February 04, 2019

Great Falls City Commissioners,

I am writing to protest Ordinance 3185. The combined Board of Adjustment/Appeals should not be the deciding body for CDBG allocations.

According to the City of Great Falls website, the Board of Adjustment/Appeals, "hears and decides appeals regarding administration of Title 17 or the housing or building regulations, and hears and decides requests for variances consistent with Title 17."

I see no relevance between those duties and allocating CDBG monies. The City Commission has stated that members of the Board of Adjustment/Appeals have special knowledge in land use and/or housing/construction regulations. How does that knowledge/expertise translate to deciding who receives CDBG grants? How does that translate to avoiding conflicts of interest?

I fail to see how placing the CDBG decision-making with the Board of Adjustment/Appeals will "help eliminate any potential conflicts of interest in the future," as Joseph Cik, Assistant City Attorney states in the ordinance information. Once again, the city is setting itself up for more problems with HUD/CDBG conflicts of interest.

There should be a more appropriate body for CDBG decision-making, perhaps the Ethics Committee, since the prior CDBG issues were issues of questionable ethics.

Jeni Dodd