



CHEROKEE NATION HOUSING ASSESSMENT

PHASE I WHITE PAPER
September 2024

Prepared For:
Housing Authority of the Cherokee Nation

DEVELOPMENT STRATEGIES

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INTRODUCTION

STUDY PURPOSE

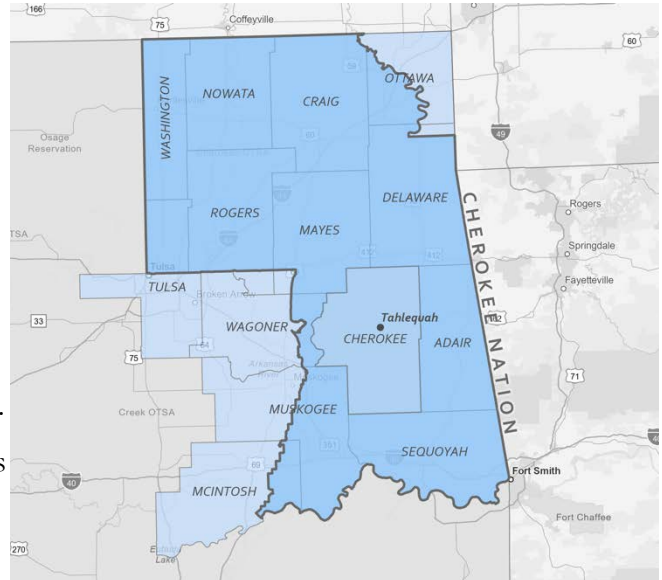
The Housing Authority of the Cherokee Nation (“HACN”) hired Development Strategies to prepare a Housing Needs Assessment for Cherokee Nation Citizens (“Cherokees”) residing in the Cherokee Nation Reservation. The purpose of this assessment is to define current and future (10-year) demand for various types of housing (i.e., rental and homeowner, single-family and multi-family, multigenerational housing) at all affordability levels/price points. This information will allow the Cherokee Nation to strategically fundraise and guide its continued investments into housing for citizens.

Cherokee Nation has invested substantial tribal resources into housing through the Housing Authority of the Cherokee Nation, which also manages programs funded by the U.S. federal government. Efforts include:

- The Cherokee Nation passed the Housing, Jobs, and Sustainable Communities Act of 2019, which earmarked \$30 million for new housing development, focusing on rehab projects of existing housing units.
- After receiving nearly \$2 billion in American Rescue Plan Act funding in 2021, the Nation amended the 2019 act to authorize an additional \$120 million toward housing. These funds supported nearly 2,500 housing rehab projects and are currently in use by HACN to construct more than 350 replacement or new construction homes, including more than 90 new housing units in Tahlequah, Collinsville, Stilwell, Muskogee, Sallisaw, and Jay.
- The Nation continues to leverage Indian Housing Block Grant (“IHBG”) funds for home repair and renovation programs, rental payment assistance, ARPA funds for mortgage payment assistance, and other supportive efforts.

It is widely recognized by tribal leadership that a more comprehensive understanding of the housing needs of Cherokees is needed to guide future strategic investments aimed at meeting the varied housing needs of Cherokees.

This report summarizes key facts and trends about housing and additional detail and analysis is included in the appendix.



HOUSING NEEDS SUMMARY

The primary intent of this study is to quantify current and future housing needs, over a 10-year period, for Cherokee Nation Citizens in the Cherokee Nation Reservation. The needs analysis measures demand across all incomes, housing types and price points. Demand calculations for this assessment considered the following:

- waiting list and other housing data from HACN;
- assessment of households in the homeless system of care,
- housing condition and deficiency data,
- population and household growth trends,
- housing market data, such as occupancy trends, for-sale inventory, and other metrics, and
- migration and job patterns and projections.

This analysis assumes that housing would be developed so that all Cherokees have improved housing choice, are not cost burdened, are not living in overcrowded situations, and live in homes that are in good repair. HACN’s waiting lists for housing assistance/vouchers, affordable housing units, homeownership programs, and renovation programs were analyzed and the demand conclusions assume that these lists would effectively be reduced to zero.

The demand conclusions reflect *gross* estimates, meaning that existing housing units could be renovated or rehabbed to meet a portion of housing demand.

The Big Picture

A projected 8,800 to 9,400 units of all types and price points are needed over the next 10 years to meet demand and support the housing needs of Cherokees. Current, pent-up demand accounts for approximately 6,000 to 6,500 of these units.

10-Year Gross Demand Projections

8,800–9,400
units

5,400–5,800
rental units

3,400–3,600
for-sale units

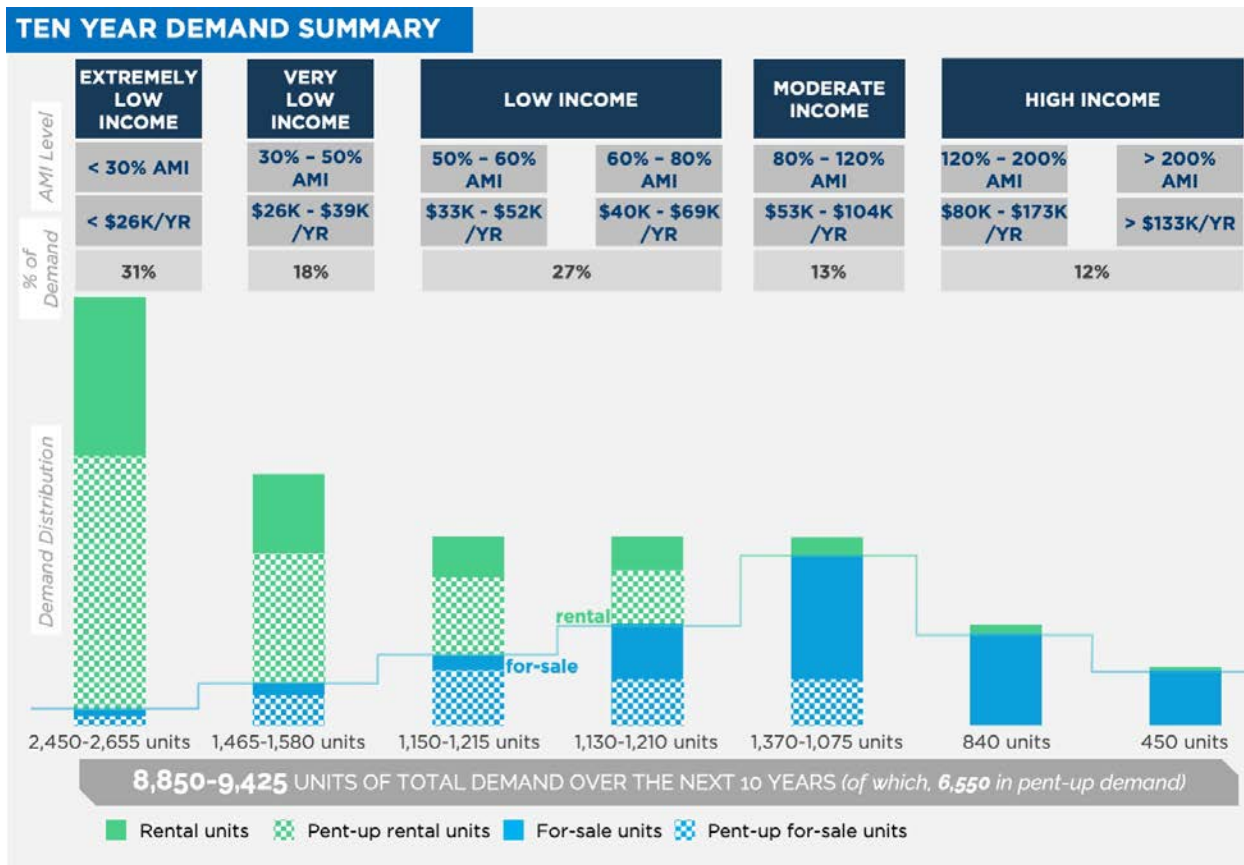
HOUSING DEMAND

Defining Affordability

An important first step in quantifying current and future demand is to define affordability by different income categories. Then, it is possible to calculate what affordable rent and purchase prices are. The graph and table below indicate these categories for the Cherokee Nation Reservation. *Additional detail regarding the methodologies used in this analysis are included in the appendix.*

Demand by Income Group

The graphic and the table below summarize demand by affordability category.



AMI Level	10-Year Cumulative Demand			Pent-Up Demand*			
	Total	For-Sale	Rent	Total	Sale	Rent	
30%	2,450 - 2,655	85 - 95	2,365 - 2,560	30%	2,190	70	2,120
50%	1,465 - 1,580	285 - 305	1,180 - 1,275	50%	1,325	265	1,060
60%	1,150 - 1,215	465 - 480	685 - 735	60%	1,060	440	620
80%	1,130 - 1,210	615 - 660	515 - 550	80%	860	455	410
120%	1,370 - 1,075	965 - 1,075	405	120%	725	600	120
200%	840	630	210	200%	250	190	65
>200%	450	380	70	>200%	135	115	20
Totals	8,850 - 9,425	3,420 - 3,625	5,425 - 5,800	Total	6,550	2,135	4,415

**Totals may not sum due to rounding

*Pent-up demand is included in the 10-year cumulative demand

Extremely Low Income (<30% AMI)

There will be demand for approximately 2,450 to 2,660 units—2,365 to 2,560 rental and 85 to 95 for-sale—for households earning less than 30 percent of AMI (\$25,820 for a 3-person household across the entire Reservation).

Approximately **one-fifth of demand** is for this income group. This cohort mostly rents their housing, although there are homeowners—typically households or individuals with fixed incomes who may be long-term homeowners. Households within this income group are at the greatest risk of housing insecurity and homelessness, which is why adding deeply subsidized units to the market is important. Developing and maintaining this housing is also resource-heavy and long-term funding is needed to ensure its sustainability and viability.

Generally, housing units in this category are typically developed through federal housing programs, such as Public Housing or Housing Choice Vouchers (project-based or tenant-based), as well as Low Income Housing Tax Credits. In addition, HACN and Cherokee Nation can also use funding from programs, such as the IHBG or the Indian Community Development Block Grant (ICDBG). In the rural areas of the Reservation, programs from the USDA, such as Section 504 Home Repair, Multifamily Direct Loans, and Section 502 Direct Homeownership Loan Program, and others could also be leveraged.

Funding for deeply affordable units such as these has decreased over the past few decades, making it difficult to fund new units and preserve/maintain existing ones. In addition, current strong rental markets combined with the operational complexities and challenges of working with the HCV programs contribute to a decline in private landlords accepting vouchers. Finally, funding of Native American programs for housing has fallen flat, been reduced, or even cut over the past several years. While a \$100 million increase in funding of the IHBG in 2018 and influx of money from the American Rescue Plan has helped increase funding, the historic shortfalls leave a remaining gap.

Very Low Income (30% AMI to 50% AMI)

There will be demand for approximately 1,465 to 1,580 units—1,180 to 1,275 rental and 285 to 305 for-sale—for households earning between 30 percent and 50 percent of AMI.

Excluding the Tulsa MSA and Washington County, this is households earning between \$25,820 and \$29,950 (lower end) to \$32,900 (higher end). In the Tulsa MSA and Washington County, this is households earning between \$25,820 (lower end) and \$37,150 to \$39,000 (higher end).

The majority of this income group is made up of renters, but does have a higher proportion of homeowners than the extremely low-income cohort. Resources that help existing homeowners improve housing conditions and stay in their current home are a vital part of a strategy to meet the needs in this category.

Housing units in this category are provided through the federal sources noted above, as well as increasing the quality of the existing housing stock. This creates similar challenges as for the extremely low-income cohort. Households are generally vulnerable to unstable housing conditions, older housing in poor condition, and the costs associated with major repairs. Funding for new development and preservation has been relatively limited for many years, although programs like USDA Section 504 Home Repair Improvement Loans and Grants or the Bureau of Indian Affairs Housing Improvement Program can be used to support homeowners in these units.

Low Income (50% AMI to 80% AMI)

There will be demand for approximately 2,275 to 2,425 units—1,200 to 1,280 rental and 1,075 to 1,140 for-sale—for households earning between 50 percent and 80 percent of AMI.

Excluding the Tulsa MSA and Washington County, this is households earning between \$25,820 to \$29,950 (lower end) and \$47,900 to \$52,640 (higher end) for a household of three. In the Tulsa MSA and Washington County, this is households earning between \$37,150 to \$39,000 (lower end) and \$59,400 to \$62,400 (higher end).

This income group has a large proportion of renters but skews higher towards homeowners. This range is served by previously mentioned homeownership programs and others. Preservation of existing affordable options in this category is critical to meeting future demand, while also identifying additional resources to support new development. Additionally, areas with high proportions of manufactured homes and rural areas, which have higher rates of substandard housing, will need targeted investment to improve housing conditions for existing and future homeowners. Much of the rental and for sale housing stock was built in the 1960s through 1990s—with the multifamily stock being older than owner-occupied housing. While Class C multifamily¹ and older single-family neighborhoods provide naturally occurring affordable housing with subsidy or assistance, it is at risk due to the age and repair needs. The primary production funding for these units is through LIHTCs, as well as ICDBG, IHBG, HOME, and USDA Rural Development multifamily programs.

Moderate Income (80% AMI to 120% AMI)

There will be demand for approximately 1,075 to 1,300 units—405 rental and 965 to 1,075 for-sale—for households earning between 80 percent and 120 percent of AMI.

Excluding the Tulsa MSA and Washington County, this is households earning between \$47,900 to \$52,640 (lower end) and \$71,850 to \$78,950 (higher end) for a household of three. In the Tulsa MSA and Washington County, this is households earning between \$59,400 to \$62,400 (lower end) to \$89,100 to \$93,550 (higher end).

Approximately 25 percent of demand comes from this income group. This cohort is made up of a diverse mix of Class B and Class C rental properties, as well as portions of the for-sale stock, that are more than 20 years old. This market cohort can become strained when there are not enough higher-market options—as these households will effectively compete for the same multi-family and for-sale units as lower and higher incomes because not enough supply is available.

In recent years it has become more challenging to produce new units at the high end of this range due to rising housing costs. Resources to support the development of new options in this range are more limited, because many programs, such as ICDBG or HOME, have cutoffs at 80 percent AMI. There has been more emphasis on supporting development in this cohort because it represents a wide range of households, including first-time homebuyers, teachers, nurses, early professionals, and others. Throughout the

¹ Multi-family housing is distinguished by its class as a marker of quality. Class A units are generally newer units that demand higher rents, have fewer vacancies, and are professionally managed with little or no deferred maintenance. Class B units are generally older units that are well-maintained and sometimes professionally managed. Class C units are typically more than 20 years old and in need of renovation. They usually face significant deferred maintenance and have relatively low rental rates.

Reservation, there may be a number of local, county, and state incentives to facilitate development of this housing, such as the Peoria-Mohawk TIF in Tulsa and local tax abatement or housing funds.

High Income (120% AMI and higher)

There will be demand for approximately 1,290 units—280 rental and 1,010 for-sale—for households earning between 120 percent of AMI or higher.

Excluding the Tulsa MSA and Washington County, this is households earning over \$71,850 to \$78,950 for a household of three. In the Tulsa MSA and Washington County, this is households earning over \$89,100 to \$93,550 (higher end).

This cohort also accounts for nearly one-fourth of housing demand. There are very few Class A rental properties on the Cherokee Reservation, meaning most of this stock is comprised of newer Class B rental properties, as well as a wide range of the for-sale stock. Households in the category have more housing choice than any other category, and more resources to achieve their housing goals. While this income group has the greatest housing choice, many areas lack newer housing products that fit the needs of this group. Adding more products that cater to this group will support freeing up existing units for moderate- and lower-income households.

This cohort also faces the fewest development barriers. With few exceptions, builders and developers can produce this housing without any sort of market interventions—although rural areas may face more challenges in obtaining traditional lending for these products. Certain catalyst projects may need a light subsidy to be accomplished in challenged areas. In some areas, there may be opportunity to diversify the types of housing delivered in this category, including more high-quality single-family housing options, missing middle, and Class A multifamily typologies.

Key Conclusions

The following statements summarize key conclusions from the demand analysis.

- **Housing is needed across the spectrum of affordability.** Improving the existing housing stock in addition to quality development of housing is needed.
- **The greatest demand comes from households at the lower-to-middle range of the income spectrum.** About one-third of demand comes from those earning 30 percent or less of the AMI and more than three-fourths of demand is for housing affordable at or below 80 percent of AMI.
- **There is a need for housing that serves larger and intergenerational families,** as evidenced by larger household sizes of Cherokees and the relative lack of these options in the Reservation.
- **There is a need to create more options, particularly for-sale, for high-income earners.** The age and vulnerability of the existing stock coupled with a low supply of Class A rentals and newly built homes in many areas of the Reservation adds additional pressure to the housing market for other income groups.

FUNDING AND FEASIBILITY

Understanding the scale of need is a critical first step in working toward housing solutions and establishing funding goals. An important next step is to calculate the financial resources needed to meet demand. One of the key reasons there is such demand for deeply affordable housing (i.e., under 50 percent of AMI) for citizens in the Reservation is because the existing tools and funding sources that support production of those units is simply not enough to meet demand, especially in the face of substantially increased construction costs.

Methodology

A high-level development feasibility study forms the basis of this analysis. That is, the cost to produce housing is compared to its value for a variety of housing types and locations. For instance, the underlying model includes housing at each income level included in the demand analysis, single-family and multifamily, for-sale and rental, and new construction versus renovation. Key steps for this analysis include:

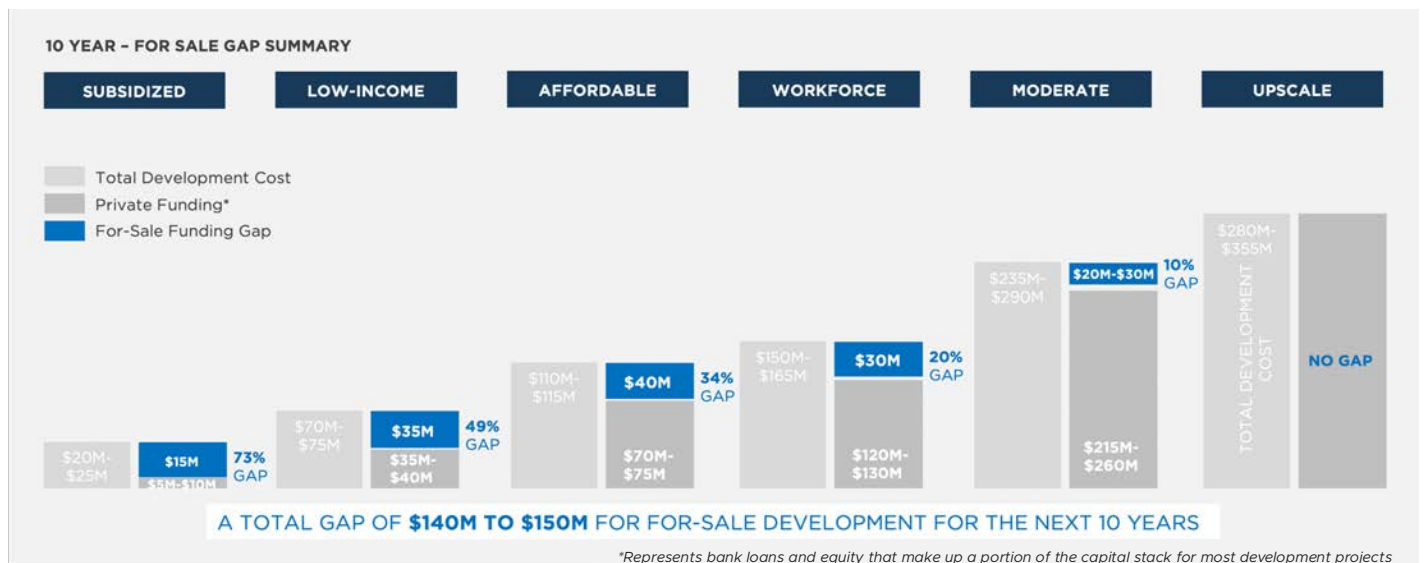
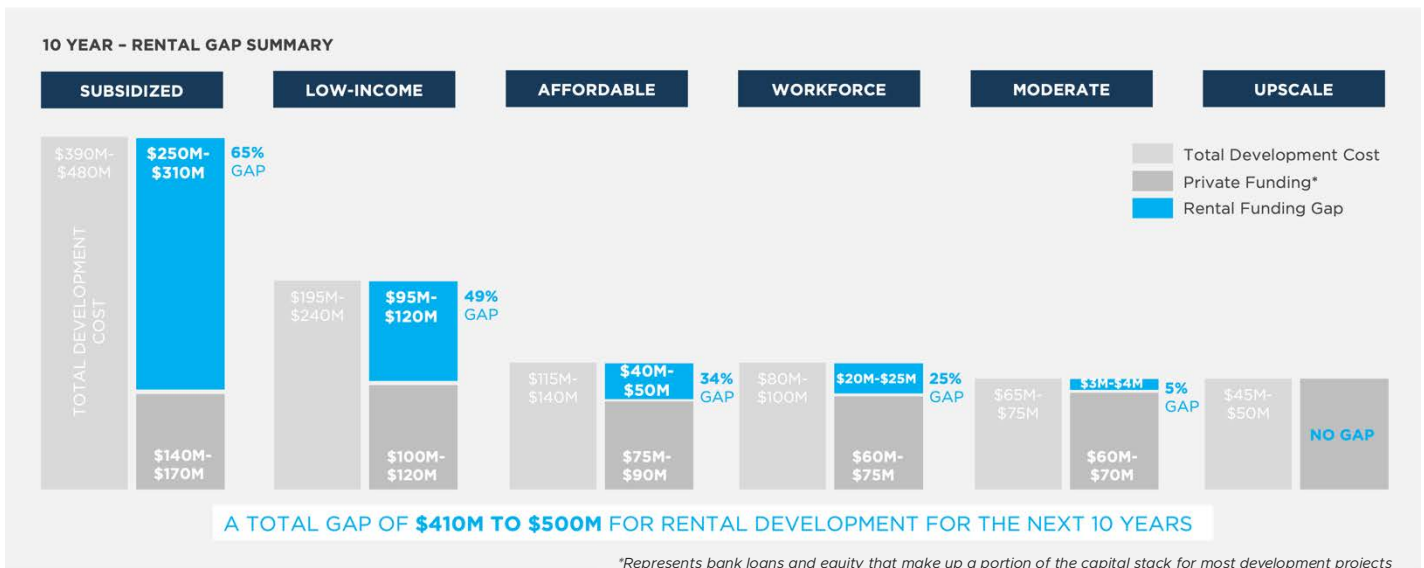
1. Estimates of current development costs based on market data and conversations with developers, including HACN.
2. Estimates of current market values based on sales and rent data, as well as income limits and affordability requirements for housing at or below 120 percent of AMI.
3. Distribution of housing typologies for each income category.
4. Distribution of for-sale vs. rental housing for each income category.
5. Calculation of development gaps; private market sources; current tools, funding, and incentives; and remaining funds needed to produce housing in demand.

The intent of this methodology is to provide broad averages of what is needed to meet demand over the next ten years. The development economics differ from project to project based on multiple factors, including land/site ownership and control, land costs, materials and labor, financing, timing, and others.

Results

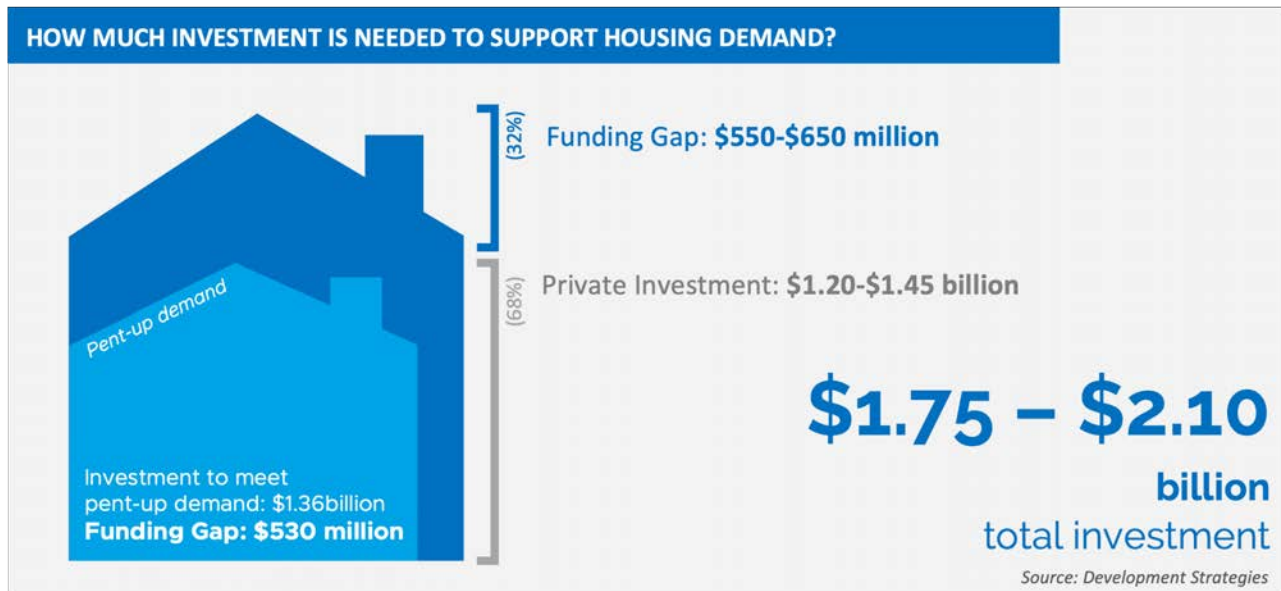
The following graphic illustrates the total development cost to meet demand at the income levels defined in the demand analysis, as well as the development gaps for each income cohort. The analysis assumes that private funding in the form of loans and equity investments will make up a portion of the development capital stack. The remaining gap could be filled by a variety of sources, including those described in the demand analysis.

This analysis focuses on the gap between what the private market supports and what is truly needed to support all housing development so that Cherokee Nation can appropriately plan for future funding commitments while also pursuing sources that it has not traditionally used for housing.



Overall, approximately \$1.75 to 2.10 billion in *total housing investment* is needed over the next decade, or more than \$175 million each year. This can be broken down as follows:

- **Nearly 70 percent**, or \$1.2 to \$1.4 billion (\$120 to \$140 million annually), **could be met by traditional private market mechanisms**, such as bank financing and equity;
- **More than 30 percent**, \$546 to \$654 million (\$55 to \$65 million annually), **needs to be raised through other sources**, such as Cherokee Nation’s Housing, Jobs, and Sustainable Communities Act; LIHTCs, HTCs, CDBG, HOME, TIF (where possible), USDA Rural Development, other public programs, and potential outside philanthropic partners.



It is important to note that HACN currently develops its housing properties with no debt. This approach requires a higher percentage of gap funding than calculated above. HACN historically used LIHTC for several projects, but none within recent years. Additionally, while current housing investment is funded without financing, HACN has constructed a large number of individual family units using HUD Section 184 lending. Looking forward, to meet growing housing demand, HACN should utilize LIHTCs and similar programs, which could leverage Cherokee Nation funds to produce more units.

A new approach, including new or modified policies, expanded funding, and enhanced partnerships are needed to support housing development.

DEMOGRAPHIC AND ECONOMIC TREND ANALYSIS

AN IMPORTANT AND COMPLICATED HISTORY

While the focus of this assessment is on current and future housing needs, there are important elements of the Cherokee Nation’s history that impact the housing market:

- **Cherokee Nation vs. Georgia (1830)** established the Cherokee Nation as a “domestic dependent nation.” This enabled the federal government to hold tribal lands in trusts on behalf of tribal nations² and continues to limit the ability of American Indian/Alaskan Native (AI/AN) persons living on tribal lands to access mortgages and construct new housing.
- The **Dawes Act of 1887** dissolved collectively-owned lands into privately-held parcels and allowed the seizure of millions of acres of tribal lands for white settlement.³ A patchwork of individually-held trust lands that have been divided over generations, presents legal barriers to homeownership and housing development on tribal lands.
- The **Urban Indian Relocation Act of 1948** sought to erode tribal sovereignty over reservations by encouraging AI/AN households to relocate to cities. This program, which ended in 1970, saw a generation of Native Americans relocate to cities, where they faced widespread racism and other challenges. Many returned to their tribal lands under worse economic circumstances with fewer housing and land ownership options.⁴
- The U.S. Department of Housing and Urban Development (HUD) **began funding Indian Housing Authorities** in the early-1960s and the Housing Authority of the Cherokee Nation was established in 1966. These new funding mechanisms allowed for the development of thousands of subsidized rental units on tribal lands, particularly in the early 1970s.⁵
 - Funding from this program focused on **low-income households** and did not address moderate- and higher-income needs; although a handful of programs, such as mutual help housing, helped bridge this gap, significant challenges obtaining mortgages and supporting new housing construction persisted.
- In 1996, Congress passed the **Native American Housing Assistance and Self Determination Act (NAHASDA)**, which created the **Indian Housing Block Grant (IHBG)**. NAHASDA granted federally-recognized and some state-recognized tribes greater sovereignty over housing development, allowing dollars to be leveraged with private funding, the creation of tribe-specific mortgage programs, and use of up to 10 percent of funds for moderate-income households.⁶ Cherokee Nation is the second largest recipient of the block grant.⁷

Increased funding for housing through the IHBG has helped expand attainable housing options and improve the condition of existing housing, but the scale of funding available is not sufficient to meet the housing needs of Cherokees.

² Enterprise Community Partners. (2021). Historical Policies That Shapes Housing in Native America. <https://www.enterprisecommunity.org/blog/historical-policies-shaped-housing-native-america>

³ National Archives. (2022). Milestone Documents: Dawes Act (1887). *The U.S. National Archives and Records Administration*. <https://www.archives.gov/milestone-documents/dawes-act>

⁴ Nesterak, M. (2019). Uprooted: The 1950s plan to erase Indian Country. *APM Reports*. <https://www.apmreports.org/episode/2019/11/01/uprooted-the-1950s-plan-to-erase-indian-country>

⁵ The Housing Assistance Council. (1988). Indian Housing In The U.S.: A History. *HUD*. https://www.huduser.gov/portal/portal/sites/default/files/pdf/Indian-Housing-in-the-US_A-History.pdf

⁶ Enterprise Community Partners & Freddie Mac. (n.d.). Enhancing and Implementing Homeownership Programs in Native Communities. *Enterprise Community Partners*. <https://nativehomeownership.enterprisecommunity.org/preface-acknowledgments>

⁷ Cherokee Nation. (2024). Cherokee Nation FY2023 Popular Annual Financial Report. <https://www.cherokee.org/media/y5ndsuj/fy23-pafr-final.pdf>

DATA NOTES AND CHALLENGES

Traditional demographic data sources, such as the U.S. Census, American Community Survey (ACS), and providers like Esri⁸ offer a wide range of useful data points for analyzing population, household, income, race, housing, employment, and other trends. However, there are several important limitations and/or challenges in applying these data sources to the Cherokee Nation:

- Census data relies on the self-identification of racial identity, whereas tribal enrollment figures are based on tribe-specific requirements for proving ancestry. For instance, more than 1.5 million respondents to the 2020 Census claimed Cherokee heritage⁹—this is more than triple enrollment reported by the Cherokee Nation (464,014 registered tribal citizens).
- AI/AN individuals are more likely than members of other racial cohorts to identify as multi-racial, so this data helps provide an understanding of trends impacting Cherokees, as well as non-Cherokee multi-racial individuals living in the study area.
- Data for the Cherokee Nation is from the Cherokee Nation Oklahoma Tribal Statistical Area (OTSA). Populations of tribal statistical areas may also differ from tribal enrollment figures and include AI/AN individuals who are not enrolled in the specified tribe.¹⁰
- The 2020 Census undercounted the AI/AN populations by up to 5.6 percent.¹¹
- Data for rural counties are subject to higher margins of error.
- The 2020 Census relied more heavily on the internet to collect data compared to those conducted in 2010 and 2000. As broadband infrastructure is generally poorer in rural locations and among the AI/AN population compared to the population overall, this may have contributed to an undercount as well.¹²

Given these limitations, data from HACN and Cherokee Nation, as well as qualitative information from conversations with Cherokee Nation employees and representatives, is used to supplement and ground-truth data from traditional Census-based sources.

⁸ Esri is a third-party geospatial analysis software that reports Census and ACS data and uses that data, as well as data on school enrollment, utility hookups, postal service delivery addresses, and others, to provide estimates and projections.

⁹ There are three federally-recognized Cherokee tribes: the Cherokee Nation (Oklahoma, 464,000 enrolled), Eastern Band of Cherokee Indians (North Carolina, approximately 16,000 enrolled), and United Keetoowah Band of Cherokee Indians in Oklahoma (Oklahoma, approximately 12,000 enrolled). Members of any of the three respective tribes cannot maintain dual enrollment in one another. Source: Bureau of Indian Affairs. (2021). Indian Entities Recognized by and Eligible to Receive Services From the United States Bureau of Indian Affairs. *Federal Register*. <https://www.federalregister.gov/documents/2021/01/29/2021-01606/indian-entities-recognized-by-and-eligible-to-receive-services-from-the-united-states-bureau-of>

¹⁰ Congress Research Service. (2024, April). American Indian, Alaska Native, and Tribal Population Data. *CRS Reports*. <https://crsreports.congress.gov/product/pdf/IF/IF12612#:~:text=OMB%20currently%20defines%20American%20Indian,more%20than%20one%20racial%20group>

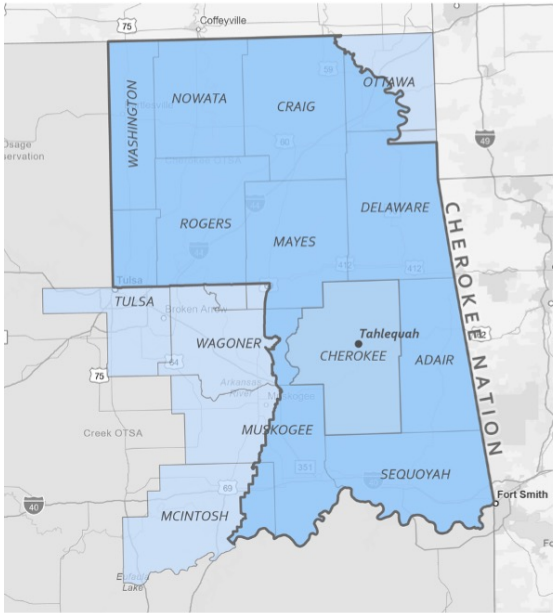
¹¹ U.S. Census Bureau (2022, March). Post-Enumeration Survey and Demographic Analysis: News Conference. *Census.gov*. <https://www.census.gov/content/dam/Census/newsroom/press-kits/2022/20220310-presentation-quality-news-conference.pdf>

¹² Morrison, G. & Bowen, C. M. (2022). Internet First or Internet Choice? Identifying Factors to Predict Low Self-Response Rates on the 2020 Census.

STUDY AREA TRENDS

The primary study area for this assessment is the Cherokee Nation Reservation, which contains part or all of the 14 counties noted on the map below. The nearly 7,000-square mile area is large and diverse, including very rural and sparsely populated regions, as well as more densely populated areas of north Tulsa, Tahlequah, and other job and population centers. Key trends for the general and AI/AN populations are summarized in the graphic below.

DEMOGRAPHIC & HOUSING TRENDS: CHEROKEE NATION RESERVATION



POPULATION TRENDS

Total general population	AI/AN & mixed-race population
523,700 Population	132,100 Population
8.5% Population Growth (2010 – 2024)	11.6% Population Growth (2010 – 2024)
\$57,100 Median Household Income	\$53,800 Median Household Income
\$203,000 Median Home Value	\$134,000 Median Home Value
69% Owner-Occupied	67% Owner-Occupied

HOUSING TRENDS

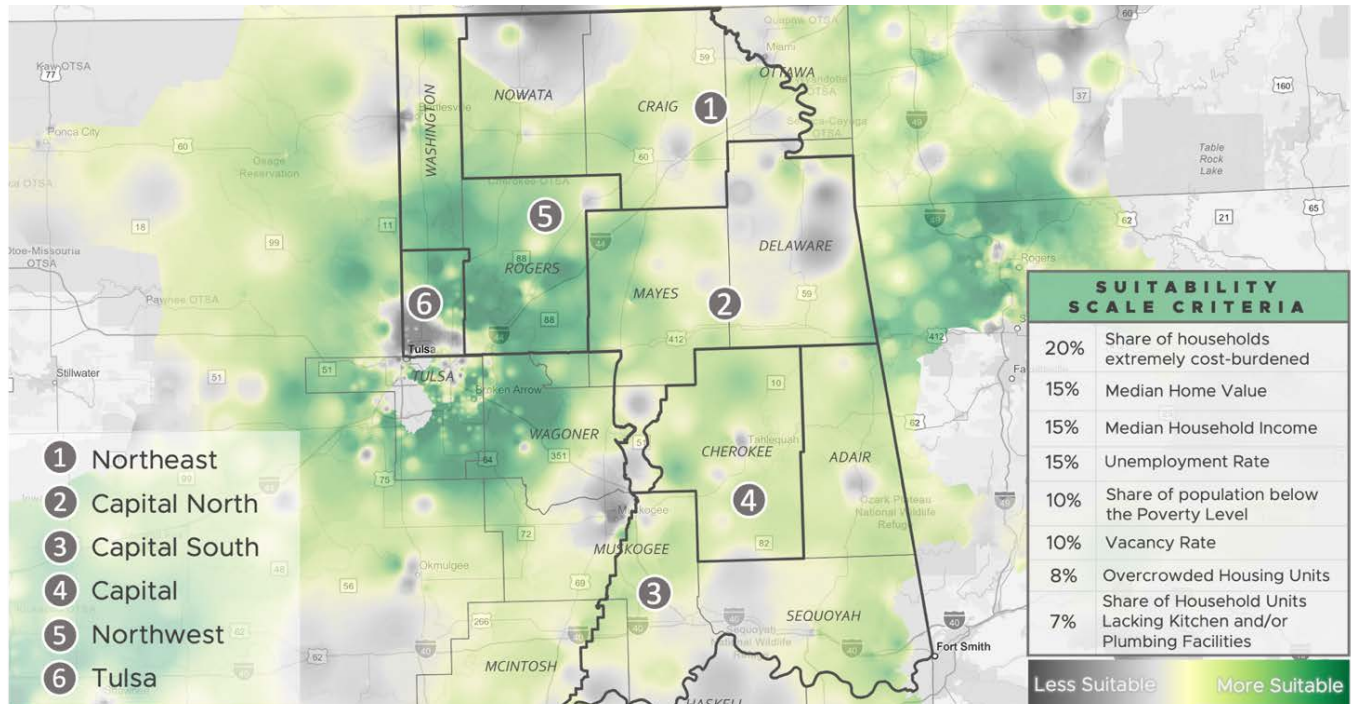
Total general population	AI/AN & mixed-race population
234,800 Housing Units	47,400 Housing Units
74.5% % Single-Family	72.5% % Single-Family
14.1% % Mobile Homes	14.4% % Mobile Homes
68% % Family Households	68% % Family Households
2.56 Avg. Household Size	2.91 Avg. Household Size

**All data listed is for the Cherokee Nation Reservation as mapped in with the dark gray boundary;
 "AI/AN" refers to self-identified American Indian, Alaskan Native, and/or mixed-race responses to Census and related surveys;
 Source: Esri, 2024*

FRAMEWORK FOR ANALYSIS

For the purpose of analysis, the 14-county region was divided into six groups based on their shared demographic profiles, neighboring geographies, housing stock characteristics, and principal centers of economic, cultural, and civic activity. The map below shows the study area along with the county groupings: Northeast, Capital North, Capital South, Capital, Northwest, and Tulsa.

Upcoming sections in this document utilize this framework to discuss demographic, economic and housing trends. The accompanying table summarizes the framework along with a few key trends.



	Counties	Cities	Total Population	AI/AN & Mixed-Race Population Share of Total Pop.	Self-Identified Cherokee Population ¹ Share of AI/AN & Mixed-Race Pop.	Share of Cherokee Nation Citizens ²
Northeast	Craig Nowata Ottawa	Nowata Vinita Miami*	54,080	15,150 28%	9,900 65%	7%
Capital North	Mayes Delaware Wagoner	Pryor Wagoner* Grove	162,380	39,070 24%	29,190 75%	20%
Capital South	Adair Sequoyah Muskogee McIntosh	Sallisaw Muskogee* Muldrow Stillwell	145,030	45,610 31%	25,200 55%	17%
Capital	Cherokee	Tahlequah	47,400	21,220 45%	17,690 83%	12%
Northwest	Rogers Washington	Claremore Bartlesville* Catoosa	148,450	28,747 19%	20,250 70%	14%
Tulsa	Tulsa	Tulsa*	668,920	77,000 12%	37,860 49%	25%

¹ Refers to the proportion of the combined American Indian/Alaskan Native and multi-racial population that identifies as Cherokee based on the 2022 American Community Survey. This figure varies from the total enrolled population reported by the Cherokee Nation.

² Refers to the proportion of Citizens of the Cherokee Nation that live within each county group based on the 2022 American Community Survey.

* City is located entirely or partially outside of Cherokee Nation Reservation.

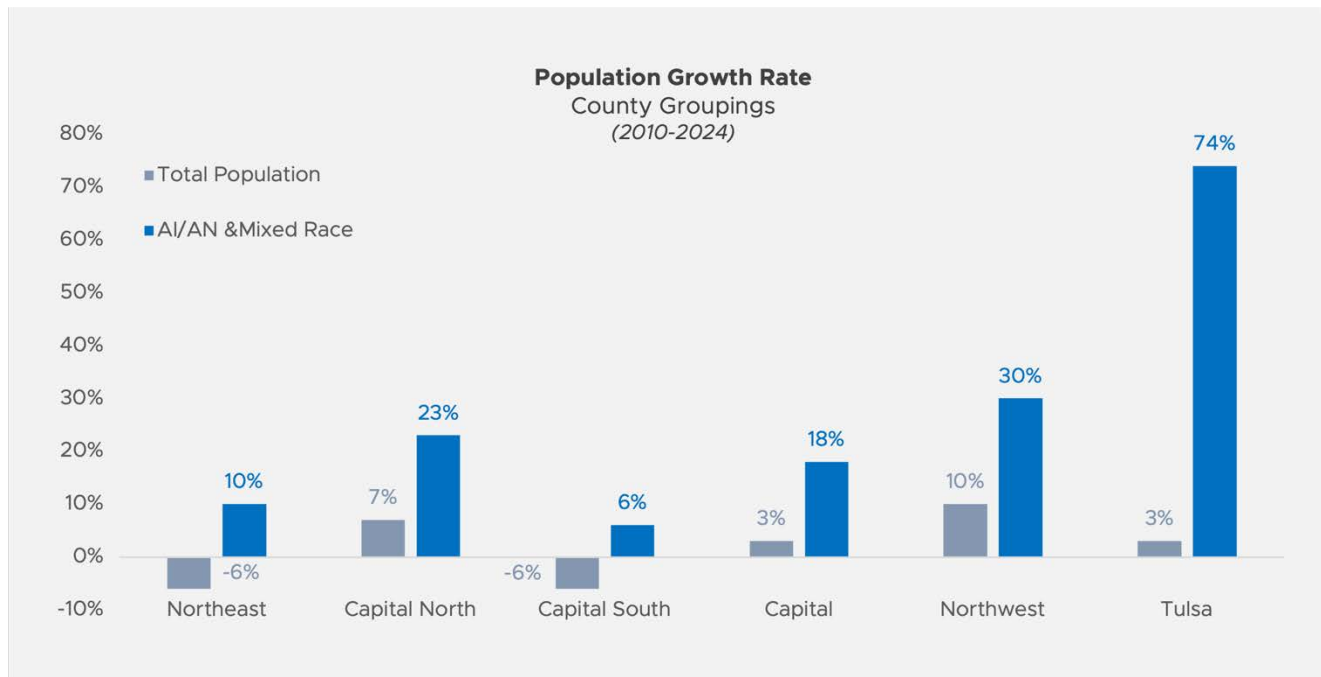
DEMOGRAPHIC TRENDS

Population Growth

The AI/AN and multi-racial populations are among the fastest-growing racial groups in the Cherokee Nation Reservation.

- Population trends for the overall population vary across the Nation, with metropolitan centers experiencing strong growth while rural counties experience population decline. Cherokee Nation’s population has become more urban and suburban in recent years as it has grown, yet continued growth among citizens in rural counties has produced a demographic shift.
- While the Cherokee Nation Reservation’s general population has grown slower (3.3 percent) than the statewide growth (7.2 percent) since 2010, the AI/AN and multi-racial populations have grown much faster, growing 24 percent and 18 percent, respectively.
- Additionally, indigenous persons comprise an increasing share of the rural population in the Cherokee Nation Reservation.

Rural counties are more likely to be vulnerable to declining economic conditions, and their housing stock tends to be in poorer condition. As the indigenous persons population in rural counties continues to grow, there will be a growing need for more housing options for these households. **Proactive strategies are needed to develop new and affordable housing while ensuring the quality and stability of the existing housing stock.**



Household and Household Size

Non-family households are growing more rapidly compared to family households in the Cherokee Nation.

- While non-family households comprise just a third (32 percent) of the 51,000 AI/AN and/or mixed-race households in the Cherokee Nation, its share has grown by three percent since 2010.
- This trend is also shared within the six county groupings, where non-family households are experiencing more growth than family households.
- Further, as per ACS, 2022, the average household size in the Cherokee Nation OTSA is 2.91 persons—a decrease from 3.10 persons in 2010, reflecting the growing share of non-family households in the Nation.
- It is important to note that nearly all 14 counties have larger average household sizes than the Nation. While data considerations should be applied to the ACS numbers to explain this discrepancy (see footnotes), it is likely that AI/AN and multi-racial households are, in fact, larger than average.
- We also analyzed data from the Cherokee Nation’s 2023 children’s clothing assistance program as an additional source for average household size. While not representative of the Cherokee Nation’s population, it provides a direct data point sourced from citizens and suggests larger average household sizes than those indicated by the ACS.

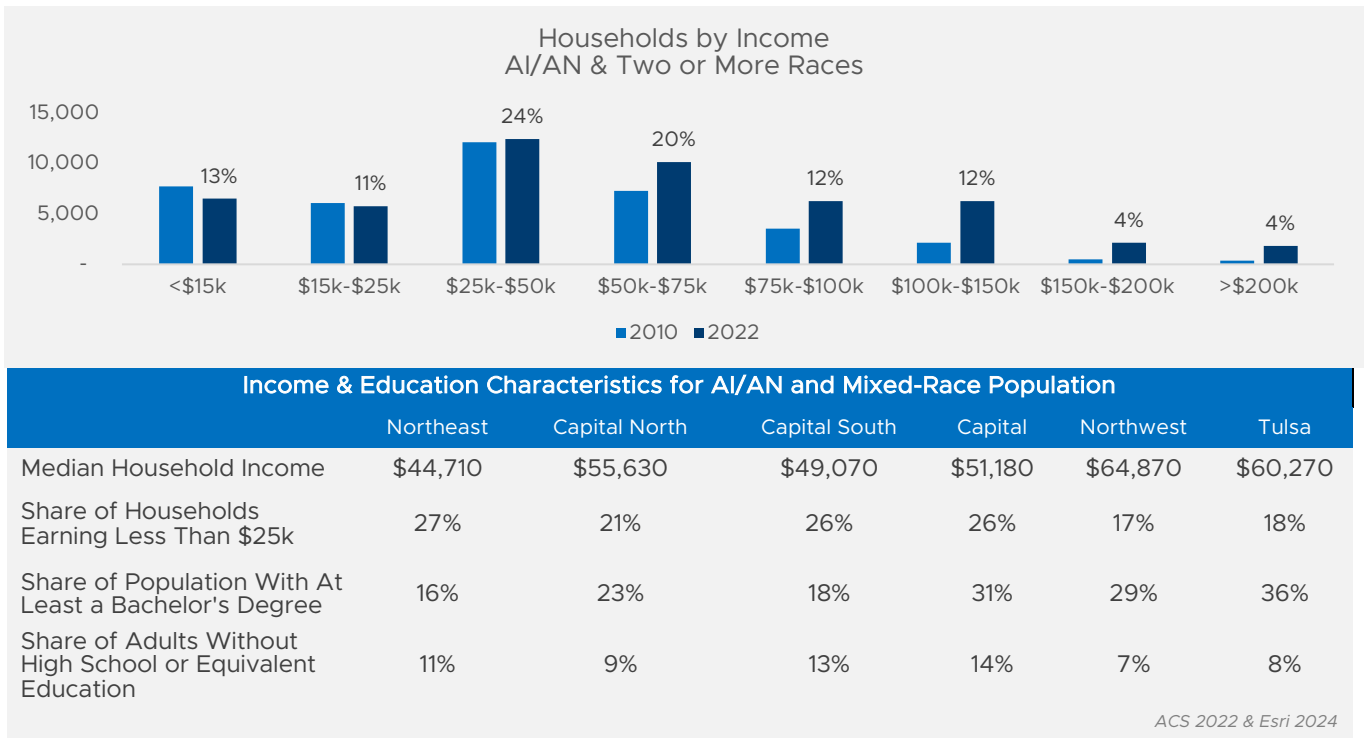
Declines in household sizes and the number of family households suggest **a growing demand for smaller unit types for rental and for-sale housing**. Of consideration, however, is that the older adult population is among the fastest growing and, in response, **households may increasingly seek out multi-generational living arrangements, typically consisting of larger homes or homes with accessory dwelling units (ADUs)**.

Income

Growth in the median household income across the Nation is being driven by increases among moderate- to high-income households, while the number of low- to very low-income households has held steady.

- The median household income for AI/AN and mixed-race households within the Cherokee Nation is \$53,800 (ACS, 2022). While this is six percent lower than that for all households in the Nation’s footprint (\$57,100), it has increased by nearly 50 percent since 2010 when it was \$36,000.¹³
- As shown in the graph below, there is a growing share of households in the Cherokee Nation that earn higher incomes (> \$75,000).
- The median household income varies widely by geography, reflecting a pattern where incomes trend lower in rural regions compared to denser, more urbanized regions. Income trends for each of the six county groupings are summarized in the table below.

The increasing share of higher-income households in the Cherokee Nation indicates a **potentially increasing affordability for market-rate and high-end rental and for-sale housing**; however, the number of residents in **need of affordable and workforce options has remained more or less unchanged** when considering increases in housing costs over the decade. Further, HACN maintains a waiting list of more than 5,000 households for its various housing programs, indicating a **substantial pent-up demand for quality affordable housing**.



¹³ While significant, this gain is only slightly higher relative to what would be expected with inflation. Per the Consumer Price Index, a wage of \$36,000 in 2010 would be equivalent in purchasing power to a wage of \$50,400 in 2023. Of note is that the prices of many essentials—namely, transportation, food, and housing—have risen at rates well exceeding inflation in recent years. See the Consumer Price Index for the most recent YoY price changes by category: <https://www.bls.gov/news.release/cpi.toc.htm>.

Education

The educational attainment of AI/AN and mixed-race populations within the Cherokee Nation has improved significantly since 2010.

- Within the Cherokee Nation, one-fifth of the combined AI/AN and mixed-race population has achieved a bachelor's degree—up from just 14 percent in 2010. Of this, seven percent have attained graduate degrees compared to four percent in 2010.
- Simultaneously, the share of residents that have not completed high school or an equivalent degree declined from 17 percent to 13 percent.

Educational attainment varies between the six county groupings.¹⁴

- The Northeast and Capital South regions have the lowest levels of educational attainment, with 11 percent of adult residents in Northeast and 13 percent of residents in Capital South having not completed high school or equivalency.
- Of the six county groupings, Cherokee County has the second-highest share of residents with graduate degrees (11 percent), behind only Tulsa County (12 percent).
- Tulsa County has the highest share of college-educated residents (36 percent), but the proportion of residents that have not completed high school or equivalent falls in line with those of surrounding regions (eight percent).

Increases in educational attainment may be tied to improved economic opportunity and, potentially, the ability to afford more suitable housing if it is available.

Age

Seniors (ages 65 to 74) and Early Workforce (ages 25 to 34) are the fastest-growing age cohorts in the Cherokee Nation.

- The *Seniors* and *Early Workforce* cohorts have grown 51 percent and 39 percent, respectively, since 2010. Growth was similarly high among *Elderly* (ages 75 and older) and *College Age* (ages 18 to 24) cohorts, increasing 36 percent and 30 percent, respectively.
- Around one-third of the Cherokee Nation's population is under the age of 18. Other prominent age cohorts include the *Family Years* (ages 35 to 49) at 17 percent and *Empty Nesters* (ages 50 to 64) at 15 percent. Despite comprising a significant share of the Cherokee Nation's population, these age cohorts have seen very slow growth since 2010.
- Concurrently, the median age in the Cherokee Nation for AI/AN residents has increased from 29.4 years in 2010 to 31.4 years.

This demographic shift partly explains why the average household size is decreasing and has important **implications for the type and size of housing units needed to meet housing demand**, particularly for culturally-appropriate multi-generational housing that incorporates care for the Cherokee Nation's growing Elder population.

¹⁴ County-level data on educational achievement by race was not available the 2022 ACS; 2024 Esri estimates for the general population are used instead

Poverty and Cost Burden

The rates of housing cost burden¹⁵ and poverty among AI/AN and mixed-race households within the Cherokee Nation are similar to those of the overall population.

- As of the ACS 2022, 20 percent (28,750) of the combined AI/AN and multi-racial population in the Cherokee Nation lived under the Federal Poverty Rate (FPR)¹⁶, down from 22 percent in 2010. Comparatively, 16 percent of the overall population in the Cherokee Nation is under FPR.
- As per National Equity Atlas, among AI/AN households, 18 percent of the owner and 45 percent of the renter households in Oklahoma and 18 percent of the owner and 44 percent of the renter households in Tulsa MSA are cost-burdened. For comparison, among the general population of the Cherokee Nation, 17 percent of the owner and 38 percent of renter households are cost-burdened.

The housing cost burden and poverty levels among AI/AN households within the Cherokee Nation are much lower than national rates.¹⁷ This lower housing cost burden among AI/AN households can be attributed to the **success of rental assistance and rent-to-own programs administered by HACN**. The housing cost burden can be further reduced by **funding the development of more quality affordable units**.

¹⁵ A household is considered cost-burdened if the cost of housing, either rental or for-sale, is equal to 30 percent or more of monthly income. Severe housing cost burden is defined as housing costs equal to or exceeding 50 percent of monthly household income.

¹⁶ The FPR in the contiguous U.S. was \$27,750 for a household of four in 2022. In 2010, the rate was \$22,050 for a household of four. Due to recent high rates of inflation, the 2024 FPR (\$31,200) represents a far greater increase than would be expected based on 2010 to 2022 trends.

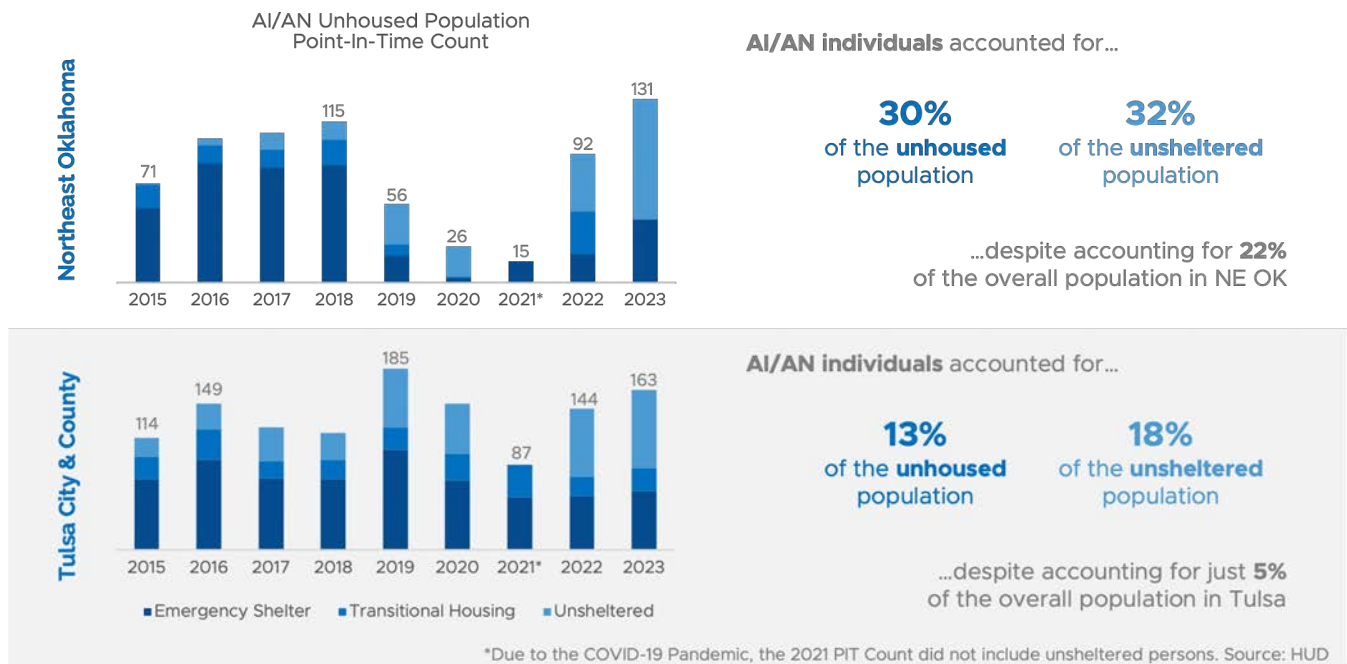
¹⁷ Census data shows that approximately 40-50% of AI/AN households are cost-burdened nationally compared to 30% of the overall population. AI/AN households also have higher poverty rates than the general population, contributing to their likelihood of being cost-burdened. In 2020, the poverty rate for AI/ANs was 25.4%, compared to 13.4% for the overall U.S. population.

Homelessness

For both the Tulsa and Northeast Oklahoma Continuum of Care (CoC)¹⁸, the AI/AN population is overrepresented among the unhoused and unsheltered.

- In Tulsa City and County, the overall unhoused population increased annually from around 960 in 2015 to 1,220 by 2020,¹⁹ then dropping to just 840 in 2022 due to the impact of COVID-era eviction moratoria. Since the pandemic, homelessness rates rose rapidly, with 1,130 persons counted in 2023—the highest growth among which was observed in the unsheltered population. The number of AI/AN unhoused individuals in transitional housing remained unchanged over the period, while the number of persons in transitional housing *decreased*.
- In Northeast Oklahoma, the total unhoused population rose from 340 in 2015 to a peak of 390 in 2018. The count declined to just 55 persons in 2020 before increasing again to 330 by 2023.
- In both Tulsa and Northeast Oklahoma, the unsheltered population has grown at a rate exceeding that of the unhoused population overall. This analysis does not capture unhoused persons living with relatives or friends, which is more common in AI/AN households; one study, for instance, found that 17 percent of AI/AN households surveyed reported hosting another person or persons who would otherwise be homeless. Specific data corresponding to the AI/AN population is highlighted in the graphic below.

Given that AI/AN individuals are already overrepresented in the unsheltered population and transitional housing capacity has not appeared to have improved,²⁰ it may indicate **a growing risk of unsheltered homelessness in Cherokee Nation and Tulsa, specifically—a situation only compounded by increases in the cost of living over the past years.**



¹⁸ Counts of the unhoused population in the Cherokee Nation are sourced from the Tulsa City and County Continuum of Care (CoC) and Northeast Oklahoma CoC, which, combined, serve the 14-county area.

¹⁹ Excludes the 2021 PIT count, as unsheltered persons were not counted due to the Pandemic, per guidance set by HUD.

²⁰ A six-unit transitional housing development in Tahlequah was approved in the summer of 2024. Source: *Tahlequah Daily Press*.

ECONOMIC TRENDS

Employment

Nearly a fifth (22 percent) of the total jobs (170,800) in the Cherokee Nation Reservation are held by AI/AN and mixed-race residents. Additionally, the labor force participation rate for residents over 16 years of age is higher among AI/AN (60 percent) and mixed-race (62 percent) residents than the general population (58 percent).

- Before the Great Recession, employment in the Cherokee Nation Reservation climbed from 168,000 workers in 2003 to a peak of 191,900 workers in 2008. Nearly 7,500 jobs (3.9 percent) were then lost from 2008 to 2009, though employment quickly recovered after that, peaking at 202,300 jobs in 2014.
- Employment held steady at around 200,000 jobs until 2019, when it dipped to 194,000. In 2020, due to the Pandemic and subsequent recession, employment declined to 189,600 jobs. As of the most recent Census data (2021), 186,500 jobs were held by residents of the Cherokee Nation OTSA.
- Around half of the Cherokee Nation’s residents are employed within the Reservation boundaries—a share that has remained relatively steady over the past decade.

Economic opportunity and housing are intrinsically linked. **Job centers like Tulsa, Tahlequah, Pryor, Jay, and Wagoner can benefit from more quality and attainable housing options. Housing investment in these areas will increase Cherokees' access to stable and better-paying jobs.** Additionally, as the Reservation’s rural counties have more challenging economic and housing conditions, focusing on **developing affordable and quality housing in these areas will ensure their economic stability.**

Key employment trends and projections for the six county groupings are summarized in the table below.

Unemployment Trends for AI/AN & Mixed-Race Population						
	Northeast	Capital North	Capital South	Capital	Northwest	Tulsa
Number of Workers <i>(Share of 14-County Workforce)</i>	26,100 <i>(4%)</i>	81,930 <i>(14%)</i>	62,300 <i>(10%)</i>	21,000 <i>(3%)</i>	70,900 <i>(12%)</i>	341,400 <i>(57%)</i>
2020 Unemployment Rate	5.7%	5.6%	6.7%	5.6%	6.0%	6.7%
2023 Unemployment Rate	3.0%	3.3%	4.0%	3.5%	3.1%	3.2%
Job Growth (2015-2023)	5.0%	13.0%	1.0%	11.0%	4.0%	8.0%

BLS 2024

Key Industries

Health care and social assistance and manufacturing are the largest industry sectors for the general population of the Cherokee Nation Reservation, employing 14 percent and 13 percent of the workforce, respectively.

- Relative to the state, the Reservation contains a more significant concentration of “blue collar” positions in manufacturing, construction, and transportation and warehousing.
- Arts, entertainment, and recreation (1,840 jobs added), construction (1,540 jobs added), accommodation and food services (1,400 jobs added), and professional, scientific, and technical services (1,150 jobs added) were among the fastest-growing industries in the Cherokee Nation between 2010 and 2021.
- Simultaneously, significant declines were observed in educational services (loss of 3,580 jobs), manufacturing (loss of 3,140 jobs), and public administration (loss of 1,440 jobs).

Employment opportunities are tied to the ability of households to afford housing—access to good paying jobs substantially improves housing stability.

Occupations, and Wages

The combined AI/AN and mixed-race workforce accounts for the majority of employment growth within the Nation, growing by 31 percent—from 48,250 workers in 2010 to 63,360 workers in 2022.²¹

- Among AI/AN and multi-racial workers in the Nation, the fastest-growing occupations are sales and related occupations (2,630 jobs added), community and social service occupations (1,490 jobs added), and production occupations (1,430 jobs added).
- As of the most recent data (May 2023), the median annual wage is \$37,600 (NE OK) and \$43,100 (Tulsa MSA).²²
- Occupations more commonly held by AI/AN and multi-racial residents that have exhibited strong recent growth tend to have sub-median wages. For example, the median wage for sales and related occupations is \$28,800 (NE OK) and \$34,000 (Tulsa MSA); for an individual to earn that wage and not face housing cost burden, an affordable rent would be between \$720 to \$850 and for-sale price from \$86,000 to \$102,000.
- Wages are slightly higher for the other growing sectors. Community and social service positions have a median wage of \$43,900 (NE OK) and \$47,100 (Tulsa MSA), translating to affordable rent of \$1,100 to \$1,180 and for-sale price of \$132,000 to \$141,000. Production occupations provide median wages of \$38,900 (NE OK) and \$44,700 (Tulsa MSA). Affordable rents for these positions range from \$970 to \$1,120 and for-sale price from \$117,000 to \$134,000.

The growing sectors noted above added more than 5,500 jobs since 2010, and their prevailing wages have important implications on housing demand. **The median wages indicate substantial need for affordable and moderately-priced workforce housing.**

²¹ ACS 2022

²² The BLS publishes occupation and wage statistics for all occupational sectors in the Northeast Oklahoma nonmetropolitan area (NE OK) and the Tulsa MSA. Combined, these two areas include all counties in the 14-county area, as well as Okfuskee County (NE OK) and Creek, Okmulgee, Osage, and Pawnee counties (Tulsa MSA).

Projected Job Growth

Occupations with strong projected growth in the region tend to pay wages at the lower end of the distribution.

- The Northeast Oklahoma nonmetropolitan area is projected to add 11,600 jobs from 2020 to 2030, growing total employment by about ten percent. Employment in the Tulsa MSA is expected to grow by 40,500 positions, or nine percent.²³
- In both regions, the occupations with the highest projected net increases are restaurant cooks, home health and personal care aides, fast food and counter workers, and restaurant servers. Across the Northeast nonmetropolitan area and Tulsa MSA, these four occupational groups combined are expected to add a total of 9,250 jobs by 2030.
- Other leading occupations in Northeast nonmetropolitan area are in the healthcare sector and include registered nurses, nursing assistants, and medical and health service. These occupations are projected to grow in Tulsa as well, alongside positions in retail sales, food preparation, and manufacturing.

Workforce housing development in the region needs to target affordability levels that are attainable for the individuals and households that will occupy these growing jobs over the coming decade.

²³ The Oklahoma Employment Security Commission

HOUSING SUPPLY

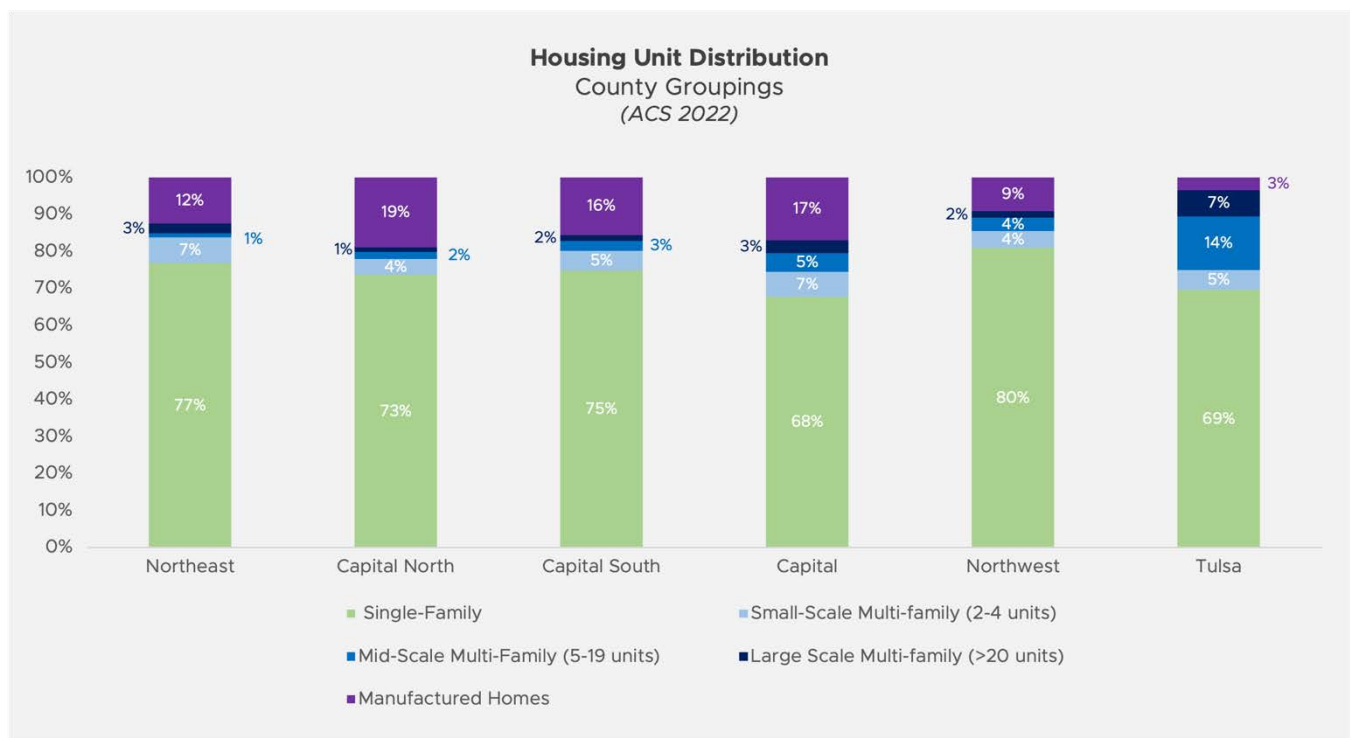
CURRENT SUPPLY

Distribution by Typology

When compared to the general population, AI/AN and mixed-race households in the Cherokee Nation are less likely to reside in single-family dwellings and are more likely to reside in units in multi-family structures with fewer than five units or manufactured homes.

- The Cherokee Nation contains a total of 193,500 housing units, of which 47,700 (25 percent) are occupied by AI/AN and mixed-race households.
- While majority of the AI/AN occupied housing stock is detached, single family units (74 percent), it is a lower share compared to the detached, single-family stock occupied by general population (76 percent).
- Multi-family units account for 10 percent of the AI/AN and mixed-race occupied housing units, of which half are within smaller properties, containing two to four units. Though the share of multi-family units in the housing stock occupied by the general population is the same (10 percent), majority of these units (60 percent) are in larger properties containing more than 5 units.
- Mobile homes make up a substantial share (14 percent or 6,900 units) of the AI/AN and mixed-race occupied housing stock, higher than the share of mobile home within the housing stock occupied by general population (12 percent).

The distribution of housing units by typology for the six county groupings is depicted in the graphic below.

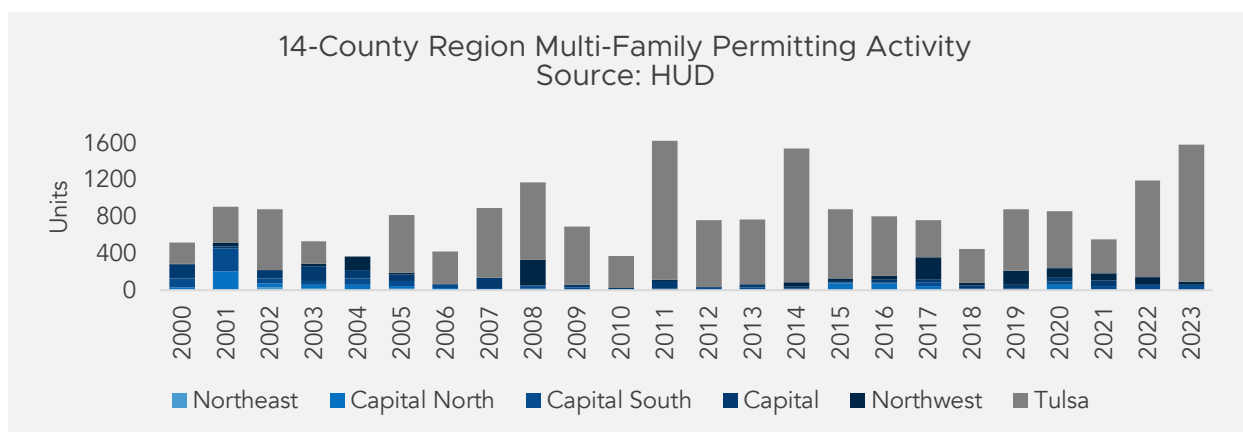
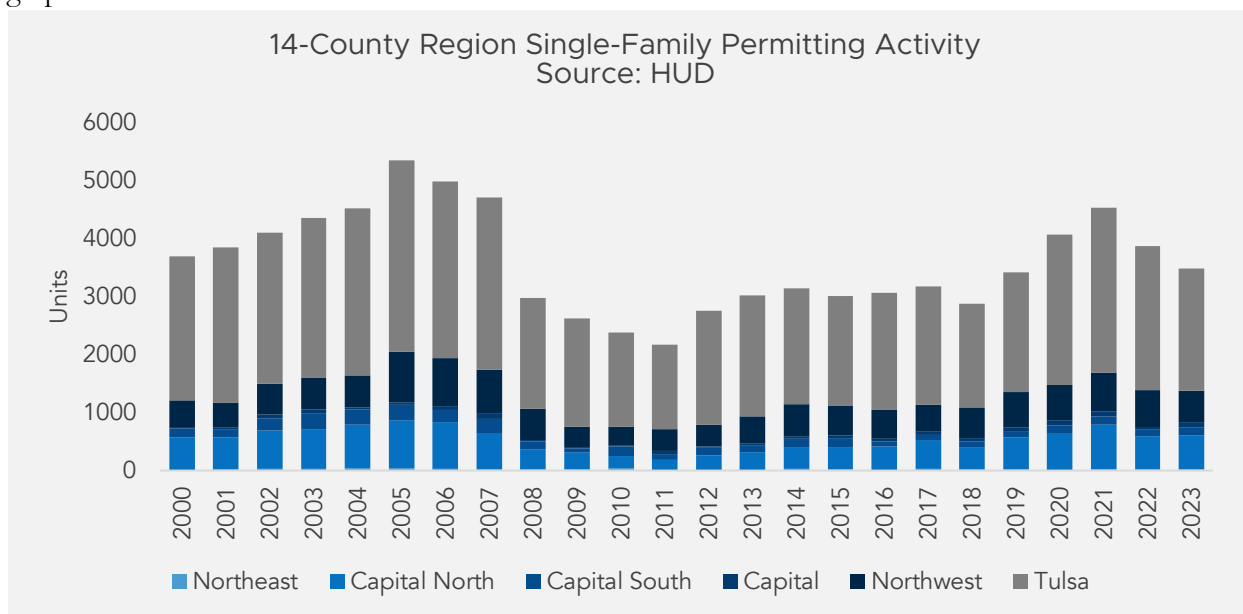


Permitting Activity

For the combined 14 county region, single-family permitting activity²⁴ climbed steadily in the early-2000s, peaking at 5,350 units permitted in 2005. Activity then declined year-over-year, with a large drop at the onset of the Great Recession, and reached a low of just 2,170 units permitted in 2011. **Permitting has not returned to pre-Recession levels, which is one of the factors contributing to the current housing challenges.**

Multi-family permitting activity fluctuated substantially year-to-year and actually increased during and following the Great Recession compared to the prior decade. **From 2000 to 2009, single-family comprised 85 percent of permits compared to 78 percent from 2010 to 2023.**

Permitting trends for the six county groupings for single-family and multi-family units are summarized in the graphs below.



²⁴ There are two important limitations to housing permitting data: First, data is not available for the Cherokee Nation geography as a whole—it is sourced at the county level. Second, this data only tells us the types of units that are permitted for construction. It does not tell us who lives in the units (i.e., if AI/AN and mixed-race households are occupying a proportional fair share of new units) and when they are completed.

Single-Family Trends

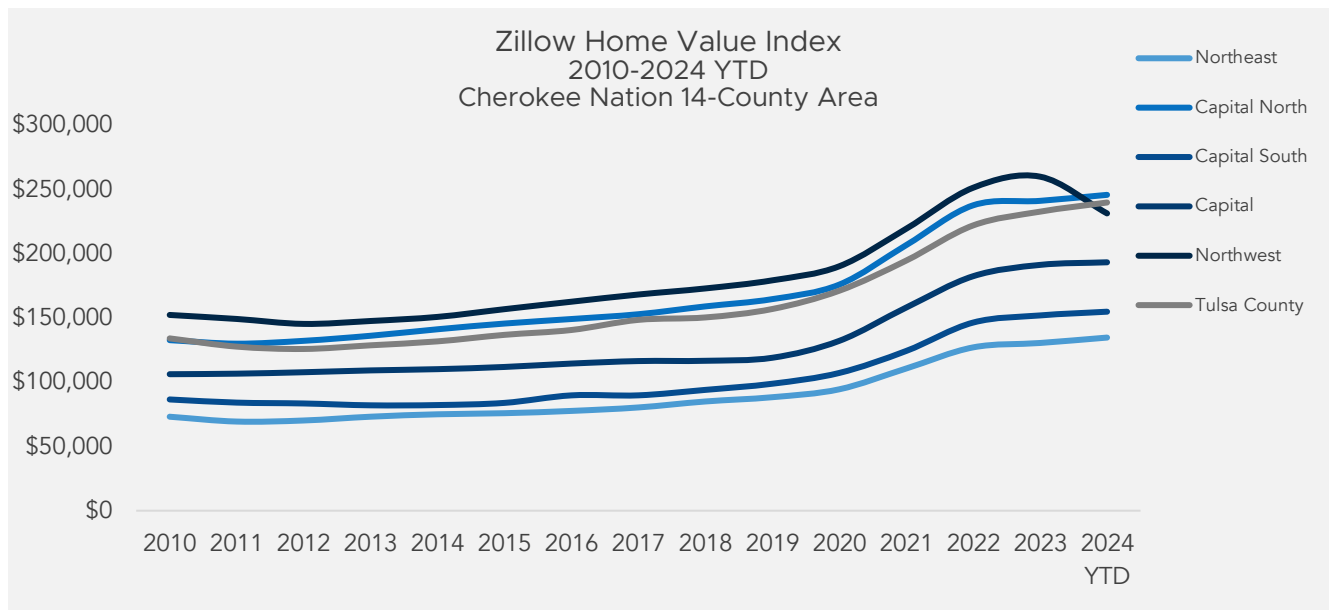
The estimated median home value in the Cherokee Nation (\$223,100) is not affordable for 68 percent of Cherokee Nation citizen households.

The 2022 ACS indicates that the average home value for all households in the Cherokee Nation is \$153,800, while the average home value for AI/AN and mixed-race households is \$134,300²⁵ (13 percent less).

The Zillow Home Value Index²⁶ reports a weighted average single-family home value of \$223,100 as of August 2024 for the 14-county region.

- **Tulsa County** has an average home value of \$239,500, increasing 79 percent since 2010 and 53 percent since 2019.
- The average home value in **Capital South** is lower (\$154,700), though it has appreciated at similar rates, increasing 79 percent since 2010 and 57 percent since 2019.
- **Capital North** has both the highest average home value (\$245,500) and rate of appreciation since 2010 (85 percent).
- The average home value in the **Northwest** region (\$231,000)²⁷ is similar to Tulsa's, yet it has the lowest rates of appreciation, increasing 52 percent and 29 percent since 2010 and 2019, respectively.
- In the **Capital Region**, Cherokee County has the highest rate of recent appreciation, with the average home value having risen 62 percent in the last five years alone, reaching the current average value of \$193,100.
- **Northeast** has the lowest average home value at \$134,600, though appreciation since 2010 was still strong (84 percent).²⁸

With high appreciation rates over the past several years, **home price increases have outpaced income increases, further exacerbating the housing affordability challenge.**



²⁵ ACS data is subject to a two-year time lag at the time of writing and, therefore, represents a low estimate for home values. Hence, these averages are used solely to compare the across the relevant racial cohorts.

²⁶ The Zillow Home Value Index (ZHVI) captures the median home price for homes sold between the 35th to 65th percentile of the sale price distribution for a county.

²⁷ The average value in Rogers County (\$268,600), which is part of the Tulsa MSA, is nearly exactly \$100,000 above that of Washington County (\$168,400), not in the Tulsa MSA.

²⁸ Craig County, specifically, has some of the oldest housing stock in the Cherokee Nation: 15 percent of units were built before 1939 and just 16 percent were delivered in the 21st century. Yet, the county had the highest rates of appreciation in the Nation, with the average home value having risen 114 percent since 2010 and 65 percent over the past five years to a current average of \$162,900.

Recent Sales

According to Redfin, over the past two years, single-family home sales were concentrated in Tulsa County, with smaller clusters in Bartlesville, Claremore, Tahlequah, and Grove.

- The median home sale price was \$175,000 for an average-sized home of 1,464 square feet (\$119.54 per square foot).
- Most homes were priced between a low of \$105,000 to a high of \$280,000.
- Less than ten percent of homes sold for under \$60,000 or above \$400,000.
- The median year built was 1978—nearly equivalent to the median nationally (1979)—and the majority dated from 1955 to 2003.
- Most homes were between 1,100 to 1,900 square feet, with less than ten percent being smaller than 900 square feet or larger than 2,500 square feet.

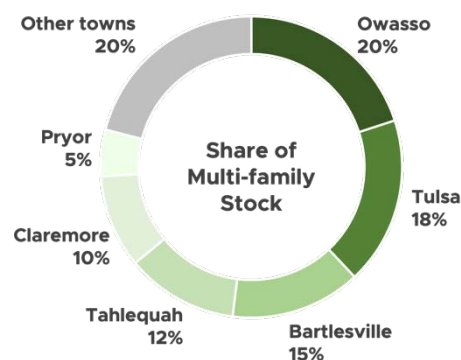
Recently-sold homes were primarily 1,000 to 2,000 square feet, suggesting that the small to mid-sized homes often referred to as “missing middle housing” are in strong supply in the market. **This suggests an underserved market for homes above 2,000 square feet to serve large families and below 1,000 square feet to serve individuals, couples, and elders.** Demand for smaller-scale housing will be particularly acute in rural areas that lack multi-family stock, which traditionally serve these markets.

Multi-Family Trends

According to CoStar, the Cherokee Nation contains 19,290 professionally-managed multi-family units²⁹ across 408 properties.³⁰ This is nearly 21 percent of the total units (90,970) within the 14-county region.

- Nearly 2,420 multi-family units were added since 2010, growing the supply by 14 percent.
- The average asking rent in the Cherokee Nation is \$881.
- In the past decade, the average rent has risen 27 percent, and much of this rent growth has occurred since 2019.

Multi-family housing is concentrated in the Nation’s largest towns and metropolitan centers, with shares depicted in the graphic below.



Market-rate development accounts for 61 percent of total units (9,940). Affordable units in the region include low-income housing tax credit units, USDA rural development units, and properties operated by local housing authorities. There are 5,810 affordable and 450 mixed-income units. HACN operates 1,067

²⁹ Figure includes units in manufactured/mobile home parks.

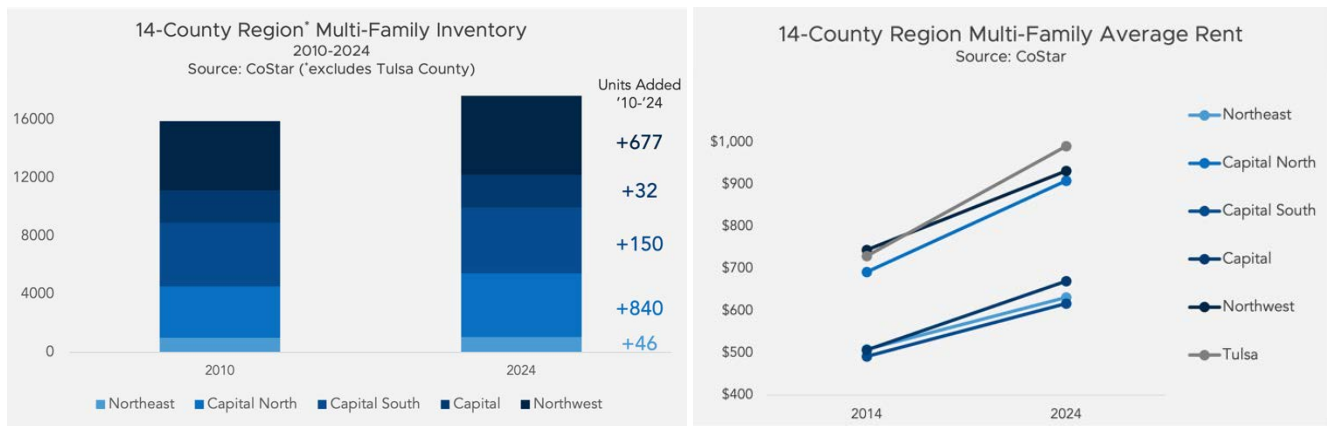
³⁰ CoStar provides current and historic market data on commercial real estate, which includes multi-family properties. CoStar most-readily captures data from actively-marketed, newer, professionally-managed market rate developments in primary markets and often does not include smaller, older, and non-professionally-managed developments, including many operated by non-profit or governmental organizations. Consequently, there is a gap between the total units reported by CoStar, HUD, and the Census Bureau.

rental units, which are primarily rented at a rate equal to 30 percent of the occupant household’s income up to 50 percent of the Fair Market Rent.

Key observations about the multi-family supply in the Nation:

- The most common type of developments are low-rise, garden-style properties, duplex properties, along with a handful of high-rise developments near Tulsa.
- The majority of the stock (64 percent) is comprised of Class C units, with the remainder primarily in Class B units.³¹ This indicates that the multi-family stock is generally older and may be in need of significant maintenance and repairs.
- The current vacancy rate (seven percent) has remained relatively stable over the recent decade, fluctuating from a high of 8.1 percent in 2016 to a low of 4.8 percent in 2022.³² This falls within the desirable vacancy rate and suggests a strong market with adequate demand pipeline.

Multi-family trends for inventory and rents for the six county groupings are depicted in the graphics below.



Affordability appears to be the primary challenge in Tulsa, Northwest, and Capital North, which benefitted from housing production rates, but have also seen rapid rent appreciation; in contrast, Capital South, and Northeast have weaker markets that are comparatively more challenged by less development activity and aging stock.

Capital North and Capital face both challenges to a certain extent: the two regions have added many units in recent years and endured high rates of appreciation, yet maintain sizable shares of residents living in manufactured homes.

³²A vacancy rate of around five percent is generally considered stable and desirable for multi-family stock.

Manufactured Housing

Per CoStar, there are 53 manufactured home parks with a total of 2,870 units in the Cherokee Nation, accounting for 14 percent of the Nation's multi-family stock.³³ The average asking rent is \$711, or \$0.84 per square foot, up from \$635 (\$0.75 per square foot) in 2014. No new mobile home parks have been constructed since 2008.

Data on manufactured home sales from the past two years were sourced from Redfin.³⁴

- Compared to single-family home sales, manufactured home sales were more evenly spread throughout the Nation's geography. However, clusters appeared around large bodies of water, particularly the Neosho River, Tenkiller Ferry Lake, and the Arkansas River; this cluster may indicate that some of these properties are utilized as secondary or vacation homes or homes of Cherokees, reflecting the cultural value of living alongside water.
- Few manufactured homes were sold in the Tulsa area, where zoning has not allowed new manufactured home developments for many years, while small concentrations appeared on the outskirts of Bartlesville, Wagoner, Tahlequah, Grove, and Nowata.
- The median sale price was \$89,000 at a median size of 1,280 square feet (\$69.70 per square foot), with most sales falling between \$58,000 and \$140,000.
- Fewer than ten percent of manufactured homes were sold for under \$40,000 or for above \$200,000, respectively.
- Relative to single-family homes, manufactured homes trend on the smaller side, from 1,000 to 1,700 square feet, and are newer, at median age of 28 years old (built 1996).
- Fewer than ten percent of manufactured homes sold within the last two years were built prior to 1975; that said, the 90th percentile year built for manufactured homes (2013) is older than that of the recently-sold single-family stock (2018), despite the relatively short lifespans of manufactured homes.³⁵

Manufactured housing is the primary attainable option for Cherokee Nation households in the private housing market. The concern around mobile homes comprising such a large share of the local housing stock is based on the idea that **these properties tend to depreciate** (or appreciate at rates far slower than single-family stock) **and have relatively short lifespans**. There are also **substantial challenges with the quality and condition of mobile and manufactured homes built before the 1980s**. That said, **well-maintained, high-quality, and responsibly managed manufactured homes are viable options for housing development in the future, particularly in sparsely-populated rural communities**.

³³ According to the ACS, in the Cherokee Nation there are 23,670 units in manufactured homes, of which the minority (6,470) are rental units. The disparity between CoStar and the ACS suggests that a large proportion of manufactured homes are not contained within mobile home communities.

³⁴ Manufactured homes in the Cherokee Nation were often sold alongside significant acreage of unimproved land. To avoid capturing such land sales, this analysis includes solely manufactured housing sold on lots less than one acre in size.

³⁵ There is a lack of clear data on the lifespan of mobile homes and, as with site-built properties, their lifespan will depend heavily on how they are maintained. The earliest manufactured homes date to the 1940s and were designed to last only a decade. In 1976, HUD imposed stricter quality control regulations on mobile homes, which has greatly increased their lifespans. Generally, a mobile home built after 1976 is (and was) expected to last 30 to 50 years, though this lifespan can stretch longer if the property is well-maintained. (Source: *Forbes, Lev, Inc.*).

Age of Housing Stock

Throughout the Nation, renter-occupied housing is generally older³⁶ than owner-occupied units: about seven percent of rental units were constructed pre-World War II compared to five percent of owner units.

- Six percent of units in **Tulsa County** were constructed pre-World War II. Development increased in the 1950s through 1980s and peaked in the 1970s (21 percent of all units). Like the other geographies, development slowed in the 1990s through 2000s (20 percent); that said, recent development has been strong, with 10 percent of units constructed from 2010 to 2019. From 2020 to 2022, 1,085 units were delivered in Tulsa County.
- **Northeast** has a comparatively large share of older stock, with 12 percent of units dating to before World War II. A further 30 percent of existing units were built from 1940 to 1969. As with the Nation overall, the 1970s was a peak decade for construction (18 percent), followed by sustained construction in the 1980s (12 percent) and 1990s (12 percent). This trend slowed thereafter, as just 16 percent of units were constructed within the new millennium.
- Just five percent of **Capital North's** stock was constructed pre-1950. Housing development peaked in the 1970s and 2000s, adding 19 percent and 21 percent of stock, respectively. Over 12 percent units were constructed from 2010 to 2022.
- **Northwest** has some of the newest housing stock in the Nation, as 24 percent of units date to the 2000s and 15 percent were constructed since 2010. A previous development peak occurred in the 1970s (18 percent), sustained throughout the 1980s (13 percent) and 90s (14 percent). As a result, just 16 percent of housing is upwards of 65 years old.
- Nearly half (48 percent) of properties in **Capital South** date to the 1970s and 80s, while a further 27 percent are from 1990s to 2000s. About 10 percent of units were constructed prior to 1950 and a roughly equal proportion (11 percent) was delivered within the last decade.
- **Capital** (Cherokee County) has a small pre-war stock, corresponding with four percent of units. Like the Nation, a significant share of housing was developed from the 1970s through the 1990s, at a total of 49 percent of the stock. The county saw relatively strong activity in the 2000s (18 percent), which then slowed in the 2010s (10 percent). About 200 units (one percent) were constructed in the first two years of the 2020s.

Cherokee Nation citizens are more likely to live in housing typologies that skew older (namely small-scale multi-family properties) and comprise larger shares of the overall population in geographic areas containing aged housing stock.

³⁶ Data on the age and condition of the housing stock disaggregated by the race of the householder is not available for the Cherokee Nation and its 14-county area. Instead, data for the general population from the 2022 ACS is analyzed.

HOUSING CONDITIONS

Plumbing and Kitchen Facilities

Housing conditions vary extensively by geography and more rural counties with older housing stock tend to see higher rates of inadequate facilities.

- In the Cherokee Nation Reservation, an estimated 1,470 renter units (0.9 percent) and 820 owner-occupied units (0.6 percent) lack complete plumbing facilities—both of which are well above the rates in the U.S. for rental units (0.6 percent) and owner-occupied units (0.3 percent).³⁷
- A much larger share of renter households (2.6 percent) lacks complete kitchen facilities, both when compared to owner households in the Nation (0.6 percent) and renter households throughout the United States (1.5 percent).
- In the Northeast Region, kitchen facilities are lacking in 3.7 percent of rental units and 1.1 percent of owner-occupied units. Craig County, specifically, has a high rate of inadequate rental housing, with 7.8 percent of rental units' lacking complete kitchen facilities.

Across the United States, **AI/AN households tend to have far more elevated rates of inadequate housing facilities than the general population.** According to the most recent housing needs assessment of AI/AN households living in tribal areas,³⁸ dated to 2017, 5.6 percent AI/AN households living in Tribal Areas lacked adequate plumbing facilities and 6.6 percent lacked complete kitchen facilities. For comparison, 1.3 percent and 1.7 percent of all housing units in the United States lacked complete plumbing and kitchen facilities, respectively, rates of which are also much lower than the estimates from the 2022 ACS for the Cherokee Nation.

Housing conditions among Cherokee Nation citizens are likely better than those of other tribal nations, but the problems that impact AI/AN housing stock also pose challenges in the Nation.

³⁷ ACS data on housing conditions is available only for all households and is not disaggregated by the race of the householder.

³⁸ Pindus et al. (2017)

Overcrowding

Overcrowding is more common among Nation citizens relative to the general population. Of the 51,040 housing units occupied by AI/AN and mixed-race householders, 2,400 units (five percent) house more than one person per room and are, therefore, considered overcrowded—a higher share compared to the general population (three percent).

- Renters in the Nation’s 14-county service area tend to face heightened rates of overcrowding³⁹ when compared to owners. Renters in the **Capital South** region have particularly high rates of overcrowding at seven percent of all households. Other regions with high rates of renter overcrowding are **Capital North** (5.5 percent), **Tulsa** (4.4 percent), and **Northwest** (4.2 percent).
- Among owners, the highest rates of overcrowding are in the **Capital** region (2.6 percent of households) followed by **Capital North** (2.4 percent).

For all regions, **condition challenges are higher among renter households** compared to owner households, as rental units skew older. This trend indicates that a significant portion of the rental stock on the private market may be inadequately maintained. **The Northeast region stands out as having particularly poor housing conditions**, compounded by low household incomes, aged housing stock, and slow economic growth. The area also has a large share of renter households, which are already more likely to face poor housing conditions than owners.

³⁹ Racially-disaggregated data on overcrowding at the county level is not available. Instead, numbers for all households are used and, therefore, likely under count the true rate of overcrowding among Cherokee Nation citizens.

CONCLUSIONS

The Cherokee Nation Reservation spans at least a portion of 14 counties in northeast Oklahoma and includes a diverse mix of rural, suburban, and urban places. Housing conditions, costs, and opportunities also vary across the geography. Key conclusions of this study include:

- There is a need for more than 8,800 housing units of all types and price points over the next ten years to provide safe, decent, and affordable housing for Cherokee Nation citizens.
- Much of that need is driven by pent-up demand—approximately 6,000 to 6,500 housing units are needed to reduce housing cost burden, eliminate overcrowding, improve housing conditions, and ensure that all Cherokees have access to attainable housing.
- The cost to develop all of the needed units is estimated to be more than \$1.75 billion, although more than two-thirds of that amount could be covered by traditional private sources. The remaining \$550 to \$650 million (i.e., the development gap) will need to be raised from a variety of sources, including Cherokee Nation funds and programs, LIHTCs, USDA rural development programs, outside philanthropic funds, and others.
- The cost to meet the pent-up demand is estimated to be more than \$1.3 billion and the development gap is estimated to be \$530 million.
- Much of this need is driven by substantial underfunding of housing production for decades.
- Cherokees are more likely to live in substandard housing and in overcrowded homes than the general population in the Reservation.
- HACN currently maintains a wait list of more than 5,000 households for its various housing programs, demonstrating the substantial need for new and expanded housing efforts.

APPENDIX

HOUSING DEMAND METHODOLOGY NOTES

Due to data challenges previously discussed, it is important to understand the process in which the model was built:

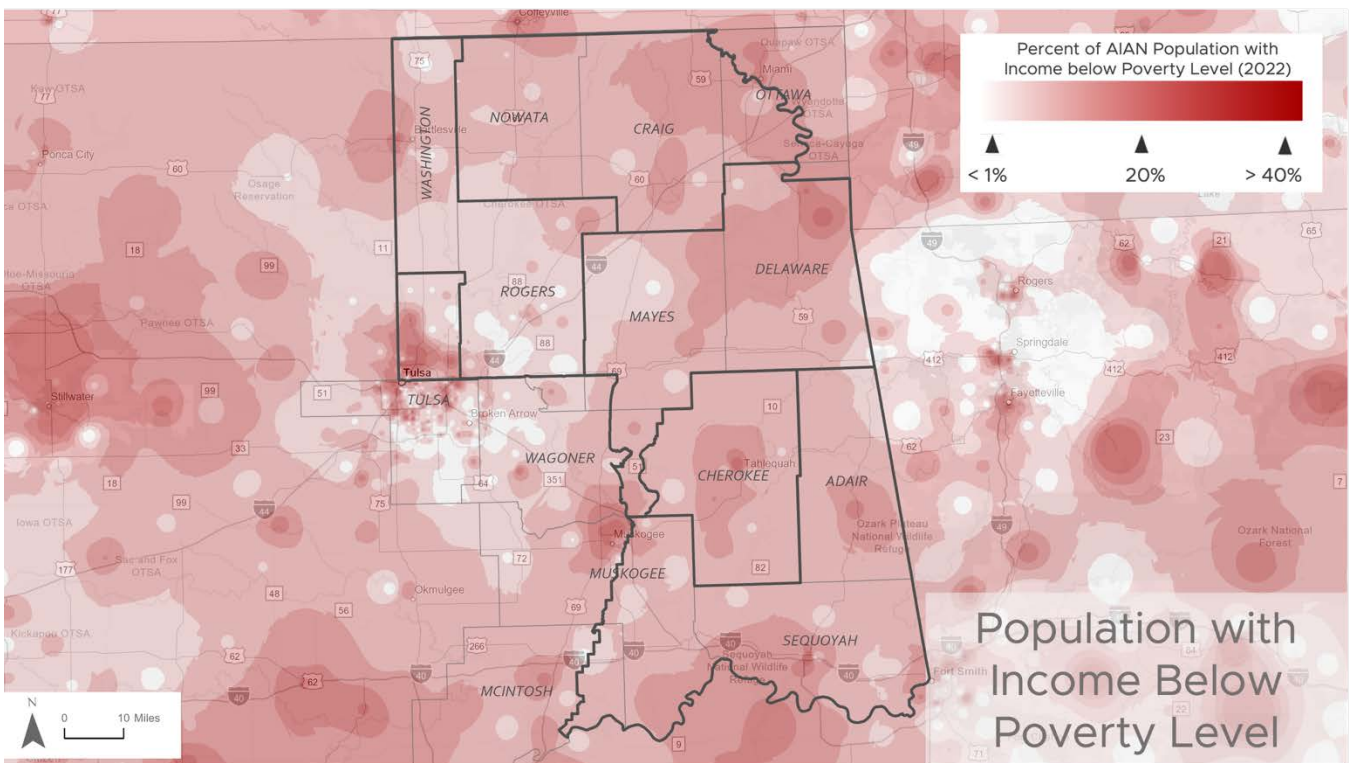
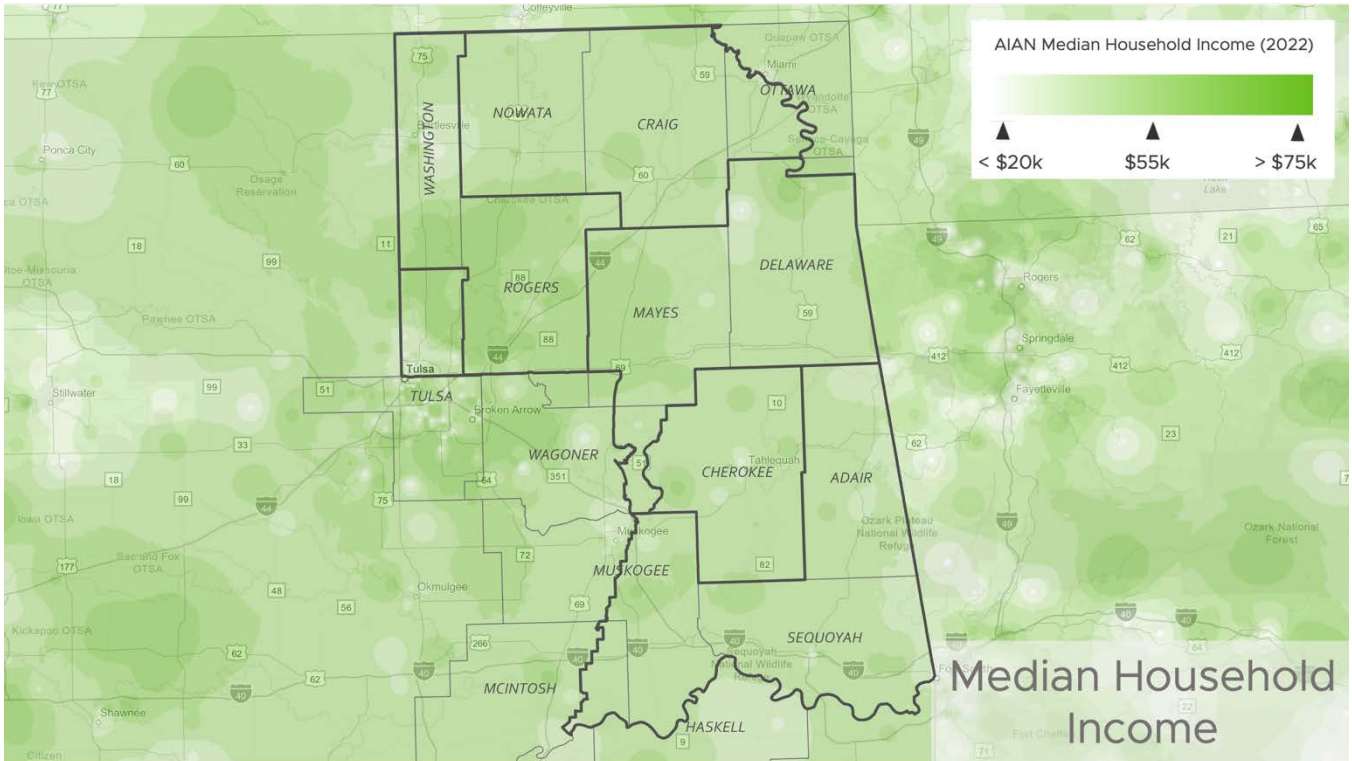
- A layered approach was taken when analyzing trends around population, household growth, household incomes, average household size, housing tenure, housing conditions, vacancy rates, and other key data points and trends.
- Using Census, American Community Survey, Esri, and other data sources, first an analysis of the overall demographic and housing trends of the general population was conducted.
- This was followed by another analysis of population and household trends for the AI/AN and mixed-race population in each county. This stage in the data analysis, informed the six groups formed within the Reservation.
- At this point in the process, institutional data from Cherokee Nation was incorporated into to the analysis of population, household, household size, and income level data obtained from other sources.
- This iterative approach helped build a stronger understanding of the differences—and the implications of these—between counties and between Cherokees and the general population.
- A housing demand model was built for each subarea within Cherokee Nation.
- The housing demand for the entire Cherokee Nation Reservation is a sum of the demand for the six county groupings.

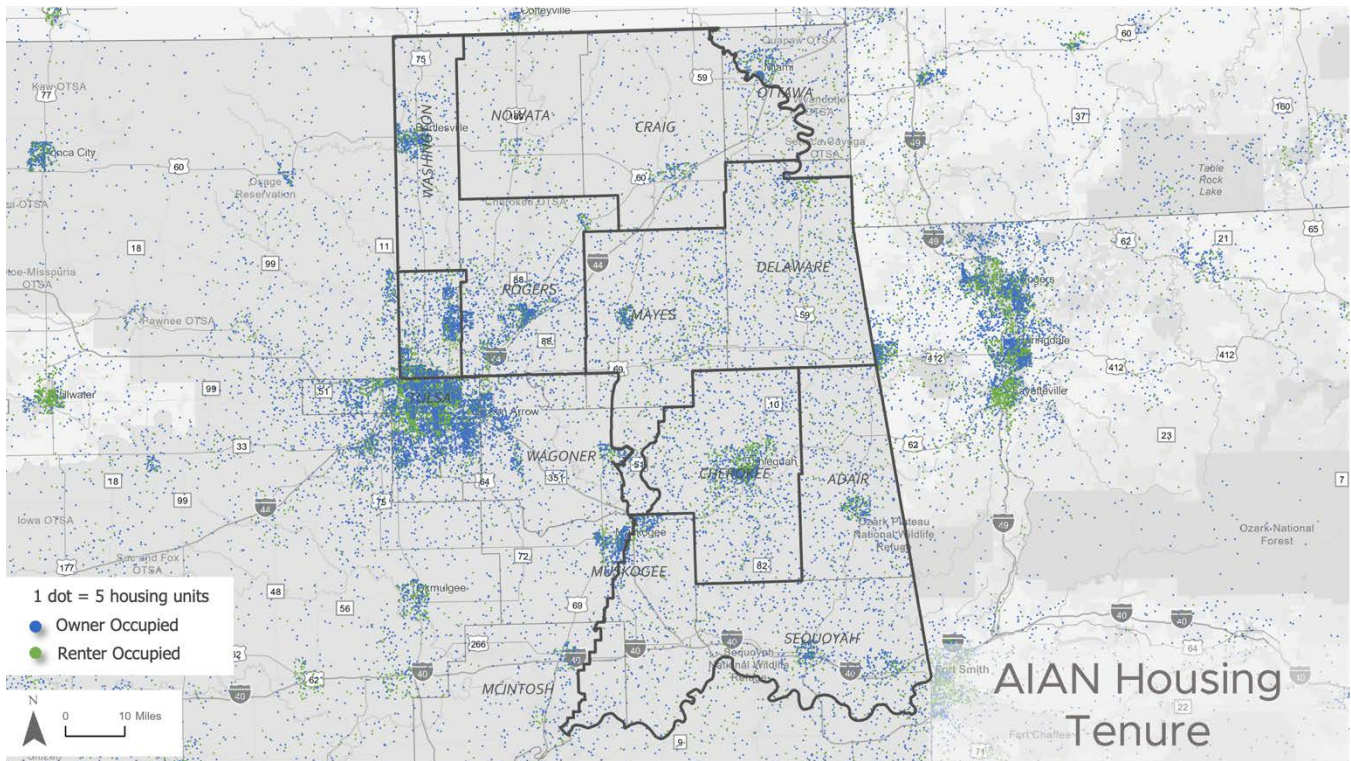
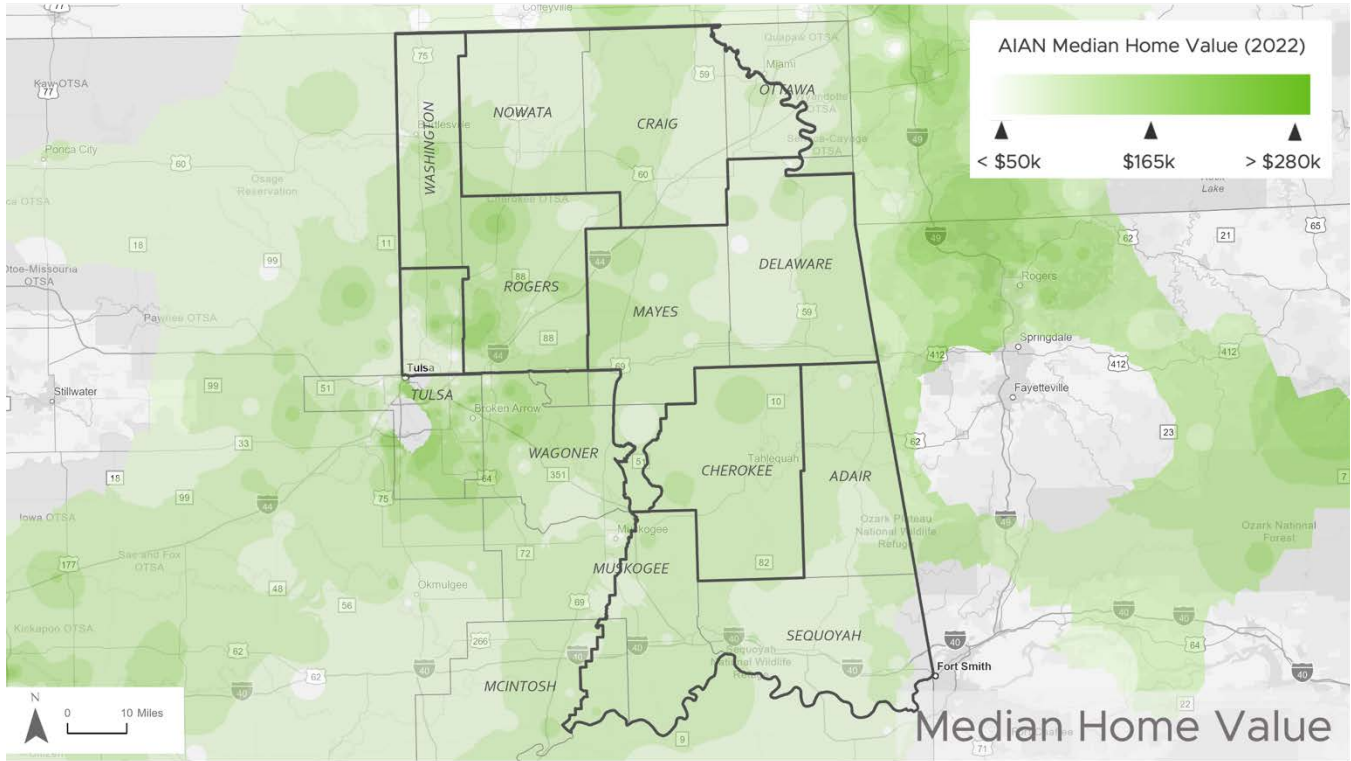
In addition to the data analysis process, these calculations include other important considerations:

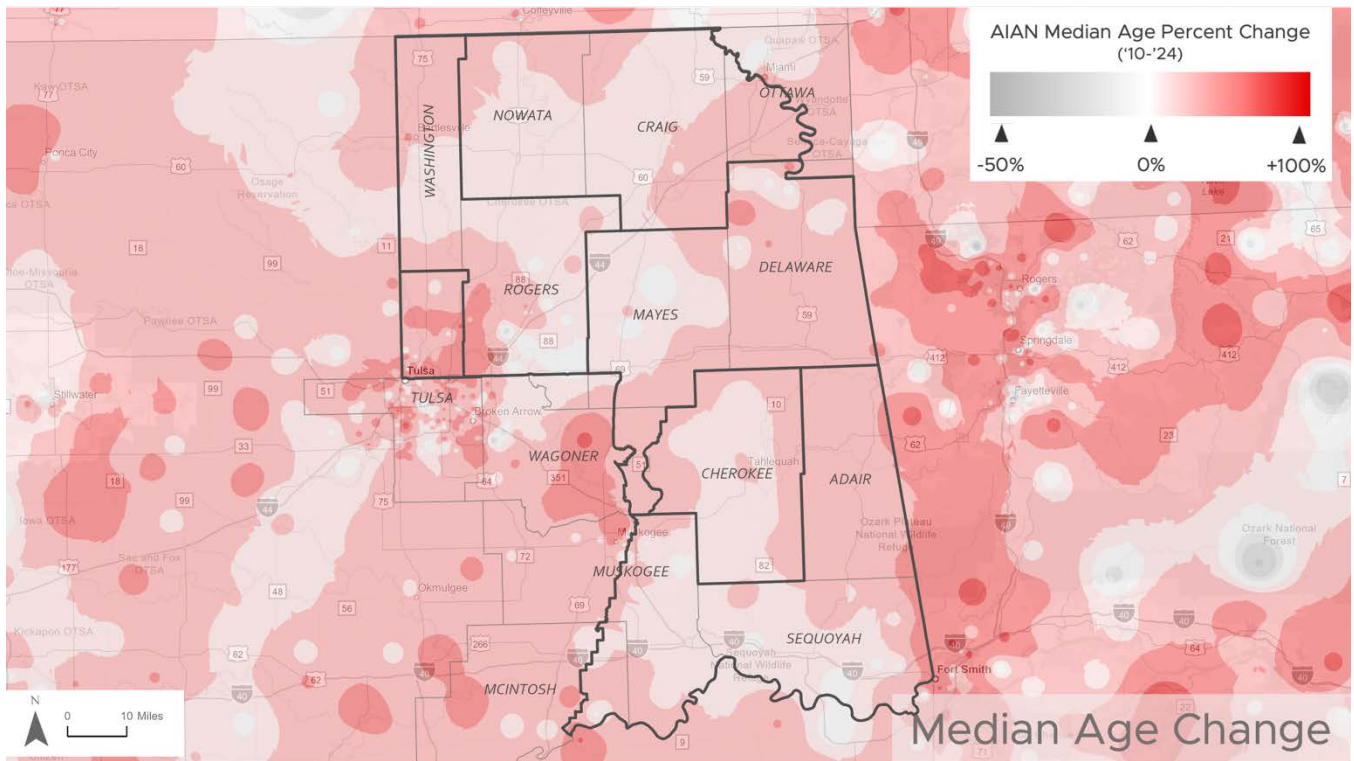
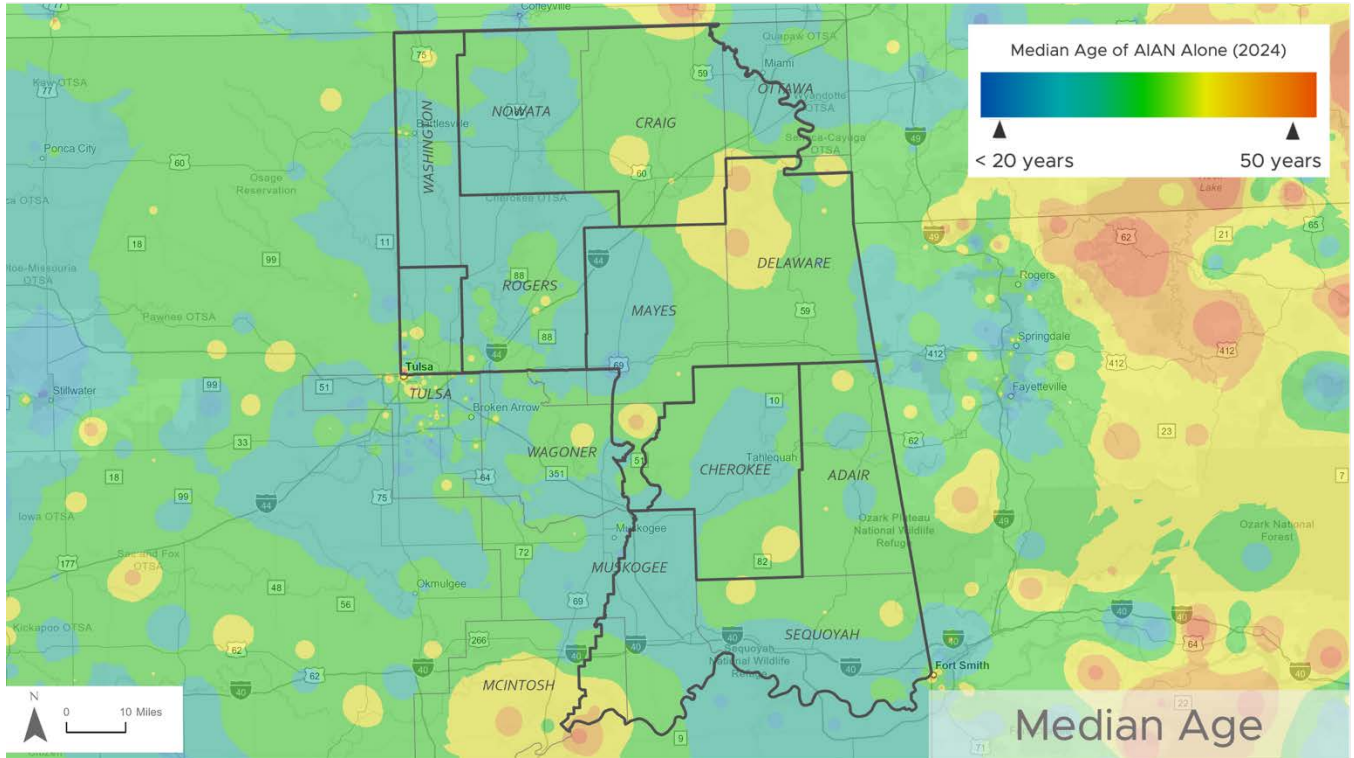
- The study area contains urban, suburban, exurban, and rural contexts—therefore creating a diverse mix of incomes, affordability ranges, housing stock, conditions, and needs across the Reservation.
- HUD’s Office of Native American Programs (ONAP) annually issues updated Median Family Incomes (MFI) and income limits for programs, such as the Indian Housing Block Grant, which is what is utilized by the Housing Authority of the Cherokee Nation. Since ONAP’s MFIs are based on median incomes for the entire United States, these incomes skew higher throughout most of the Reservation. In order to better understand and represent the median incomes and affordability levels of each county and sub-group, HUD’s Area Median Income (AMI) Limits for each county in lieu of ONAP’s MFI data.
- Since each county has an assigned median family income and income limits, an average of the AMI for each county was used to calculate affordability of each grouping (e.g., the Northwest group’s affordability is defined by the average of Rogers and Washington’s AMI). The following summary of Cherokee Reservation’s demand will use HUD’s defined income ranges for a household of three (the nearest rounded household size for all groupings) and provide ranges of incomes at each levels seen throughout the Reservation.
- Assumes households **pay up to 30 percent of income on housing** (i.e., rent and utilities for rental housing and mortgage payment, taxes, and insurance for for-sale). Thus, the demand calculations show what price points of housing are needed to eliminate housing cost burden, as this is one of the main components of housing insecurity.

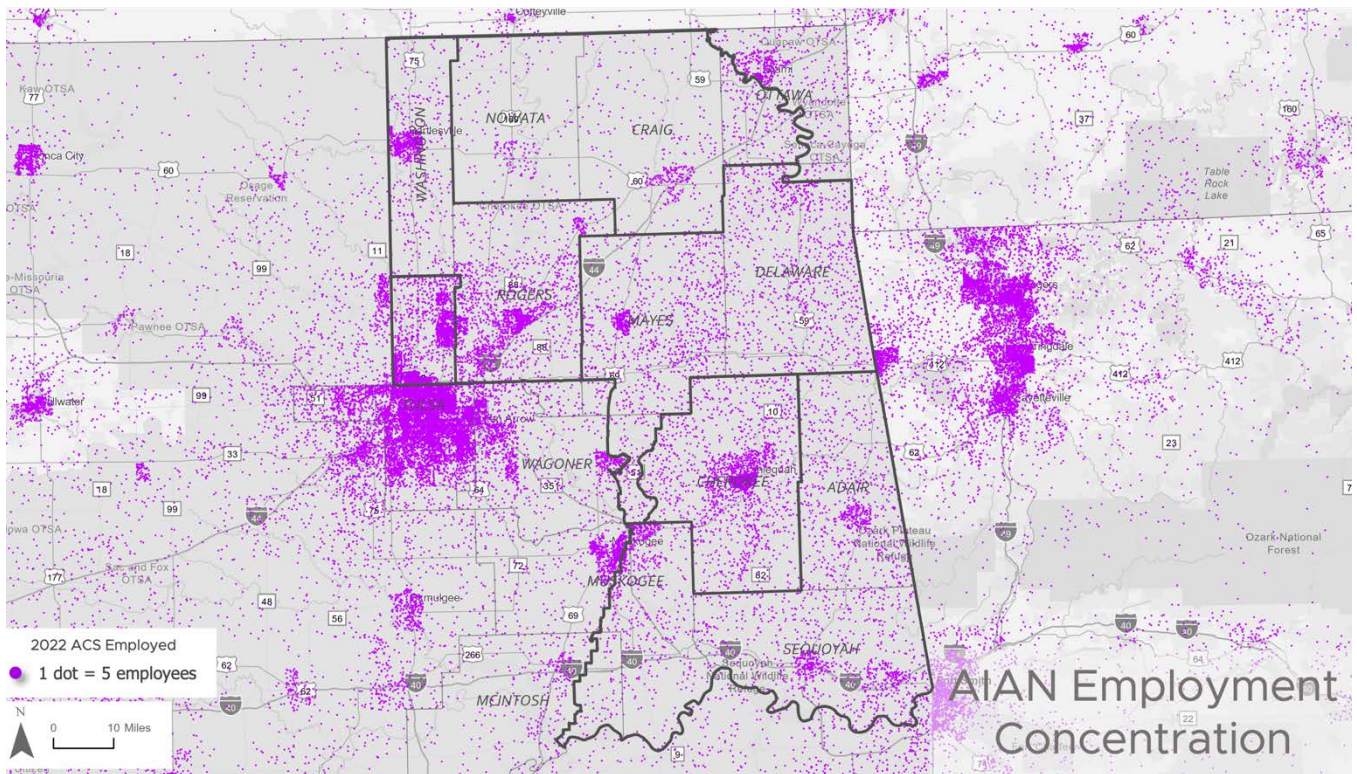
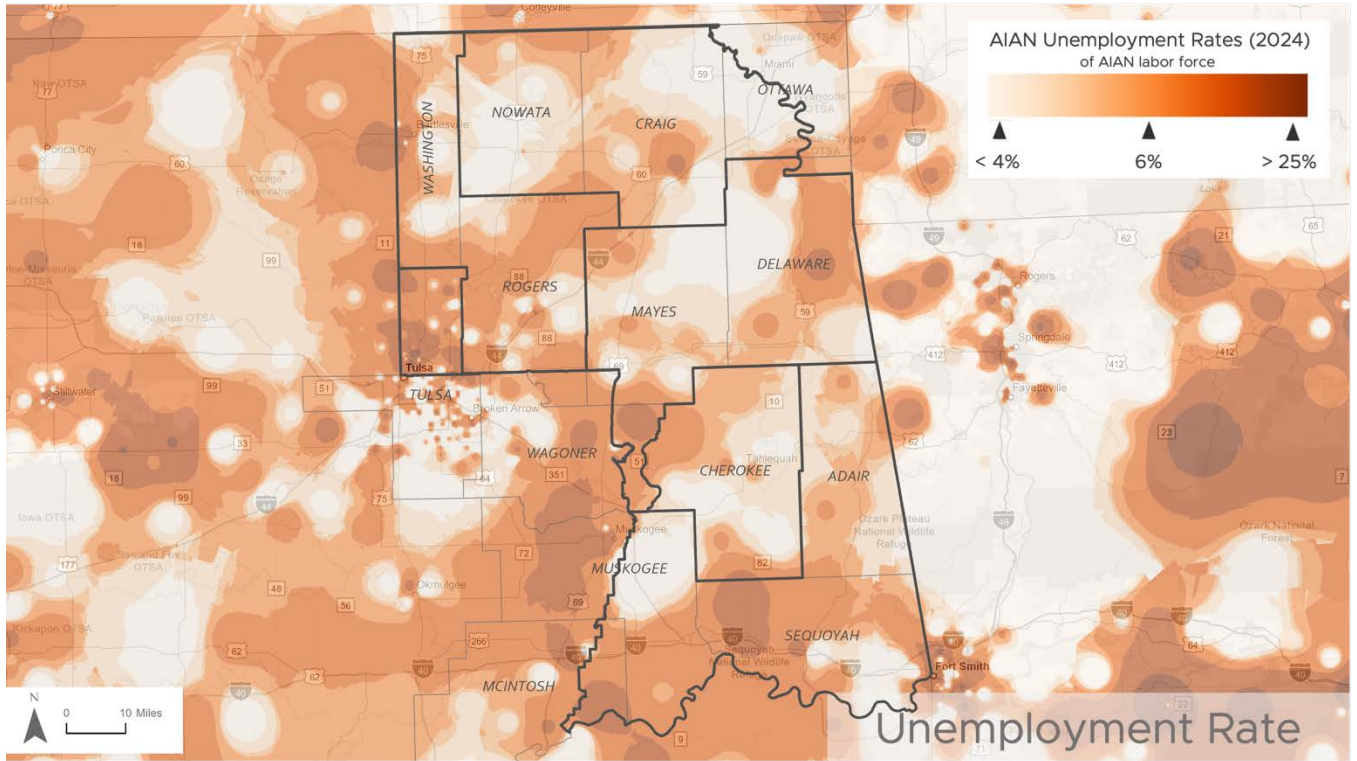
Overall, this iterative approach helped build a more robust model for understanding current and projected housing demand for Cherokee Nation citizens.

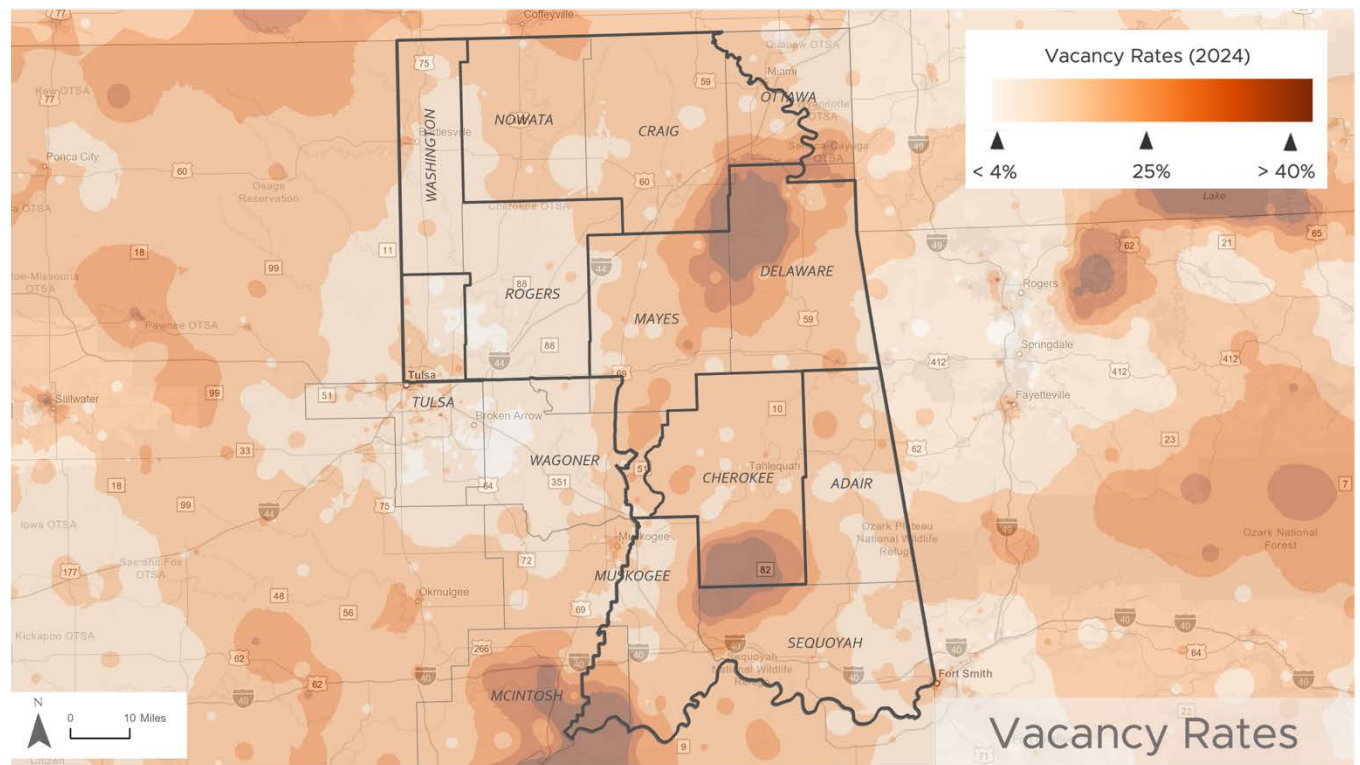
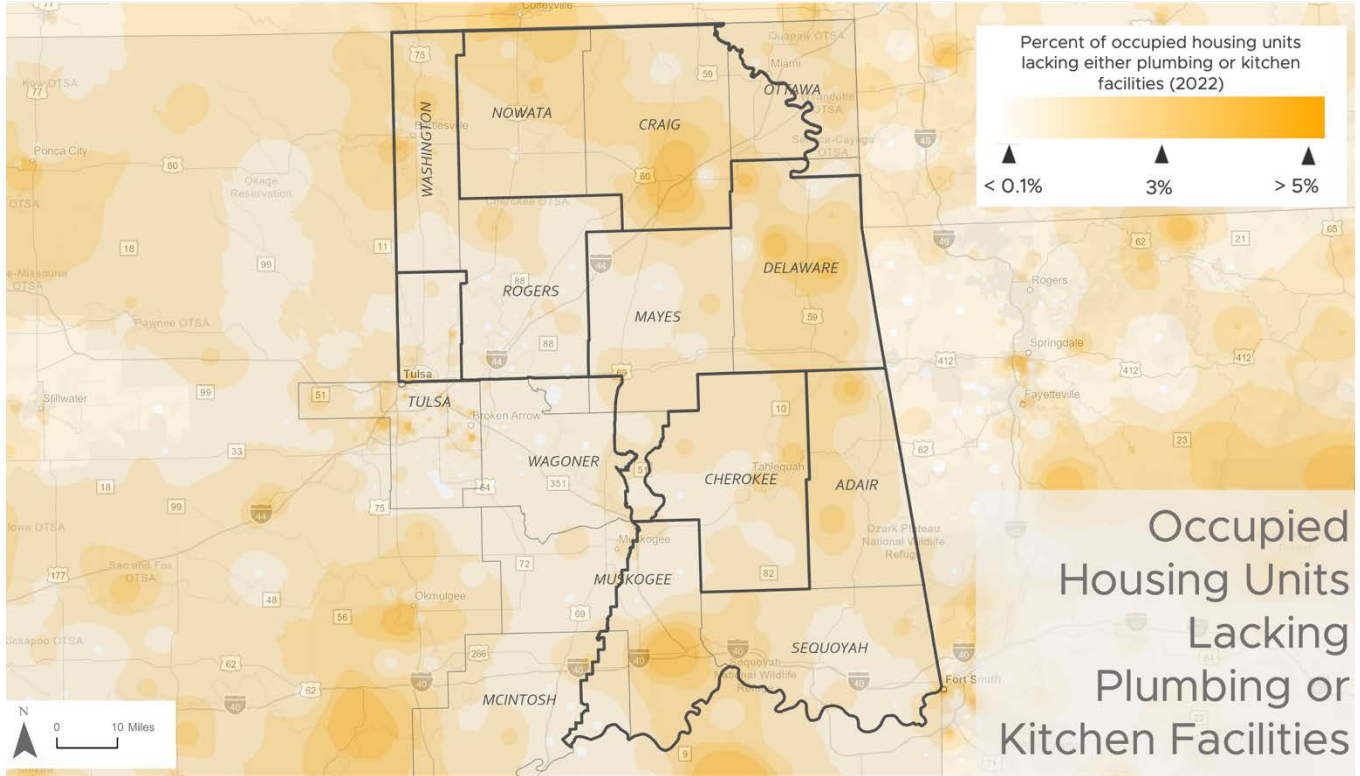
DEMOGRAPHIC MAPPING FOR THE CHEROKEE NATION

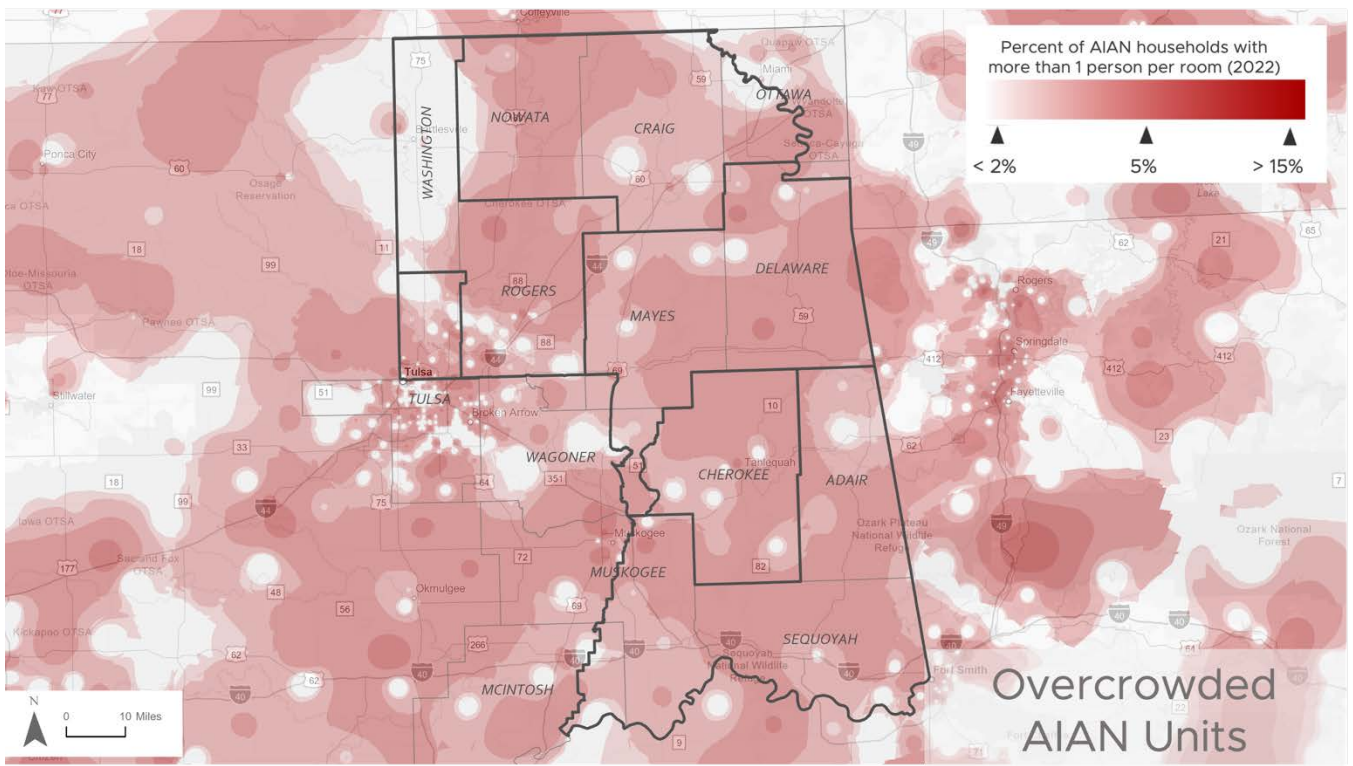
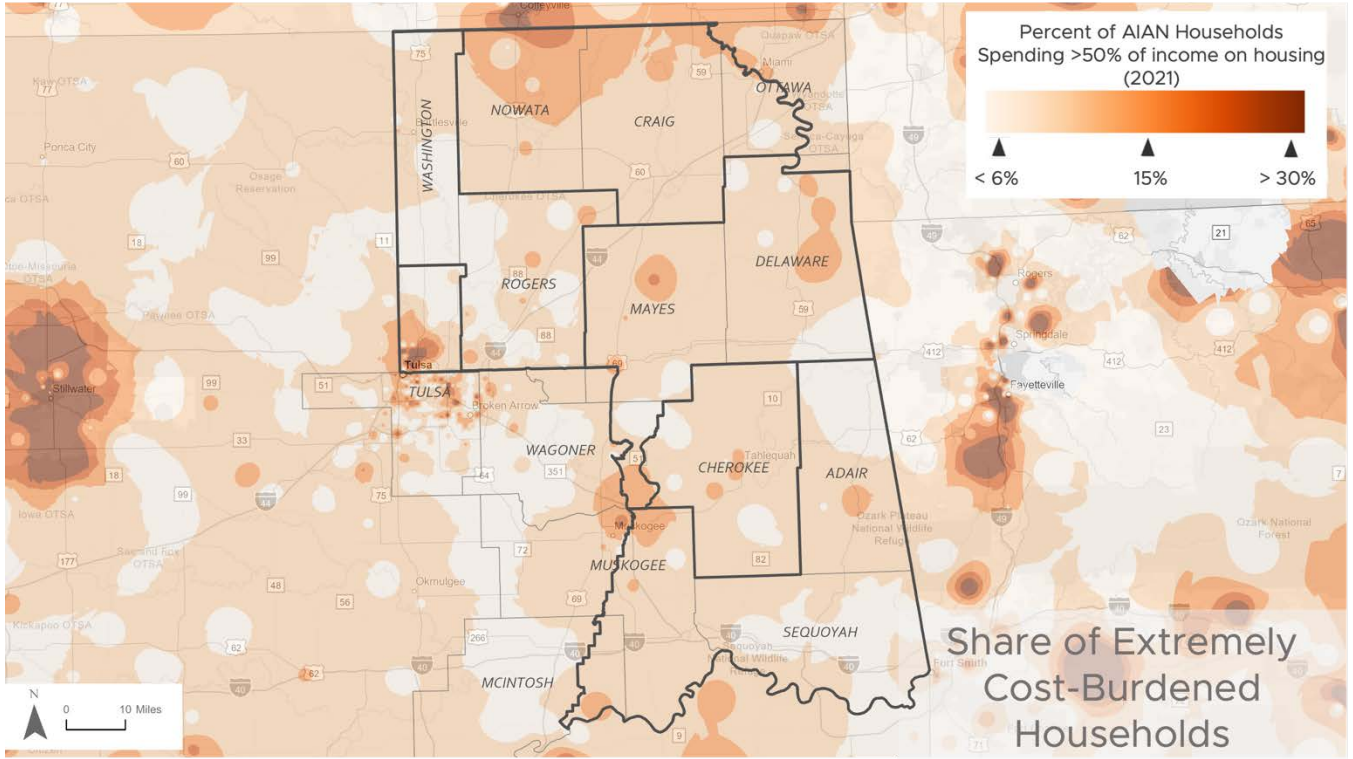






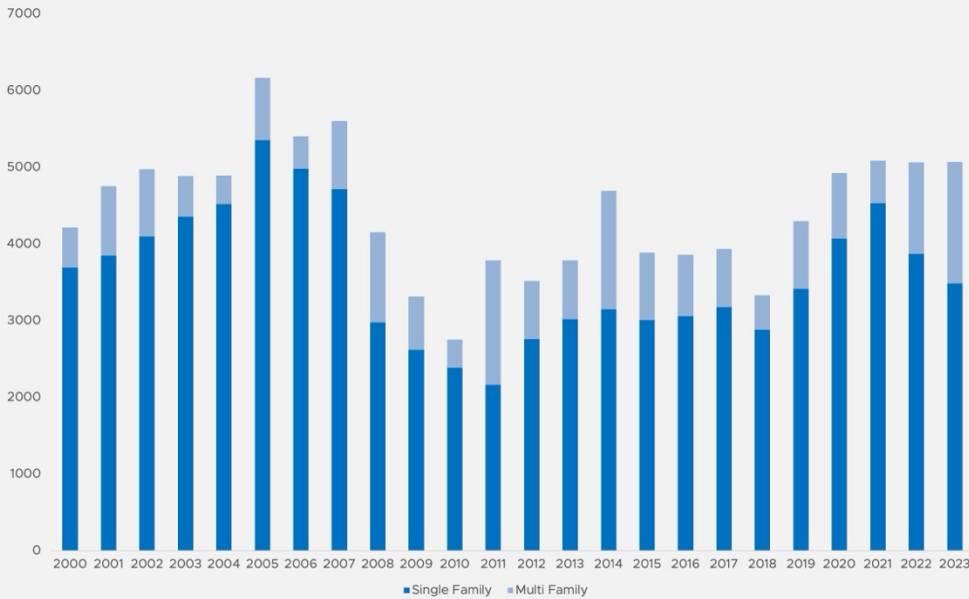






HOUSING SUPPLY TRENDS

HOUSING SUPPLY TRENDS
PERMITTING TRENDS: 14-COUNTY REGION



Since 2000...

81%

of new residential construction has been **single-family**

89%

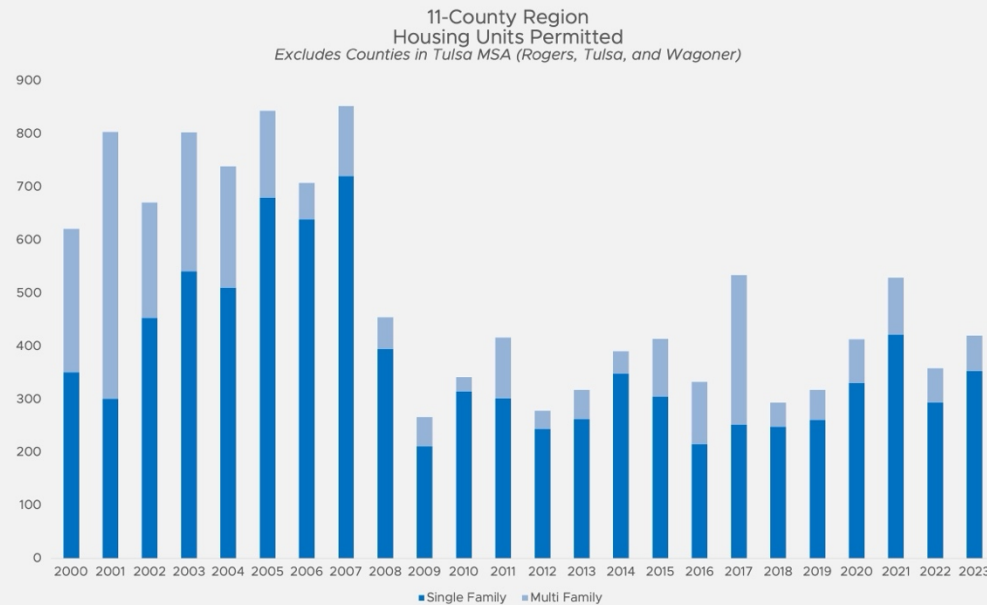
of permits were in the **Tulsa MSA**

90%
single-family
(77.2k units)

84%
multi-family
(17.0k units)

Source: HUD SOCDC Building Permits Database

HOUSING SUPPLY TRENDS
PERMITTING TRENDS: 11-COUNTY REGION (EXCL. ROGERS, TULSA, AND WAGONER COUNTIES)



In **rural** counties:
Since 2000...

74%

of new residential construction has been **single-family**

Cherokee County
14%
single-family
(1,230 units)

36%
multi-family
(1,150 units)

Source: HUD SOCDC Building Permits Database