



**U.S. Department of Housing and Urban Development**  
1999 Broadway, Suite 3390, Box 4  
Denver, Colorado 80202

**OFFICE OF THE ASSISTANT SECRETARY  
FOR PUBLIC AND INDIAN HOUSING**

**NATIONAL OFFICE OF NATIVE  
AMERICAN PROGRAMS**

31 NOV 2003

Mr. Larry Coyle  
Executive Director  
Cowlitz Indian Tribal Housing  
P. O. Box 711  
Chehalis, WA 98532

Dear Mr. Coyle:

This is in response to your correspondence dated September 15, 2003, regarding the Tribal Enrollment, Formula Area and Needs data as listed on the Cowlitz Tribe's Fiscal Year (FY) 2004 Indian Housing Block Grant (IHBG) Formula Response Form.

**Tribal Enrollment**

HUD has accepted your tribal enrollment figure of 2,707 based upon documentation dated August 26, 2003, and will update your Tribe's IHBG formula data for FY 2004.

Please note this enrollment change will not affect your IHBG formula allocation. The role of tribal enrollment in the IHBG formula is to cap the number of American Indian and Alaska Native (AIAN) persons at twice tribal enrollment. Since your Tribe's Needs data is less than twice your Tribe's tribal enrollment, your Tribe's Needs data will be unaffected by this change.

You should also note that your Tribe's Formula Area overlaps the Formula Areas of other tribes. This means that your Tribe shares the Needs data associated with the overlapping tribes' Formula Areas. Changes in the IHBG data for these other tribes can result in a change in the IHBG data for your Tribe. Should you wish additional information concerning your overlapping areas, please contact the IHBG Formula Customer Service Center at the address below.

**Formula Area**

The current Formula Area of the Cowlitz Tribe is the balance of Clark County, the balance of Cowlitz County, the balance of Lewis County, the balance of Pierce County, and the balance of Skamania County. All of these are located in the State of Washington.

In your correspondence of September 15, 2003, you requested an expansion to include Wahkaikum and Pacific Counties. In correspondence dated October 15, 2003, your Office provided information on prior housing investments and intended future housing assistance to households in these counties. In accordance with 24 CFR 1000.302 Formula Area (2), we have reviewed the submitted data regarding previous and planned investment in these areas, taking into consideration whether or not the addition of the requested areas is fair and equitable for all Indian tribes in the formula.

Our Office found that the documentation submitted does not adequately demonstrate substantial housing investment. During FY 2003, assistance in Wahkaikum County was provided to 10% of all AIAN households in the county. However, the assistance provided in this county equaled only 2% of your Tribe's FY 2003 IHBG allocation. During FY 2003, assistance in Pacific County was provided to 5% of all AIAN households in the county. However, the assistance provided in this county equaled only 3% of your Tribe's FY 2003 allocation. Therefore, based on the documentation you provided, we cannot expand your Formula Area to include Wahkaikum and Pacific Counties at this time.

### **Needs Data**

Your correspondence dated October 15, 2003, included tables from the 2000 Census showing the data for the formula variables and for other demographic variables. These tables showed the data by county. At this time, we are unable to use this data for IHBG formula purposes.

The Needs data that appears on your Tribe's Formula Response Form is based upon a special tabulation that Census provides to HUD. This tabulation uses definitions specific to the Formula and may not agree with data from other tables published by Census. In addition and as mentioned above, your Tribe's Formula Area overlaps with several other tribes. This means that your Tribe shares the Needs data associated with the overlapping tribes' Formula Areas in accordance with procedures found in §1000.326. Also in accordance with §1000.326, it is HUD's policy to use the most currently published Bureau of Indian Affairs Total Resident Service Area Indian Population data to proportionally divide the U.S. Decennial Census population data for tribes with overlapping areas.

Challenges to the Needs data are due by June 15th of the year preceding the FY being challenged. However, because the FY 2004 estimate is the first time that the entire data set from Census 2000 has been included in the IHBG calculations, and because you did not see this data prior to the June 15, 2003, deadline for Challenging Needs data, your Office might want to consider requesting a waiver of that deadline. If granted, a waiver would allow you to conduct a Census challenge survey in accordance with 24 CFR 1000.336 and the enclosed document, "Challenging U.S. Decennial Census Data: Guidelines for the Indian Housing Block Grant Formula. You could then submit that data for HUD's review and for potential use in the IHBG formula.

Thank you for submitting this correction. Your active participation ensures that allocations are fair and accurate. As you know, you will receive the Formula Response Form and subsequent Allocation and Formula Data on an annual basis. I encourage you to continue to play an active role in making sure your Tribe's formula data is correct.

Should you have any questions, please contact our IHBG Formula Customer Service Center at:

1331 H Street, NW  
Suite 1000  
Washington, DC 20005  
Phone: 800-410-8808  
Fax: 202-393-5043  
E-Mail: IHBGformula@swinter.com

Sincerely,



Deborah Lalancette  
Director, Office  
of Grants Management

Enclosure

**Cowlitz Tribe**  
**Fiscal Year (FY) 2003 Indian Housing Block Grant**  
**Allocation & Formula Data**

**FY 2003 Allocation**

1. Current Assisted Stock:	\$0
2. Need:	\$1,090,011
3. Adjustments to achieve FY 1996 Base Year Amount <sup>1</sup> :	\$0
4. FY 2003 Grant:	\$1,090,011
5. FY 1998 Adjustments <sup>2</sup> :	\$0
6. FY 1999 Adjustments <sup>2</sup> :	\$0
7. FY 2000 Adjustments <sup>2</sup> :	\$0
8. FY 2001 Adjustments <sup>2</sup> :	\$2,961
9. FY 2002 Adjustments <sup>2</sup> :	\$3,992
10. Repayments <sup>3</sup> :	\$3,930
11. FY 2003 Grant with FY 98, FY99, FY 00, FY 01, and FY 02 Adjustments <sup>4</sup> :	\$0
	<hr/>
	\$1,100,894

**FY 2003 Maximum Investment**

FY 2003 Grant with FY 98, FY99, FY 00, FY 01, and FY 02 Adjustments <sup>4</sup> :	\$1,100,894
FY 2003 Operating Subsidy:	\$0
FY 2003 Maximum Investment <sup>5</sup> :	<hr/> \$1,100,894

<sup>1</sup>FY 1996 base year amount is the amount of funds a tribe received in FY 1996 for operating subsidy and modernization. NAHASDA mandates that the formula cannot allocate less than this amount to a tribe.

<sup>2</sup>FY 1998, FY 1999, FY 2000, FY 2001, and FY 2002 Adjustments (see accompanying cover letter).

<sup>3</sup>This year, a new entry has been added to the Allocation and Formula Data sheet for repayment. This affects only Tribes that have a repayment agreement with HUD for previous year over-funding. Your Tribe's repayment amount is now included in your Tribe's FY 2003 Allocation. It will no longer be necessary to manually deduct this amount.

<sup>4</sup>Tribes SHOULD NOT amend their FY 1998, FY 1999, FY 2000, FY 2001, or FY 2002 Indian Housing Plans to reflect the FY 1998, FY 1999, FY 2000, FY 2001, and FY 2002 adjustments. Rather, tribes/TDHEs SHOULD use the FY 2003 grant with FY 1998, FY 1999, FY 2000, FY 2001, and FY 2002 adjustments as reported above for FY 2003 Indian Housing Plan purposes.

<sup>5</sup>For investment requirements, see 24 CFR 1000.58 and Notice PIH 2000-21 (TDHEs), Administrative Requirements for Investing Indian Housing Block Grant Funds.

## **Cowlitz Tribe**

### **FY 2003 Formula Current Assisted Stock**

#### **Inflation Rate Factor**

1.1804

#### **Local Area Cost Adjustments**

Annual Expense Level (AEL):	\$0
Fair Market Rent (FMR):	\$629
Total Development Costs (TDC):	\$173,274

<b>Project Number</b>	<b>Low-Rent</b>	<b>Mutual Help</b>	<b>Turnkey III</b>	<b>Development</b>	<b>DOFA</b>
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#### **Section 8**

<b>Contract Number</b>	<b>S8 Units</b>	<b>Expiration Date</b>
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## Cowlitz Tribe

### FY 2003 Needs Data

#### Formula Area

A "+" next to a geographic area listed below that indicates that area overlaps with another tribe.

The tribe's current Formula Area is:

Balance-Clark County	WA
Balance-Cowlitz County	WA
Balance-Lewis County	WA
Balance-Pierce County	WA
Balance-Skamania County	WA

+

#### Population, Income, Housing Condition

AIAN Persons:	4,422
AIAN Households with annual income less than 30% of median income:	211
AIAN Households with annual income between 30% and 50% of median income:	168
AIAN Households with annual income between 50% and 80% of median income:	265
AIAN Households which are overcrowded or without kitchen and plumbing:	106
AIAN Households with housing cost burden greater than 50% of annual income:	167
Housing Shortage (Number of low-income AIAN households less total number of NAHASDA and Formula Current Assisted Stock):	645

If there is a "\*" next to "AIAN Persons" above, the tribe's data have been "capped". This occurs when Native American population in the tribe's service area is greater than 200% of its total tribal enrollment.

#### Formula Area Population Cap

In some cases the total Native American population within a tribe's Formula Area is greater than its total tribal enrollment. In general for those cases, to maintain fairness for all tribes, the population data will not be allowed to exceed twice a tribe's enrolled population. However, a tribe subject to this cap may receive an allocation based on more than TWICE its total enrollment if it can show that it is providing housing assistance to substantially more non-member Native Americans who are members of another federally recognized tribe than it is to members.

The tribal (Alaskan Corporation) enrollment being used for your tribe is: 2,461

## Cowlitz Tribal Housing

### Service Area Population Calc's

#### **Section 1**

##### **AI /AN Alone or in combination, In Region; 2000 Census Data**

Data extracted from Census 2000, AI/AN Statistics for C1T Designated Service Area

	Total	Clark	Cowlitz	Lewis	Pacific	Pierce	Skamania	Wahkiakum
<b>Total</b>	31,585	6,292	2,771	1,487	851	19,720	331	133
<b>Allocated</b>	903	158	61	39	32	593	15	5
<b>Not Allocated</b>	30,682	6,134	2,710	1,448	819	19,127	316	128

**Note:** This data is extracted from 200 Census, raw, un-adjusted and as described, for the Counties indicated.

##### **AI /AN Alone, In Cowlitz Tribally Designated Service Area; 2000 Census Data**

Data extracted from Census 2000, AI/AN Statistics for C1T Designated Service Area

	Total	Clark	Cowlitz	Lewis	Pacific	Pierce	Skamania	Wahkiakum
<b>Native Alone, Total</b>	6,846	2,910	1,417	840	206	996	217	60
<b>Native Male Total</b>	3,310	1,458	713	399	111	488	113	28
<b>Native Female Total</b>	3,336	1,452	704	441	95	508	104	32

##### **AI /AN Alone or in combination, In Cowlitz Tribally Designated Service Area; 2000 Census Data**

Adjustment Factor  
Data extracted from Census 2000, AI/AN Alone or in Combination Statistics for C1T Designated Service Area

	Total	Clark	Cowlitz	Lewis	Pacific	Pierce	Skamania	Wahkiakum
<b>Total</b>	13,327	6,292	2,771	1,487	341	1,972	331	133
<b>Allocated</b>		158	61	39	13	59	15	5
<b>Not Allocated</b>		6,134	2,710	1,448	328	1,913	316	128

##### **HUD Formula Area Population Calculation**

**Total Enrolled C1T Population**  
**HUD Formula Population Cap**

**2,707**  
**5,414**

(=Enrolled Population x 2)

**Note:** This data is extracted from 200 Census, as described, for the Counties indicated.  
Adjustment factor for Pierce County is as previously agreed in C1T HUD Population Formula, AI/AN Alone or In Combination. Other Tribes within Pierce County, Nisqually and Puyallup, claim the remaining population.  
Adjustment factor for Pacific County is newly claimed population per Tribally Designated Service Area, AI/AN Alone or in Combination. Other Tribally Designated Housing Entities within Pacific County, i.e., Shoalwater, claim the remaining population.

## Cowlitz Tribal Housing

### Section 2

#### AI /AN Alone or In Combination, Percent Over Median Occupancy

Data extracted from Statistical Modelling Sheet, applied to AI/AN Alone or in Combination

	Total	Clark	Cowlitz	Lewis	Pacific	Pierce	Skamania	Wahkiakum
Pct. over Median Occupancy, approx 3 per HH	30.23%	32.05%	28.26%	28.13%	30.27%	33.29%	30.43%	29.17%
AI/AN Alone or In Comb., Population		6,292	2,771	1,487	341	1,972	331	133
Total Population Over Median Occupancy	4,117	2,017	783	418	103	656	101	39
AI/AN Alone or In Comb., Population extracted from Section 1, as indicated with service population percentages applied.								

Pct. over Median Occupancy; (approx 3 per HH), extracted from AI/AN Alone US Census 2000.

### Section 3

#### AI /AN Alone or In Combination, Percent Extreme Overcrowded

Data extracted from Statistical Modelling Sheet, applied to AI/AN Alone or in Combination

	Total	Clark	Cowlitz	Lewis	Pacific	Pierce	Skamania	Wahkiakum
Total	5.76%	5.67%	5.85%	7.25%	5.36%	7.48%	5.34%	3.34%
AI/AN Alone or In Comb., Population		6,292	2,771	1,487	341	1,972	331	133
Total Population Overcrowded Occupancy	815	357	162	108	18	148	18	4
AI/AN Alone or In Comb., Population extracted from Section 1, as indicated with service population percentages applied.								

Pct. Extreme Overcrowding; (greater than 5), extracted from AI/AN Alone US Census 2000.

### Section 4

#### AI /AN Alone or In Combination, Seniors / Elders Below Poverty Level

Data extracted from Statistical Modelling Sheet, applied to AI/AN Alone or in Combination

	Total	Clark	Cowlitz	Lewis	Pacific	Pierce	Skamania	Wahkiakum
General Population Seniors pct below Poverty Level	30.23%	32.05%	28.26%	28.13%	30.27%	33.29%	30.43%	29.17%
AI/AN Alone or In Comb., Senior / Elder Population	313	119	69	49	20	41	9	6
General population Seniors income percentages extracted from Census 2000 raw data.	96	38	19	14	6	14	3	2
AI/AN Alone or In Combination Senior /Elder population extracted from raw Census 2000 data.								

## Cowlitz Tribal Housing

### Section 5

**AI /AN Alone or In Combination, pct Households W/ Incomes less than 30 pct of Median**  
Data extracted from Census 2000, AI/AN Statistics for CIT Designated Service Area

	Total	Clark	Cowlitz	Lewis	Pacific	Pierce	Skamania	Wahkiakum
Median Household Income	738	271	166	95	17	160	21	8
Less than 30 pct Median		\$ 48,376	\$ 39,797	\$ 35,511	\$ 31,209	\$ 45,204	\$ 39,317	\$ 39,444
Total AI / AN Population in CIT Service Area		4.30%	6.00%	6.40%	5.00%	8.10%	6.20%	5.80%
<b>General population Median HH Income extracted from Census 2000 raw data.</b>								
<b>Less than 30pct of Median Data extracted from census 2000 raw data.</b>								
<b>AI/AN Alone or In Comb., Population extracted from Section 1, as indicated with service population percentages applied.</b>								

### Section 6

**AI /AN Alone or in Combination, pct Households W/ Incomes 30 pct to 50 pct of Median**  
Data extracted from Census 2000, AI/AN Statistics for CIT Designated Service Area

	Total	Clark	Cowlitz	Lewis	Pacific	Pierce	Skamania	Wahkiakum
Median Household Income	1,855	705	457	281	77	254	51	30
30 to 50 pct Median		\$ 48,376	\$ 39,797	\$ 35,511	\$ 31,209	\$ 45,204	\$ 39,317	\$ 39,444
Total AI / AN Population in CIT Service Area		11.20%	16.50%	18.90%	22.50%	12.90%	15.30%	22.90%
<b>General population Median HH Income extracted from Census 2000 raw data.</b>								
<b>30pct to 50 pct of Median Data extracted from census 2000 raw data.</b>								
<b>AI/AN Alone or In Comb., Population extracted from Section 1, as indicated with service population percentages applied.</b>								

### Section 7

**AI /AN Alone or In Combination, pct Households W/ Incomes 50pct to 80 pct of Median**  
Data extracted from Census 2000, AI/AN Statistics for CIT Designated Service Area

	Total	Clark	Cowlitz	Lewis	Pacific	Pierce	Skamania	Wahkiakum
Median Household Income	1,946	1,033	346	205	58	235	50	19
50 to 80 pct median		\$ 48,376	\$ 39,797	\$ 35,511	\$ 31,209	\$ 45,204	\$ 39,317	\$ 39,444
Total AI / AN Population in CIT Service Area		16.42%	12.50%	13.80%	17.10%	11.90%	15.00%	14.60%
<b>General population Median HH Income extracted from Census 2000 raw data.</b>								
<b>50pct to 80 pct of Median Data extracted from census 2000 raw data.</b>								
<b>AI/AN Alone or In Comb., Population extracted from Section 1, as indicated with service population percentages applied.</b>								

## Cowlitz Tribal Housing

### Section 8

#### AI/AN Alone or in Combination, pct Households W/ Housing Costs greater than 50 pct of Gross Income

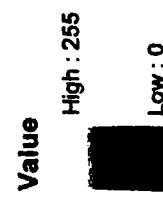
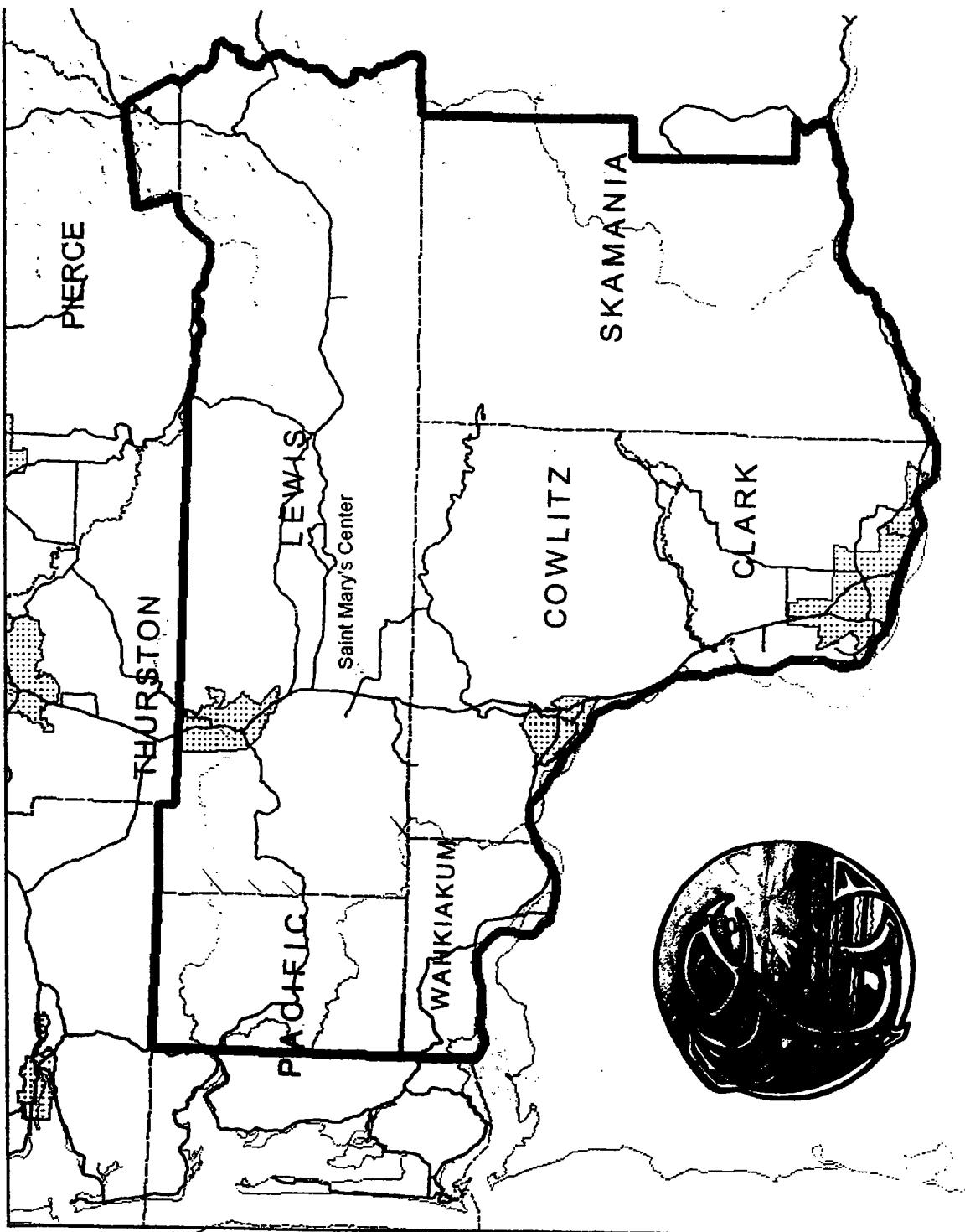
Data extracted from Census 2000, AI/AN Statistics for CIT Designated Service Area

	Total	Clark	Cowlitz	Lewis	Pacific	Pierce	Skamania	Wahkiakum
Total Percent	815	277	172	131	54	146	35	-
Total AI / AN Population in CIT Service Area		4.40%	6.20%	8.80%	15.90%	7.40%	10.80%	0.00%
General population housing cost to income ratio extracted from Census 2000 raw data.								

AI/AN Alone or in Comb., Population extracted from Section 1, as indicated with service population percentages applied.

## Service Area Population Calc's

### Legend



Cowlitz Indian Tribe HUD Formula Area Boundaries