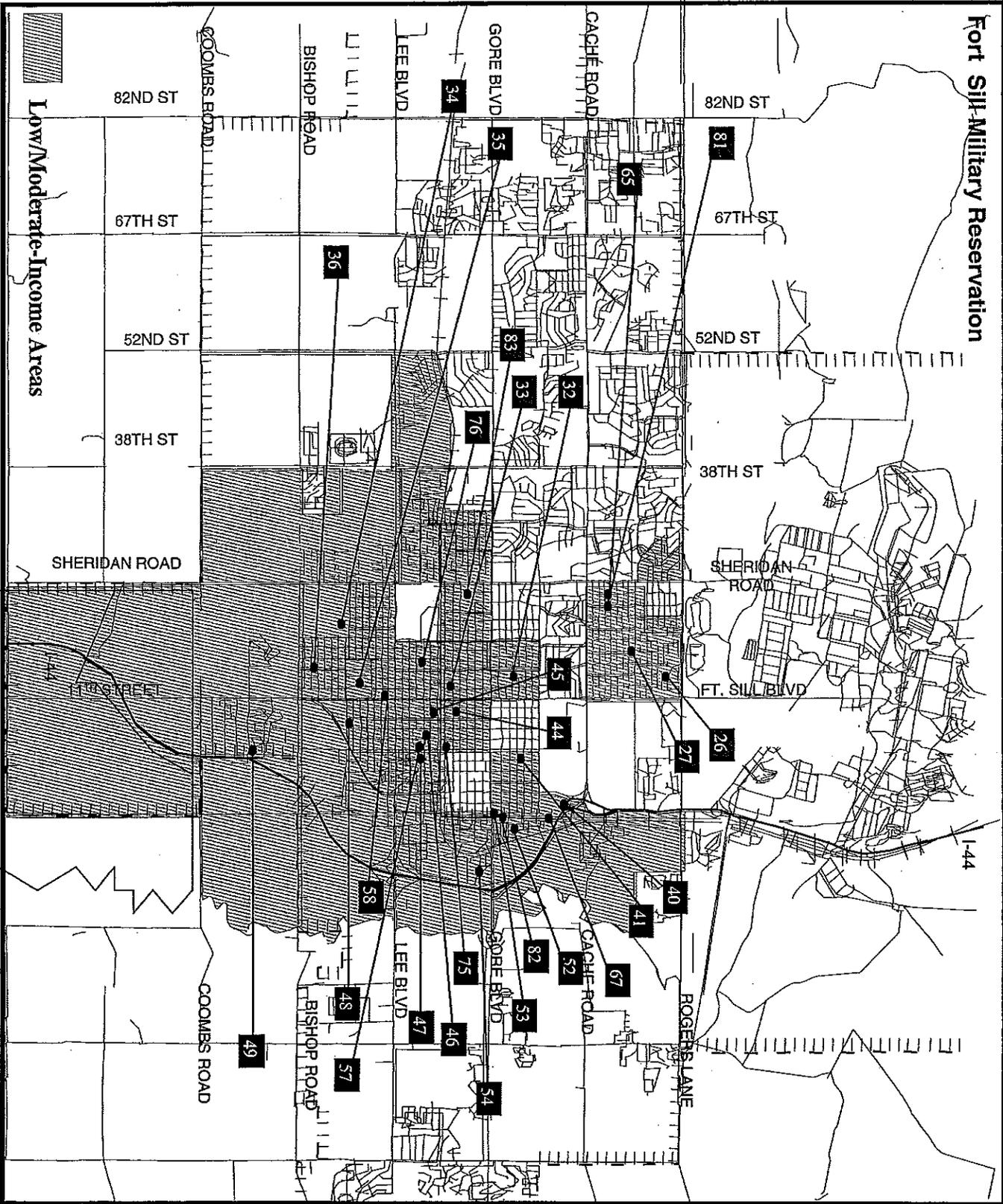
Low/Moderate-Income Areas

CONSOLIDATED PLAN-City of Lawton

CDBG Eligible Parks

Map No. CP-2

Fort Sill Military Reservation



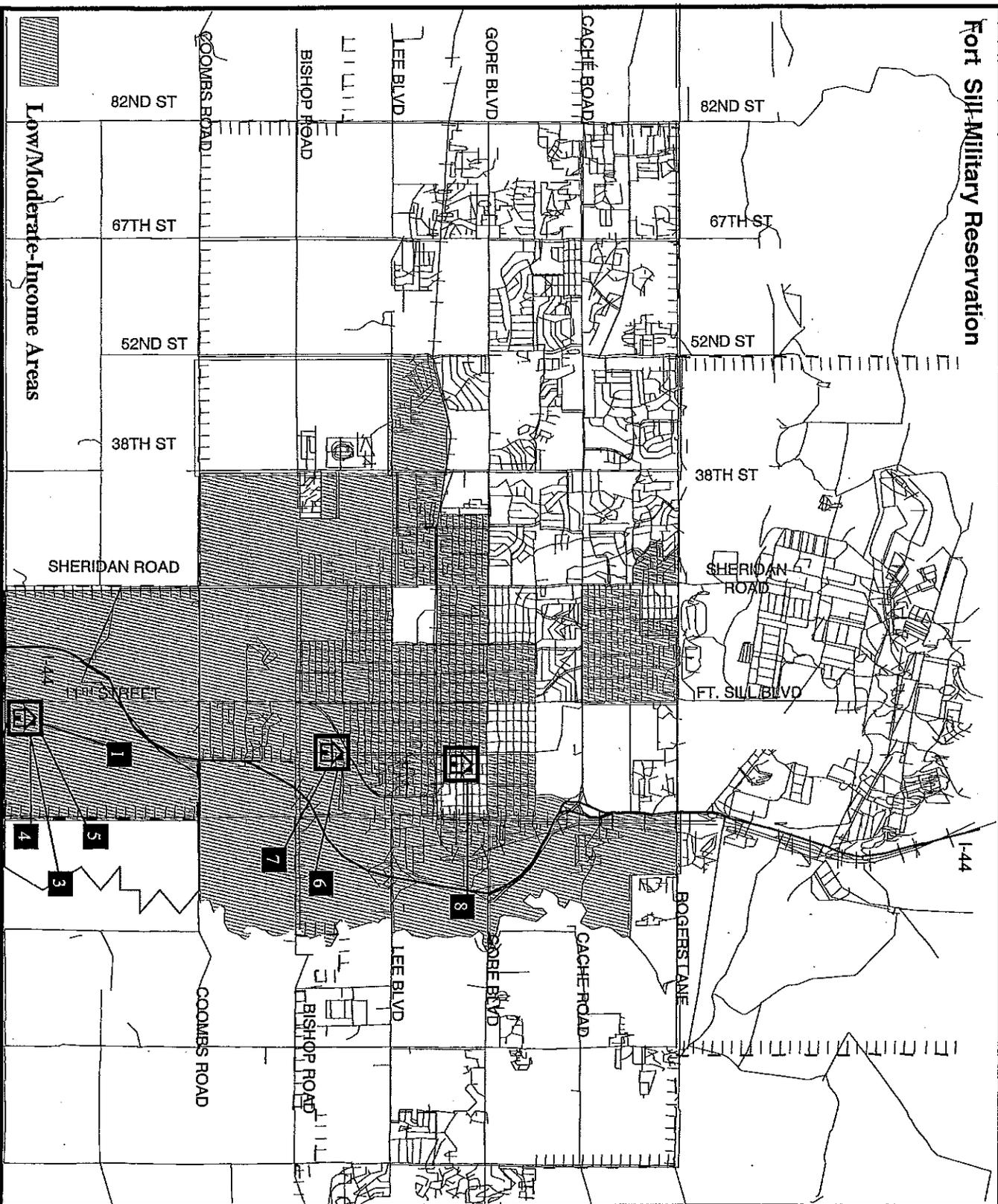
CONSOLIDATED PLAN-City of Lawton

C.I.P. Public facilities



Map No. CP-3

Fort Sill Military Reservation

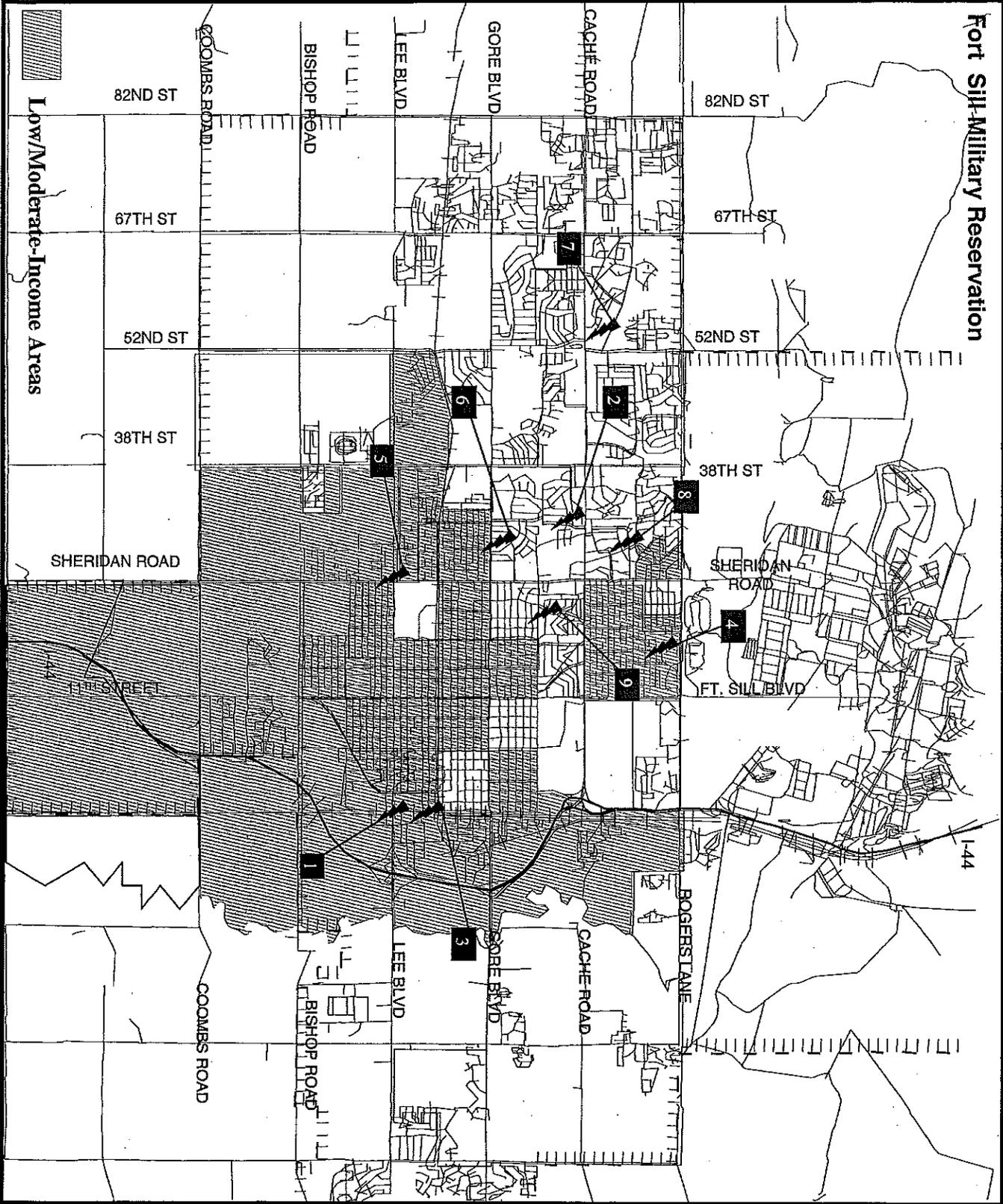


CONSOLIDATED PLAN-City of Lawton

CIP Major Storm Systems

Map No. CP-4

Fort Sill Military Reservation

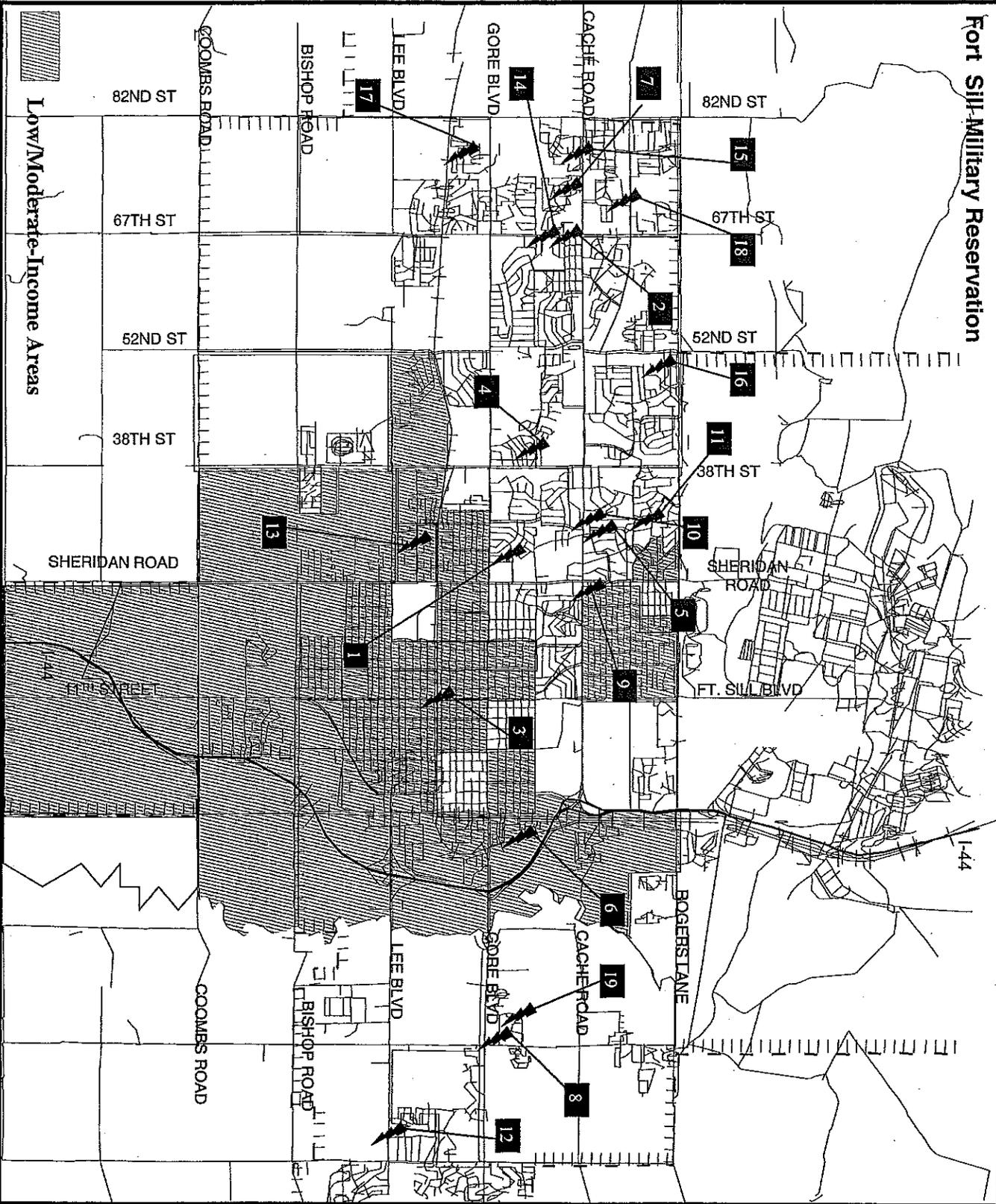


CONSOLIDATED PLAN-City of Lawton

CIP Minor Storm Systems

Map No. CP-5

Fort Sill Military Reservation

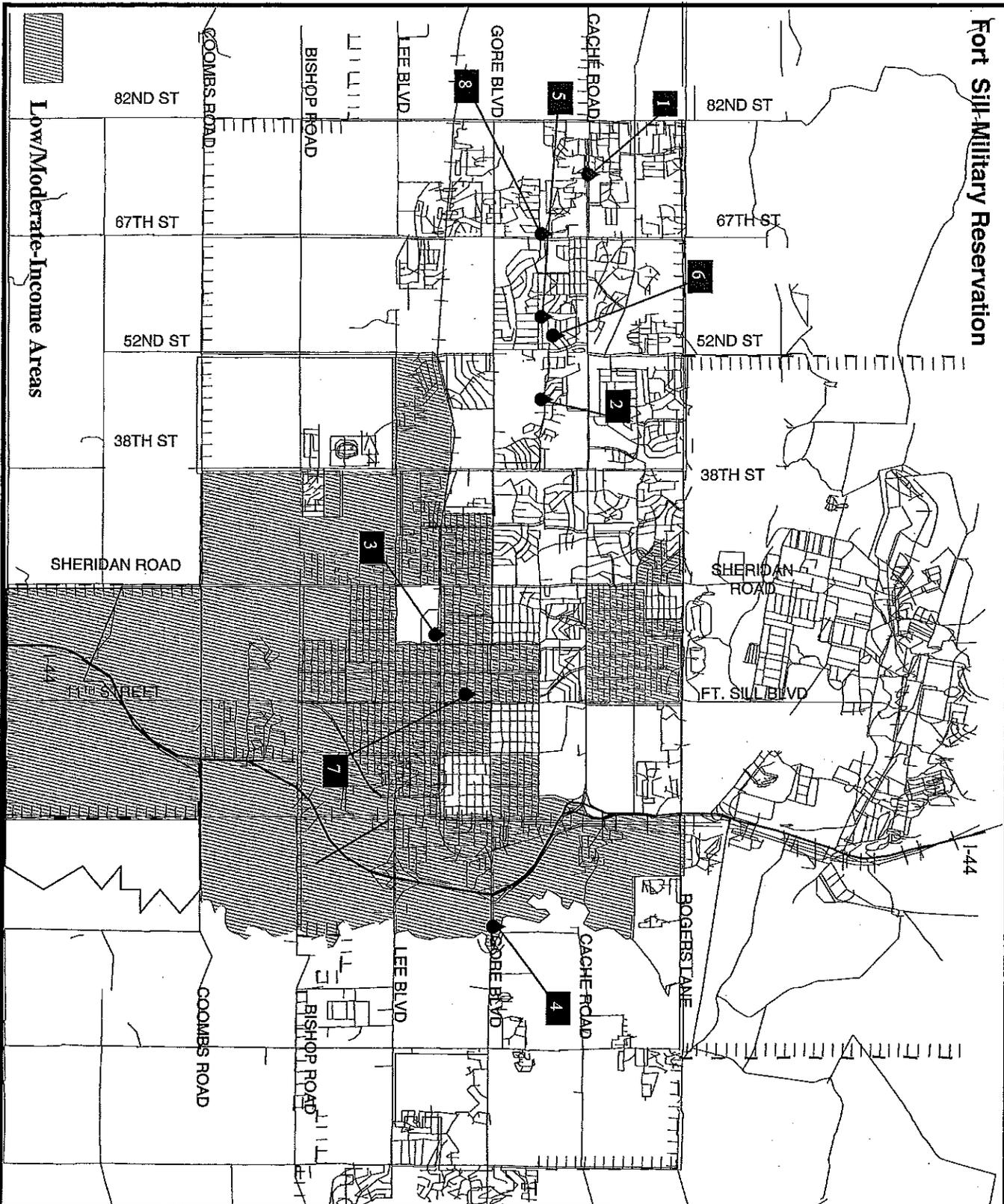


CONSOLIDATED PLAN-City of Lawton

CIP Major Water Systems

Map No. CP-6

Fort Sill-Military Reservation

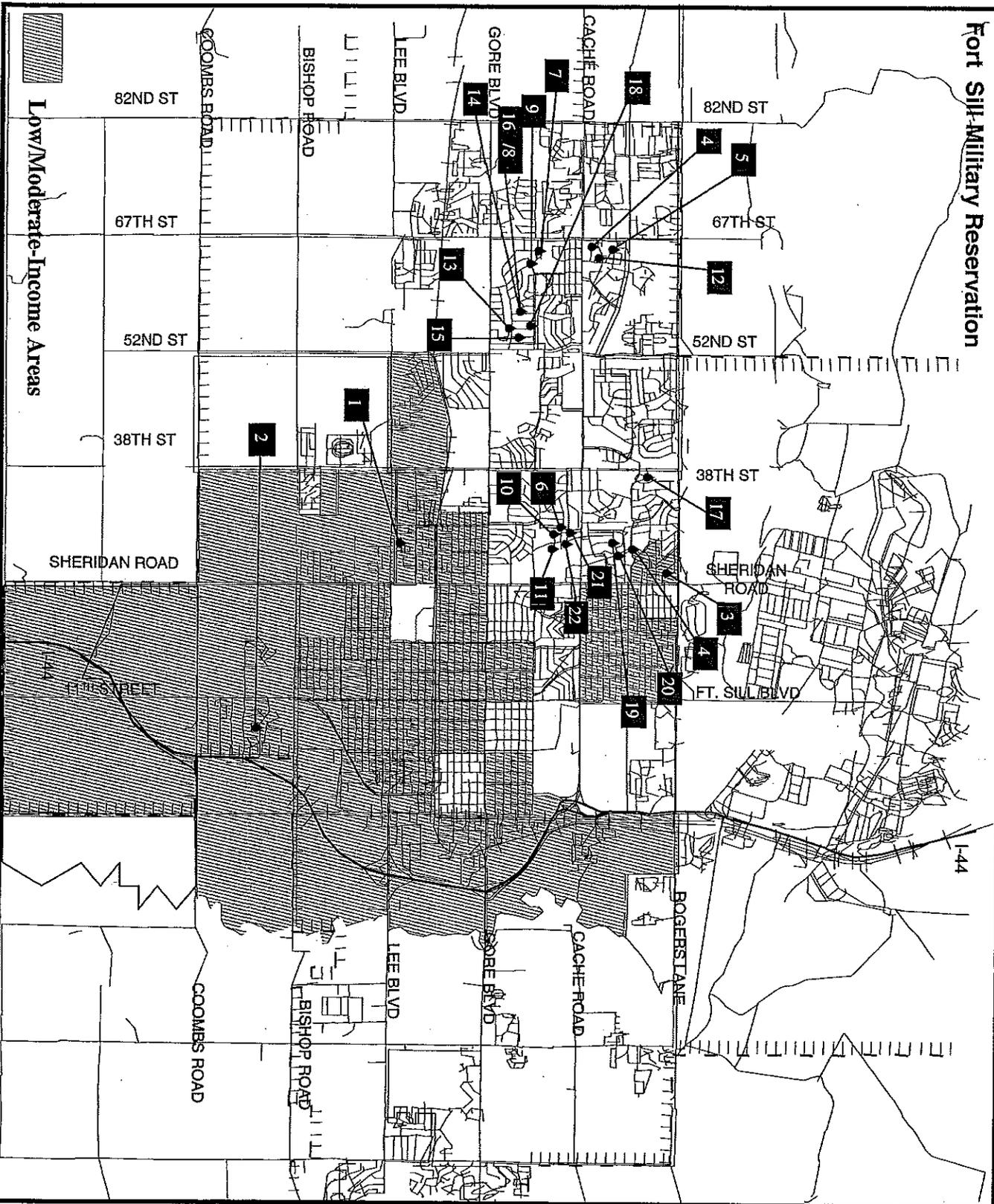


CONSOLIDATED PLAN-City of Lawton

CIP Minor Water Systems

Map No. CP-7

Fort Sill Military Reservation

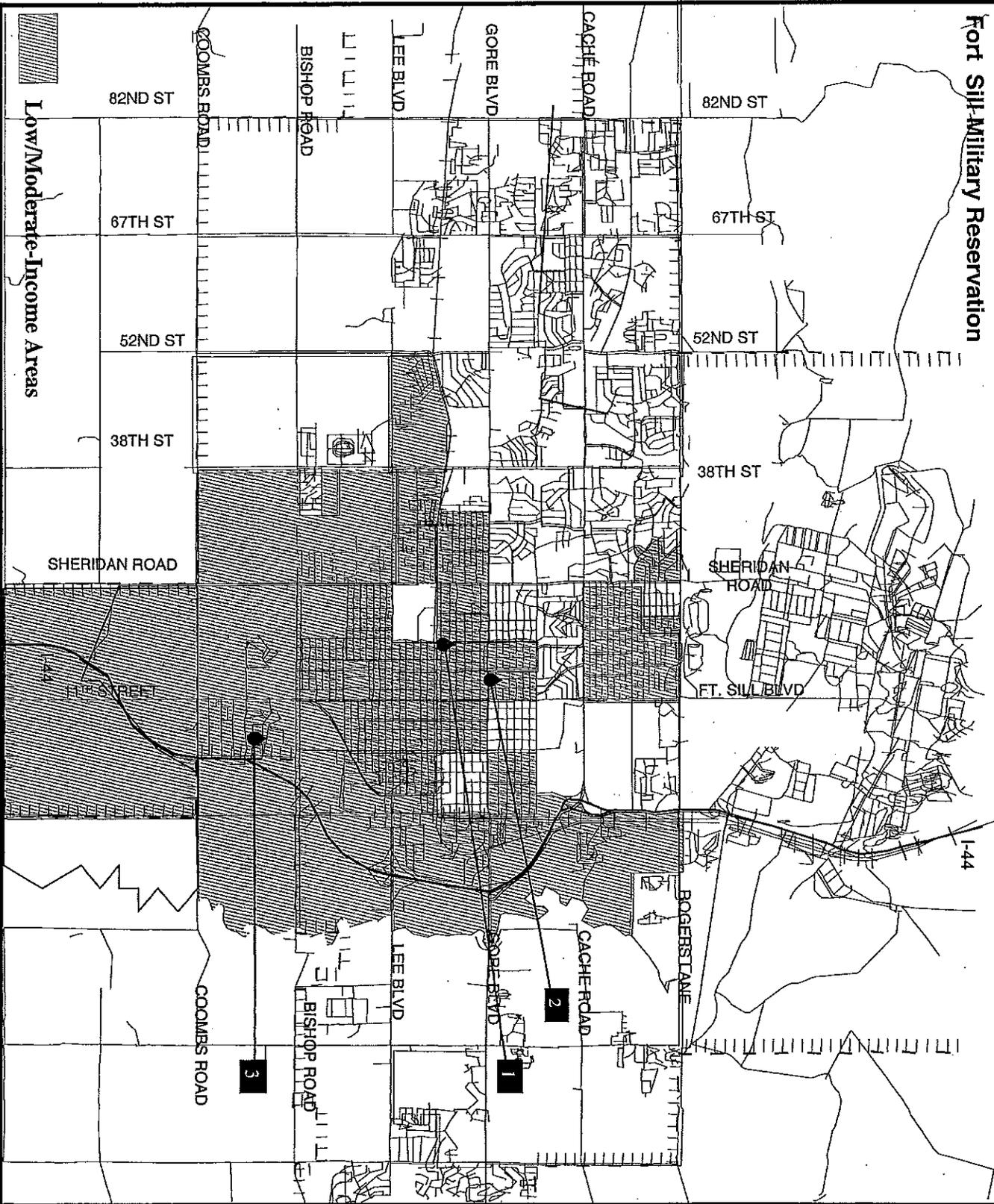


CONSOLIDATED PLAN-City of Lawton

Waterlines CDBG Eligible

Map No. CP-8

Fort Sill Military Reservation



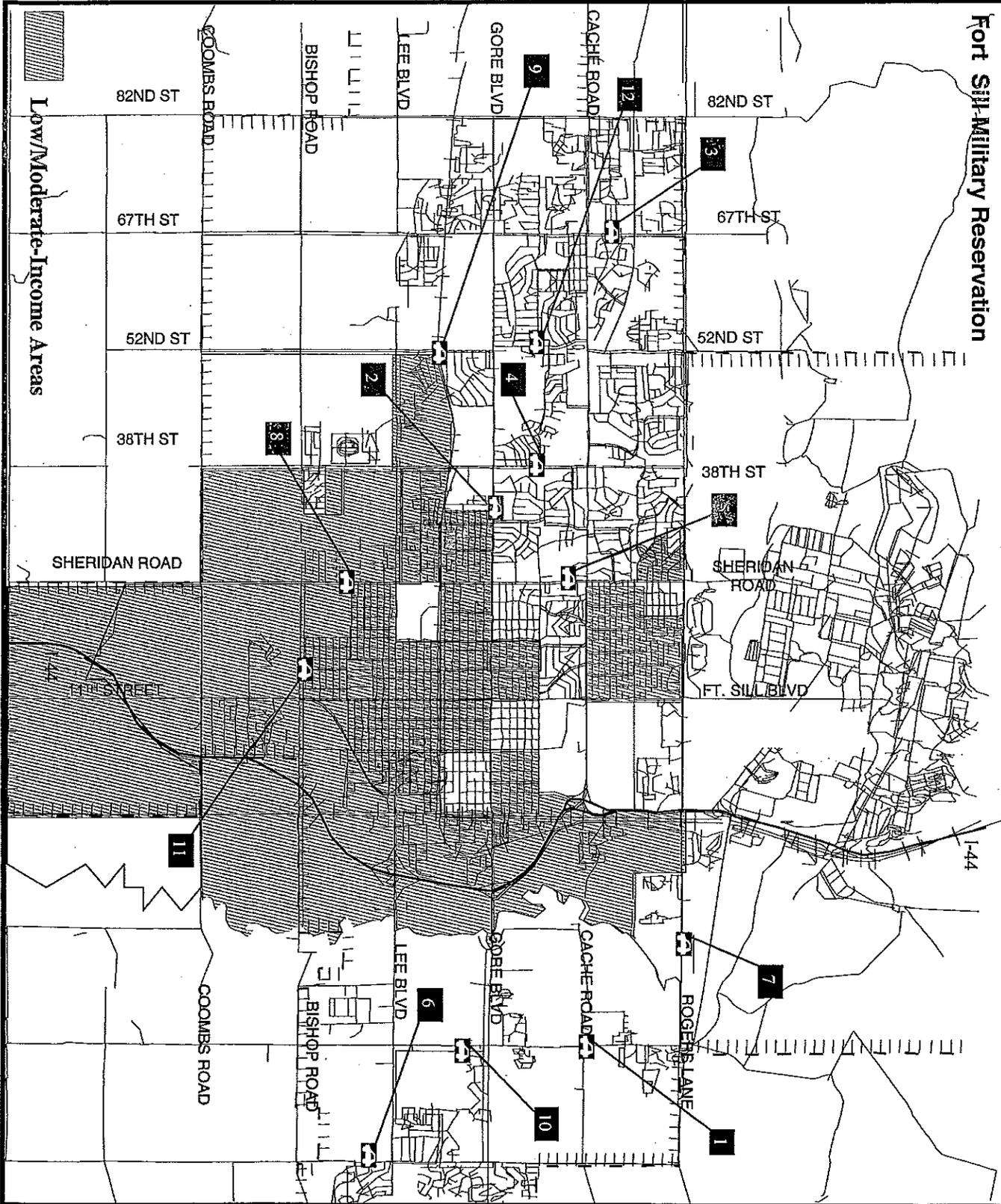
CONSOLIDATED PLAN-City of Lawton

CIP Major Streets



Map No. CP-9

Fort Sill Military Reservation

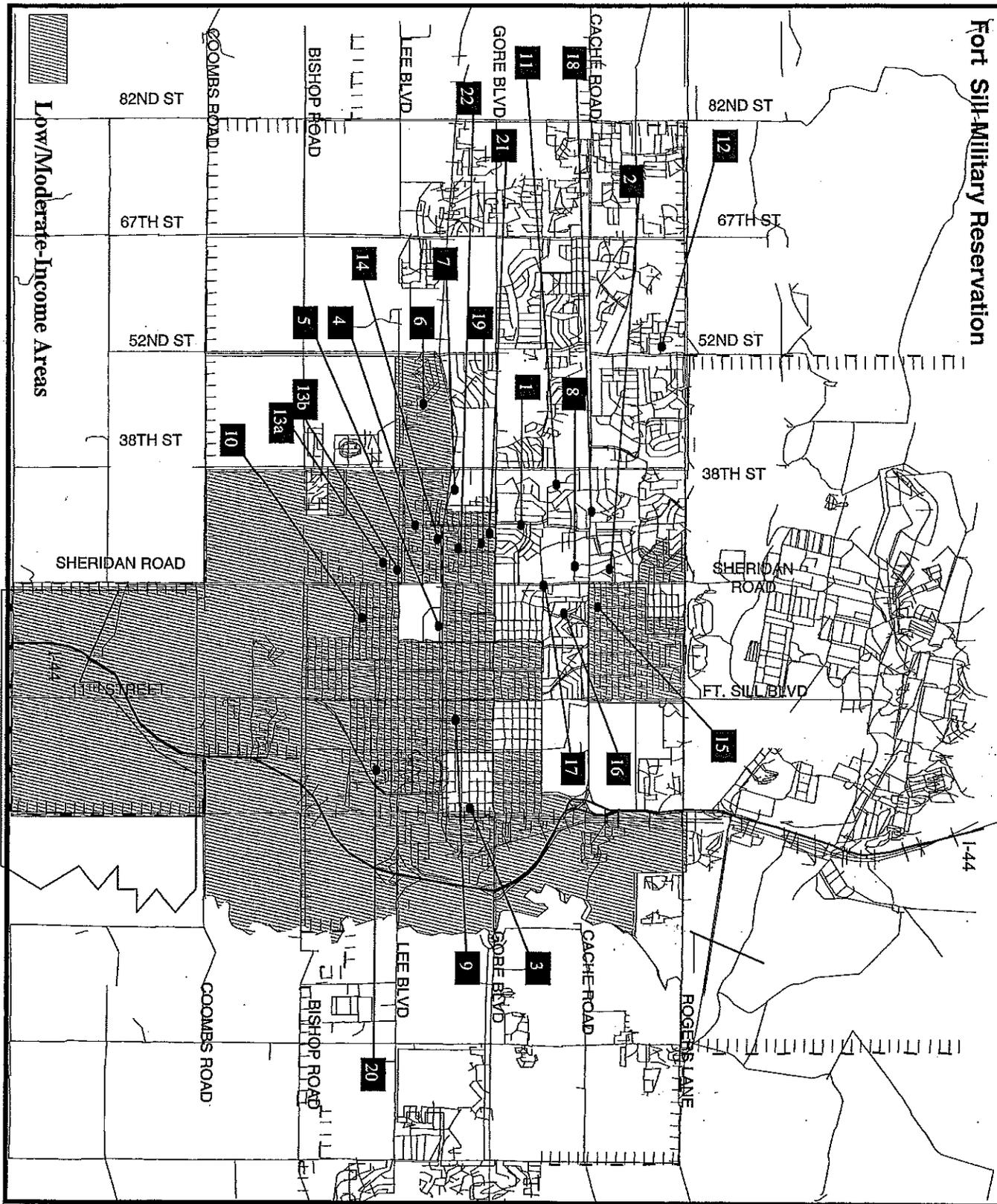


CONSOLIDATED PLAN-City of Lawton

CIP Minor Streets

Map No. CP-10

Fort Sill Military Reservation

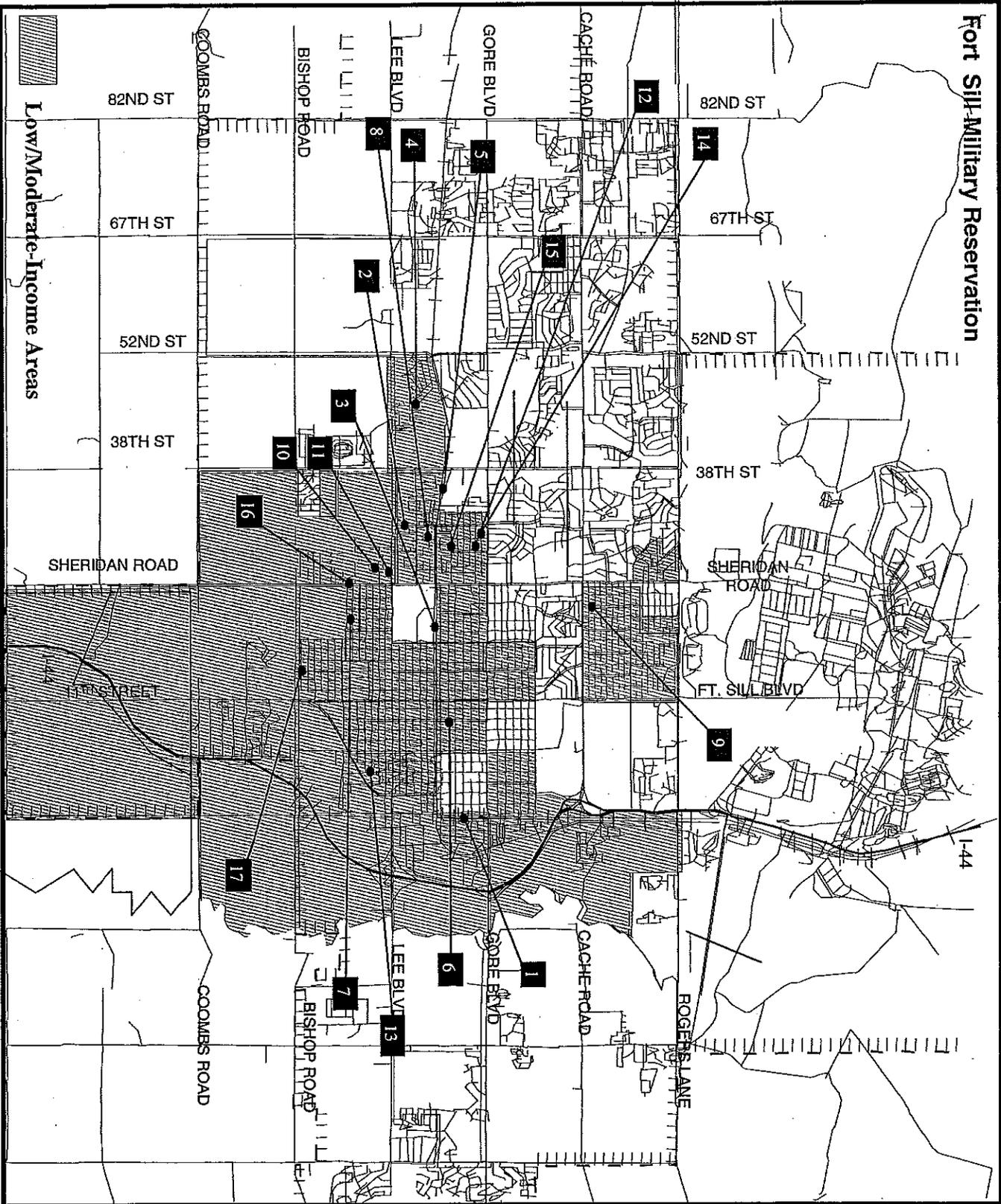


CONSOLIDATED PLAN-City of Lawton

CDBG Eligible Streets

Map No. CP-11

Fort Sill Military Reservation



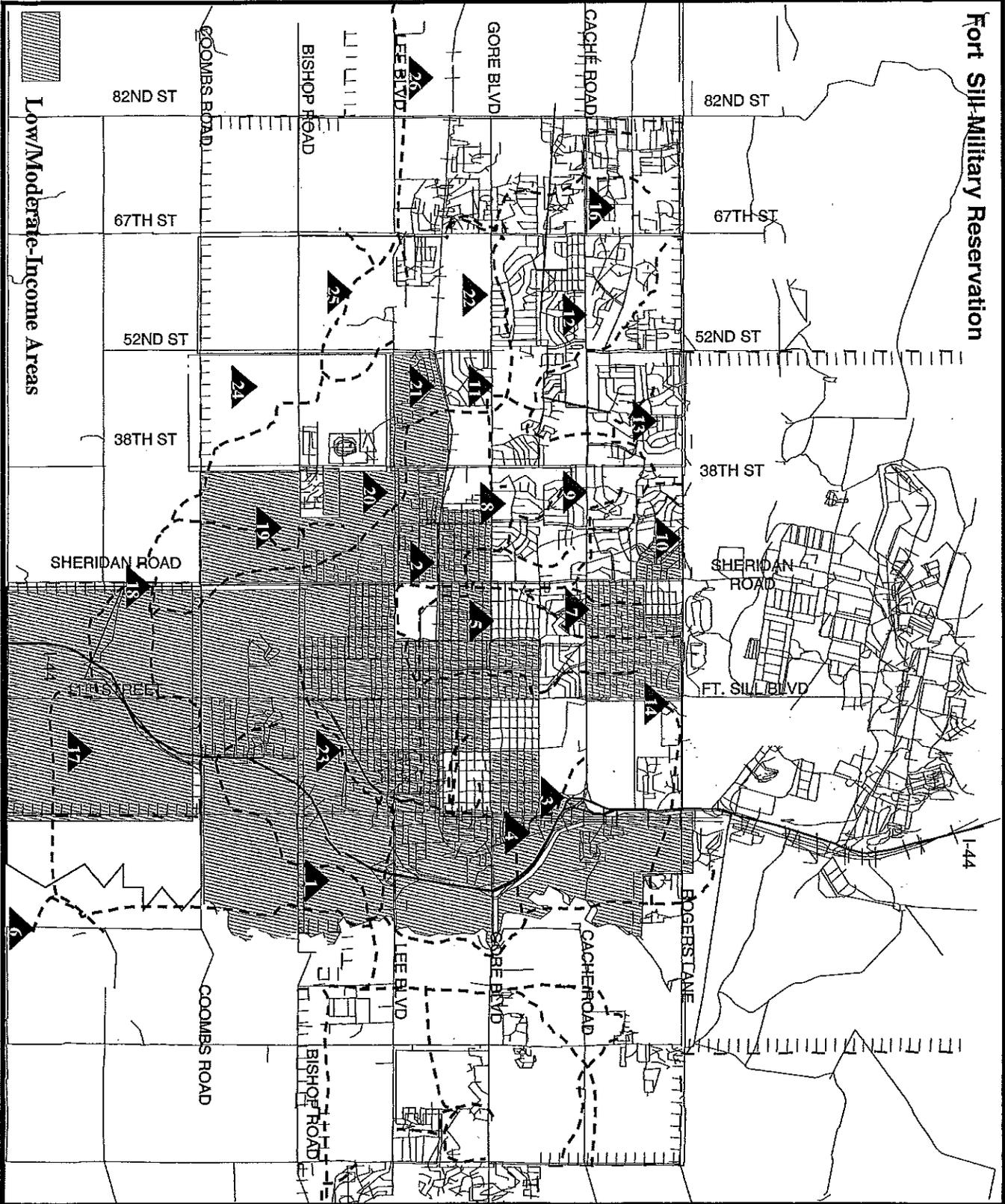
CONSOLIDATED PLAN-City of Lawton

CIP Sewer Upgrades



Map No. CP-12

Fort Sill-Military Reservation



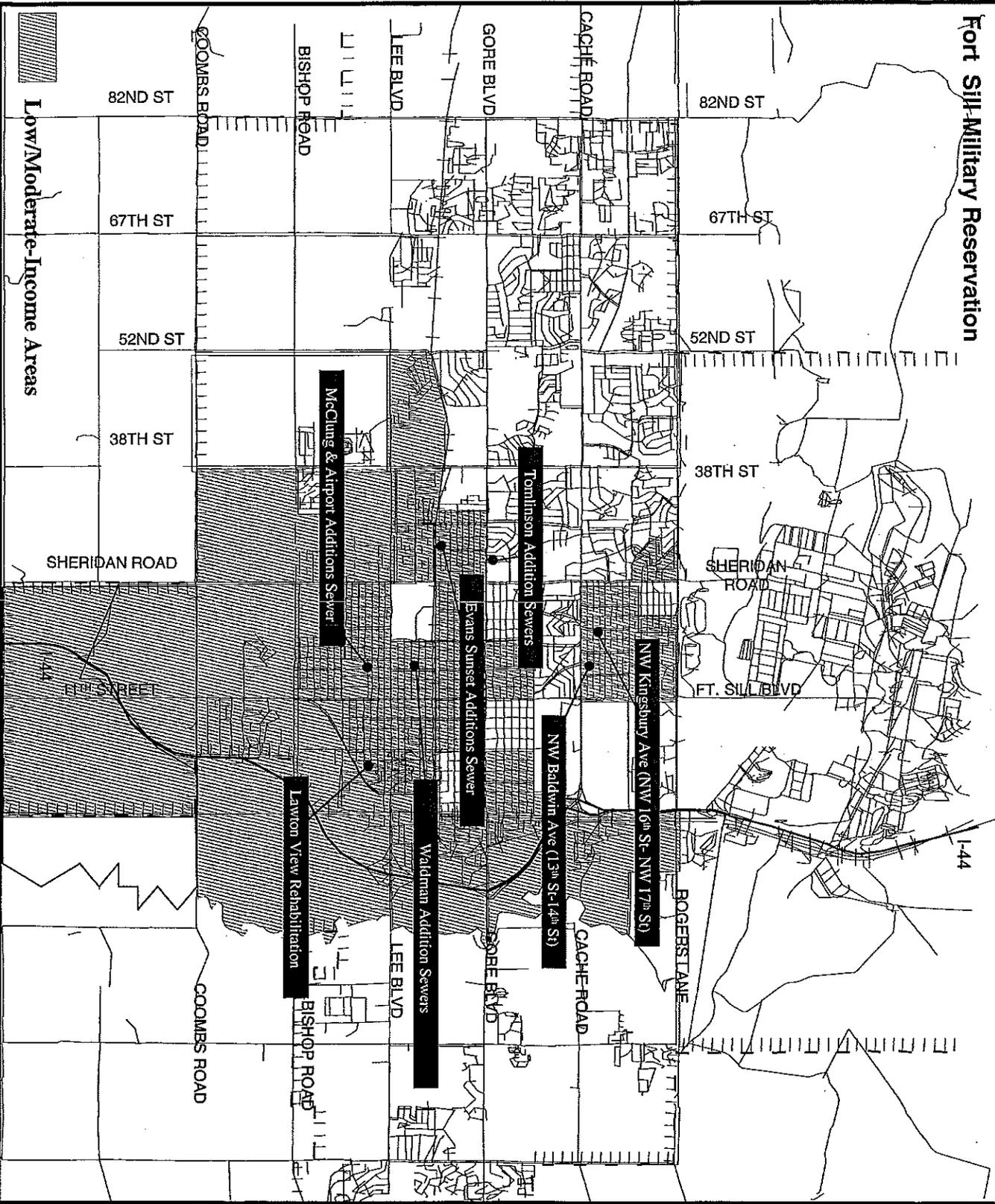
Low/Moderate-Income Areas

CONSOLIDATED PLAN-City of Lawton

CDBG Eligible Sewer Rehab

Map No. CP-13

Fort Sill Military Reservation



SECTION VI
HOUSING AND COMMUNITY DEVELOPMENT
FIVE-YEAR STRATEGY

Five-Year Strategy – Summary

General

This Housing and Community Development Five-Year Strategy establishes the framework for the City of Lawton's housing and community development programs and for implementation of the U.S. Department of Housing and Urban Development (HUD) programs within the community.

Lawton's goal for community development is to provide efficient, effective, and responsive customer-oriented service delivery, to promote a quality of life based on harmony and cooperation, and to provide leadership and opportunity for Southwest Oklahoma. An underlying premise is that the City of Lawton will strive to develop an environment within the community that encourages cooperation, collaboration, and development of partnerships among all levels of government; public and private agencies, including profit and nonprofit organizations; community groups; and all citizens of the community to develop dynamic strategies and programs to address the community's needs, particularly those of disadvantaged members of the community. The strategy is based on four principles: economic opportunity, sustainable community development, community-based partnerships, and a strategic vision for change.

In partnership with the Lawton-Fort Sill Chamber of Commerce and many other profit and non-profit agencies in the community, the City of Lawton continues to provide a mechanism for coordination of the city's future community and economic development. The partnership facilitates community development and economic growth by focusing on community self-improvement. It provides a comprehensive and effective tool for a community's self-analysis, organization, and goal setting to achieve the community's short and long-term goals and objectives. The program provides Lawton the ability to target its strengths and weaknesses, to develop comprehensive and coordinated approaches to meeting future community and economic development needs, and to develop innovative solutions to problems facing the community. The Century Communities Program provides a mechanism to enhance overall community readiness, a key factor in a city's community and economic development efforts. To achieve the goal of community readiness, the Century Communities Program establishes standards specifically designed for Oklahoma communities, which focus on improvements in the areas of Human Resources, Economic Development, Government Organization, Community Services, and Community Facilities. The keys to success in the Century Communities Program emphasize overall community involvement, obtaining support of local elected officials, recognizing successful efforts by community groups and organizations, establishing an ongoing program, and evaluating projects according to the program's standards. Henceforth, this strategy will refer to the Century Communities Program, which will provide future direction.

The goals and objectives of the State of Oklahoma's Century Communities Program parallel the overall goals of Lawton's community planning and development programs covered by this plan, which are to develop and sustain in Lawton a viable community by providing decent housing and a suitable living environment and by expanding economic opportunities for all citizens, but principally for low- and moderate-income persons. In concert with the Century

Communities Program, the plan seeks to accomplish these goals by encouraging, extending, and strengthening partnerships within the community among all levels of government and the private sector, including profit and non-profit organizations, in community and economic development and the development of affordable housing throughout the community. Integrating Housing and Community Development programs with the Century Communities Program affords a unique opportunity to achieve integration of economic, physical, environmental, community, and human development in a comprehensive, coordinated fashion to meet the community's needs. Additionally, this integration of efforts provides for effective organization and use of the community's human resources while ensuring maximum flexibility to respond to changing needs and priorities. Most community and economic development components of the program will continue to be implemented, evaluated and improved, and the housing component of the program will be implemented in the first year.

This five-year strategy will be implemented principally through the partnerships and collaborations resulting from the Century Communities Program. The City of Lawton Housing and Community Development will continue its collaboration with the Lawton-Fort Sill Chamber of Commerce and Industry (LCCI), United Way of Lawton-Fort Sill and other for profit and non-profit partners in the community to address the human and the community and economic development needs of the community, emphasizing the needs of low- and moderate-income citizens of the community. Aggressive efforts will be directed toward encouraging and maximizing community wide participation throughout the programs' planning, development, and implementation cycle.

Priorities

The priorities identified in the previous 5-Year Plans will remain substantially the same for the next five years. Implementation of the programs governed by this strategy devolve from the overall assessment of Lawton's human, community, and economic development needs assessment of the community's needs, and citizen involvement and input. Program priorities will be reviewed and evaluated at least annually, and changes will be incorporated into Lawton's Consolidated One-Year Action Plan for Housing and Community Development.

The HUD community planning and development programs implemented under this strategy are designed to benefit low- and moderate-income members in the community, those earning 50 percent or less of the area's median family income (AMFI) and those earning from 51 to 80 percent of the AMFI. In order to meet this overall objective, local community planning and development (CPD) programs, such as the Community Development Block Grant (CDBG) Program and the HOME Investment Partnerships (HOME) Program, will focus on development and implementation of projects which are consistent with the priority needs outlined in The Plan and which benefit:

- a. Low-income members of the community,
- b. Moderate-income members of the community,
- c. Low- and moderate-income areas in the community,

d. Overall community and economic development of the community for the benefit of low- and moderate-income members of the community.

The City of Lawton establishes the guidance provided by HUD for funding priority on specific projects. If the priority need level is indicated by the letters H (for High), M (for Medium), L (for Low) or N (for No Such Need) in the previous sections of this document, the City of Lawton will use funds as indicated below based on the relative priority given to each item listed during the period of time designated by this plan.

a. High Priority: The City of Lawton plans to use funds made available for activities that address this unmet need during the period of time designated in the strategic plan.

b. Medium Priority: If funds are available, activities to address this unmet need may be funded by the City of Lawton during the period of time designated in the strategic plan. Also, the City of Lawton will take other actions to help this group locate other sources of funds.

c. Low Priority: The City of Lawton does not plan to use funds made available for activities to address this unmet need during the period of time designated in the strategic plan. The City of Lawton will consider certifications of consistency for other entities' applications for Federal assistance.

d. No Such Need: The City of Lawton finds there is no need or the City of Lawton shows that this need is already substantially addressed.

CDBG community development activities will focus on development and revitalization of the Central Corridor of the city. HCD will continue to work with low- and moderate-income neighborhood groups, when sustained interest is developed. In the past, to include this past year, neighborhood groups have showed little or, at best, fleeting interest and then fail to maintain focus in the face of the daunting tasks with which they are faced. Often groups are formed to meet a particular community or neighborhood need. When outside funds are available, the interest is maintained, however when the neighborhoods face obstacles without funding, the interest in attacking the issue within their small community wanes rapidly. In these hard economic times, funds for the projects within the neighborhoods will likely go unfunded. While the staff remains available to provide guidance and expertise, additional funding will have to be generated through fund raising and grant applications for specific projects. Additionally, HCD will collaborate with and advise and assist the Lawton Urban Renewal Authority's (LURA's) redevelopment efforts in the central city along 2nd Street and C Avenue. During this five-year period consolidated planning efforts will focus on economic development, infrastructure improvements, and redevelopment activities related to the completion of Phase I of LURA's Lawton Downtown Revitalization Plan. HCD's efforts in this regard will be directed to economic development projects and activities benefiting low- and moderate-income neighborhoods surrounding the redevelopment area. CDBG and HOME housing projects will be implemented community wide.

Citizen involvement is an important component of the process of identifying and monitoring the community's needs; establishing priorities and allocating the community's limited resources; and planning, development, and implementation of HUD's CPD programs. Therefore, increased citizen participation is a priority element of this strategy. Citizen participation will be encouraged throughout the planning, development, and implementation stages of the process. Town meetings, workshops, surveys, and information provided through Century Communities Program analyses and activities will be used to the maximum extent possible to provide opportunities for citizens, particularly low- and moderate-income persons and persons or organizations representing low- and moderate-income persons and/or segments of the community, to participate in the decision making and execution of local government activities, including HUD sponsored CPD program activities.

Obstacles to Meeting Underserved Needs

The greatest obstacle to meeting underserved needs is money. As can be seen from the Priority Needs Table, current funding levels fall far short of the community's requirements. As a result, the challenge is to ensure establishment of priorities that meet the most urgent needs and, at the same time are consistent with the community's long term goals and objectives. The Plan provides the mechanism for ensuring proper allocation and effective investment in the community of both federal and local funding.

Program Objectives

Short-term objectives:

1. Evaluate a new program designed to assist handicapped citizens in accessing transportation through the use of the Community Development Block Program designed to construct new bus stops that are completely handicapped accessible and provide a modicum of shelter. Working in conjunction with the Lawton Area Transit System (LATS), develop a standard, locally identifiable structure that will be funded using the CDBG funds. Additionally, investigate other bus stops that have already been constructed to determine if additional work is needed to extend sidewalks or other work necessary to ensure easy of access to handicapped citizens. Since handicapped persons are a presumed beneficiary, the restrictions from accomplishing these tasks in targeted (LMI) neighborhoods are waived. In addition, the Housing and Community Development office will sell advertising on the walls and benches, using the funds as program income to continue the program in future years, regardless of funding from other sources.
2. Review all low- and moderate-income neighborhoods with Police, Fire, Inspection Services and Neighborhood Services to determine if new emphasis is required from the Mayor or from this office to assist in arresting the decline of particular neighborhoods through the focus of a total community effort consisting of fire, police, Inspection and Neighborhood Services and Housing & Community Development.

Mid-term objectives:

1. Improve the viability of any low- and moderate-income neighborhoods addressed above that

are determined to be areas in distress/decay.

2. Redirect the code enforcement efforts to support the areas identified above, if necessary.
3. Continue to improve the capacity of CHDOs; Great Plains Improvement Foundation, Inc., Lawton-Fort Sill Habitat for Humanity, and ZOE N.E.E.D. Program Inc., to develop additional affordable housing, both rental and homeownership opportunities in the community.
4. Link housing and supportive services within the community to provide a continuum of care and assistance for low-income and homeless families and individuals in the community to move from dependency to self-sufficiency.

Long-Term Objectives:

1. Enhance, in a joint and collaborative effort with the Century Communities Program, development and diversification of Lawton's economic base to enhance economic growth and employment opportunities in the community. Begin an economic development set-aside program to provide funding to assist economic development projects with funds to complete small infrastructure projects as potential match to request other grants or other funds.
2. Increase the quantity and quality of decent, safe, and sanitary affordable housing in the community.

Affordable Housing

Goal

The overall goal for Lawton's housing programs is to use the resources available through the CDBG and HOME programs to ensure that low- and moderate-income residents of the City of Lawton are afforded opportunities for decent, safe, sanitary, and affordable housing and economic opportunities.

Priority Analysis and Strategy

The analysis to establish priorities for implementation of Lawton's affordable housing programs and projects is based on the information provided by the 2000 U.S. Census and the 2000 Comprehensive Housing Affordability Strategy (CHAS) data. This section will address only the high priority needs developed from the analysis. The Priority Housing Needs Table summarizes the priorities resulting from the analysis. The 2000 Census and HUD's 2000 Comprehensive Housing Affordability Strategy (CHAS) data are the basis for establishing the following priorities to meet the community's affordable housing needs.

Priority 1: Produce Affordable Housing

Goal: The gaps, as identified in Section IV of this document, for housing in the tenure ladder, which currently exist, are filled based on available funding, and the overall supply of affordable housing in the community is increased.

Priority 2: Promote Homeownership and Household Mobility

Goal: The level of homeownership within low- and moderate-income neighborhoods is increased.

Priority 3: Preserve and Upgrade the Existing Housing Stock

Goal: Existing affordable housing, whether subsidized or not, is preserved.

Table 6-1
"Housing Needs"

PRIORITY HOUSING NEEDS (households)		Priority Need Level High, Medium, Low, No Such Need			ESTIMATED UNITS	ESTIMATED DOLLARS NEEDED TO ADDRESS	
		0-30%	31-50%	51-80%			
R E N T E R S	Small	Cost Burden > 30%	H	H	M	2,314	3,906,000
		Cost Burden > 50%	H	H	M	1,229	7,374,000
		Physical Defects	H	H	H	336	6,720,000
		Accessibility	H	H	L	70	350,780
	Large	Cost Burden > 30%	H	M	L	400	691,200
		Cost Burden > 50%	H	L	N	208	1,248,000
		Physical Defects	H	H	H	295	5,900,000
		Accessibility	H	H	L	69	345,769
	Elderly	Cost Burden > 30%	H	H	M	504	979,200
		Cost Burden > 50%	H	L	L	232	1,392,000
		Physical Defects	H	H	H	429	8,580,000
		Accessibility	H	H	H	220	1,097,275
O W N E R	Cost Burden > 30%	H	M	M	2032	3,801,600	
	Cost Burden > 50%	H	M	M	1225	675,000	

S	PRIORITY HOUSING NEEDS (households)	Priority Need Level High, Medium, Low, No Such Need			ESTIMATED UNITS	ESTIMATED DOLLARS NEEDED TO
		H	H	H		
	Physical Defects	H	H	H	585	11,700,000
	Accessibility	H	H	H	456	2,302,800
TOTAL ESTIMATED DOLLARS TO ADDRESS THE NEEDS:						\$49,696,998

Note 1: Unable to update the information. Last study conducted by Cameron University at the Request of Fort Sill Housing in 2005.

It is important to note that neither the 2000 census nor Lawton's 1995 community needs assessment addressed housing in sufficient detail to provide for rigorous analysis of housing issues. The 2005 Community Needs Assessment did not fill in many of the information gaps found in the 2000 Census that existed in the area of housing needs, either. Subsequent gaps will be addressed by other research methods, which will orient on additional sources of information. Only the Lawton-Fort Sill Housing Study of 2005 has been able to fill in any of the gaps. Funding through the Housing and Community Development office is not sufficient to request an update of the study by the Cameron University team that conducted the previous study. The following analysis, however, is based on the best available information from HUD's CHAS Data and Special Tabulations.

Priority 1: Produce Affordable Rental Housing

High Priority

Extremely Low- (0 to 30% AMFI) and Low-Income (31 to 50% AMFI) Renters in all Household Categories

1. Analysis:

a. Renter - Small Family Cost Burden (> 30%)

A small family consists of four family members or less. There were 2,479 renters in the small family category with incomes at 50 percent or less of the AMFI. 77.4 percent of these families had housing problems, and 75.3 percent had cost burdens exceeding 30 percent of their incomes. An estimated 1,869 small family renters have housing cost burdens. To meet this need, it is estimated that monthly rental assistance per family would cost approximately \$300.00 per month, or \$3,600.00 per year. To assist 1,869 renters, the estimated annual cost is \$6,728,400.

b. Renter - Small Family Severe Cost Burden (> 50%)

Of the 2,479 renters with incomes at 50 percent or less of the AMFI, 915 small family renters with extremely low-incomes and 289 small family renters with low-incomes had severe cost burdens in excess of 50 percent of their incomes. An estimated 1,204 small family renters have severe cost burdens for housing. To meet this need, it is estimated that monthly rental assistance per family would cost approximately \$500.00 per month, or \$6,000.00 per year. To assist 1,204 renters, the estimated annual cost is \$7,224,000.

c. Renter - Large Family Cost Burden (> 30%)

A large family consists of five or more family members. There were a total of 479 renters in the large family category with incomes at 50 percent or less of the AMFI, and 78.3 percent of them had some type of housing problem(s). An estimated 90.3 percent of those with extremely low-incomes, or 223 families, had cost burdens exceeding 30 percent of their incomes, and 63.9 percent of the large family renters with low-incomes, or 148 families, had housing cost burdens exceeding 30 percent of their incomes. Therefore, there are an estimated 371 large family renters with housing cost burdens who are in need of rental assistance. To meet this need, it is estimated that monthly rental assistance per family would cost approximately \$300.00 per month, or \$3,600.00 per year. To assist 371 large family renters, the estimated annual cost is \$1,335,600. The finding, that approximately 8.5 percent of the families in this category also live in overcrowded accommodations, magnifies the housing needs of large families.

d. Renter - Large Family Severe Cost Burden (> 50%)

Of the 479 renters with incomes at 50 percent or less of the AMFI, 200 large family renters had extremely low-incomes, and 4 had low-incomes who had severe cost burdens exceeding 50 percent of the family's income. An estimated 204 large family renters have severe cost burdens for housing. To meet this need, it is estimated that monthly rental assistance per family would cost approximately \$500.00 per month, or \$6,000.00 per year. To assist 204 renters in this category, the estimated annual cost is \$1,224,000.

e. Renter - Elderly Household Cost Burden (> 30%)

An elderly family / household is 1 or 2 person household, in which; either person is 62 years old or older. There were 667 elderly renters with incomes at 50 percent or less of the AMFI, and 66.5 percent of them had some type of housing problem(s), and 65.9 percent had cost burdens exceeding 30 percent of their incomes. An estimated 70.8 percent of those with extremely low-incomes, or 228 elderly households, had cost burdens exceeding 30 percent of their incomes, and 61.4 percent of the elderly household renters with low-incomes, or 212 elderly families, had housing cost burdens exceeding 30 percent of their incomes. An estimated 440 elderly renters have housing cost burdens. To meet this need, it is estimated that monthly rental assistance per family would cost approximately \$300.00 per month, or \$3,600.00 per year. To assist 440 elderly renters, the estimated annual cost is \$1,584,000.

f. Renter - Elderly Household Severe Cost Burden (>50%)

Of the 667 renters with incomes at 50 percent or less of the AMFI, 165 elderly renters had extremely low-incomes, and 57 had low-incomes who had severe cost burdens exceeding 50 percent of the family's income. An estimated 222 elderly have severe cost burdens for housing. To meet this need, it is estimated that monthly rental assistance per elderly family would cost approximately \$500.00 per month, or \$6,000.00 per year. To assist 222 renters in this category, the estimated annual cost is \$1,332,000.

2. Strategy - Renter Assistance: Tenant-Based Rental Assistance Program

a. The Oklahoma Housing Finance Agency (OHFA) will continue for the foreseeable future to manage and operate the Section 8 program for the benefit of the City of Lawton from their home office in Oklahoma City. OHFA indicates that the average rental assistance payment is \$325.00 per month. Additionally, OHFA anticipates the current funding level, approximately \$3,120,000 annually, to continue. At that level of funding the Section 8 program will provide assistance for approximately 800 units of affordable housing annually in Lawton. The waiting list for Section 8 housing assistance in Lawton is typically twelve months long.

b. The Lawton Housing Authority (LHA) will continue for the foreseeable future to manage and operate a Section 8 program for the benefit of the City of Lawton. The LHA indicates that the average rental assistance payment is \$325.00 per month. Additionally, the LHA anticipates the current funding level, approximately \$798,336 annually, to continue. At that level of funding the LHA Section 8 program will provide assistance for approximately 189 units of affordable housing annually in Lawton. The waiting list for Section 8 housing assistance in Lawton is typically twelve months long.

3. Strategy - Renter Assistance: Project-based Rental Assistance Providers

a. The LHA owns 319 units of conventional Public Housing, 100 of which are designated for elderly only, and 50 are designated for disabled/elderly households. 169 of the units are for families. The annual vacancy rate is approximately 14%. There is not a waiting list for the LHA Public Housing at the present time.

b. Ten (10) other housing developments (See the table in section III for a listing of the housing providers) in Lawton provide project-based Section 8 rental housing assistance consisting of 468 units of low-income housing. While the funding levels of these housing agencies are unknown, they are expected to continue to provide low-income housing for the foreseeable future. The typical twelve month waiting lists for these facilities parallel the Section 8 program's experience.

4. Rental Assistance Program

As can be seen from the previous data, the 1,776 affordable housing units provided by these housing agencies do not meet the needs to afford those families / households faced with severe housing cost burdens. A shortage of 1,947 affordable rental households exists in the City, which are needed for households that are extremely low- and low-income. An additional 222 affordable units, which are tax credit qualified units under the Low Income Housing Tax Credit (LIHTC) program, were constructed in 2006. 162 units are dedicated for families, and 60 units are dedicated for the elderly. The LIHTC apartments were scheduled for occupancy in June/July 2006. The LIHTC units have assisted the City in addressing a portion of the rental assistance need in Lawton.

To enhance the community's ability to assist these extremely low- and low-income families / households, the City of Lawton will invest CDBG and HOME Program funds to

leverage other housing funds, i.e. LIHTC funds, project-based rental assistance funds, private funds, etc., to assist in the construction and/or rehabilitation of additional affordable housing units in the community. An investment of this nature may possibly create an additional 500 to 700 affordable housing units in the next five years. Past experience reveals approximately \$100,000 per year is required in CDBG and HOME Program funds to leverage other funds that will have an impact on affordable housing in the community. Approximately \$500,000 is required for the period of the plan.

In the past, the City has funded a Tenant-Based Rental Assistance (TBRA) with HOME Program funds to assist extremely low- and low-income rental households. Since a relatively high vacancy rate exists in project-based rental assistance, approximately seven (7) percent in project-based rental assistance programs and fourteen (14) percent in public housing, the City of Lawton has yet to reinstitute the TBRA program. If the vacancy rate in these units declines to a balance level of 3-5 percent in the future, the City of Lawton will consider providing the HOME Program TBRA again. No funding has been requested for the first year of this 5-Year Plan. If it is reinstated, the program would offer this rental assistance for up to 24 months to low-income households that qualify under the CITY's established preferences for specific category or special needs to receive benefits.

a. The specific category includes families with abandoned spouses, displaced homemakers, welfare to work families, and displaced workers pursuing an education or job training.

b. Special needs are defined as persons with disabilities, victims of domestic violence, homeless, and displaced persons.

Medium and Low Priority

Moderate-Income (51 to 80% AMFI) Renters in all Household Categories

1. Analysis:

a. Renter - Small Family Cost Burden (>30%)

There were 1,710 renters with moderate-incomes in the 51 to 80 percent AMFI range in the small family category. 32.2 percent of these small families had some type of housing problem(s), and 26 percent experienced housing cost burdens in excess of 30 percent of their incomes. Therefore, there are an estimated 445 small family renters with housing cost problems and 105 with housing problems. 550 affordable housing units are required to address this need. To provide rental assistance and rental rehabilitation to small families in this category requires an estimated \$3,612,600.

b. Renter - Small Family Severe Cost Burden (>50%)

Of the 1,710 renters with moderate-incomes in the small family category, 15 percent, or 25 families, had severe housing cost burdens in excess of 50 percent of their incomes. 25

affordable housing units are required to meet this need. To provide rental assistance to these families with moderate-incomes and severe housing cost burdens requires an estimated \$150,000 annually.

c. Renter - Large Family Cost Burden (>30%)

There were 469 renters with moderate-incomes in the large family category, and 55.2 percent of them had some housing problem(s). 20 percent, or 94 large families, had housing cost problems with cost burdens over 30 percent of their incomes. 94 affordable housing units are required to meet this need. To provide rental assistance to these families with moderate-incomes and housing cost burdens requires an estimated \$324,000 annually.

d. Renter - Large Family Severe Cost Burden (>50%)

Of the 469 renters with moderate-incomes in the large category, less than 1 percent, or 4 families, had severe housing cost burdens in excess of 50 percent of their incomes. 4 affordable housing units are required to meet this need. To provide rental assistance to these families with moderate-incomes and severe housing cost burdens requires an estimated \$24,000 annually.

e. Renter - Elderly Household Cost Burden (30%)

There were 221 elderly households with moderate incomes. 38.9 percent of the households had housing problems. 26 percent of those elderly households with housing problems, or 64 households, had a housing cost burden in excess of 30 percent of household income. 64 affordable housing units are required to address this need of elderly households. The annual cost of providing rental assistance for these households is estimated at \$194,400.

f. Renter - Elderly Severe Cost Burden

Of the 221 renters with moderate-incomes in the elderly category, 4.5 percent, or 10 families, had severe housing cost burdens in excess of 50 percent of their incomes. 10 affordable housing units are required to meet this need. To provide rental assistance to these families with moderate-incomes and severe housing cost burdens requires an estimated \$60,000 annually.

2. Strategy - Homebuyer Assistance for Moderate-Income (51 to 80% AMFI) Renters:

24 percent of all renters are in the moderate-income category with incomes ranging from 51 to 80 percent of the AMFI. The needs of this renter group are significant, and housing assistance is needed. However, this analysis shows that the rental assistance needs of extremely low- and low-income households easily surpass those of other higher income groups. Currently, the housing providers discussed earlier are unable due to limited resources to meet the needs for rental assistance from the lower income groups. The six to twelve month waiting lists maintained by the OHFA Section 8 program and other local low-income housing providers reinforces the importance of the need for additional rental assistance resources in the community. Given current resource constraints, the priority for rental assistance will continue to be the latter groups, those households with incomes which are 50 percent or less of the median income.

The level of funding for these groups will be dependent on the amount of funds available after other higher priorities are addressed. Therefore, due to the lack of sufficient funding to address the needs of these lower income groups, rental assistance is not available to households with moderate incomes unless additional resources are made available. During the ensuing five year period of the Plan, an objective of the housing assistance program will be to investigate other alternatives to providing affordable rental housing in the community and to expanding rental opportunities for those households in this category who prefer renting to owning a home.

Homeownership provides an attractive and affordable alternative to renting for many households in the moderate-income category if appropriate assistance is provided. Therefore, homebuyer assistance will be the primary focus for assistance to this renter group. The FTHB program outlined in this strategy will be employed as a mechanism for assisting moderate-income renter households with affordable homeownership opportunities. The priority for assistance to households will be to those with incomes at or below 80 percent of the AMFI. The FTHB program is outlined later in the strategy.

Priority 2: Promote Homeownership and Household Mobility

High Priority: Moderate-income

Medium Priority: Low-income

Low Priority: Extremely Low-income

Extremely Low- (0 to 30 % AMFI), Low-Income (31 to 50% AMFI), and Moderate-Income (51 to 80% AMFI) First-Time Homeowners with Children and All Others

1. Analysis:

a. Housing Cost

The latest analysis indicates that, given the age of housing, current vacancy rates, number of substandard units in the community, Lawton does not have sufficient affordable housing stock without new construction. Statistics show that the number of persons per housing unit in Lawton remained constant between 1990 and 2000, the lowest level in twenty years. However, as illustrated in Section III, housing costs in Lawton are among the highest in the state of Oklahoma. The 2000 U.S. Census established \$70,900 as the median value for new and previously owned homes in Lawton. Compared to the United States median value of \$111,800, the cost appears reasonable and affordable. However, the median cost of purchasing a home in Lawton is well above the median value of \$67,700 for the state. Combined with the generally low levels of income in Lawton and Comanche County, the relative cost of housing must be

considered high.

b. Housing Affordability

Housing affordability is a function of the price of housing and the level of income. 38.9 percent of all renters in Lawton live on extremely low- and low-incomes and pay some of the highest rents in the state. Lawton's median gross rent of \$626.00 per month is only lower than Edmond (\$887.00), Norman (\$664.00), and Oklahoma City (\$649.00) in the region, and is slightly above the statewide median gross rent of \$614.00.00¹ per month. Many of the households in these low-income categories are currently paying the monthly equivalent to a mortgage in monthly rent. Regrettably, the advantages of homeownership are beyond the reach of many willing low-income households. The greatest barriers to homeownership for Lawton's low-income households stem from low incomes, low personal savings, and ability to qualify for a mortgage. The economic downturn has frozen the low- and very low-income families completely out of the home buying market. Banks have been unwilling to repeat the criminal mistakes of the past and to revert back to the creative financing that allowed banks to sell new homes to every one without the wherewithal to maintain the payments as floating interest rates blossomed into rates that created new payment that were beyond the ability of many Americans to afford. And, as is often the case, many just lack sufficient funds for down payment and/or closing costs. Additionally, many of the homes found in affordable price ranges in Lawton are very old and have been poorly maintained and require significant repairs or rehabilitation that are beyond the financial capability of the average low-income family or household. There is, then, a need for homeowner assistance to help low-income households who want to own a home of their own and who can afford the long-term cost of a home but lack the accumulation of capital necessary to afford the initial costs involved in the purchase of a home.

The housing plight of moderate-income renters was addressed earlier in this analysis. While the need exists for rental assistance for households in this income category, limited resources prevent making rental assistance a top priority. Additionally, because of their higher incomes, households in this income category have greater financial resources and better access to other resources than those households with extremely low and low incomes. Therefore, homeownership is a more practical alternative to moderate-income households. However, these households face the same barriers to homeownership as those restricting access of lower income households to homeownership opportunities. As with the lower income groups, many moderate-income households lack the financial resources to cover a down payment and/or closing costs. Additionally, many of the homes found in affordable price ranges in Lawton are very old and have been poorly maintained, and therefore, require significant repairs or rehabilitation that are beyond the financial capability of many of these households. There is a need, however, for assistance to leverage the financial resources of those moderate-income households who aspire to homeownership, who can afford the long-term cost of homeownership, but who lack the financial resources or financial capability to make the initial investment.

2. Strategy - Homebuyer Assistance

In order to provide homeownership opportunities for qualified low- and moderate-

income families and households in the community, the City of Lawton has developed and implemented a policy, which establishes the requirements and procedures for a First-Time Homebuyer (FTHB) program. The FTHB program will continue to be funded by HOME program funds. To qualify the prospective homebuyer must meet the eligibility criteria: qualify as a low-income household, be a first-time homebuyer as defined by HUD, provide a minimum of 5% of their gross annual income for investment in the home, and agree to occupy the home as the household's principal residence in accordance with HUD's required period of affordability based on the dollar amount invested. The household also must procure private financing for the purchase price from a financial institution. The FTHB program provides a down payment and/or closing costs of up to \$10,000.00 to ensure that housing costs are affordable. To provide homeownership opportunities for qualified segments of the Lawton community, the City of Lawton plans to invest HOME program funds to assist approximately 15 to 20 families or individuals each year to purchase a home through the FTHB program. The number of families or individuals assisted will, of course, depend on future housing prices; the level of mortgage interest rates; and the availability of decent, safe, and sanitary housing. At an average homebuyer purchase assistance of \$10,000, approximately \$100,000 of HOME program funds will be allocated each year to FTHB assistance.

In addition to the FTHB Program, the HCD office has received funding from the Oklahoma Department of Commerce called the Neighborhood Stabilization Plan (NSP). The program provided the City of Lawton 1,072,800 to buy foreclosed or abandoned properties in low- and moderate-income neighborhoods and rehabilitate, demolish and reconstruct, or sell as is, these homes that are empty in the various neighborhoods and creating a safety and security issue for the City. With the House of Representatives passing a prospective NSP III, the City has determined a continuing need for these additional funds to assist the low- and moderate-income citizens of Lawton-Fort Sill and plans to apply for such funds should they become available. A delay in the hiring of a coordinator affected the City's ability to implement the first program for almost an entire 16 months after the funds were available for the program, but the City has been scrambling to ensure we meet ODOC's deadline to commit the funds to housing projects in the City. A general comment would be that it would be substantially easier for cities to receive the funding directly from HUD, similar to our other grants and/or entitlements and cut out the middleman. The additional administrative funds would be helpful in administering the program, the ease of using local requisitions/purchase order systems and IDIS, systems already well known to the various cities, would greatly ease the burden of meeting arbitrary and archaic rules added which makes it nearly impossible to reasonably purchase new foreclosures as they enter the market. This City requests such consideration if and when a future NSP is funded.

Prior to the purchase, the Housing Rehabilitation Specialists from the Housing and Community Development (HCD) office will inspect the properties, using the Housing Choice Voucher (Section 8) Inspection Form and provide a copy to the realtor and to the Housing Development Specialist, in order to ensure their structural soundness, code and regulatory compliance, and suitability for affordable housing. Additionally, a repair list, if necessary, is prepared which identifies repairs necessary to the structure to conform to city codes and to ensure the home is decent, safe, and sanitary for occupancy.

Operation and management of the FTHB program is the responsibility of Lawton's

Housing and Community Development office. The HCD also assists homeowners in learning about self-help care and maintenance on their properties.

The Lawton Board of Realtors has been informed about the FTHB, and the board supports the use of the program for those clients who meet the program's guidelines. The local board oversees fair housing and equal opportunity for housing in the community and fully supports and enforces the requirements among their membership.

In accordance with 24 CFR 92.254(a)(5), the City adopts the shared net proceeds method of the recapture requirements to ensure affordability for homeownership assistance. If the HOME recipient decides to sell the house within the period of affordability at whatever price the market will bear, the City will require recapture of all or a portion of the HOME assistance that enabled the homebuyer to buy the dwelling unit as follows:

Shared net proceeds: When the net proceeds are insufficient to recapture the full or a reduced amount of the HOME investment plus enable the homeowner to recover the amount of the homeowner's downpayment and any documented capital improvement investment made by the owner since purchase, the City of Lawton and the homeowner shall proportionally divide the net proceeds as set forth in the mathematical formulas in 24 CFR 92.254(a)(5)(ii)(A)(3). The City of Lawton's share of the proceeds shall not, in any case, exceed the HOME investment provided to purchase the dwelling unit. The net proceeds are defined as the sales price minus loan repayment (other than HOME funds) and closing costs.

Exception: Development subsidies are not subject to recapture. For properties that receive development subsidies only, and there is no direct financial assistance to the homebuyer, the resale requirements will apply. Under certain City programs, such as some CHDO projects or activities that receive development subsidies, the HOME-assisted units must remain affordable over the entire affordability term, and therefore those units will be designated as "affordable units." If a unit is so designated and is sold during the affordability period, the sale must meet the criteria established in 24 CFR 92.254(a)(5)(i). The City will use deed restrictions, land covenants, or other similar legal mechanisms to enforce the resale restrictions in accordance with the provisions of 24 CFR 92.254(a)(5)(i)(A).

Priority 3: Preserve and Upgrade the Existing Housing Stock

High Priority

Extremely Low- (0 to 30% AMFI) and Low-Income (31 to 50% AMFI) Existing Homeowners

1. Analysis:

The 2,291 homeowners in the extremely low- and low-income categories make up 13.2 percent of all homeowners. 68 percent of extremely low-income homeowners and 45.2 percent of low-income homeowners had housing problems of some kind. 75 percent of extremely low-

income and 57.1 percent of low-income homeowners had cost burdens over 30 percent, and 64 percent of extremely low-income and 33.5 percent of low-income homeowners had severe cost burdens in excess of 50 percent. Combined, 52.8 percent of these homeowners, or 1211 homeowners experienced severe cost burdens. Elderly homeowners in these categories were particularly affected by housing problems. 62.2 percent of those with extremely low-incomes and 45.8 percent with low-incomes had housing problems, and 53.6 percent, or 553 elderly homeowners, were cost burdened. 389, or 37.7 percent, of elderly homeowners with a housing cost burden had severe cost burdens with over 50 percent of their incomes required to pay for housing.

The data also indicate that approximately 10 percent of homeowners with extremely low-incomes and 11.9 percent of those with low-incomes had physical defects in their housing. This represents approximately 253 housing units in various stages of disrepair. Local experience has shown that the average cost of rehabilitating a housing unit is approximately \$20,000. 53.6 percent of all homeowners in this income category are already burdened by housing costs, which provide a major barrier to undertaking expensive repairs or renovations to their homes, even those of an urgent nature. At the average rate, then, approximately \$5,060,000 is necessary to address the rehabilitation needs of extremely low- and low-income homeowners.

2. Strategy - Homeowner Assistance

To address the needs of extremely low- and low-income homeowners, the City of Lawton has developed policies and procedures for providing assistance for repair and rehabilitation of homeowner properties. These programs can be funded by CDBG and HOME funds. They include the Homeowner Rehabilitation Program, the Emergency Home Repair Program, and the Exterior Housing Improvement Program.

The Homeowner Rehabilitation Program provides a deferred low interest loan, of which a percentage is forgivable, and the remaining is repayable based on the household's income and size. The program is designed to assist low- and moderate-income homeowners with rehabilitation of their homes. To qualify, homeowners must meet the low- or moderate-income requirements and must own and occupy the home. The housing unit will be repaired and upgraded to meet current city building codes. The estimated value of the property, after rehabilitation, cannot exceed 95 percent of the median purchase price for the area. HOME Program and CDBG funds will be used to fund activities for eligible homeowners. The objective of the Homeowner Rehabilitation Program is to provide rehabilitation assistance to 10 to 15 homeowners each year. Approximately \$225,000 of CDBG funds and \$250,000 of HOME Program funds will be allocated each year to the Homeowner Rehabilitation Program.

The Emergency Repair Program is designed to assist homeowners who do not have the financial means to pay the costs of repairs of an emergency nature which, if not corrected within a reasonable time, will threaten the health or safety of the homeowner. The assistance is in the form of a grant. To qualify the applicant must own and occupy the home, meet stringent income criteria, have combined liquid assets that do not exceed \$2,500.00, cannot own any other residential property, mobile home on private lots, and/or undeveloped/unimproved land, and agree to reside in the home for at least twelve months following completion of the repairs.

Repairs must be urgent in nature and typically include projects such as repair of a collapsed sewer or faulty or unsafe electrical, gas or heating systems. Historically, this program has benefited primarily extremely low-income elderly homeowners. The objective of the Emergency Repair Program is to provide emergency repair assistance to approximately 40 to 50 extremely low-income and low-income homeowners. Approximately \$100,000 of CDBG funds is required annually to fund this program.

The Exterior Housing Improvement Program provides assistance to low-income elderly and disabled households who own and occupy a home in need of exterior housing improvement. This assistance is in the form of a grant and must be used for exterior painting and/or siding, windows, doors, and roofing to improve the exterior condition of houses. It is not the intent of this program to be a rehabilitation program, or to provide normal routine maintenance. The objective is to assist approximately 15 to 25 extremely low- and low-income homeowners. Approximately \$100,000 of CDBG funds is required annually to fund this program.

Medium Priority

Moderate-Income (51 to 80%) Existing Homeowners

1. Analysis:

The 2,366 moderate-income homeowners make up 13.6 percent of all homeowners. Approximately 39.9 percent of existing homeowners in this category have housing problems. 35.6 percent, or 842, homeowners in this category had housing cost burdens. 10.5 percent, or 248, homeowners with moderate-incomes had severe cost burdens.

Approximately 14.1 percent of homeowners with moderate incomes had physical defects in their housing. This represents approximately 332 units that require repair or renovation. As indicated earlier, local experience indicates that the average cost of rehabilitating a housing unit is approximately \$20,000. 35.6 percent of moderate-income homeowners already experience housing cost burdens, which provide a serious obstacle to their ability to undertake major repairs or renovation of their homes, even those of an urgent nature. At the average cost for rehabilitation, approximately \$6,640,000 is required to address the rehabilitation needs of moderate-income homeowners.

2. Strategy - Homeowner Assistance:

In order to expand moderate-income homeowners' access to financial resources to meet their housing needs, homeowner assistance will be provided for rehabilitation only. Funding will be provided by HOME Program and CDBG funds. The level of funding for this group of homeowners, however, will be dependent on the amount of funds available after other higher priorities are addressed.

Homelessness

Goal

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

Priority Analysis and Strategy

The analysis to establish priorities for implementation of Lawton's homeless programs is based on extremely limited and sketchy information from the 2000 census and input from Lawton's homeless providers. Although the current information is limited, it is sufficient to identify the concerns of local homeless providers, determine deficiencies in homeless programs and the continuum of care system, and establish priorities to guide the community's future efforts to address and serve homeless needs. The Priority Homeless Needs Table below reflects the priorities resulting from the analysis.

Table 6-2
"Homeless Needs"

PRIORITY HOMELESS NEEDS	Priority Need Level High, Medium, Low, No such need			ESTIMATED DOLLARS NEEDED TO ADDRESS
	Families	Individuals	Persons w/ Special Needs	
Outreach Assessment	L	L	L	280,000
	H	H	H	
Emergency Shelters	H	H	H	968,925
	H	H	M	
Transitional Shelters	H	H	M	500,000
	L	L	M	
Permanent Supportive Housing	L	L	M	0
	M	L	M	
Permanent Housing	M	L	M	55,000

Homeless Families (Priority # 3)

1. Analysis:

The homeless needs analysis in Section Four noted that homelessness today is no longer the domain of the single male. More and more families require homeless assistance. 1990 census data shows that at the time 298 families with children, or 1,280 individuals, were provided homeless services in the community. 100 of the homeless families, or 340 individuals, were unsheltered. Reception/day center services were provided for 55 families, emergency shelter for 150 families, and transitional housing was provided for 48 families. Services to the families addressed the needs of approximately 750 individuals making up those families. More recent data from the C. Carter Crane Shelter indicate that 330 families were provided homeless services in FFY 2008. While the number of turn-aways is not tracked currently, C. Carter Crane Shelter is unable to provide housing for many homeless families, particularly large families, because of limited housing resources. Other homeless service providers echo the problem of limited resources to attend to a growing problem of homeless families.

A local homeless program has been established in Lawton through the collaborative efforts of providers in the public sector. The C. Carter Crane Shelter for the Homeless, in partnership with Great Plains Improvement Foundation (GPIF), Inc., is the primary provider of housing for homeless families and individuals. GPIF, a community action agency, manages one homeless shelter, and nine transitional houses for homeless families. The C. Carter Crane director indicates that typically the facilities are used to 100 percent of capacity. The Director also indicates a need for additional single room occupancy (SRO) facilities to house homeless individuals as well as the additional resources to operate the facility. Additional transitional houses are required to expand the shelter's capacity to provide housing assistance for homeless families. She estimates the shelter can effectively manage up to 20 transitional houses without additional staffing, although she admits it would further stress an already over-extended staff. The shelter is highly dependent on volunteers and in 2008 and 2009 relied on volunteers to assist in delivery of over 200 homeless persons to job sites, doctor's appointments, and interviews. They facilitated over 5,000 nights (total number of beds used during the year or stated differently, a running total of each bed used in the shelter throughout the year) to clients who were in need. In addition, military veterans were provided housing and linkages to services to which they are entitled. Over 125 working (full- and part-time) clients were given a stable environment to begin good work ethics and provided shelter, laundry facilities and transportation to their employment. The agency anticipates providing shelter to a similar number of homeless people next year. It is important to note that, like many of Lawton's human service providers, C. Carter Crane serves not only the local community, but it also draws some of its homeless clientele from Comanche County at large as well as parts of other surrounding counties. To meet future homeless needs the shelter is developing plans to expand the capacity of the shelter and has requested assistance in procuring additional transitional houses to address the needs of families, particularly large ones. While the C. Carter Crane Shelter historically has made use of HUD rental properties to make up a small part of the shortfall in housing for homeless families, there are currently none in the inventory. However, the agency has recently reapplied for that HUD program and anticipates using the program to expand the shelter's capacity for providing for the housing needs of homeless families.

Goodwill, Inc. also provides homeless services to low-income households and individuals. Goodwill's program focuses on the elderly; homeless with disabilities; non-

homeless with disabilities; and individuals who rely on Supplemental Security Income (SSI), the Veterans Administration (VA), or the Department of Human Services (DHS) for their incomes. Eligibility requires an urgent need, disabilities and handicaps must be verified by a physician, and households with children are not eligible. Goodwill manages Goodwill Village Apartments, a 36 apartment facility, and is constructing facilities for 21 additional apartments. The agency maintains a list of 40 potential eligible households which is screened and updated semi-annually. The waiting period of "confirmed" eligible households on the list is fifteen months long. As can be seen from the waiting list, additional facilities are required to meet the demand for Goodwill's housing services.

New Directions, Inc. is a shelter for battered women and their families. Current data reflects the incidence of domestic abuse being on the rise across Lawton and the surrounding community. In the past, New Directions has served an average of 100 women in need of shelter arising from domestic violence. This past year, the organization served approximately 347 people who were victims of domestic violence or rape and their families, and another 318 through the first ten (10) months of this fiscal year. The need for this type of housing for the temporarily homeless and suffering is in increasing demand.

2. Strategy:

a. Service Provision

The continuum of care for providing services to meet the needs of homeless families and the anti-poverty strategy outlined later provide the foundation for this strategy to address the needs of homeless families. The C. Carter Crane Shelter for the Homeless and Goodwill, Inc. will remain the focal points for provision of services for homeless families in the community.

C. Carter Crane Shelter will continue to provide housing opportunities for homeless families in the area. Additionally, the shelter will strive to improve its efficiency and effectiveness in providing homeless services for needy families. Working in collaboration with GPIF, United Way of Lawton - Fort Sill, United Way service agencies, and other public and private agencies; the shelter will continue to improve the linkage of its housing services with the continuum of care provided by agencies that address the other economic, human, and social needs of homeless families.

Goodwill, Inc. will continue its specialized housing services for elderly, disabled, and displaced homeless families. Goodwill will continue to expand its capability to provide housing and services for its clientele. Like the C. Carter Crane Shelter, Goodwill is expected to continue to strive for improvements in the linkage between its housing services and the continuum of care to meet the needs of the homeless families it serves.

The City of Lawton HCD Office will continue to work in partnership with GPIF to continue the availability of transitional housing and to expand C. Carter Crane's capacity to provide housing for homeless families. Home Program funds set-aside for the community housing development organization (CHDO) will be used to acquire and rehabilitate additional residential properties and make them available for purchase by qualified low-income First-Time

Homebuyers. The City of Lawton, in conjunction with all of the different CHDOs of Lawton, to include GPIF, ZOE N.E.E.D. Program, and Lawton-Ft. Sill Habitat for Humanity, will employ their collective efforts to develop innovative concepts for leveraging federal and local funds to expand the supply of housing to meet the community's need for additional housing for homeless families by building new homes and rehabilitating existing structures already in place. The objective will be to increase the supply of transitional housing by approximately 3-5 houses per year over the period of the plan if the levels of funding permit.

Lawton's HCD office will continue to work in collaboration with local housing and human service agencies to expand current sources and develop new sources of funding to leverage local resources. While efforts will be directed to developing the community's efforts to increase internal funding, an important objective will be to take advantage of other federal and state homeless programs for which the community is eligible.

Homeless Individuals (Priority #3)

1. Analysis:

Available data from the 1990 census and local providers indicate that approximately 1,170 individuals were provided homeless services in the community, and 300 were unsheltered. Approximately 340 homeless individuals were youth 17 years of age or younger, and 100 of them were unsheltered. Reception/day center services were provided for 240 individuals, emergency shelter for 680 individuals, and transitional housing for 190 individuals. Of the total provided these services, an estimated 325, or over 40 percent, were homeless youth.

In addition to the providers already mentioned, the housing and other needs of homeless individuals are addressed by The Salvation Army, Marie Detty Youth and Family Service Center, and the J. Roy Dunning Children's shelter.

The C. Carter Crane Shelter is also the primary housing provider for homeless individuals. As mentioned previously, the agency manages the homeless shelter which is typically used to 100 percent capacity. While the shelter frequently must turn away individuals because of a lack of space, no records currently are maintained of the number of individuals who cannot be served. While the level of service is well documented the level of demand is not known, except the level of demand often exceeds the capacity of the shelter. Individuals who cannot be served because of capacity limitations are referred for assistance to other local housing providers. The director of the C. Carter Crane Shelter, estimates a need for two additional single room occupancy (SRO) facilities, each capable of providing transitional housing for 10 individuals. Additional staff will also be required to manage the facilities. Estimated cost for two new facilities is approximately \$800,000.

The Salvation Army provides short-term emergency assistance with lodging, utilities, and rental assistance. Those individuals with long-term needs such as transitional housing assistance are referred to other service agencies. The Salvation Army also provides counseling and transportation services for those in need.

Marie Detty Youth and Family Services Center, Inc. provides for the physical, emotional, and psychological needs of children and families experiencing distress and dysfunction. The agency provides emergency shelter for short-term residential care. The facility emphasizes the establishment and support of strong family units to combat rebellious, delinquent, and abusive behavior.

J. Roy Dunning Children's Shelter provides a safe haven for children who are abused, neglected, abandoned or otherwise in need of protection. The shelter is committed to the concept that with loving care of children, crisis counseling, and child abuse prevention programs, the cycle of child abuse and neglect can be broken. The shelter reports that its facility needs to be expanded to meet current needs for assistance to this client group. In addition to renovation, expansion of the facility is required to provide housing accommodations with appropriate amenities such as bathrooms and furnishings for at least ten additional children.

2. Strategy:

The continuum of care for providing services to meet the needs of homeless families and the anti-poverty strategy outlined later provide the foundation for this strategy to address the needs of homeless individuals. C. Carter Crane Shelter will continue to provide housing opportunities for homeless individuals in the area. The Salvation Army, Marie Detty Youth and Family Services Center, and J. Roy Dunning Children's Shelter will continue to provide the housing services for the special needs groups they serve.

The City of Lawton HCD office will continue to work in partnership with all CHDOs to expand transitional housing facilities for individuals and improve the effectiveness of the linkage between the housing services and the continuum of care. The HCD office will work closely with all organizations to improve the community's potential to qualify for both federal and state competitive grant funds for homeless programs.

The HCD office will provide assistance and support to other housing and human needs service agencies to strengthen the linkage between housing providers and the continuum of care system throughout the community. Additionally, the HCD office, within its capabilities, will provide advice and assistance.

Homeless Assistance Strategy

Emergency shelter and transitional housing strategies were addressed previously. The key to success will be development of a strong, functioning Continuum of Care in this region. HCD held meetings two years ago to discuss the issues with the service providers in the region. They outlined a plan to establish a Continuum of Care and a Homeless Management Information System (HMIS) for the region. Great Plains Improvement Foundation, Inc. stepped forward and assumed the leadership role in the continuum, holding monthly meetings at their facility with stakeholders. Because of a SuperNOFA request for funding of a HMIS for the Southwest region, a grant was awarded GPIF to purchase the rudimentary system, hardware, and other linkage necessary to complete installation of a system. The HMIS will allow more effective communication of the homeless needs, allow rapid scheduling of all types of services from job

training and interviews, to setting up doctor's appointments and school enrollment. It is a system designed to track the progress of the homeless population from entry into the continuum of care to reentry into society via employment and either renting or purchasing a home. It is a part of the President's strategy to end chronic homelessness within ten (10) years. Assistance to homeless individuals and families will be accomplished through a holistic approach that addresses their specific economic, housing, and social needs within the continuum of care to provide opportunities for homeless households to achieve economic independence and free of supportive assistance.

Homeless prevention must be addressed through the collaborative efforts of all housing and service providers. Agencies most directly involved with the homeless feel that there are numerous individuals and families that are close, for many reasons, to a homeless status and need assistance. The major problem is identification of those families and individuals to provide them the necessary information concerning the assistance that is available in the community. To partially address this need, the Lawton Helpline was established as the community's information and referral service, providing clients with details regarding services available to the residents of Lawton - Fort Sill. Helpline services are provided on a 24-hour 7 day-per-week crises hotline, referral service and a Phone Alert League (PAL) which assists elderly households and homebound people obtain the services and support available from many volunteer organizations in the community.

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

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

Special Needs/Supportive Needs of Non-Homeless

Elderly Persons

The growing elderly population is increasing the importance of the need for supportive services in the community. Various agencies within the community's continuum of care provide services to elderly households. As the population ages, the demand for these and new services is

expected to increase, and it is essential that the community continues to assess the need to expand current services and/or develop new services and alternative solutions to address the needs of the elderly population. The City of Lawton Commission on Aging plays an important role in assessing the needs of Lawton's aging and elderly citizens. The committee is linked with the continuum of care through their representation on United Way's Human Services council which meets monthly to address current human service issues facing the community. The council provides an excellent mechanism for representing the needs of elderly households and provides continuous opportunity for collaborative efforts of all members represented on the council.

Frail, Elderly Persons

Goodwill, Inc., the Center for Creative Living, and Hospice are agencies most involved in the services required of frail, elderly persons. The service provided by Goodwill has already been addressed in this plan. The Center for Creative Living provides independent living for older citizens with the maximum amount of family support. Hospice provides hospice care to terminally ill patients and their care givers in their own homes. The needs of frail and elderly persons are also in the purview of issues addressed by Lawton's Commission on Aging.

Persons with Disabilities

Since 1990, housing available in the Lawton community to meet the needs of frail, elderly persons, and persons with disabilities has increased from 48 available units to 97 available units in 2000. Goodwill Inc., the Center for Creative Living and Hospice are the agencies most involved with providing services required for frail, elderly citizens in the community. Goodwill also provides housing assistance to disabled, elderly, or displaced persons. Quality Enterprises, Inc. (formerly Grace - Harding Homes) assists with housing for adults with developmental disabilities; GPIF also provided housing assistance and supportive services to developmentally disabled persons. Continuum of Care services are accessible to persons with disabilities through all these agencies.

Disabled Low- and Moderate-Income (0% to 80%)

1. Analysis:

There are 1,615 disabled families/households in the community, including 415 elderly families/households and 1,200 other households, who rent housing. 61.2 percent or 190 extremely low-income and low-income elderly disabled renters had some type of housing accessibility problem. It further shows that 26.9 percent of all disabled low-income renters surveyed experienced some kind of housing problem related to physical defects and accessibility.

There are 1,477 disabled families/households in the community, including 848 elderly families/households, and 629 other households, who own housing. 50.1 percent, or 240 extremely low-income and low-income elderly disabled owners had some type of housing accessibility problem. It further shows that 41.3 percent of all disabled low-income owners

surveyed experienced some kind of housing problem related to physical defects and accessibility. At the average rate of \$5,000.00 per activity, then, approximately \$2,150,000 is necessary to address the accessibility needs of extremely low- and low-income renters and homeowners.

2. Strategy – Disability Assistance

The Housing Accessibility Modification Program provides assistance to low-income elderly disabled households who own and occupy a home in need of accessibility improvement. This assistance is in the form of a grant and must be used for ramps, walk-in showers, wider entrance doors, and other needs to improve the accessibility of the home. The objective is to assist approximately 5 to 10 extremely low- and low-income homeowners, annually. If an organization requests funding, approximately \$20,000 of CDBG funds is required annually to fund this program.

Persons with Alcohol or Other Drug Addiction

Roadback, Inc. is the community's primary service provider, which addresses the needs of persons and/or families with alcohol or other drug addiction. Roadback offers non-medical detoxification, continuing treatment, vocational assistance and rehabilitation in a residential setting for recovering alcohol/drug addicts. Based on the needs identified in Section IV of this plan, CDBG, HOME Program, and other sources of funding may be used to address these needs during the period of this plan. Priority for funding will be based on the new needs assessment and requests for funding from service providers that address the needs of persons and/or families with alcohol or other drug addiction.

Persons with HIV/AIDS and Their Families

Southwest AIDS Network was recently established as a local nonprofit organization to address the needs of persons and families affected by HIV / AIDS. The organization at this time is in its fledgling stages and currently lacks a stable source of funding for operations. SWAN, however, in collaboration with Carepoint, Inc., is currently coordinating for provision of an HIV/AIDS case worker in the Lawton community. Carepoint, Inc., a nonprofit organization headquartered in Oklahoma City, provides health care and support services to persons who are infected with and/or affected by HIV. It provides prevention and educational services related to HIV utilizing Ryan White CARE Act Title II funds and other appropriate financial resources. Services also include housing assistance to households affected by AIDS that need assistance. Priority for CDBG and HOME program funding will be based on the new needs assessment and request for funding from service providers that address the needs of persons and/or families with alcohol or other drug addiction.

Public Housing Residents

The LHA is currently implementing a well designed and coordinated effort to solicit and encourage resident participation in management and operation of the housing authority. The program, through resident input and coordination, monitor the needs of residents and works

closely with resident councils to develop innovative solutions to meet those needs.

Public Housing Resident Initiatives

Public Housing Improvements

The LHA manages and operates a total of 319 units of public housing. The authority's Comprehensive Grant Program has identified handicap accessibility, as a major need to meet the needs of residents. Other important needs being addressed include safety and security issues relating to public housing. The authority plans to work in collaboration with the Lawton HCD office on projects to revitalize the Lawton View neighborhood, where the majority of public housing is located, to improve the living environment and the quality of living of public housing residents.

Public Housing Resident Initiatives

1. Management Initiatives:

The LHA Board of Commissioners has adopted and implemented a resolution establishing policies and procedures to support and encourage resident initiatives to create self-sufficiency opportunities. Resident councils have been established throughout the public housing developments managed and operated by the authority. Resident councils are charged with the responsibility to work with the LHA's staff to develop program initiatives to address the needs and interests of public housing residents.

2. Homeownership Initiatives:

The LHA and the City of Lawton have entered an agreement to ensure opportunities for public housing residents to participate in homeownership opportunities offered by the FTHB program. The overall goal of the authority is to provide assistance and opportunities for public housing residents to become self-sufficient members of the community. The FTHB program provides opportunities for those who aspire to self-sufficiency and homeownership.

Barriers to Affordable Housing

Barriers to affordable housing were addressed earlier in Section III. The major obstacles to affordable housing in Lawton are the level of housing prices relative to the levels of income earned by low-income members of the community. Future economic development of the community to raise the incomes of low-income households is one key to affordability. The restriction on expansion of LHA's services to the community and HUD's lead-based paint requirements are discussed in detail later in this strategy.

Fair Housing

There is currently no indication of serious problems related to fair housing. Fair housing is monitored by the Lawton Board of Realtors and the Lawton Apartment Association for the benefit of the citizens of Lawton as well as the well-being of the local real estate industry. The entities monitor and evaluate housing issues related to both real estate sales and rental market activities. Identified fair housing complaints are referred to the Oklahoma Human Rights Commission and/or HUD's Fair Housing and Equal Opportunity (FHEO) office for investigation.

Lead-Based Paint Hazard Reduction

It is recognized that the average age of Lawton's housing is an indicator of lead-based paint in the area's residential housing as stated in Section III. According to the 2010 Census, 16,178 housing units that are occupied by renters and 17,680 units that are occupied by homeowners were built prior to 1979. Even though 65.5 percent of Lawton's housing is pre-1979 construction, it is estimated that 18,548 units, or 51.2 percent of Lawton's pre-1979 housing, contains some lead-based paint. Of the 18,548 pre-1979 housing units, it is estimated that low- and moderate-income homeowners occupy 4025 housing units and low- and moderate-income renters occupy 3,100 housing units that contains some lead-based paint.

The objective of the lead-based paint hazards reduction activity is to provide lead-based paint inspections, risk assessments, and clearance test at no charge for housing activities assisted with federal funding. The City will also support the continuation and expansion of a lead-based paint hazard reduction strategy with rehabilitation activities funding. The City will require inspections of tenant-based rental assistance properties, homebuyer properties, and rehabilitation activities to identify lead-based paint hazards. This activity will provide assistance to 40 to 50 homeowners each year. Approximately \$20,000 of CDBG funds and \$30,000 of HOME Program funds will be allocated each year to address the reduction of lead-based paint hazards.

The overall goal of this five-year strategy stems from the needs identified in Section IV and meeting the regulatory requirements of lead-based paint rule.

Anti-Poverty Strategy

The organization discussed above will have as part of its tasking, the development of a program to specifically address poverty and how to sustain activities which will continue to

address the needs of those persons which meet the definition, whether as a person, family or household living below the poverty level. The program must insure that these groups do not become forever trapped in the cycle of poverty. Local service agencies which make up the continuum of care that supports this strategy are at Appendix A.

Central to this program will be the integration of social services and housing activities for households and individuals below the poverty line.

The identification of barriers for households and individuals to rise out of poverty must be thoroughly researched to include policies, codes and regulations, etc.

The encouragement of economic development activities as part of the LHA's resident management council or other resident groups must be addressed by the committee.

The development of or assistance in providing child care in rental housing or readily available to the tenants in rental housing also should be part of the committee's activities.

Relevant Public Policies, Court Orders, and HUD Sanctions

Relevant Public Policies

An important barrier to the provision of affordable housing for low-income households in Lawton was the restriction on expansion of the number of units managed by the Lawton Housing Authority. Based, in part, on the emphasis given to this issue by the 1995 Consolidated Plan, a State Law has been passed which now allows the Lawton Housing Authority to undertake new projects and to take advantage of Federal funding for the provisions of affordable housing. Efforts continue to secure funding of the Section 8 program in Lawton by the Lawton Housing Authority.

The biggest obstacle to homeownership in Lawton, however, continues to be the high cost of housing relative to the incomes in the area. Economic development and affordable housing programs in Lawton are essential to address these two most important long-term needs in the community.

Court Orders and HUD Sanctions

There are currently no court orders or HUD sanctions in effect for the City of Lawton or any of its federal programs.

Non-Housing Community Development

Goals and Objectives

Community Development

The objective of CDBG community development programs is to improve the city's physical infrastructure serving low- and moderate-income areas of the city to enhance quality of life, develop the areas' future economic development potential, and provide job opportunities for low- and moderate-income persons. The objective of Lawton's CDBG and HOME programs is to collaborate with the United Way of Lawton - Fort Sill and other human service agencies to improve and enhance the availability and quality of human services to meet the needs of Lawton's low- and moderate-income individuals / families / and households.

Economic Development

Economic development includes Commercial-Industrial Rehabilitation, Commercial-Industrial Infrastructure, Other Commercial-Industrial Improvements, Micro-Businesses, Technical Assistance, and Other Economic Development Needs. The basic objective of the Oklahoma Century Communities Program is community readiness--a key factor in both the community and economic development efforts of a city. This program is a guided self-evaluation which can be accomplished by volunteers. It allows communities to focus on strengths and developing local pride, while at the same time identifying weaknesses and encouraging the community to set goals to overcome those problems. Once weaknesses or problems are identified within the community, HCD will work with other local partners to develop possible solutions, propose measures to address key issues, fund and carry out solutions that have been developed from the "bottoms up" committee planning structure. Many organizations, including Cameron University, the Great Plains Technology Center, Association of South Central Oklahoma Governments (ASCOG), North Side Chamber of Commerce as well as local financial, banking public and private institutions will have to be involved in the process. A vision of the future must be made clear and the means to achieve that picture must be outlined in detail and in a rational, year by year program of activities.

The objective of CDBG economic development activities is to collaborate with the Lawton-Fort Sill Chamber of Commerce and Industry, Northside Chamber of Commerce, Century Communities Program committees, and other economic development agencies in the community to diversify the local economy and encourage growth to provide employment and business opportunities for Lawton's low- and moderate-income population and to revitalize low- and moderate-income areas of the city.

Analysis of the community and economic development needs of the community are based on the best information available at this time. The analysis leans heavily on the city's previous community and economic development activities. The Priorities for community and economic development are reflected in Table 6-3 below:

Table 6-3
"Community Development Needs"

PRIORITY COMMUNITY DEVELOPMENT NEEDS	Priority Need Level High, Medium, Low, No Such Need	ESTIMATED DOLLARS NEEDED TO ADDRESS
PUBLIC FACILITY NEEDS		
Senior Centers	N	\$0.00
Youth Centers	N	\$0.00
Neighborhood Facilities	N	\$1,500,000.00
Child Care Centers	N	\$0.00
Parks and/or Recreation Facilities	M	\$1,500,000.00
Health Facilities	N	\$0.00
Parking Facilities	N	\$0.00
Other Public Facilities	N	\$0.00
INFRASTRUCTURE IMPROVEMENT		
Flood Drain Improvements	H	\$600,000.00
Flood Drain Improvements	H	\$7,000,000.00
Water Improvements	H	\$6,721,000.00
Street Improvements	H	\$10,447,000.00
Sidewalk Improvements	M	\$0.00
Sewer Improvements	H	\$26,707,783.00
Asbestos Removal	N	\$0.00
Other Infrastructure Improvement Needs	N	\$0.00
PUBLIC SERVICE NEEDS		
Food/Feeding the Hungry	M	\$0.00
Senior Services	M	\$250,000.00
Handicapped Services	M	\$250,000.00
Youth Services	M	\$2,500,000.00
Transportation Services	N	\$500,000.00
Substance Abuse Services	H	\$250,000.00
Employment Training	H	\$5,000,000.00
Crime Awareness	H	\$1,250,000.00
Fair Housing Counseling	N	\$0.00
Tenant/Landlord Counseling	N	\$0.00
Child Care Services	M	\$250,000.00
Health Services	M	\$500,000.00
Other Public Service Needs	N	\$0.00
ACCESSIBILITY NEEDS		
Public Accessibility Needs	M	\$250,000.00
HISTORIC PRESERVATION NEEDS		
Residential Historic Preservation Needs	N	\$0.00
Non-Residential Historic Preservation Needs	N	\$500,000.00
ECONOMIC DEVELOPMENT NEEDS		
Commercial-Industrial Rehabilitation	H	\$1,000,000.00
Commercial-Industrial Infrastructure	H	\$2,500,000.00
Other Commercial-Industrial Improvements	H	\$2,500,000.00
Micro-Business	H	\$500,000.00
Other Businesses	H	\$500,000.00
Technical Assistance	N	\$0.00
Other Economic Development Needs	L	\$0.00
OTHER COMMUNITY DEVELOPMENT NEEDS		
Energy Efficiency Improvements	M	\$0.00

PRIORITY COMMUNITY DEVELOPMENT NEEDS	Priority Need Level High, Medium, Low, No Such Need	ESTIMATED DOLLARS NEEDED TO ADDRESS
Lead Based Paint/Hazards	M	\$0.00
Code Enforcement	H	\$0.00
PLANNING		
Planning	M	\$250,000.00
TOTAL ESTIMATED DOLLARS NEEDED TO ADDRESS:		\$73,225,783.00

See the Priority Needs Summary Table and notes at Appendix B.

Non-Housing Community Development Strategy

The neighborhood is the focal point for consolidating and coordinating the development of the Lawton community. There are four key principles which provide the basis for the non-housing community development strategy, including the principles of (1) economic opportunity, (2) sustainable community development, (3) community based partnerships, and (4) strategic vision for change.

Economic Opportunity

The first priority in revitalizing distressed neighborhoods is to create economic opportunities, jobs and work for all residents. The creation of jobs, both within the neighborhood and throughout the city, provides the foundation on which residents will become economically self-sufficient and neighborhoods can revitalize themselves. Opportunities for entrepreneurial initiatives, small business expansion, and training for jobs that offer upward mobility are other key elements for providing economic opportunity and direction.

Sustainable Community Development

The creation of jobs is the critical first step toward the creation of a livable and vibrant community where human initiative, work, and stable families can flourish. However, economic development can only be successful when part of a coordinated and comprehensive strategy that includes physical development as well as human development. A neighborhood where the streets are safe to walk, the air and water are clean, housing is secure, and human services are accessible, and where a vital civic spirit is nurtured by innovative design, is a neighborhood that can be a source of strength and hope to its residents. A neighborhood, where learning is a commitment for life, can foster the skills, habits of mind and attitudes that will make work rewarding and families nurturing. This principle empowers neighborhood residents by developing plans that coordinate economic, physical, environmental, community and human development.

Community-Based Partnerships

The road to economic opportunity and neighborhood development starts with broad participation by all segments of the neighborhood. This may include, among others, the political and governmental leadership, community groups, health and social service groups, environmental groups, religious organizations, the private and nonprofit sectors, centers of

learning, and other community institutions. The residents themselves, however, are the most important element of revitalization.

Neighborhoods that stand together are communities that can rise together. Neighborhoods cannot succeed with public resources alone. Private and nonprofit support and involvement are critical to the success of a neighborhood seeking revitalization.

Partnerships also must be created within and among the levels of government. Government departments and agencies on all levels must work together to ensure that relevant programs and resources can be used in a coordinated, flexible, and timely fashion to help implement your strategic plan and that regulatory and other barriers to sustainable growth are removed.

Strategic Vision For Change

A vision for change describes what the residents want their neighborhood to become--for example, they may envision their neighborhood as a center for emerging technologies or for learning new skills, linked to a nearby university or community college; a key export center for certain farm products, customized manufacturing goods, or health and other human services; or a vibrant residential area focused around an active local school, with access to jobs, retail markets, recreation, and entertainment. A vision for change is not a laundry list of concerns, shortcomings, and deficits. Instead, it is a strategic map for revitalization. It is a means to analyze the full local context and the linkages to the larger community and the region. It builds on local assets and coordinates a response to the needs of the residents of the neighborhood -- such as public safety, human and social services, and environmental protection. It integrates economic, physical, environmental, community and human development in a comprehensive and coordinated fashion so that families and neighbors can work together and thrive. A strategic plan also sets real goals and performance benchmarks for measuring progress and establishes a framework for assessing how new experience and knowledge can be incorporated into a successful plan for revitalization.

One of those mechanisms is the Lawton Industrial Foundation. The mission statement of the Lawton Industrial Foundation provides an excellent point of departure for discussing with citizen groups how their neighborhood development would fit into the foundation's mission.

The mission of the Lawton Industrial Foundation is to develop and locate prospects that will provide jobs in the Lawton-Fort Sill metro area. The following are the business and industry areas of concentration for the Lawton-Fort Sill metro area:

- * **Defense Industries:** Because of Fort Sill, Lawton is a prime area for the location of defense-related industries. A well-trained and knowledgeable work force, that is essential for any high tech operation to be successful.

- * **Telecommunications:** Because of our large labor pool, competitive wage rates, and telecommunication infrastructure, the Lawton-Fort Sill community is extremely compatible with the location of telecommunication companies.

* Compatible Industries to Goodyear: Lawton-Fort Sill is the perfect location for companies that serve or act as suppliers to Goodyear Tire and Rubber Company.

* Textile-Related Industries: Because of the presence of a trained work force in this area, and because of a close proximity to major producers and outlets, Lawton-Fort Sill is an outstanding location for textile companies.

While these are the major areas of concentration for the Lawton Industrial Foundation, any prospect is worked diligently so as to make a great business choice for Lawton-Fort Sill.

Micro-Business development also offers potential growth opportunities for Lawton, and there is a need in the City of Lawton for programs that encourage micro-business ventures. A "microenterprise" or Micro-Business is defined by Section 807(c)(2) of the 1992 Housing and Community Development Act as a "commercial enterprise that has five or fewer employees., one or more of whom owns the enterprise." Micro-businesses also provide employment opportunities for the community that in many cases benefit residents of the city's low-income areas.

"Other Business" opportunities must also be examined for their compatibility with the community, and "Technical Assistance" for startup business enterprises is critical to maximize overall success in the small business arena. The "Other Business and Technical Assistance" areas are served well by the Great Plains Technology Center's Economic Development Center. The continuation of this Center is greatly needed. The Economic Development Center provides technical assistance to both new and existing large and small businesses in manufacturing or retailing. The Economic Development Center is very pro-active in terms of Economic Development and is constantly striving to meet the needs of an incredibly diverse group of firms in southwest Oklahoma.

The Great Plains Economic Development Center Team has developed a series of seminars for the upcoming year to assist business persons to:

- 1) Improve the profitability of their businesses;
- 2) Operate the businesses in compliance with federal, state, county, and city laws, rules, and regulations; and,
- 3) Create a safe and desirable work environment for customers and employees alike.

To assist business owners in selecting seminars that are appropriate for their needs and interests, the seminars have been arranged in four "tracks." A description of the Great Plains business programs is provided in Appendix C. The four tracks are as follows:

- 1) Going into Business
- 2) Business Development
- 3) Compliance and Safety Issues
- 4) Human Resource Development Issues

"Other Economic Development Needs" include the Bid Assistance Center, Business Incubator and Tax Increment Financing Districts. The Great Plains Technology Center operates a very successful Bid Assistance Center. The Bid Assistance Center helps businesses understand how the government purchases goods and services by providing up-to-date notices of bidding opportunities from federal, state, and local governments as well as private sector markets. Key areas in which the center assists include:

1. Finding bid opportunities

- * Daily identifying and mailing bid opportunities to business from the Commerce Business Daily
- * Helping businesses get on buyer's bid lists
- * Providing information on sub-contracting and joint venture opportunities

2. Preparing a bid package

- * Providing copies of military, federal and industrial specifications and standards
- * Helping interpret solicitations
- * Assisting with bid packet preparation

3. Performing on a contract

- * Helping prepare for pre-award surveys
- * Interpreting contract clauses
- * Assisting in preparation of operational procedures for contract compliance

Tax Increment Financing Districts can be instrumental in providing the funding for redevelopment projects. Basically, the program works by identifying areas to be developed and determining the amount of taxes that are being paid at the present time by the existing business owners, if any. Based on the increased value of the property after the proposal, bonds can be sold to pay for the acquisition of the property and the development. The bonds are retired from the taxes on the improved property that go directly to retire the debt incurred until the bonds are paid off. The difference between the taxes that are paid before the development and the taxes that would be generated by the project after its development are the "tax increment". Once the bonds are paid off the property pays taxes the same as any other property owner.

"Other Community Development Needs" include energy efficiency improvements, lead-based paint hazards and code enforcement. Background information on code enforcement can be found in the 2020 Land Use Study, Chapter 18 Fire Protection, Section 18.6 entitled Building Standards. Currently, the city has adopted and operates under the 2003 International Building Code (IBC).

Any structure built prior to the adoptions of an applicable code is said to be a legal non-conforming structure (some may use the slang term "grandfathered"). Under this situation, normal maintenance of the structure is allowed, but the construction of any addition, renovation, or remodeling would require that the entire structure be brought up to existing code. Prior to

1956, there were no minimum standards for building within the City. In 1957 the National Building Code was adopted. In 2001, the City of Lawton adopted the 2000 IBC and now has adopted the 2009 IBC. Monitoring of the codes occurs during the building permit process and also follows citizen complaints.

Energy efficiency needs and lead-based paint/hazards were discussed in a previous section of this The Plan.

Planning Needs and requirements are addressed in Lawton's Land Use Study

The Land Use Study and Land Use Plan identify Areas of Special Character which are in need of neighborhood development or redevelopment plans. The majority of neighborhood areas located in the Central Corridor serve at least low- and moderate-income persons are as follows:

1. The Creamery
2. Central Business District
3. Gore Boulevard Professional Corridor/Old Town North
4. Airport Industrial
5. University Medical Area

"Appropriate Neighborhood Planning" should be undertaken in these areas. The Appropriate Planning Principles were published in A Better Place to Live New Designs for Tomorrow's Communities by Michael N. Corbett. The following is a presentation of the seven principles that Corbett sets forth for neighborhood planning:

In addition, redevelopment principles for each area need to be developed. In the Creamery Area, Community Development Block Grant funds should be used to assist the private sector in the redevelopment of the area. Such incentives for redevelopment would include the construction of infrastructure, i.e., sidewalks, streets and landscaping, making low interest loans available for businesses that locate in the Creamery Area, vacating existing streets to create pedestrian and parking space for the shops, businesses and attractions that are planned for the area. In the Central Business District there is a need to expand the CBD and analyze ways to use the Tax Increment Financing mechanism to assemble and redevelop new attractions in the Downtown Area. The Lawton Parking Authority could acquire such additional land as needed to support Civic Center/Hotel/Office/Commercial development and lease the parking back to any number of newly established and existing businesses in the area.

The Century Communities Workbook contains an Appendix which deals with the Community Development Process. By including the Century Communities Process as a key vehicle for the development of the Consolidated Plan. The philosophy of "strategic planning" with the total involvement of the citizen is institutionalized. The "Using the Community Development Process" section of the Century Communities workbook details information on organizing, identifying assets and liabilities, formulating goals, planning and implementation and the evaluation and process renewal. Following this process will meet all the requirements of the Department of Housing and Urban Development for "Consolidated Planning."

Using That Community Development Process

This section contains additional information on organizing, identifying assets and liabilities, formulating goals, planning and implementation, and the evaluation and process renewal.

Organizational Development

This phase consists of initiating the process, developing public awareness and support and creating or designing an organization to lead the community problem-solving process. Any individual or group may be responsible for the initiation of the community development process. However, it is vital that immediate efforts be made to involve and to inform the entire community, including civic groups, the general citizenry and public officials. This initial public involvement effort should be directed at both generating widespread community understanding of the need for a coordinated community-wide development process and stimulating active support and participation from all segments of the community.

As community awareness is generated, an organization should be formed or an existing organization designated to serve as the focal point of the community development effort. It is important that this organization be broadly representative of the community in order to effectively serve its functions. The primary functions of this group include:

- * To provide leadership for the community's development programs.
- * To serve as a forum for community discussion.
- * To serve as a clearinghouse and coordination mechanism for community development activities.
- * To provide information regarding community development activities.
- * To encourage cooperation and participation in community development activities.
- * To assist in mobilizing resources for community development activities.

Once a group has been formed, leaders should be chosen and group operating procedures established.

A key factor in community organization effectiveness is the knowledge of the members and the capability to carry out designated responsibilities. A process for the education and training of individuals within the community should therefore be undertaken to provide the necessary tools to operate effectively.

Identification of Assets and Assessment of Liabilities

The second phase of community development involves a self-assessment of the assets and liabilities that exist within a community. Through analysis of the various factors that make up the resources available to a community, individuals are made aware of what problem-solving tools are available for immediate use and what tools need to be developed in order to proceed in a planned approach to community development.

In order to identify the strengths and weaknesses within a community, it is necessary to implement an approach involving research and analysis that will prove effective, efficient and revealing, by dealing with the various aspects of the community objectively. Knowledge of local resources (including people) is necessary before responsible decisions can be made.

Once an assessment has been made, an identification of needs, may then follow. By looking at a community objectively, certain needs may be clarified that otherwise have been obscured by issues only clouding the real problem. In this manner, individuals within a community can identify needs through both the strengthening of assets or the alleviation of identified weaknesses and liabilities.

Goal Formulation

In the third phase of the development process, it is necessary for the group to begin to address the specific situations they wish to improve on or to develop.

The concept of short- and long-range planning enters the picture in this phase. A beginning point on which would be a "priority list" of needs or problems to focus. What can we do to alleviate a certain problem? What are some of the long-range goals we wish to achieve? A fundamental aspect of the community development process is that of community involvement. At no one stage of the process is citizen input of more importance. The goals of the group should be in line with the wants and the needs of the community as a whole.

It is necessary now to set specific goals. The goals should be realistic, yet drawn up so as to improve existing situations in the community and reflect already existing local values. Some goals will be short range. The problem to be tackled or the project to be undertaken can be completed in a short amount of time. Other goals, however, will be long range in nature. It is necessary to clearly define the goal and to make sure that it is going to serve as an instrumental tool in the overall community development process.

Action Plan

In phase three the "goal" was outlined. It is important that the members of the community clearly understand the specific goal being worked toward, why it is of such a high priority, and what significance there is to its accomplishment. In this phase, the "strategy" for achieving the goal is designed. A necessary initial step for this phase is another analysis period wherein the group brings to light community resources they hope to enlist and problems, such as apathy and negative thinking they will need to address.

Community involvement is an important element in the overall process. Are the resources that could be of assistance, the goal in achieving, being tapped within the community? Are the talents of the members being utilized?

A tool that should be used in this phase is the "timetable." A timetable can serve as an effective measurement tool for the activities the group carries out. Where does the group want to

be in one month? At what point should the particular area be addressed?

The delegation of duties may also be of some help to the group. The group should utilize the talents of its members. Clearly defined assignments and areas of responsibility are a necessary element of this planning stage.

Implementation

The true test of the development process can best be measured during this phase. The actual accomplishment of established goals can be visualized at this point by the implementation of the action plan.

The success or failure of the efforts involved in community development groups often rests with the proper use of an action plan to achieve required results. Inaction at this point can be detrimental. For this reason, the implementation phase is perhaps the most crucial in the process. At this point, there can be no substitute for the individual initiative of the private citizen who is committed to the established goals.

Evaluation and Process Renewal

A periodic, thorough evaluation of the community's development effort is essential to the maintenance and refinement of the local program. This should normally be undertaken after the community is well into the implementation of its action plan. This activity should include an honest assessment of the entire community development program and should seek the opinions of the entire community, as well as those who have been actively involved in the community development program.

The central questions in this process, of course, are "Are the community's goals being met?" and "If not, why not?" Each phase and each activity of the program should be revised. Were the goals realistic? Was the strategy devised to implement objectives that are appropriate and effective? Was the general public adequately informed and involved? Was there sufficient coordination and communication throughout the community?

This analysis lays the groundwork for the next cycle in the community development process. At this point, refinements should be made to correct any weaknesses identified in the evaluation. Additionally, new people should be brought into the community development organization to insure its continued vitality. New goals and problems require different viewpoints and capabilities.

The community development process is a dynamic ongoing process. Each phase is interrelated, and several phases, if not all, may progress simultaneously. An integral part of all phases of the process is community involvement. Participation must come from all segments of the community. It is through involvement that a coordinated effort may emerge into a viable problem-solving community force. However, it is important throughout this coordinated effort that the development of the individuals involved in the community development process be stressed so that new and varied approaches may be taken for input into the community

development model. The goal is a more capable citizen, aware of what she or he can do. People cannot be forced to participate, only taught how to, and then given the opportunity.

Through individuals cooperating to achieve shared goals, the shape of the model is molded to a community's own characteristics and is made applicable to its needs. It is, therefore, important that the personal development of the individuals involved be a continuing process throughout the model so that the community as a whole will benefit from the increased knowledge and awareness of its individual members. Through an active and ongoing approach to personal development and citizen awareness, opportunity for individual participation in the community development process is increased.

The accomplishment of personal development is of the utmost importance, in order to achieve the involvement of the individual. It is, therefore, necessary to address the training needs of individuals and groups as an ongoing process throughout the community development process. Differing phases of the community development process call for varying expertise. Through personal development, qualities may be enhanced that will allow the opportunity to identify the most effective method for participation, and therefore an active recruitment and training of leadership qualities within the personal development framework must be a continual process. In order to remain informed and aware of the components of the community development effort, an active pursuit of feedback should be maintained during all phases. The local citizens will be the final arbitrators of methods and goals.

Institutional Structure and Intergovernmental Cooperation

The following list of institutions is a partial list of those institutions which play a role in Housing and Community Development in the City Of Lawton.

PUBLIC AGENCIES	INSTITUTION WEAKNESSES	STRENGTHS
Housing and Community Development	Overloaded staff	Dedicated Staff Relations with HUD
Housing Authority of Lawton	Overloaded staff	Property management Relations with HUD
Department of Human Services (DHS)	Overloaded Staff Social Employment Services	Individual contact with clients
GPIF – Food Bank	Organization	Volunteer citizens Variety of programs
Chamber of Commerce	Turnover of volunteers	Leaders, volunteers Business experience
Great Plains Area Vo-Tech School	None	Education and outreach. Facilities
Lawton Public Schools	None	Education Individual contact with clients
Cameron University	None	Education Student assistance in projects

Association of South Central Oklahoma Governments (ASCOG)	None	Variety of Programs Economic development
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PRIVATE AGENCIES

Lenders	Inexperience with high risk loans.	Underwriting Loan servicing
Foundations	Unknown	Funds
Contractors	Unknown	New construction

NON-PROFIT AGENCIES

Goodwill Industries	Focused on handicapped	Handicapped housing Leadership
Quality Enterprises, Inc.	Limited administration Grant writing capability	Group home

There is no one institution to implement a Coordinated Approach on Housing and Community Development problems in the City of Lawton. Rather there are several agencies including the City of Lawton, the Chamber of Commerce, Cameron University, Great Plains Area Vo-Tech School, Cameron University, Lawton Public Schools, the Lawton Public Housing Authority, the Department of Human Services, the Lawton Urban Renewal Authority, the Great Plains Improvement Foundation(GPIF), the Association of South Central Oklahoma Governments(ASCOG), Goodwill Industries and Comanche County Commissioners which must act in concert to bring the resources that are available to bear on the problem of housing and community development.

Leadership is the critical link in the chain of success. The elected officials of the City of Lawton, because of their responsibilities under the Community Development Block Grant Program and the HOME Investment Partnership Act, must be proactive leaders in coordinating the activities of the above mentioned institutions.

Overcoming Gaps

It is clear there are gaps in the system and in this plan which need to be addressed in the future. However, as stated above there is currently no one organization with authority or control over the full range of housing and community development activities and the continuum of care which is a key to many aspects of implementation of The Plan.

The Century Communities process, which augments activities of the city's citizen participation process outlined in the City of Lawton Citizen Participation Plan, assists in meeting the citizen participation requirements of the Community Development Block Grant (CDBG) and the HOME Investment Partnerships (HOME) programs will continue to assess, discuss and analyze with its various committee structures the gaps that appear in the planning and implementation of Housing and Community Development strategies.

Resource Allocation

The ultimate goal of the City's Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) Programs is to reduce the number of people living in poverty in the City. Toward this end, the City will give funding priority to programs, which - in addition to complying with federal regulations, addressing a priority outlined in the Consolidated Plan, and meeting the minimum criteria required in the application process - are consistent with the following anti-poverty strategy for resource allocation.

Each project must satisfy one of the three following overriding goals:

- The project must help people move out of poverty.
- The project must prevent people from entering poverty.
- The project must address the basic needs of people living in poverty.

In making funding decisions, the City will give priority to programs that:

- Support, complement or are consistent with other current City plans;
- Are sustainable over time;
- Have demonstrated cooperation and collaboration among government, private nonprofit agencies, and the private sector to maximize impacts and reduce administrative costs;
- Meet the minimum criteria required in the application process;
- Do not have a more appropriate source of funds.

A priority population for CDBG and HOME Program funded services are individuals who are denied, by poverty and historical institutional practices, the opportunity to develop their full potential and to enjoy the benefits of community participation.

Priority populations for CDBG and HOME Program services are female-headed households with children, disabled households, elderly households, and the homeless who are currently, and have been historically, disproportionately impacted by poverty.

CDBG and HOME Program services must, to the fullest extent possible, be appropriate and accessible to people with disabilities, female-headed households with children, elderly households, homeless, and other eligible individuals and families who may face special barriers in accessing services. The City recognizes that while progress is being made in improving access to services and activities, specialized access services are likely to continue to be required in certain instances to ensure that priority populations receive the services they need.

The CDBG and HOME programs were built on a premise of local involvement in directing funds to neighborhood and community needs. The City will give priority to programs that promote community initiatives to identify priority needs and to address those needs. Recognizing the limits on the ability of service systems to meet all needs, the City will seek to leverage resources to promote comprehensive, long-term responses that promote neighborhood self-sufficiency.

The City will give priority to programs that provide services addressing the basic needs of Lawton's most at-risk populations.

The City will give priority to programs that build and support the capacity of local organizations to address the needs of residents.

The City will give priority to programs that support economic development and other programs that capture local dollars and prevent them from "leaking out" of the community.

The City will give priority to programs that promote access to quality jobs - positions that pay well enough to support an adequate standard of living, allow the purchase of housing and other basic necessities, provide decent, safe, sanitary, and affordable housing, offer stability and decent working conditions, and provide opportunities for advancement.

Monitoring Standards and Procedures

Monitoring Standards and Procedures includes review by citizens at public hearings and committee meetings of the Century Communities program. A Department Policy on monitoring has been prepared by the Housing and Community Development Director of the City of Lawton. This policy will be used in the preparation of the Consolidated Annual Performance and Review Report (CAPER) required by HUD.

SECTION VII
APPENDIXES

APPENDIX A-1
The Consolidated Plan - City of Lawton
Lawton Human Service Agencies

United Way of Lawton - Fort Sill Service Agencies - The City of Lawton is served by the United Way of Lawton \Fort Sill. The United Way is the main agency in the area, which provides services to person at or below the poverty level. Since the last Consolidated Five-Year Plan, the United Way has established a "211 Hotline" for all public services related questions in the area. Citizens of Lawton and Comanche County are now able to call a hotline to get information on the services that they need for their particular emergency. The Hotline provides direct access to answer any type of question regarding public services, homeless assistance, or meals provided. The following short program descriptions are provided to indicate some of the types of activities that are included in "Anti-Poverty" strategies.

American Red Cross, Comanche County Chapter - improves the quality of life, enhances self-reliance and concern for others and helps people avoid; prepare for and cope with emergencies. This is done through service to military families and veterans, disaster services, CPR training, first aid, swimming and water safety, and AIDS education videos.
401 West Gore Blvd., 355-2480

Armed Services YMCA - meets the needs of the junior enlisted military personnel by enhancing the quality of life through social, recreational and educational programs.
201 South 4th Street, 355-5520

Boy Scouts of America, Black Beaver Council - helps to instill values in young people and in other ways prepare them to make ethical choices over their lifetime in achieving their full potential. The Black Beaver Council brings scouting to youth in 11 counties in Southwest Oklahoma.
20 NW Cache Road, 357-3633

C. Carter Crane Shelter for the Homeless - serves the temporarily homeless and deinstitutionalized by providing a place to live, food, clothing, job placement, assistance in locating permanent housing and referral to other social services.
1203 SW Texas, 357-5259
1203 Texas, 248-0936

Camp Fire, Inc., Heart of Oklahoma Council - provides programs (educational, social, camping, self-reliance) for children and youth ages 5-18 to realize their potential and to function as caring, self-directed individuals who are responsible to themselves and others.
714 West Gore Blvd., 355-0666

Center for Creative Living - provides an environment that allows independent living for older citizens with the maximum amount of family support. The Center is dedicated to personal growth, lifelong learning, recreation, and an active volunteer program promoting preventative medicine.
3501SW F Avenue, 248-0471

Christian Family Counseling Center - provides professional counseling services, which integrate Christian values with knowledge gained from modern psychology to anyone in need regardless of their ability or inability to pay for the services.
44 Cache Road Square, 248-0983

Fort Sill Community Activities Fund - contributes to the well being of military personnel, civilian employees and their families within the Lawton-Fort Sill community.
Bldg. 455 (McNair Hall) Room 125,442-3842

Helpline - serves as the community's information and referral service, providing clients with details about services available to residents of Lawton-Fort Sill. Services includes a 24-hour, 7-day-a-week crisis hotline, referral service

and a Phone Alert League(PAL) which puts elderly and homebound people in touch with a voluntarily.
P.O. Box 2011, 355-7575

Hospice - A community oriented organization desired to provide Hospice care to terminally ill patients and their care givers in the familiar surroundings of their own homes.
1011 SW C Ave., #1,248-5885

J. Roy Dunning Children's Shelter - provides a safe haven for children who are abused, neglected, abandoned or otherwise in need of protection. The shelter is committed to the concept that with loving care of children, crisis counseling and child abuse prevention programs, the cycle of child abuse and neglect can be broken.
P.O. Box 2622. telephone restricted, call 355-0218

Lawton Food Bank- Provides food for individuals and families in emergency situations. Other services include the provision of clothing and household items when items are available.
1405 SW 20th, 353-7994

Legal Aid of Western Oklahoma - provides civil legal services to low income and elderly people throughout Western Oklahoma. Services are limited to civil legal problems with priority given to public benefits issues, family law involving domestic violence or abuse and issues involving elderly and handicapped.
621 D Avenue, 248-4675

Marie Detty Youth and Family Service Center- provides for the physical, emotional and psychological needs of children and families experiencing distress and dysfunction. The agency-provides emergency shelter for short-term residential care. The establishment and support of strong family units to combat rebellious, delinquent and abusive behavior is emphasized.
811 SW 17th Street, 248-6450

New Direction, Inc.- provides intervention services for victims of domestic violence and sexual assault. A 24 hour hotline is available for information and referral. Safe temporary shelter is available to women and children 24-hours per day. Battered or emotionally abused women as well as sexual assault victims and dependent children qualify for residency.
P.O. Box 1684, 357-6141, Hotline, 357-2500.

Roadback, Inc. - offers non-medical detoxification, continuing treatment, vocational assistance and rehabilitation in a residential setting for recovering alcohol/drug addicts.
1502 SW D Avenue #4,357-8114

Robert E. Greiner School for the Handicap - provides care, education and training of the handicapped with the goal in the self-sufficiency of the students. The students participate in curriculum that includes speech and physical therapy, Music, physical education, arts and crafts, reading, writing, math, health, camping and Special Olympics.
10 East B Avenue, 355-2559

Salvation Army Boys and Girls Club - provides social, educational and recreational programs including sports, crafts and camping for area children and youth ages 6 - 18.
1315 SW F Avenue, 357-7541

Salvation Army Cows Community Center - provides material, physical and spiritual assistance to all in need. Services include lodging, utility bill and rental assistance, nursing home visits, transportation, counseling, pre-release inmate housing and much more.
1306 E Avenues, 355-1802

APPENDIX A-2
Great Plains Improvement Foundation, Inc.
Community Action Agency (CAA)

The City of Lawton is indeed fortunate to be the base of operations for the Great Plains Improvement Foundation. The Great Plains Improvement Foundation (GPIF) is a Community Action Agency serving Comanche County. The GPIF provides services to person at or below the poverty level. The programs that the GPIF operates are the Child Support Enforcement Program, Child and Adult Care Food Program, Weatherization, Group Home, Supported Living/Supported Employment, and the Homeless Shelter. The following short program descriptions are provided to indicate some of the types of activities that are included in "Anti-Poverty" strategies.

CHILD SUPPORT ENFORCEMENT

Fourteen employees, two of who are full time attorneys, staff the Child Support Enforcement. Services provided to establish and enforce child support obligations.

HOMELESS SHELTER

The C. Carter Crane Shelters for Homeless persons provides temporary housing for anyone homeless. Residents can stay in the shelter up to five (5) weeks. They receive 3 meals a day, transportation to emergency services, clothing when needed, and furniture and household belongings when moving to independent living. The shelter maintains a home atmosphere. All recipients must seek employment if they are able to work.

GROUP HOME

The Lawton and Altus Group Homes provide people with developmental disabilities the support they need to become full members of the communities. The residents live in a home like environment with staff supervision. They are taught basic life skills and given the opportunity to maintain a job while residing in the Group Home.

WEATHERIZATION

Provides a service to Low Income renters and homeowners. Preference is given to handicapped and elderly homeowners or renters. Caulk windows, blow insulation in attics, install weather-stripping, and install storm windows and doors.

CHILD ADULT CARE FOOD PROGRAM

The CACFP is a Federal Food Program that provides money for licensed Day Care Home Providers for serving nutritious meals to children enrolled in their program. It is funded by the U.S. Department of Agriculture (USDA) and at the local level by the Oklahoma State Department of Education. The Day Care Home Providers receive checks to help them cover food costs for feeding nutritious meals to the children in their care.

SURPLUS FOOD GIVE-AWAY

Provides surplus (commodities) to low- and moderate-income residents of Comanche County. This service is usually provided once a month on the third (3rd) or fourth (4th) Tuesday at 8:00 a.m. at Bethlehem Baptist Church. Specific dates are advertised in the newspaper and on the radio. Proof of income and social security number is required.

SUPPORTED LIVING /SUPPORTED EMPLOYMENT

Provides a homelike environment for people with developmental disabilities. Clients live in their own apartment or house under the supervision of staff. The supported employment program provides support to individuals who are employed in an integrated community setting. Individuals receive the one on one support of a job coach and necessary training to secure and maintain a job.

APPENDIX A-3

Senior Services and Youth Services

The needs for Senior Services and Youth Services can best be analyzed by looking at the number of elderly and youth in the City of Lawton. The 2020 Land Use Study, in the Chapter on Demographics provided such information in Map No. 4.3A People Ages 60 Years & Older and in Figures 4.3A, 4.3B and Table 4.3A. The section on Demographics in the Community Profile Section of this report also discusses senior and youth populations.

The following agencies, which impact Senior Services and Youth Services have participated in a "Collaboration" through the Comanche County Human Services Council. This collaboration has resulted in the sharing of information concerning Agency Contact Persons, Agency Resources, Needs of the Agency and Collaboration Projects.

<u>Agency</u>	<u>Resources</u>	<u>Needs</u>
J. Roy Dunning	<ol style="list-style-type: none"> 1. Complete home environment 2. Trained Staff 3. Kids(0-12) 4. Play area/yard 	<ol style="list-style-type: none"> 1. Programs with coping problem-solving skills 2. Per therapy 3. Self-Esteem building activities 4. "Normalcy"
Armed Services -Camp/YMCA	<ol style="list-style-type: none"> 1. Two vans 2. Auditorium 3. Staff 4. Young Kids (0-5) 5. Access to military families 	<ol style="list-style-type: none"> 1. Summer day camp for young enlisted family members 2. Summer day camp with Fire at Camp C'Andy
Center for Creative Living	<ol style="list-style-type: none"> 1. Large meeting room 2. 28 varied programs 3. Ceramic kiln available 4. 100 talented volunteers 5. Mail office space 6. Access to Art-n-Crafts Teacher involved in activities 	<ol style="list-style-type: none"> 1. Intergenerational seniors with younger adults 2. Choral groups presentations 3. More minority seniors 4. Increased number of men
YMCA	<ol style="list-style-type: none"> 1 Recreational facilities 2. Program expertise 3. Preschool program 4. After school/Out of school program 5. Health presentation 	<ol style="list-style-type: none"> 1. Serve-at-risk youth in Lawton View & Ranch Oak "In area" 2. Develop teen programming for these areas - which would be on location
Oklahoma Parents As Teachers	<ol style="list-style-type: none"> 1. Literature 2. Referral systems 3. Speakers 	<ol style="list-style-type: none"> 1. Parent educators 2. Volunteers
La Sill Optimist	<ol style="list-style-type: none"> 1. Money for youth programs 2. concession equipment 3. Skilled adult volunteers 4. Access pre-release worker for 	<ol style="list-style-type: none"> 1 Sponsor programs for "at-risk" youth 2. Sponsoring Boy Scouts and Camp Fire clubs in Housing Authority 3. Camp Fire summer labor program

Christian Family Counseling Center

<ul style="list-style-type: none"> 1. Individual counseling for children, adolescents and 2. Marriage and Pre-marriage counseling adults 3. Family Counseling 4. Therapy Groups and Support Groups (Divorce Recovery, Adults Molested as children, adult Children of Alcoholic or Chaotic Families Couples Communication) 	<ul style="list-style-type: none"> 1. Transportation 2. Access to minorities 3. Counseling for Housing Authority youth
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First Step Clubhouse

<ul style="list-style-type: none"> 1. Trained staff 2. Communication relation 3. Knowledge of Social Security benefits for disabled 4. Mentally ill young adult clients 	<ul style="list-style-type: none"> 1. Start a Thrift Shop 2. Start and oversee Transitional building employment program
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Union Baptist Church

- 1. Summer day camp(1st-5th grade)
- 2. Classroom and conference rooms
- 3. Outreach center for food and clothing
- 4. Health presentations

APPENDIX A-4
Substance Abuse Services and Health Services

The Lawton Community Needs Assessment prepared in 2005 asked several questions which indicated the grave needs for Substance Abuse Services and Health Services. The following agencies, which impact Substance Abuse and Health Services, have participated in "Collaboration" through the Comanche County Human Services Council. This collaboration has resulted in the sharing of information concerning Agency Contact Persons, Agency Resources, Needs of the Agency and Collaboration Projects.

Agency	Resources	Needs
Memorial Hospital	<ol style="list-style-type: none"> 1. Education Services 2. Drug & Alcohol and Mental Health literature 3. Free Assessment services 4. Speakers and workers 5. Referrals 	<ol style="list-style-type: none"> 1. Statewide lobbying
Roadback, Inc.	<ol style="list-style-type: none"> 1. Adults 2. Recovery houses 	<ol style="list-style-type: none"> 1. Employment Opportunities for women (short term)
Health Department	<ol style="list-style-type: none"> 1. Access to adults and kids 	<ol style="list-style-type: none"> 1. Money for staff
Area Prevention Resource Center	<ol style="list-style-type: none"> 1. Statewide link with prevention programs 2. Topic presentations in prevention 3. Books & videos on prevention 	
Christian Family Counseling Center	<ol style="list-style-type: none"> 1. Trained staff 2. Drug & Alcohol & mental health literature 3. Group therapy 	

APPENDIX A-5 Employment Training and Child Care Services

Employment data is provided in the "2020 Land Use Study" in Chapter 6. The unemployment rate was discussed in the Community Profile section of the Consolidated Plan. The unemployment rate has ranged from a high in 2010 of 6.2% to a low in 2015 4.1%. The Lawton Community Needs Assessment prepared in 2005 asked several questions which indicated the need for Employment Training and Child Care Services.

The following agencies, which impact Employment Training and Child Care Services, have participated in "Collaboration" through the Lawton Fort Sill Community Coalition. This collaboration has resulted in the sharing of information concerning Agency Contact Persons, Agency Resources, Needs of the Agency and Collaboration Projects.

Agency	Resources	Needs
Oklahoma Employment Commission	<ol style="list-style-type: none"> 1. Literature on job seeking 2. Workshops & speakers 3. Classrooms 4. Registration for employment 5. Certified typing test 6. Federal list-all of Oklahoma 	<ol style="list-style-type: none"> 1. More employers to provide on-the-job training 2. Publicity 3. Free workshops 4. Local listings for day care
Displaced Homemakers Free Workshops	<ol style="list-style-type: none"> 1. Van, driver, insurance 2. Network/referral 3. Contact with out of work adults 	<ol style="list-style-type: none"> 1. Parents as teachers to provide transportation to clients 2. Need professional clothing 3. Work opportunities
Department of Human Services	<ol style="list-style-type: none"> 1. Conference rooms 2. day care 3. Access to low- and moderate-income families 	<ol style="list-style-type: none"> 1. Volunteers

APPENDIX A-6
Fair Housing Counseling, Tenant Landlord Counseling and
Other Public Service Needs

An indication of Fair Housing Counseling, Tenant Landlord Counseling and Other Public Service Needs appear in The Lawton Community Needs Assessment prepared in 2005.

The following agencies, which impact Fair Housing Counseling, Tenant Landlord Counseling and Other Public Services, have participated in “Collaboration” through the Lawton Fort Sill Community Coalition. This collaboration has resulted in the sharing of information concerning Agency Contact Persons, Agency Resources, Needs of the Agency, and Collaboration Projects.

Agency	Resources	Needs
Open Doors	<ol style="list-style-type: none"> 1. Laptop computers 2. Free textbook materials 3. Counseling service for personal and academic careers 	
Legal Aide of Southwest Oklahoma	<ol style="list-style-type: none"> 1. Legal library 2. Consult with agencies on legal issues 3. Library meeting room 	<ol style="list-style-type: none"> 1. Adult volunteers to help with screening clients.
Mayor’s Council on Women’s Affairs	<ol style="list-style-type: none"> 1. Women volunteers 	

APPENDIX C
The Consolidated Plan - City of Lawton
Business and Technical Assistance

Great Plains Technical Center (GPTC) School Business Development Services

Other Business and Technical Assistance

The Other Business and Technical Assistance area is served well by the Great Plains Tech Center's Economic Development Center. The continuation of this Center is greatly needed. The Economic Development Center provides Technical Assistance to new and existing, large, and small businesses in manufacturing or retailing. The Economic Development Center is very pro-active in terms of Economic Development and is constantly striving to meet the needs of an incredibly diverse group of firms in southwest Oklahoma.

Business Development Seminars

The Great Plains Economic Development Center Team has developed a series of seminars for the upcoming year to assist businesspersons to:

- 1) Improve the profitability of the business;
- 2) Operate the business in compliance with all federal, state, county, and city laws, rules, and regulations; and,
- 3) Create a safe and desirable work environment for customers and employees alike.

To assist you in selecting seminars that are appropriate for your needs and interests, the seminars have been arranged in four "tracks" and are as follows:

- 1) Going into Business
- 2) Business Development
- 3) Compliance and Safety Issues
- 4) Human Resource Development Issues

1. The **"Going into Business"** track is designed to help those individuals who are contemplating the idea of starting a business. The seminars in this track are scheduled weekly to give you jump start on the business planning process. The goal of this seminar series is to give the individual participants enough knowledge about the requirements and processes involved in starting a business that they are then in a position to make a good decision about starting the particular business they have in mind. Serious participants will receive enough information and one-on-one assistance to allow them to complete a business plan by the end of the series.

2. The **"Business Development"** track has been devised to assist owners/managers of existing businesses to increase the profitability of the business and implement sound, proven management practices for the business. Programs in this track are designed to give owners/managers insight into "cutting edge" business management practices as well as revisiting tried and true ideas that are often overlooked in the day-to-day operation of the business. Special emphasis will be placed on the effective use of personal computers and powerful, yet affordable business software to relieve the everyday burdens associated with business operations.

3. The "**Compliance and Safety Issues**" track will help owners/managers of existing businesses cope with the myriad laws, rules, and regulations impacting their business every day. These seminars are designed to provide management personnel with the knowledge necessary to understand which laws apply to their particular business and to show them ways to bring their business into compliance with the applicable laws. Safety training programs related to this track are also provided by the EDC to relieve you of the training obligations associated with many workplace regulation laws. If you have a small number of employees, please see the Safety Training Schedule to locate no-cost, open-enrollment safety training classes that will meet your needs. If you have enough employees to fill a class, we would be pleased to schedule training for your employees and customize the safety training to your specific workplace. Normally, there will be no cost associated with Safety Training.

4. The "**Human Resource Development Issues**" track is designed to help business owners, managers, and supervisors deal with employee issues in a manner that will improve their business operations and employee satisfaction while operating the personnel function in a manner that is consistent with proven and legal business management practices. Many of the topics covered in these seminars never seem to be all that important to business owner/managers until someone files a lawsuit against the business and then it's too late. Job descriptions policy manuals, and the like seem to be unnecessary burdens to many business owners/managers but they are necessary for effective business operation and are invaluable when an employee takes you to court.

In addition to the four seminar tracks, you will also find a "**Special Events**" section in the seminar schedule. These events are "special" by virtue of the fact that they are normally longer in duration than a regular seminar and they target "hot topics" that need special attention. Additional special events may be scheduled during the coming year as demand warrants.

Safety Training Schedule

The following training programs have been scheduled to allow businesses to meet their safety training obligations with a minimum of interruption in the conduct of their business. *All of these classes are open-enrollment and there are no costs for participation.* Classes will also be scheduled in the spring . If your business has enough employees to warrant an on-site class, please call the EDC to arrange an acceptable schedule. As with open enrollment safety classes, there is normally no charge for on-site safety training.

AUTHENTICATION

The City of Lawton Consolidated Plan for Federal Fiscal Years (FFYs) 2016 through FFY 2020 was approved by the Lawton City Council at a regularly scheduled meeting on April 26, 2016. This plan becomes effective immediately on approval by the U. S. Department of Housing and Urban Development (HUD) and shall remain in effect until rescinded or changed by approval of the City Council.

Signed:

FRED L. FITCH
MAYOR

DATE