

CITY OF GREAT FALLS

2020-2024 Consolidated Plan for HUD-Funded Programs



The City's Five-Year Plan for Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME)

Prepared by
City of Great Falls
Planning & Community Development
2 Park Drive South
Great Falls, MT 59401
(406) 455-8443

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Section 1 | Executive Summary

ES-05 Executive Summary 24 CFR 91.200(c), 91.220(b)

Introduction

The City of Great Falls Consolidated Plan (Consolidated Plan or “ConPlan”) for the five-year period from 2020 through 2024 received approval by the Great Falls City Commission on December 1, 2020, following a 30-day comment period extending from October 26 – November 24, 2020. City Commission action on the Consolidated Plan followed a plan development process which included input from local organizations and residents through a community needs assessment survey; a community kick-off meeting on December 16, 2019; a focus group discussion held on February 27, 2020; and a public hearing on the proposed Consolidated Plan and 2020-2021 Annual Action Plan on December 1, 2020.

The purpose of the Consolidated Plan is to identify the housing and community development needs of low to moderate income residents of Great Falls and develop strategies for addressing those needs in a comprehensive, coordinated fashion using available federal and non-federal resources. The Consolidated Plan includes the one-year Annual Action Plan for 2020-2021, which serves as the budget for the City of Great Falls 2020-2021 Community Development Block Grant (CDBG) Program and Home Investment Partnerships Program (HOME). Funding priorities for the 2020-2021 Annual Action Plan have been approved by City Commission to carry out strategic goals identified and detailed in the Consolidated Plan.

The Consolidated Plan is required for participation by the City of Great Falls in the U.S. Department of Housing and Urban Development (HUD) CDBG and HOME programs. The Consolidated Plan combines the planning and application requirements for the CDBG and HOME programs, which allows program planning and citizen participation to take place in a comprehensive context.

Seven priorities and related objectives are identified in the Consolidated Plan to meet the diverse needs of low to moderate income households in Great Falls. These needs were identified primarily through the plan development process and citizen participation described in this section. Census data and other HUD-provided data were also reviewed to assist in identifying needs.

Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

The City of Great Falls identified seven objectives or goals, as identified below:

Goal 1: Public Services

Provide support to public service agencies' operating programs that benefit low to moderate income persons. The City of Great Falls will provide CDBG funds to social service agencies for activities that service low to moderate income people or areas.

Goal 2: Affordable Housing

Increase and preserve affordable housing opportunities for very low to moderate income renters, homeowners, first-time homebuyers, and those experiencing homelessness. This includes affordable housing efforts that require funding to remediate properties negatively affected by slum and blighted conditions.

Goal 3: Housing Rehabilitation

Provide construction and rehabilitation assistance for very low to moderate income homeowners, rental property owners and the Public Housing Authority. The City will focus on upgrading the City's housing stock to meet standard building codes to provide and sustain safe, affordable housing through its revolving loan fund. The City of Great Falls will address Public Housing Authority rehabilitation or modernization projects with the use of CDBG funding.

Goal 4: Fair Housing

Provide funding for activities that affirmatively further fair housing. The City of Great Falls will fund activities that include, but are not limited to fair housing education, counseling, outreach, and referrals pertaining to the laws, rights, and responsibilities related to housing and housing-related transactions, as well as service activities that reduce and remove barriers to fair housing choice.

Goal 5: Economic Development

Provide funding for projects which create decent paying jobs with benefits for persons from low to moderate income households. The City of Great Falls will fund economic development projects which will result in the creation and retention of jobs for low to moderate income people.

Goal 6: Public Facilities and Improvements

Provide public facility and infrastructure assistance, including but not limited to handicap accessibility, energy efficiency improvements, and removal of slum and blighted properties to provide a suitable living environment. The City of Great Falls will prioritize meeting handicap accessibility requirements in public facilities and infrastructure.

Goal 7: Planning and Administration

City staff to administer, manage, and monitor CDBG and HOME funded activities.

Evaluation of past performance

The City of Great Falls receives CDBG funds as an Entitlement City and HOME funds as a Participating Jurisdiction. Year after year, the City's HUD-funded grant programs have successfully met performance expectations to benefit low and moderate income individuals and areas within the community.

Five of the seven goals from the City's 2015-2019 Consolidated Plan have been maintained or reinforced for use as goals in the new 2020-2024 Plan. The two new goals that have been added to the 2020-2024 Plan are Affordable Housing and Planning and Administration. Two previous goals outlined in the 2015-2019 Consolidated Plan, Transitional Housing and Homeownership, remain priorities for the City and are included within the 2020-2024 Affordable Housing goal.

Prior to the preparation of the 2018 Annual Action Plan, more than midway through the 2015-2019 Consolidated Plan cycle, the City evaluated its performance to date. After careful review of the City's practices, staff determined that it was necessary to update the Program's Grant Policies and Citizen Participation Plan documents to meet the City's current staff capacity and to create a more strategic and sustainable community grant program. Past performance demonstrated that the City was funding many small grants, collaborating with multiple non-profit agencies, and relying solely on sub-recipients to reach community goals. Another challenge was that public facility projects were difficult for non-profits to implement due to their lack of knowledge of federal requirements. Evaluation of past performance also identified that many of the same agencies continuously requested funding.

The evaluation of these issues led to updating the City's Grant Policies in 2018. The City now balances the funding of sub-recipients with providing direct programming in order to reach community goals. Instead of funding many small grants, the City's most recent Annual Action Plans have focused on fewer goals. This narrowed funding approach is intended to make a greater impact by allocating greater funding amounts to a smaller number of projects annually. These updated policies will continue to be implemented in the 2020-2021 program year.

Summary of citizen participation process and consultation process

Community involvement is a critical component of the planning process for the effective use and prioritization of CDBG and HOME funds. The City's Citizen Participation Plan was updated in June 2020 and outlines the purpose of the Consolidated Plan, Annual Action Plan, and Consolidated Annual Performance and Evaluation Report (CAPER), as well as the strategy for greater community participation. This includes the publishing requirements of public notices in local newspapers, an explanation of the Grant Review Committee for the allocation of CDBG and HOME-funded projects, and the methods of direct communication and information distribution to public and nonprofit agencies and faith-based organizations. A copy of the Citizen Participation Plan can be found in Appendix D of this document and on the City's [website](#).

A community needs assessment survey and two public meetings were held to gather citizen input for the creation of the 2020-2024 Consolidated Plan. The community needs assessment was conducted via electronic and paper surveys and was available to the public from January 8 - February 7, 2020. Public outreach for the survey included direct survey distribution to stakeholder partner agencies, Neighborhood Council members, and City employees via email. Electronic survey links and paper survey locations were provided to and distributed by traditional and social media outlets, including the Great Falls Tribune, The Electric, and the City's Facebook page and webpage. Paper copies of the survey were available at the Planning and Community Development office, the public library, and upon request to all public, nonprofit, faith-based, and stakeholder agencies. A total of 529 survey responses were received.

The community kick-off meeting was held on December 16, 2019, and was attended by 26 individuals representing public agencies, nonprofit agencies, Neighborhood Council members, and community residents. A second public meeting was conducted in a focus group format on February 27, 2020. Twenty representatives from public agencies, nonprofit agencies, and Neighborhood Councils attended and participated in a focus group discussion to review results from the community needs assessment survey and to identify and further prioritize community goals. The 2020-2024 Consolidated Plan draft was made available to the public for a 30-day comment period from October 26 – November 24, 2020. A final City Commission public hearing to review the Consolidated Plan draft occurred on December 1, 2020. All public comments received and themes addressed in public meetings were transcribed and attached to this document as Appendix G.

Summary of public comments

A summary of public comments can be found in Appendix G.

Summary of comments or views not accepted and the reasons for not accepting them

All public comments were noted, transcribed, or accepted into the Consolidated Plan where applicable.

Summary

The needs of low to moderate income residents in the Great Falls community are greater than the funding provided from the entitlement community's CDBG funds or participating jurisdiction's HOME funds. Despite this, constant communication with public and nonprofit leaders, as well as the added oversight provided by the Grant Review Committee, seek to make the best use of these federal funds. The joint use of the Fair Housing Specialist by the City and Great Falls Housing Authority is an example of working together to meet the expressed needs of the community. Great Falls is the only municipality in Montana with this position.

Section 2 | The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	GREAT FALLS	Planning & Community Development
HOME Administrator	GREAT FALLS	Planning & Community Development

HUD Table 1 – Responsible Agencies

Narrative

The Planning and Community Development Department is responsible for administering the Community Development Block Grant (CDBG) and Home Investment Partnerships (HOME) programs within the City of Great Falls, Montana. A Consolidated Plan is required by the U.S. Department of Housing and Urban Development (HUD) in order to receive federal assistance annually. The City of Great Falls has received CDBG and HOME funds as an entitlement community and participating jurisdiction, respectively. The City Commission reviews and approves the Consolidated Plan and will continue to do so in December 2020. Following City Commission approval, the City of Great Falls is seeking HUD approval for the 2020-2024 Consolidated Plan in December 2020. The 2020-2024 Consolidated Plan is being submitted under a deadline extension granted by HUD and in accordance with the mega-waiver permissions released by HUD in response to the Novel Coronavirus disease (COVID-19) pandemic in 2020. The City program year begins July 1 and ends June 30.

Consolidated Plan Public Contact Information

On the web: <https://greatfallsmt.net/planning/consolidated-plan-annual-action-plan>

Call: (406) 455-8443 or (406) 455-8432

Mail: P.O. Box 5021 | Great Falls, MT 59403

Introduction

The 2020-2024 Consolidated Plan was primarily authored by City of Great Falls Planning and Community Development department staff. Other City departments were heavily involved either in attendance/guidance for input meetings or available for consultation in updating current city projects (particularly the Great Falls Housing Authority, Public Works, and Park and Recreation). Nonprofit service agencies, affordable housing services, and housing developers were heavily involved in both the creation and fulfillment of past Consolidated Plan goals and objectives and are crucial to the further fulfillment of these goals for the next five-year period.

Sources of public data used in creating the Consolidated Plan include: U.S. Department of Housing and Urban Development (HUD User, CHAS 2011-2015, Office of Community Planning and Development, Office of Public and Indian Housing); the U.S. Bureau of the Census (2010 Census and American Community Survey 5-year estimates for 2011-2015 and 2014-2018); Montana Department of Public Health and Human Services; and Cascade City-County Health Department. All citizen participation meetings are documented as appendices and include attendance records. Other relevant planning or housing documents developed before the 2020-2024 Consolidated Plan are referenced later in this section (Table 3).

Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I)).

The City will encourage the participation of both residents and assisted housing residents from the Great Falls Housing Authority and Opportunities, Inc., to provide input to the City on whether their needs in regards to physical health, mental health, and basic services are being adequately met in the community. In response to this input, the City will make every effort to share this feedback with other public, private and non-profit agencies that provide housing, health services, and social services to these residents.

From the 2020 Citizen Participation Plan, as posted publicly on the City of Great Falls website:

1. The City will contact local affordable housing and public service agencies, the Great Falls Housing Authority and the Neighborhood Councils to obtain information and comments to make citizens aware of the Consolidated Plan or Annual Action Plan process. The City will make reasonable efforts to consult with other public, private and non-profit agencies that provide housing, health service, and social services. In particular, agencies to be consulted will be those that focus on service to children/families with children, elderly persons, racial/ethnic minorities, persons with disabilities, female heads of household, non-English speaking persons, and other

persons in need of services. State relay 711 and reasonable accommodations are available upon request.

2. The proposed Consolidated Plan or Annual Action Plan will be available to all citizens on the City internet site and the City Planning & Community Development Department. Citizens will be informed about the availability of the proposed Consolidated Plan or Annual Action Plan by notifications on the City website, publishing display advertisements in the Great Falls Tribune and emailing notices to a wide variety of public service agencies. Notification will describe the availability of the plan and the 30-day period to receive public comment.
3. The City Commission will provide three public meetings requesting input from citizens and representatives of low to moderate income level people on grant policies and as to the needs of the community, including but not limited to housing, community development, infrastructure, economic development and homeless assistance.

The City will provide a reasonable number of free copies of the Consolidated Plan or Annual Action Plan to citizens and groups upon request.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

The Montana Continuum of Care Coalition (MT CoCC) was established by representatives of relevant geographies within the geographic state of Montana for the purpose of carrying out the duties of the CoCC program, as provided for in federal statute 24 CFR Part 578. Great Falls is within Region 5 of this statewide CoCC, and this Region is used to determine Homeless Survey data from the Montana Department of Health and Human Services. The most recent Point-in-Time count and survey was conducted on January 30, 2020; however, data from that survey was not available at the time of this report. For that reason, data from the 2019 Point-in-Time survey has been used in this report.

The City participates in the local Continuum of Care for Homelessness (CoC) group. The CoC group meets monthly throughout the year to expand understanding of the services needed by those who are homeless, to facilitate consolidation and coordination of homeless services and to improve service delivery to people experiencing homelessness. The CoC meetings provide a networking opportunity and assist in keeping funding options open for future HUD homeless grant funds.

The City encourages application for federal homeless grant funds for projects assisting homeless people through the Montana Continuum of Care Coalition (MT CoCC) statewide application process. The MT CoCC is a statewide entity which addresses homelessness issues and is the main vehicle for organizations in Montana to apply for federal homeless grant funds. If local agencies pursue projects through the MT CoCC, the local CoC will support all appropriate proposals

The City will also encourage our local CoC to undertake activities which will move toward reaching the federal goal of ending chronic homelessness. Although no agencies in Great Falls other than Opportunities, Inc., have received any federal homeless grant funding for more than 16 years, the City will continue to cooperate with the MT CoCC as much as possible to meet whatever requirements are established.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS.

ESG funds are not projected to be available for the City for program years 2020-2024.

Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities.

1	Agency/Group/Organization	NEIGHBORWORKS GREAT FALLS
	Agency/Group/Organization Type	Housing Services - Housing Services-Education Regional organization Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Attended public meetings and hearings, responded to and distributed community surveys, provided input on community needs. Attended meetings with City staff to develop potential project ideas for proposed Affordable Housing funds.
2	Agency/Group/Organization	GREAT FALLS DEVELOPMENT AUTHORITY
	Agency/Group/Organization Type	Services-Education Services-Employment Regional organization Planning organization Business Leaders Community Development Financial Institution
	What section of the Plan was addressed by Consultation?	Economic Development

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Attended public meetings, responded to surveys, provided input on community needs, and attended meetings with City staff to develop potential project ideas for proposed Economic Development funds.
3	Agency/Group/Organization	QUALITY LIFE CONCEPTS
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Employment Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Needs - Veterans
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Attended public meetings, responded to surveys, provided input on community needs.
4	Agency/Group/Organization	GREAT FALLS AREA HABITAT FOR HUMANITY
	Agency/Group/Organization Type	Housing Services - Housing Services-Education
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Attended public meetings, responded to surveys, provided input on community needs.
5	Agency/Group/Organization	CITY PARK AND RECREATION - COMMUNITY RECREATION CENTER
	Agency/Group/Organization Type	Services-Children Services-Persons with Disabilities Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Facility/ADA Improvements
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Attended public meetings, responded to surveys, provided input on community needs. Attended meetings with City staff to develop potential project ideas for proposed Public Infrastructure funds.

6	Agency/Group/Organization	CENTER FOR MENTAL HEALTH
	Agency/Group/Organization Type	Housing Services - Housing Services-Persons with Disabilities Services-Health Health Agency
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Attended public meetings, responded to community survey, provided input on community needs, attended CoC meetings and bi-monthly Case Conferencing meetings.
7	Agency/Group/Organization	Great Falls Public Housing Authority
	Agency/Group/Organization Type	Housing PHA Service-Fair Housing Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Attended public meetings, responded to and distributed community survey, provided input on community needs, attended CoC meetings and bi-monthly Case Conferencing meetings.
8	Agency/Group/Organization	INDIAN FAMILY HEALTH CLINIC
	Agency/Group/Organization Type	Services-Health Health Agency Regional organization
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Attended public meetings, responded to and distributed community survey, provided input on community needs, attended CoC meetings and bi-monthly Case Conferencing meetings.

9	Agency/Group/Organization	YOUNG PARENTS EDUCATION CENTER
	Agency/Group/Organization Type	Services - Housing Services-Children Services-homeless Services-Education Services-Employment Service-Fair Housing Childcare
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Attended public meetings, responded to community survey, provided input on community needs.
10	Agency/Group/Organization	St. Vincent de Paul
	Agency/Group/Organization Type	Services - Housing Services-homeless Food Boxes
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homelessness Needs - Veterans Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Attended public meetings, responded to community survey, provided community needs input, attended CoC meetings and bi-monthly Case Conferencing meetings.
11	Agency/Group/Organization	Great Falls Public Schools
	Agency/Group/Organization Type	Services-Children Services-homeless Services-Education
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homelessness Needs - Unaccompanied youth

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Attended public meetings and provided input on community needs.
12	Agency/Group/Organization	North Central Independent Living Services
	Agency/Group/Organization Type	Services - Housing Services-Elderly Persons Services-Persons with Disabilities Services-homeless Service-Fair Housing Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Attended public meetings, responded to and helped distribute community surveys, attended CoC meetings, provided input on community needs.
13	Agency/Group/Organization	United Way of Cascade County
	Agency/Group/Organization Type	Services-homeless Services-Health Services-Education Services-Employment
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Attended public meetings, provided input on community needs, attended CoC meetings.

HUD Table 2 – Agencies, groups, organizations who participated

Identify any Agency Types not consulted and provide rationale for not consulting.

The City attempted to contact local public and private agencies with public meeting invitations and information via electronic mail as well as traditional and social media platforms. Media outlets included KFBB, KRTV, the Great Falls Tribune, The Electric, and the City’s webpage and Facebook page. The agencies in attendance at our planning meetings, however, cannot fully represent the entire spectrum of needs in the community.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Montana Continuum of Care Coalition	Coordinates local and statewide housing and services for households experiencing homelessness
City of Great Falls Growth Policy Update	City of Great Falls	Dedicated Housing section informs needs for all four housing goals (Fair and Affordable Housing, Rental Rehabilitation, and Homeownership)
PHA 5-Year and Annual Plan	GFHA, U.S. Department of Housing and Urban Development	Quantifiable goals and objective for very low to low income needs; included public improvements (building sites), Affordable Housing
Great Falls Downtown Master Plan (2011)	City of Great Falls	Consists of census tracts qualifying as Low to Moderate Income areas, Housing Rehabilitation, Affordable rental goals
Analysis of Impediments to Fair Housing Choice	City of Great Falls	Goals and strategies that address Fair and Affordable Housing; the Analysis of Impediments is currently being updated and drafted as a statewide collaboration coordinated by Montana Department of Commerce, Community Development Division
Comprehensive Housing Affordability Strategy	City of Great Falls	Needs assessment for previous goals and included in previous Strategic Plans (2011-2015; 2015-2019)

HUD Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I)).

The City of Great Falls works closely with state and county agencies in determining the needs of the region despite the relative isolation of Great Falls from adjacent municipalities. For example, the community of Black Eagle is adjacent to the city limits but is found within the county jurisdiction, and the Malmstrom Air Force Base is adjacent but outside city limits. Over the last several years, representative from Malmstrom have engaged extensively with City staff about the challenges in finding quality and affordable rental housing units for the Malmstrom employees who are unable or choose to live outside of airbase property. In recent years, the Comprehensive Housing Affordability Strategy (CHAS) for 2010-2020 was conducted by a “Great Falls/Cascade County Housing Planning Group” to consider both city and county housing needs.

Summary of citizen participation process/Efforts made to broaden citizen participation

Summarize citizen participation process and how it impacted goal-setting.

A community needs assessment survey and three public meetings were held to gather citizen input for the creation of the 2020-2024 Consolidated Plan draft. The community needs assessment was conducted via electronic and paper surveys and was available to the public from January 8 - February 7, 2020. Public outreach for the survey included direct survey distribution to stakeholder partner agencies, Neighborhood Council members, and City employees via email. Electronic survey links and paper survey locations were provided to and distributed by traditional and social media outlets, including the Great Falls Tribune, The Electric, and the City’s Facebook page and webpage. Paper copies of the survey were available at the Planning and Community Development office, the public library, and upon request to all public, nonprofit, faith-based, and stakeholder agencies. A total of 529 survey responses were received.

The community kick-off meeting was held on December 16, 2019, and was attended by 26 individuals representing public agencies, nonprofit agencies, neighborhood council members, and community residents. The second public meeting was the January 28, 2020, Council of Councils meeting. A total of 28 citizens were in attendance, including Neighborhood Council representatives, community residents, and three City Commissioners. The third public meeting was held in a focus group format on February 27, 2020. Twenty representatives from public agencies, nonprofit agencies, and Neighborhood Councils attended and participated in a focus group discussion to review results from the community needs assessment survey and to identify and further prioritize community goals. The 2020-2024 Consolidated Plan draft was made available to the public for a 30-day comment period from October 26 – November 24, 2020. A final City Commission public hearing to review the Consolidated Plan draft occurred on December 1, 2020. All public comments received and themes addressed in public meetings were transcribed and attached to this document as Appendix G.

Citizen Participation Outreach

1	Mode of Outreach: PUBLIC MEETING	
	Target of Outreach	Minorities, Persons with disabilities, Non-targeted/broad community, Non-profit agency personnel, faith-based institutions
	Summary of response/attendance	The community kick-off meeting was held on December 16, 2019, and was attended by 26 individuals representing public agencies, nonprofit agencies, neighborhood council members, and community residents. Invitations were sent via electric mail to area agencies and civic leaders.
	Summary of comments received	Attendees were invited to review the goals of the 2015-2019 Consolidated Plan and the planning timeline and participation opportunities for the 2020-2024 Consolidated Plan. No comments were received.
	Summary of comments not accepted and reasons	No comments were rejected.

2	Mode of Outreach: PUBLIC MEETING	
	Target of Outreach	Minorities, Persons with disabilities, Non-targeted/broad community, Residents of Public and Assisted Housing
	Summary of response/attendance	Staff member attended Council of Councils meeting on January 28, 2020, to present information on citizen participation opportunities during the consolidated planning process, including distributing physical copies of the community needs assessment as well as online survey link. There were 28 attendees, including Neighborhood Council representatives, community residents, and three City Commissioners.
	Summary of comments received	No comments were received.
	Summary of comments not accepted and reasons	No comments were rejected.
	URL (if applicable)	https://greatfallsmt.net/neighborhoodcouncils/council-councils-meeting-january-28-2020

3	Mode of Outreach: PUBLIC MEETING	
	Target of Outreach	Minorities, Persons with disabilities, Non-targeted/broad community, Non-profit agency personnel, faith-based institutions
	Summary of response/attendance	A focus group meeting was conducted on February 27, 2020. Twenty representatives from public agencies, nonprofit agencies, and Neighborhood Councils attended and participated in a focus group discussion to review results from the community needs assessment survey and to identify and further prioritize community goals. Invitations were sent via electric mail to area agencies, civic leaders, and Neighborhood Councils.
	Summary of comments received	Attendees' comments included ideas that further prioritize activities that address Community Service, Homelessness, Housing, Community Facilities, and Economic Development. Comments were also made regarding City regulations on HUD programs, the incorporation of larger, overall community goals, the leveraging of all available funding sources, and more frequent meetings among community stakeholders. Comments are included in full in Appendix G.
	Summary of comments not accepted and reasons	No comments were rejected.

4	Mode of Outreach: PUBLIC HEARING	
	Target of Outreach	Minorities, Persons with disabilities, Non-targeted/broad community, Residents of Public and Assisted Housing, Non-profit agency personnel, faith-based institutions
	Summary of response/attendance	The public hearing was held on December 1, 2020, during a regularly scheduled City Commission meeting. The public was invited to attend in person or virtually.
	Summary of comments received	Comments received included questions and statements pertaining to greater emphasis on racial inclusion, concern regarding the age of some data used within the report, the need for a more in-depth review of the current economic development and job market landscape, and clarification regarding the flexibility of the Plan to adapt and respond to COVID-19. A complete list of comments can be found in Appendix G.
	Summary of comments not accepted and reasons	No comments were rejected.

	URL (If applicable)	City Commission Meeting, December 1, 2020 City of Great Falls Montana (greatfallsmt.net) Meeting Minutes
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5	Mode of Outreach: INTERNET OUTREACH	
	Target of Outreach	Minorities, Persons with disabilities, Non-targeted/broad community, Residents of Public and Assisted Housing, Non-profit agency personnel, faith-based institutions
	Summary of response/attendance	The community needs assessment was conducted via electronic and paper surveys and was available to the public from January 8-February 7, 2020. Public outreach for the survey included direct survey distribution to stakeholder partner agencies, Neighborhood Council members, and City employees via email. Electronic survey links and paper survey locations were provided to and distributed by traditional and social media outlets, including the Great Falls Tribune, The Electric, and the City's Facebook page and webpage. Paper copies of the survey were available at the Planning and Community Development office, the public library, and upon request to all public, nonprofit, faith-based, and stakeholder agencies. A total of 529 survey responses were received.
	Summary of comments received	Priorities identified from survey responses include projects and activities related to Community Services, Affordable Housing, Homelessness Services and Prevention, Community Facilities and Infrastructure, and Economic Development.
	Summary of comments not accepted and reasons	No comments were rejected.

6	Mode of Outreach: INTERNET OUTREACH	
	Target of Outreach	Minorities, Persons with disabilities, Non-targeted/broad community, Residents of Public and Assisted Housing, Non-profit agency personnel, faith-based institutions
	Summary of response/attendance	The City's website and Facebook page were utilized to provide Public Notice for the Community Needs Assessment survey from January 8-February 7, 2019; to provide Public Notice of the 30-day comment period for the proposed Consolidated Plan draft from October 26, 2020 to November 24, 2020; to provide notice of the scheduled December 1, 2020 Public Hearing; to host the direct link for the Community Needs Assessment survey; and to host the proposed Consolidated Plan draft for public review and comment.
	Summary of comments received	One comment was received via email in regard to housing goals and physical accessibility, visitability, and universal design. Public Comments are included in Appendix G.
	Summary of comments not accepted and reasons	No comments were rejected.
	URL (If applicable)	https://greatfallsmt.net/planning/consolidated-plan-annual-action-plan

7	Mode of Outreach: NEWSPAPER AD	
	Target of Outreach	Minorities, Persons with disabilities, Non-targeted/broad community, Residents of Public and Assisted Housing, Non-profit agency personnel, faith-based institutions
	Summary of response/attendance	Legal Advertisements were placed with the Great Falls Tribune to run on the following dates for the corresponding Public Notices: October 25, 2020, for the Public Notice of the 30-day comment period from October 26, 2020-November 24, 2020, for the Consolidated Plan draft; November 15, 2020 and November 22, 2020 for the Notice of the scheduled December 1, 2020 Public Hearing.
	Summary of comments received	One comment was received via email in regard to housing goals and physical accessibility, visitability, and universal design. Public Comments are included in Appendix G.
	Summary of comments not accepted and reasons	No comments were rejected.

Table 1 – Citizen Participation Outreach

Section 3 | Needs Assessment

NA-05 Overview

Needs Assessment Overview

The consolidated planning process includes the identification and prioritization of community needs. Community needs were determined by analysis of data presented in this section combined with consideration of the City of Great Falls Community Needs Assessment Survey results, focus group key takeaways, City Commission Public Hearing, and public comments received, all of which were conducted between January-November 2020.

The City received 529 responses from its Community Needs Assessment Survey, which was available to the public from January 8 - February 7, 2020. Priorities identified from survey responses include a wide range of projects and activities related to:

1. Community Services (Public Services)
2. Affordable Housing
3. Homelessness Services and Prevention
4. Community Facilities and Infrastructure (Public Facilities and Improvements)
5. Economic Development

Key takeaways from the focus group held on February 27, 2020, include:

1. Prioritization of *Community Service Activities* that address:
 - a. youth and children's services
 - b. mental health needs
 - c. crime prevention
 - d. substance abuse
2. Prioritization of *Homelessness Activities* that address:
 - a. transitional and permanent supportive housing
 - b. rapid rehousing
 - c. transportation services
 - d. case management
3. Prioritization of *Housing Activities* that address:
 - a. residential rehabilitation
 - b. affordable rental and homeowner housing
 - c. homebuyer assistance
 - d. slum and blighted property removal

4. Prioritization of *Community Facilities Activities (Infrastructure)* that address:
 - a. youth centers
 - b. park and recreation
 - c. community centers
 - d. public restroom facilities

5. Prioritization of *Economic Development Activities* that address:
 - a. removing barriers to work (i.e., lack of public transportation)
 - b. increasing equitable pathways to opportunity (i.e., education, training, economic mobility)

The data tables presented in this section have been pre-populated by two HUD-provided data sets, including 2011-2015 Comprehensive Housing Affordability Strategy (CHAS) data and 2011-2015 American Community Survey (ACS) data. This Needs Assessment provides an overview of the population and demographic makeup of the City of Great Falls, identifies the groups of people in most need of housing assistance, and clarifies where gaps in services currently exist. The intent of the assessment is to provide a data-driven basis for the prioritization of needs that may be addressed in the Consolidated Plan.

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

Demographics	Base Year: 2009	Most Recent Year: 2015	% Change
Population	58,505	59,565	2%
Households	23,998	25,195	5%
Median Income	\$40,718	\$42,896	5%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	3,595	3,525	4,315	2,780	10,975
Small Family Households (2-4 members)	1,085	1,040	1,595	940	5,430
Large Family Households (5+ members)	145	210	170	255	725
Household contains at least one person 62-74 years of age	520	625	1,005	420	2,380
Household contains at least one person age 75 or older	415	915	760	545	925

Households with one or more children 6 years old or younger	675	554	775	365	610
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Table 6 - Total Households Table

Data Source: 2011-2015 CHAS

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing Lacking complete plumbing or kitchen facilities	35	50	0	45	130	10	0	30	0	40
Severely Overcrowded With >1.51 people per room (and complete kitchen and plumbing)	105	100	115	4	324	10	0	4	0	14
Overcrowded With 1.01-1.5 people per room (and none of the above problems)	90	65	0	0	155	0	0	20	4	24
Housing cost burden greater than 50% of income (and none of the above problems)	1,360	245	80	35	1,720	490	375	125	20	1,010
Housing cost burden greater than 30% of income (and none of the above problems)	480	915	650	25	2,070	135	415	625	230	1,405
Zero/negative Income (and none of the above problems)	160	0	0	0	160	40	0	0	0	40

Table 7 – Housing Problems Table

Data Source: 2011-2015 CHAS

2. Housing Problems 2

(One or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	1,590	455	195	90	2,330	510	375	180	25	1,090

Having none of four housing problems	1,015	1,390	1,835	1,015	5,255	285	1,305	2,105	1,655	5,350
Household has negative income, but none of the other housing problems	160	0	0	0	160	40	0	0	0	40

Table 8 – Housing Problems 2

Data Source: 2011-2015 CHAS

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related (2-4 related members)	570	455	375	1,400	155	295	300	750
Large Related (5+ related members)	125	120	25	270	4	40	45	89
Elderly (ages 62+)	330	354	114	798	224	285	245	754
Other	945	325	210	1,480	260	165	190	615
Total need by income	1,970	1,254	724	3,948	643	785	780	2,208

Table 9 – Cost Burden > 30%

Data Source: 2011-2015 CHAS

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related (2-4 related members)	455	125	15	595	130	110	25	265
Large Related (5+ related members)	115	50	0	165	4	20	25	49
Elderly (ages 62+)	210	54	29	293	150	120	45	315
Other	685	60	30	775	230	120	30	380
Total need by income	1,465	289	74	1,828	514	370	125	1,009

Table 10 – Cost Burden > 50%

Data Source: 2011-2015 CHAS

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	195	130	100	4	429	4	0	24	0	28
Multiple, unrelated family households (e.g. more than one unrelated household living in a single dwelling unit)	0	40	0	0	40	4	0	0	4	8

Other, non-family households	0	0	15	0	15	0	0	0	0	0
Total need by income	195	170	115	4	484	8	0	24	4	36

Table 11 – Crowding Information – 1/2

Data Source: 2011-2015 CHAS

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	<i>DATA UNAVAILABLE local CHAS data does not track this statistical category</i>							

Table 12 – Crowding Information – 2/2

Data Source: 2011-2015 CHAS (data unavailable)

Describe the number and type of single person households in need of housing assistance.

According to ACS data presented in Table 5, the population of Great Falls in 2015 was 59,565. This is an increase of 2% from the city’s total population in 2009. The city’s number of households grew from 23,998 in 2009 to 25,195 in 2015, an increase of 5%. The household area median income increased at the same rate, from \$40,718 in 2009 to \$42,896 in 2015. Table 6 indicates that 45.4% of Great Falls’ households earned 0-80% of the household area median income in 2015.

The household category designated as “Other” in the tables above is likely similar to single person households. Tables 9 and 10 indicate that Other households represent 42.4% of renters experiencing severe cost burdens and 37.5% of renters experiencing cost burdens. This is the largest household category noted by percentage with the percentages being especially noteworthy in the 0-30% AMI range. In that instance, household renters with 0-30% AMI represent 24% of renters experiencing cost burden, with the percentage jumping to 37.5% of in the severe cost category. This data suggests that non-family, single person households in Great Falls have the greatest need for housing assistance.

As of August 2020, the Great Falls Housing Authority has 42 single-person households on its public housing wait list and 97 single-person households on its Housing Choice Voucher wait list. Of the Housing Authority’s 490 public housing units, 132 are one-bedroom units; 8 are efficiency apartments.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

Disabled: The American Community Survey estimates that 8,877 residents of Great Falls are living with at least one disability, making up more than 15% of the City’s 56,979 civilian, noninstitutionalized population (ACS, 2018). In 2017, the Great Falls Housing Authority reported 110 disabled households in public housing and 99 disabled households in the Housing Choice Voucher program. As of August 2020, the Housing Authority estimates 11 people with disabilities on the public housing wait list and 19 on the Housing Choice Voucher list.

North Central Independent Living Services, Inc., (NCIL) employs and serves north central Montanans with disabilities. NCIL coordinates support services and provides information, referral, and housing navigation services for its consumers who are experiencing housing instability. NCIL advocates for increased physical accessibility, visitability standards (no-step entry, ground-level accessible restrooms) and universal design in rental and homebuyer housing stock in Great Falls. Universal design efforts accommodate people with disabilities as well as senior populations who desire to age in place.

Domestic Violence: The YWCA Mercy Home, the primary provider of emergency/transitional housing and supportive services for victims of domestic abuse, has the capacity to house 30 women & children at one time. Supportive services include crisis intervention, support groups, information and referral, group counseling, personal advocacy, parenting classes, a 911 cell phone lending program, transportation, legal advocacy, resume building, and employment coaching. The YWCA Great Falls website reports that from July 2018 to June 2019 the organization provided 156 women and children fleeing domestic violence with more than 4,071 shelter nights. Along with housing assistance, victims of domestic violence may require financial assistance for basic needs, counseling, legal assistance and training/education to assist with employment.

What are the most common housing problems?

Cost burden and severe cost burden are the most common housing problems in Great Falls. HUD defines cost burden as housing costs that are greater than 30% of a household's income. Severe cost burden exists when housing costs exceed 50% of a household's income. Table 9 indicates that 3,948 renter households with 0-80% AMI experienced cost burden in 2015, while 2,208 homeowner households with 0-80% AMI experienced cost burden in the same year reported. For severe cost burden (Table 10), the totals are 1,828 and 1,009 for 0-80% AMI renters and homeowners, respectively. Combined, these numbers indicate that 35.7% of total 0-80% AMI households in Great Falls experienced some degree of housing cost burden in 2015. Consequently, households experiencing rent and mortgage cost burdens may have difficulty affording other necessities critical for basic quality of life, including food, clothing, transportation, and medical care.

Are any populations/household types more affected than others by these problems?

More than half of households with 0-30% AMI have one or more severe housing problems at a rate of 58%. Other, single-person household renters with 0-30% AMI represent 24% of renters experiencing cost burden and 37.5% of renters experiencing severe cost burden. Small, related household renters with 0-80% AMI represent 35% of renters experiencing cost burden and 32.5% of renters experiencing severe cost burden. HUD-determined Fair Market Rents for Great Falls in 2015 for efficiency, one-bedroom, and two-bedroom units--units of size that would likely serve these populations--were \$485, \$505, and \$685, respectively. The supply of these units is not great enough to respond to the large demand in the community of Great Falls.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance.

The [2019 Montana Homeless Survey](#) reports that 34 households with school-aged children were experiencing homelessness and living in emergency shelters at the time the survey was administered on January, 31, 2019. Together, those 34 households include 47 children ages 5-17, or 70 children ages birth-17.

According to [data](#) released by the Great Falls Public School District in 2018, Great Falls has the highest percentage of free and reduced lunch eligibility for AA district elementary schools in the state, with nearly 50% of elementary students qualifying for free and/or reduced lunches. Additionally, the District reported an increase in the number of homeless students during recent years. Any “child who lacks a fixed, regular, and adequate nighttime residence” is considered to be experiencing homelessness by the Great Falls Public School District. During the 2017-2018 school year, the number of students believed to be experiencing homelessness was more than 350.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

The City does not provide a numerical estimation of the at-risk population.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness.

Cost burden and severe cost burden are the most common housing problems in Great Falls and can lead to housing instability. From 2010 to 2018, census data indicates the median home price in Great Falls increased at a rate of more than 17%, from \$144,200 in 2010 to \$168,900 in 2018. During the same time span, the median household income increased at a smaller rate of 11.4%, from \$40,935 in 2010 to \$45,620 in 2018.

The basic housing affordability problem for many residents is the disparity between income levels and housing costs, especially for low and moderate income households. Average housing prices have grown faster than income levels, making it difficult or impossible for many families to save enough for a down payment or to afford the monthly cost of a mortgage, interest, insurance and taxes. This problem is worse for people with poor credit histories, especially those people with low and moderate incomes.

Housing that is considered affordable is defined as housing units that have sales prices or rents that are within the means of a low or moderate income household. The private housing market does not

generally provide affordable housing without some type of subsidy or incentive. Public agencies and non-profit organizations have been very active in housing programs for many years, as described elsewhere in this report. Despite their success, however, the ability of low and moderate income families to acquire housing has still been adversely affected as a result of costs rising faster than incomes.

Another problem related to housing affordability is a shortage of quality houses in certain price ranges. Housing units that may be affordable to residents within certain income groups often have physical problems that make the units ineligible for financing from private lending institutions, as well as unattractive to potential buyers. In other cases, the houses may be in good enough condition to qualify for a loan, but the unit is priced too high for low or moderate income potential buyers to afford.

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

Based on Tables 13-16 below, disproportionately greater need exists among certain racial or ethnic groups based on housing problems despite their small percentage of the population. Disproportionately greater need is defined by being at least 10% larger than the total income level (all races combined).

For 0%-30% AMI:

- 75.6% of extremely low income households have one or more of four housing problems. All 40 (100%) of Asian households in this AMI range suffer from one or more housing problems, while 91.2% of American Indian/Alaska Native households with 0-30% AMI experience one or more housing problems.

For 30%-50% AMI:

- 61% of low income households have one or more of four housing problems. Again, 100% (all 10) of Asian households in this AMI range have one or more housing problems. 87.5% of Hispanic households with 30-50% AMI suffer from one or more housing problems.

For 50%-80% AMI:

- 38.2% of moderate income households have one or more of the four housing problems. Once again, 61.5% of American Indian/Alaska Native in this AMI category have one or more housing problems, and 52% of Hispanic households are experiencing one or more housing problems.

For 80%-100% AMI:

- 13.3% of households with 80-100% AMI have one or more of the four housing problems, but 44.4% of Asian households suffer from one or more housing problems.

0%-30% of Area Median Income

Housing Problems 1. Lacks complete kitchen facilities 2. Lacks complete plumbing facilities 3. More than one person per room 4. Cost Burden greater than 30%	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,720	680	200
White	2,115	545	185
Black / African American	0	0	0
Asian	40	0	0
American Indian, Alaska Native	414	40	0
Pacific Islander	0	0	0
Hispanic	50	20	15

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2011-2015 CHAS

30%-50% of Area Median Income

Housing Problems 1. Lacks complete kitchen facilities 2. Lacks complete plumbing facilities 3. More than one person per room 4. Cost Burden greater than 30%	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,155	1,370	0
White	1,890	1,270	0
Black / African American	0	0	0
Asian	10	0	0
American Indian, Alaska Native	95	60	0
Pacific Islander	0	0	0
Hispanic	70	10	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data Source: 2011-2015 CHAS

50%-80% of Area Median Income

Housing Problems 1. Lacks complete kitchen facilities 2. Lacks complete plumbing facilities 3. More than one person per room 4. Cost Burden greater than 30%	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,650	2,665	0
White	1,370	2,340	0
Black / African American	40	85	0
Asian	4	35	0
American Indian, Alaska Native	80	50	0
Pacific Islander	0	0	0
Hispanic	125	115	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data Source: 2011-2015 CHAS

80%-100% of Area Median Income

Housing Problems 1. Lacks complete kitchen facilities 2. Lacks complete plumbing facilities 3. More than one person per room 4. Cost Burden greater than 30%	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	370	2,415	0
White	335	2,130	0
Black / African American	0	25	0
Asian	20	25	0
American Indian, Alaska Native	0	4	0
Pacific Islander	0	0	0
Hispanic	4	115	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data Source: 2011-2015 CHAS

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

Based on Tables 17-20 below, disproportionately greater need exists among certain racial or ethnic groups based on severe housing problems despite their small percentage of the

population. Disproportionately greater need is defined by being at least 10% larger than the total income level (all races combined).

For 0%-30% AMI:

- 58.3% of extremely low income households have one or more of the four severe housing problems identified; but all ten (100%) of Asian households suffer from one or more severe housing problems, while 84.7% of American Indian/Alaska Native households in this income category have one or more severe housing problems.

For 30%-50% AMI:

- 23.5% of low income households have one or more of the four severe housing problems identified; but 100% of Asians with 30-50% AMI have one or more severe housing problems. Nearly 69% of Hispanic households in this income category suffer from one or more severe housing problems.

For 50%-80% AMI:

- 8.7% of moderate income households have one or more of the four severe housing problems identified; but 28% of American Indian/Alaska Native households and nearly 21% of Hispanic households with 50-80% AMI have one or more of four severe housing problems.

For 80%-100% AMI:

- Only 4% of households have one or more of the four severe housing problems provided. According to Table 20, there is no disproportionately greater need within this AMI range.

0%-30% of Area Median Income

<u>Severe Housing Problems</u> 1. Lacks complete kitchen facilities 2. Lacks complete plumbing facilities 3. More than 1.5 persons per room 4. Cost Burden over 50%	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,100	1,300	200
White	1,540	1,115	185
Black / African American	0	0	0
Asian	40	0	0
American Indian, Alaska Native	389	70	0
Pacific Islander	0	0	0
Hispanic	40	30	15

Table 17 – Severe Housing Problems 0 - 30% AMI

Data Source: 2011-2015 CHAS

30%-50% of Area Median Income

Severe Housing Problems 1. Lacks complete kitchen facilities 2. Lacks complete plumbing facilities 3. More than 1.5 persons per room 4. Cost Burden over 50%	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	830	2,695	0
White	710	2,455	0
Black / African American	0	0	0
Asian	10	0	0
American Indian, Alaska Native	24	130	0
Pacific Islander	0	0	0
Hispanic	55	25	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data Source: 2011-2015 CHAS

50%-80% of Area Median Income

Severe Housing Problems 1. Lacks complete kitchen facilities 2. Lacks complete plumbing facilities 3. More than 1.5 persons per room 4. Cost Burden over 50%	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	375	3,940	0
White	285	3,420	0
Black / African American	0	125	0
Asian	0	39	0
American Indian, Alaska Native	35	90	0
Pacific Islander	0	0	0
Hispanic	50	190	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data Source: 2011-2015 CHAS

80%-100% of Area Median Income

Severe Housing Problems 1. Lacks complete kitchen facilities 2. Lacks complete plumbing facilities 3. More than 1.5 persons per room 4. Cost Burden over 50%	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	115	2,670	0
White	105	2,355	0
Black / African American	0	25	0
Asian	0	45	0
American Indian, Alaska Native	0	4	0
Pacific Islander	0	0	0
Hispanic	0	120	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data Source: 2011-2015 CHAS

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

The table below indicates that a high number of households (71.8%) are not cost burdened based on the data. The remaining 28.2% of Great Falls households are cost-burdened, meaning they pay more than 30% of their income on housing needs. In this cost-burdened category, 15.6% of cost-burdened households pay between 30-50% of their income on housing while 11.6% pay greater than 50% of their income on housing (severely cost burdened).

Housing Cost Burden				
Housing Cost Burden	<=30% (no cost burden)	30-50% (cost burden)	>50% (severe cost burden)	No / negative income (not computed)
Jurisdiction as a whole	18,080	3,940	2,940	235
White	16,290	3,470	2,355	225
Black / African American	200	40	0	0
Asian	260	30	50	0
American Indian, Alaska Native	405	160	355	0
Pacific Islander	0	0	0	0
Hispanic	510	120	85	15

Table 21 – Greater Need: Housing Cost Burdens AMI

Data Source: 2011-2015 CHAS

Discussion

According to the data presented in Table 21, American Indian/Alaska Native households experience disproportionately greater need in regard to severe housing cost burden (paying more than 50% of their income toward housing). While 11.6% of the population as a whole is severely cost burdened, 38.6% of American Indian/Alaska Native households are severely cost burdened.

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

Disproportionately greater need is defined by being at least 10% larger than the total income level (all races combined). Based upon the data provided in section NA-20, disproportionately greater needs exist among certain racial or ethnic groups despite their small percentage of the population. For extremely low incomes (0-30% AMI), Asian households and American Indian/Alaska Native households have

disproportionate needs, while in the low income category (30-50% AMI) Asians and Hispanics have disproportionately greater needs. When considering moderate incomes (50-80% AMI), American Indian/Alaska Native and Hispanic populations have disproportionately greater needs.

If they have needs not identified above, what are those needs?

Great Falls has not specified or determined any targeted needs based on race outside of the findings above.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

A review of the Community Planning and Development (CPD) Maps data provided by HUD reveals that there are some isolated concentrations of minority races in Great Falls. American Indians are located in all census tracts with the highest concentrations downtown in Tracts 108, 4, and 7; persons of Hispanic Origin are located in all census tracts with the highest concentration downtown in Tracts 7 and 8. Malmstrom Air Force Base is located on the far east side of town in Tract 12, where a high concentration of all races are represented. Tract 12 sits largely outside the city limits.

Introduction

The Great Falls Housing Authority (GFHA) is the only Public Housing Authority within the city of Great Falls. GFHA owns and operates one main public housing site (Chowen Springs) and four scattered public housing sites (Austin Hall, Yeoman-Tynes, Russell Apartments, and Sunrise Court). These properties include a total of 490 apartment units that range in size from 1-4 bedrooms. Additionally, GFHA has budget authority for 250 Housing Choice Vouchers (HCVs).

GFHA also manages two affordable housing properties (Sand Hills and Holland Court), which have 16 apartment units each. Eight units at Sand Hills were funded with City HOME funds and are currently within their affordability period per HOME regulations. Eight units at Holland Court were funded with City HOME funds, and although the period of affordability has expired, GFHA continues to set rent for these units within HOME contract limits.

GFHA is governed by a seven-member Board of Commissioners appointed by the Great Falls City Commission. The community members of the Board serve five-year terms and the resident members serve two-year terms. All members serve without compensation. The Board contracts for staff and management services from the City of Great Falls.

The Great Falls Housing Authority will continue the processes it has in place to improve the living environment for its residents, including using capital funds to rehabilitate housing units as necessary. A rehabilitation project continuing through the next five years is the infrastructure upgrade and major renovation of AMP 1, which consists of 156 units at the main housing site (Chowen Springs).

Tables 22-26 below include data from the Office of Public and Indian Housing and offer demographic information for public housing residents and Housing Choice Vouchers administered by the Great Falls Housing Authority.

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
# of units vouchers in use	0	0	469	184	0	183	0	0	0

Table 22 - Public Housing by Program Type, Data Source: PIC (PIH Information Center)

**includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition*

Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project - based	Tenant - based	Special Purpose Voucher	
			Veterans Affairs Supportive Housing				Family Unification Program	
Average Annual Income (in dollars)	0	0	11,976	12,647	0	12,602	0	0
Average length of stay (in years)	0	0	3	3	0	3	0	0
Average Household size (# of persons)	0	0	2	2	0	2	0	0
# Homeless at admission	0	0	0	0	0	0	0	0
# of Elderly Program Participants (>62 yrs of age)	0	0	61	31	0	31	0	0
# of Disabled Families	0	0	109	63	0	63	0	0
# of Families requesting accessibility features	0	0	469	184	0	183	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of Domestic Violence victims	0	0	0	0	0	0	0	0

Table 24 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant -based	Special Purpose Voucher		
			Veterans Affairs Supportive Housing				Family Unification Program	Disabled*	
White	0	0	369	149	0	149	0	0	0
Black/African American	0	0	14	8	0	7	0	0	0
Asian	0	0	6	0	0	0	0	0	0
American Indian/Alaska Native	0	0	77	26	0	26	0	0	0
Pacific Islander	0	0	3	1	0	1	0	0	0
Other	0	0	0	0	0	0	0	0	0

Table 25 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

**includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition*

Ethnicity of Residents

Program Type									
Ethnicity	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
Hispanic	0	0	11	5	0	5	0	0	0
Not Hispanic	0	0	458	179	0	178	0	0	0

Table 26 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

**includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition*

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

In reviewing the Section 504 Needs Assessment, the Great Falls Housing Authority is in compliance with the physical handicapped accessibility requirements for housing authority facilities. The Great Falls Housing Authority will take into account the handicap accessibility requirements (5% standard for percentage of ADA accessible units) during any rehabilitation projects. The Great Falls Housing Authority has housing designated for the elderly/disabled and has established partnerships with assistive agencies within the community to assist those residents.

In 2017, GFHA reported 110 households with disabilities residing in public housing and 99 households with disabilities utilizing Housing Choice Vouchers. As of August 2020, there are 11 households with disabilities on the public housing wait list and 19 households on the Housing Choice Voucher wait list. Currently, none of the households with disabilities on either wait list have requested physical handicapped accessible units.

Most immediate needs of residents of Public Housing and Housing Choice Voucher holders:

The excerpt below from the 2015 Analysis of Impediments remains accurate according to Great Falls Housing Authority leasing staff. Fair Market Rents (FMR) released by HUD for Great Falls decreased across all bedroom sizes from federal fiscal years 2019 to 2020. Although FMRs now show an increase across all bedroom sizes for federal fiscal year 2021, they remain well below the city’s market rate rents, which does not encourage participation in the HCV program by landlords in the private market.

From the Analysis of Impediments (2015): *Fair market rents are too low. The Great Falls Housing Authority and Opportunities, Inc., report Housing Choice Voucher participants are having difficulties*

finding landlords that will accept vouchers. The primary problem is fair market rents are below the city market rents and in a strong rental market, landlords will rent to the open market for higher rents. A second problem is the landlord would have to hold the rental open until the Housing Quality Standards (HQS) inspection was completed and compliance with HQS requirements achieved, meaning that rental income is lost during the transition. This waiting period, coupled with lower than market rent, results in landlords being reluctant to accept Housing Choice Vouchers.

How do these needs compare to the housing needs of the population at large?

The need for decent, affordable housing was re-emphasized in survey results from the January 2020 Community Needs Assessment, as well as the citizen participation focus group meeting held in February 2020. Survey results and community input continue to indicate that affordable rental and homeownership opportunities rank high among community needs. The decrease in public funding for nonprofit partner agencies affects all housing organizations in the community. This, along with disproportionate increases in wages and housing costs, creates a housing burden for those depending on these agencies for housing assistance.

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction

At the time of this report, data from the 2020 Point-in-Time Count and Housing Inventory Count has not been released. The data in this section reflects the 2019 Homeless Point-in-Time Count and reports on sheltered and unsheltered persons experiencing homelessness by household type and subpopulation provided by the Montana Continuum of Care Coalition and Department of Public Health and Human Services. On the night of January 31, 2019, 223 people were counted as homeless in Great Falls. Of the total, 200 were in an emergency shelter, 13 were in transitional housing, and 10 were unsheltered. When considering household type, there were 110 respondents with family, which made up 34 family households and included a total of 70 accompanying children aged 17 and under; 113 respondents were counted as individuals.

Homeless Needs Assessment, January 31, 2019

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate # experiencing homelessness each year	Estimate # becoming homeless each year	Estimate # exiting homelessness each year	Estimate # of days persons experience homelessness
	Sheltered	Unsheltered	Yearly Data Estimates Not Reported			
Persons in Households with Adult(s) and Child(ren)	110	0				
Persons in Households with Only Children	0	0				
Persons in Households with Only Adults	103	10				
Chronically Homeless Individuals	15	3				
Chronically Homeless Families	16	0				
Veterans	14	0				
Unaccompanied Child	0	0				
Persons with HIV	0	0				

Table 27 - Homeless Needs Assessment

Data Source: 2019 Point-in-Time Count, Montana Continuum of Care Coalition, <http://mthomelessdata.com/2019/>

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth).

Chronically homeless is defined by HUD as an individual or family with a disabling condition who has been continuously homeless for a year or more or has had at least four episodes of homelessness in the past three years. The 2019 Point-in-Time survey counted 18 individuals and 16 families as chronically homeless. The number of veterans experiencing homelessness the night of the count was 14, and the number of people with disabilities experiencing homelessness was 60.

The number of homeless families with children in Great Falls has increased, representing nearly 50% of the total 2019 count. To meet this growing need, the Great Falls Rescue Mission completed construction of the Cameron Family Center in November of 2016 and can serve approximately 134 people experiencing homelessness, 70 of which, on average, are children. While the number of

unaccompanied youth is undefined, other family service agencies report receiving children from family members due to methamphetamine use by one or more parents.

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

On the night of January 31, 2019, 223 people were counted as homeless in Great Falls. Of that total, there were 110 respondents with family, which made up 34 family households and included a total of 70 accompanying children aged 17 and under. The number of veterans experiencing homelessness during the one-night count was 14.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

The 2019 Point-in-Time count reflects a disproportionate rate of American Indian/Alaska Natives experiencing homelessness in Great Falls. American Indian/Alaska Natives make up less than 6% of the city's total population, yet they represent 20% of those experiencing homelessness. Great Falls serves as the social services hub of all of North Central Montana, and the surrounding Cascade County jurisdiction contains larger American Indian/Alaska Native populations than the city limits. Populations of surrounding municipalities are served by homeless providers in Great Falls and have access to public transportation within a city block of the Great Falls Rescue Mission properties.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

Of the total respondents on the night of January 31, 2019, 90% reported being in an Emergency Shelter and nearly 6% in Transitional Housing within the city. Less than 5% of respondents indicated that they slept in an unsheltered location. Unsheltered was interpreted as outside or other place not meant for sleeping (e.g. on the street, under a bridge, in a park, car, bus station, abandoned building, etc.).

Introduction

Non-homeless special needs include populations of the elderly; those who are mentally, developmentally, or physically disabled; those dependent on alcohol and drugs; victims of domestic violence; persons with HIV/AIDS; at-risk youth; and individuals depending on home care services and employment services.

Describe the characteristics of special needs populations in your community.

Elderly: According to the 2018 Census estimates, there are 10,663 residents age 65 years and over living in Great Falls, representing 18% of the total population (58,990). Approximately 35% of the city's elderly residents live alone.

Frail Elderly: *Frail elderly* is defined as individuals age 75 years and over or individuals age 65 years and over with functional impairments that affect daily living. In 2018, an estimated 1,530 residents between the ages of 65-74 were living with at least one disability in Great Falls. Of the 4,682 residents age 75 years and older, approximately 2,242, nearly 48%, are living with at least one disability.

Persons with Disabilities: The 2018 American Community Survey estimates that 8,877 Great Falls residents age five years or older are living with at least one disability. There are an estimated 3,113 residents age 18 years or older with an independent living difficulty; 1,513 residents age 18 years or older with a self-care difficulty; 3,917 residents with an ambulatory difficulty; 3,957 residents with a cognitive difficulty; 1,118 residents with a vision difficulty; and 2,493 residents with a hearing difficulty.

Mental Health: The 2016 Cascade County [Community Health Needs Assessment](#) reported that survey respondents ranked mental health and access to mental health services among the top 5 health concerns for the county, identifying depression, work-related stress, and alcohol use as the three mental health issues most impacting respondents' families. Based on survey results from the [2016 Behavioral Risk Factor Surveillance System](#), the Montana Department of Public Health and Human Services reports that 19.5% of all Montanans age 18 years and over have ever been diagnosed with a depressive disorder.

Substance Abuse: Substance dependency and abuse is a statewide concern of pressing importance. A 2017 report conducted by the Montana Department of Justice (DOJ) found that one in 10 Montanans is dependent on or abusing alcohol or drugs, and 40% of adult felony convictions are for possession or distribution of drugs or felony DUI. The National Survey of Drug Use and Health (2012-2014) estimates that 18,000 residents of the state are dependent on or abusing illicit drugs, while 66,500 are dependent on or abusing alcohol. Alcohol is the most commonly used substance in Montana, and high rates of consumption start early according the Montana DOJ study, which reports that 61% of Montana high school students who drink engage in binge drinking behavior. Across the state, substance use

contributes to more than 20,000 hospital and emergency room visits each year and is a key contributor to Montana's high rates of suicide, which are consistently twice the rate in the United States.

Victims of Domestic Violence: The YWCA Mercy Home is the primary provider of emergency/transitional housing and supportive services for victims of domestic abuse in Great Falls. The YWCA Great Falls website reports that from July 2018 to June 2019 the organization provided 156 women and children fleeing domestic violence with more than 4,071 shelter nights.

Persons with HIV/AIDS: According to the Montana Department of Public Health and Human Services, there are approximately 600 persons with HIV living in the state in 2016. On average, there have been 20-22 new cases of HIV identified annually over the last 15 years. The majority of persons with HIV in Montana are white males.

What are the housing and supportive service needs of these populations and how are these needs determined?

Persons with Disabilities and Elderly/Frail Elderly: Accessible Space, Inc., provides 23 units of accessible, subsidized housing for low income adults with severe mobility impairments and/or traumatic brain injuries at Southwinds Estates and 17 units at Meadow Lark Apartments. Twenty-four hour personal care attendant services are provided or available at both housing complexes. ASI also provides 47 units of accessible housing with availability of personal care attendant services for low income elderly residents at The Portage and 37 units of accessible housing at Voyageur Apartments.

Easter Seals-Goodwill Industries provides a variety of services to people with disabilities and disadvantaging conditions. Services include supportive and organizational employment, employment placement and training support, supported living, adult day programs, home care and home health care.

Quality Life Concepts, Inc., provides housing services for adults with developmental and/or physical disabilities. QLC also provides supportive living services for disabled people living in their own homes, as well as providing community-based day programs/services including: day activities and programming; assistance with finances, medical appointments, shopping, transportation and other day-to-day living needs; vocational rehabilitation services; recreational/social activities and assistance to families whose children have a developmental disability or are at risk for developmental delays.

Cascade County Area VIII Agency on Aging provides supportive services such as home meal delivery, home attendants, health promotion, foster grandparents, retired senior volunteer programming and transportation to assist elderly people who are not homeless. The Great Falls Senior Citizens Center provides on-site, low-cost meals, health and exercise programs, tax return preparation assistance, telephone outreach, educational workshops and recreational/social activities for elderly people in the community.

Health/Mental Health: The City-County Health Department provides a wide variety of health care services to the entire community, including people with low income and who are homeless. These services include disease prevention and control, nutrition education, food supplements, primary health care, dental care, mental health counseling, case management, assistance with obtaining prescriptions and specialty medical care, sexually transmitted disease testing and medication and parenting instruction. The Health Department provides educational services to inform the public and professional community members about lead-based paint hazards when requested.

The Indian Family Health Clinic provides primary medical care, diabetes clinical services, prescription medication, behavioral health programs (including chemical dependency and tobacco prevention, HIV/Hepatitis C prevention), wellness services, limited community resource advocacy and limited mental health counseling.

Alluvion Health is a non-profit Federally Qualified Health Center and offers medical, dental, behavioral, and substance abuse disorder services. Additional services include care coordination, crisis management, and referrals to community and housing services.

Substance Abuse and Drug Addiction: Gateway Community Services provides comprehensive alcohol and drug abuse treatment services, including evaluation, intensive outpatient treatment, adult and adolescent co-occurring mental health services, residential treatment services for low and moderate income people diagnosed with a chemical dependency addiction, case management, relapse prevention, anger management and monthly monitoring, early intervention and community prevention classes and outreach activities for community awareness.

Victims of Domestic Violence: The YWCA Mercy Home, the primary provider of emergency/transitional housing and supportive services for victims of domestic abuse, has the capacity to house 30 women & children at one time; supportive services include crisis intervention, support groups, information and referral, group counseling, personal advocacy, parenting classes, 911 cell phone lending program, transportation, legal advocacy, resume building & employment coaching. The YWCA Great Falls website reports that from July 2018 to June 2019 the organization provided 156 women and children fleeing domestic violence with more than 4,071 shelter nights. Along with housing assistance, victims of domestic violence may require financial assistance for basic needs, counseling, legal assistance and training/education to assist with employment.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

In Cascade County in 2018, the HIV infection rate was 65 of every 100,000 people according to data reported by AIDSvu.org. With a 2018 county population of 81,688, this means there are approximately 58 persons living with HIV in Cascade County. In 2019, the Montana Department of Public Health and

Human Services reported 26 newly diagnosed HIV cases across the state. The City of Great Falls does not receive Housing Opportunities for Persons With AIDS (HOPWA) funds as of 2020.

NA-50 Non-Housing Community Development Needs – 91.215 (f)

Describe the jurisdiction's need for Public Facilities:

Most non-profit social service agencies continue to have difficulty securing the financial resources to pay for code deficiencies, badly needed rehabilitation or handicap accessibility in their buildings. In many cases the rehabilitation is necessary for the agency to continue to offer services and, in some cases, the demand for the service has increased so dramatically that additional space is needed. In addition to the needs presented by agencies, needs are seen within City departments to complete upgrades at a variety of City public facilities to comply with Americans with Disabilities Act (ADA) requirements. As noted previously, the City will continue to work toward meeting ADA requirements for handicap accessibility in infrastructure and public facilities.

City departments and a number of non-profit agencies apply for CDBG funding each year and the dollar amounts of these requests has been increasing over the recent years. Funding requests for public facility projects received during program year 2019 totaled \$881,526 and included applications from two City departments. The total dollars requested for public facility projects was greater than the City's annual allocation for the 2019 program year. Funding was requested for a broad range of activities such as handicap accessibility, sidewalk repairs, building renovations and energy efficiency upgrades. Based on the current trend, a high level of requests for CDBG funding for public facility improvement projects is expected to continue throughout the next five years.

How were these needs determined?

A community needs assessment survey and two public meetings were held to gather citizen input for the creation of the 2020-2024 Consolidated Plan. The community needs assessment was conducted via electronic and paper surveys and was available to the public January 8 - February 7, 2020, and a total of 529 survey responses were received. The community kick-off meeting was held on December 16, 2019, and was attended by 26 individuals representing public agencies, nonprofit agencies, neighborhood council members, and community residents. A second public meeting was conducted in a focus group format on February 27, 2020. Twenty representatives from public agencies, nonprofit agencies, and neighborhood councils attended and participated in a focus group discussion to review results from the community needs assessment survey and to identify and further prioritize community goals. Additionally, one public hearing was held on December 1, 2020. All comments received are noted in Appendix G.

In 2017, the City of Great Falls Public Works Department completed its ADA Transition Plan per Title II of the Americans with Disabilities Act (ADA). The main goal of this transition plan is to evaluate existing pathways, such as sidewalks, curb cuts, and curb ramps; identify any barriers to accessibility; determine who should remove these barriers; and schedule the needed removal. This Transition Plan is guiding the City in efforts to provide accessible transportation and programs through the implementation of a program that identifies physical barriers on City properties and in the public rights of way.

Describe the jurisdiction's need for Public Improvements:

For the purposes of the City's implementation of the CDBG Grant Program, Public Improvement projects are categorized under Public Facilities. Please refer to the Public Facilities section of this Plan for the jurisdiction's need and how these needs were determined.

How were these needs determined?

For the purposes of the City's implementation of the CDBG Grant Program, Public Improvement projects are categorized under Public Facilities. Please refer to Public Facilities for the jurisdiction's need and how these needs were determined.

Describe the jurisdiction's need for Public Services:

A number of social service agencies apply for CDBG funding each year. A broad range of requests are received from social service agencies seeking funding for activities such as child care scholarships, food programs, youth services, homeless services, and housing/rental counseling. The trend for this high level of funding requests is expected to continue throughout the next five years. It is anticipated the needs will continue to increase exponentially in this category, especially if non-profit social service agencies continue to be faced with governmental funding cuts.

How were these needs determined?

A community needs assessment survey and two public meetings were held to gather citizen input for the creation of the 2020-2024 Consolidated Plan. The community needs assessment was conducted via electronic and paper surveys and was available to the public January 8 - February 7, 2020, and a total of 529 survey responses were received. The community kick-off meeting was held on December 16, 2019, and was attended by 26 individuals representing public agencies, nonprofit agencies, neighborhood council members, and community residents. A second public meeting was conducted in a focus group format on February 27, 2020. Twenty representatives from public agencies, nonprofit agencies, and neighborhood councils attended and participated in a focus group discussion to review results from the community needs assessment survey and to identify and further prioritize community goals. Additionally, one public hearing was held on December 1, 2020. All comments received are noted in Appendix G.

According to the community needs assessment survey results and the focus group discussions, providing support for Community Services (Public Services) rank as the highest community need, with specific emphasis given to supporting programs targeting youth services, mental health needs, substance abuse, crime prevention, child care, and homelessness services.

Describe the jurisdiction's need for Economic Development:

The Great Falls Development Authority (GFDA) is the primary economic development organization in the community. The GFDA's mission is to grow and diversify the Great Falls regional economy, create higher wage employment opportunities, and improve the community's economic competitiveness. Key economic development target areas include: 1) increasing entrepreneurial business activity as well as expanding and retaining existing businesses, 2) attracting real estate and business investment along the Missouri River corridor as well as within downtown Great Falls, 3) market-based business recruitment, 4) diversifying targeted manufacturing clusters, 5) workforce development, and 6) increased investment in commercial and housing development. One of GFDA's strategic priorities continues to be the development and marketing of "shovel-ready" heavy industrial sites within the Great Falls AgriTech Park. This rail-served industrial park contains 197 acres of property comprising 10 parcels. Occupants of the park include a FedEx distribution facility, Helena Chemical, and Montana Specialty Mills.

GFDA provides a number of key services to assist business development and ensure the creation/retention of higher wage job opportunities. GFDA's Community Development Finance Institution (CDFI) provides gap and bridge financing assistance for entrepreneurs and businesses. Additionally, their Community Development Corporation (CDC) provides SBA 504 loans. The Small Business Development Center (SBDC) is also housed within GFDA and provides valuable training and technical assistance to businesses, particularly to new startup efforts.

GFDA has been allocated CDBG funds in the past to expand their CDBG revolving loan fund to provide gap financing to existing and start-up businesses that enable these businesses to create jobs for low income people. Past examples of successful partnerships between GFDA and the City CDBG program include financial assistance for the new Montana Eggs project and assistance for the SpringHill Suites hotel project.

GFDA reports they are seeing a sharp increase in needs in the following three financial areas as a result of challenges in the local credit market:

- 1) Filling gaps in conventional lending markets; and
- 2) Additional unconventional loan capital to assist existing businesses and start-up entrepreneurs; and
- 3) Real estate revitalization loan funds to address the gap financing needs of commercial real estate developers who are trying to renovate distressed properties.

The Great Falls community has a number of economic development strengths. Its workforce is mature, experienced, and skilled. Prior to the COVID-19 pandemic, community unemployment was low. Housing costs, relative to many other areas in the country, continue to be affordable. The community's biggest challenge continues to be its wages versus cost of living. Although the community has made strides in the past Consolidated Plan cycle, the percentage is still well below 100%.

How were these needs determined?

The community's economic development needs were developed based upon the results of the Community Needs Survey process, Focus Group discussion, review of the GFDA website (growgreatfallsmontana.org), and review of the *Labor Supply Report of Great Falls MSA, Montana*, prepared for GFDA by CHMURA Economics & Analytics on August 3, 2017. This labor market study was funded by CDBG funds.

Section 4 | Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview

The majority of data and analysis presented in this Housing Market Analysis are derived from the HUD pre-populated tables throughout the section, as well as the 2018 American Community Survey ([ACS](#)) 5-year Estimates and HUD's Community Planning Development [mapping tools](#). Additional sources are referenced throughout as needed.

Great Falls is located in Cascade County in the north central region of Montana, where the geography is typical of the Northern Plains. The Rocky Mountain front is nearby to the west. The residential housing stock can be found in the relatively flat, original townsite stretching east towards Malmstrom Air Force Base or within the hills of the city's northwest side. In 2010, the population of Great Falls was measured at 58,505, a slight increase from 55,392 in 1990. According to the 2018 census estimate, the population of Great Falls remains relatively flat at approximately 58,990.

The population of Great Falls is largely White/Non-Hispanic, with minorities representing 12.9% of the total population. American Indian/Alaska Natives make up the largest minority group at 5.8% of the total population, while persons of Hispanic origin make up 4.6% of the population. Census Tract 7 has the highest concentration of racial minorities and is one of the oldest areas of the city.

The median age in Great Falls is 38.6 years; nearly 22% of the population is under 18 years, and 22% is 62 years or older. Of the people aged five years or older, 15% report living with at least one disability. As the population of the community matures in larger numbers, there is continued demand for assisted living facilities and elderly support services. As demographic changes occur, the housing market will need to change to serve these residents.

In 2018, the highest percentages of those employed in private industry was 25.4% in educational services, health care, and social assistance; 13.6% in retail trade; and 11.9% in arts, entertainment, recreation, accommodation, and food services. In 2018, the unemployment rate for Great Falls was 4.1% and was estimated to be 3.8% in March 2020 (U.S. Bureau of Labor Statistics).

The median household income in Great Falls in 2018 was \$45,620, and the median family income was \$62,110. Per capita income was \$29,203, which was 89.5% of the national average. Median house value was \$168,900. The highest concentrations of low income households are in census Tracts 108 and 9, with poverty rates of 43% and 35.25% respectively. The poverty rate for Great Falls is 14.5%.

Introduction

The 2011-2015 American Community Survey estimates that there are 27,165 residential properties within Great Falls. Nearly 63% of these units are single family houses; 27% are multi-unit, or multifamily housing. Only 6% of homes are manufactured housing. These numbers do not reflect characteristics outside of the city limits, where Malmstrom Air Force Base contains a large concentration of housing and county lands contain either larger lot homes or manufactured housing.

All Residential Properties by Number of Units

Property Type	Number	%
1-unit, detached structure	17,100	63%
1-unit, attached structure	940	3%
2-4 units	2,715	10%
5-19 units	2,780	10%
20 or more units	1,905	7%
Mobile Home, Boat, RV, Van, etc.	1,725	6%
Total	27,165	100%

Table 31 – Residential Properties by Unit Number
Data Source: 2011-2015 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	8	0%	810	8%
1 bedroom	385	2%	2,505	26%
2 bedrooms	3,725	24%	3,970	41%
3 or more bedrooms	11,340	73%	2,450	25%
Total	15,458	99%	9,735	100%

Table 32 – Unit Size by Tenure
Data Source: 2011-2015 ACS

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

Through CDBG and HOME funding, the City and its subrecipients have provided services that assist low-to-moderate income households. These services include the new construction of homeowner and rental units, rehabilitation of older units (both to comply with ADA and code standards and to add formerly-vacant units to the housing market in the downtown core), and home loan assistance.

An effective tool for managing and mapping assisted units through CDBG and HOME funds is the Community Planning Development (CPD) Maps web program, or Consolidated Plan mapping tool. This

- The Elmwoods (18 units)
- River Run Apartments (92 units)

Low Income Housing Tax Credit (LIHTC) properties in Great Falls:

- Autumn Run Apartments (121 units)
- Cascade Ridge Senior Living (39 units)
- Franklin School (40 units)
- Rainbow House Apartments (40)
- Sandstone Village (47 units)
- Soroptimist Village (55 units)
- Town Site NHS Apartments (20 units)
- Rockcross Commons (124 units)

Other assisted properties in Great Falls include but are not limited to:

- First Avenue Estates (12 units)
- The Voyageur (38 units)
- Meadowlark Apartments (18 units)
- The Portage (48 units)
- Southwind Estates (24 units)
- Sand Hills (16 units)
- Holland Court (16 units)

The Great Falls Housing Authority provides housing for approximately 700 households through its public housing, Section 8/Housing Choice Voucher, and affordable housing programs. Additional information on the Great Falls Housing Authority is detailed in the Public Housing sections of this report (NA-35; MA-25).

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

According to the Great Falls Housing Authority staff, there have been minimal complaints received regarding the rejection of Section 8/Housing Choice Voucher (HCV) eligible individuals and families by landlords and property managers. Fair Market Rents (FMR) established by HUD for Great Falls have seen yearly decreases across all bedroom sizes for the past several years, and although FMRs show an increase across all bedroom sizes for federal fiscal year 2021, they remain well below the city's market rate rents. This presents a challenge for encouraging participation in the Housing Choice Voucher program by landlords in the private market. To remain competitive in the market, the Housing Authority continues to set their payment standards to 110% of the effective FMR in an effort to ensure a reasonable pool of landlords and property managers participating in the Section 8 HCV program.

Does the availability of housing units meet the needs of the population?

The population of Great Falls experienced little growth from 2010 to 2018, increasing from 58,505 in 2010 to 58,990 at the 2018 census estimate, an increase of less than one percent. During that same time span, an estimated 1,004 housing units were added to Great Falls' housing stock, most of which are single-family homes and can be seen on the city's northwest side.

The City has worked with local developers and non-profit agencies to produce new housing opportunities. Unfortunately, the number of new affordable units is still smaller than the demand from low and moderate income residents. In order to produce units for these residents, it is often necessary to provide the tenants or developers with some type of federal and/or state subsidy or incentive. The City clearly does not have sufficient resources to provide such assistance, and the annual level of state and federal assistance is difficult to predict. The private sector is unable to build affordable single-family homes, except in limited numbers, and it takes an increasing grant subsidy for non-profit housing agencies to provide affordable units.

The ability to produce affordable rental housing varies by the targeted rent levels, and multi-family construction seems to be more dependent on market demand than single-family construction. A clear need for a demonstrated number of rental units must be shown in order to justify the substantial investment needed to construct a large multi-family residential development. The private market is generally able to produce new rental housing that is affordable to households earning above 80% of the median income level when there is sufficient demand.

Mobile or manufactured homes represent another significant component of the housing market. There are approximately 12 developed mobile home parks where residents can rent a mobile home or a pad if they already own a unit. Mobile home parks provide a form of affordable housing; however, conditions in these parks vary dramatically. Anecdotal evidence indicates limited availability of parks that will allow mobile homes which are more than five years old. In addition to developed parks, there are a number of properties located throughout the community that contain two or more mobile homes. These are often older units in crowded and poorly maintained conditions. Since 1977, the City zoning ordinance has allowed only manufactured homes to be located on lots in single-family zoning districts.

Describe the need for specific types of housing.

As indicated in the Needs Assessment in Section 3, cost burden and severe cost burden are the most common housing problems in Great Falls and are experienced by renters and homeowners alike in the 0-80% AMI range. In 2015, 35.7% of total households in Great Falls experienced some degree of housing cost burden. Consequently, households experiencing rent and mortgage cost burden may have difficulty affording other necessities, including food, clothing, transportation, and medical care.

The development and rehabilitation of affordable housing continues to be among the greatest housing needs in Great Falls. Results from the 2020 Community Needs Assessment, as well as key takeaways from the focus group planning meeting, reiterate this priority need within Great Falls.

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

In the year 2000, the median home value in Great Falls was \$89,700. Since then, homeowners have experienced significant increases in housing costs. The 2011-2015 ACS data in Table 33 below shows a median home value of \$160,900 in 2015, which represents an increase of nearly 80% since 2000. On average, median home values have increased 5.3% annually. This is similar to trends seen in other large cities in Montana.

Median contract rent increased from \$365 in 2000 to approximately \$539 in 2015, representing an increase of nearly 48%. This equates to greater housing costs for renters as well as homeowners. As illustrated in Table 34 below, most renters pay \$500 to \$999 per month, followed by those who pay \$500 or less. On average, median contract rent has increased 3.2% annually. While rents are low, this increase in rent negatively affects many of Great Falls' lowest income residents. There are only 1,175 units affordable to households earning 30% HUD Area Median Family Income (HAMFI) as seen in Table 35 below.

Table 36 includes 2019 HUD-established Fair Market Rents for Great Falls, as well as high and low rent limits for Home Investment Partnerships (HOME) Program-funded rental properties for the same year. HUD FY 2021 FMRs have since been released and show an increase from \$587 for a one-bedroom unit in 2019 to \$613 in 2021. Two-bedroom units have increased from \$777 to \$808. Three and four-bedroom units have increased from \$1,085 to \$1,126 and \$1,337 to \$1,359, respectively. The difference in Fair Market Rents between two and three-bedroom units continues to be more than \$300, creating an increasing cost burden on larger families who rent as well as limiting housing choice.

Cost of Housing

	Base Year: 2009	Most Recent Year: 2015	% Change
Median Home Value	\$133,800	\$160,900	20%
Median Contract Rent	\$442	\$539	22%

Table 33 – Cost of Housing

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Rent Paid

Rent Paid	Number	%
Less than \$500	4,100	42.1%
\$500-999	4,795	49.2%

\$1,000-1,499	600	6.2%
\$1,500-1,999	75	0.8%
\$2,000 or more	170	1.8%
Total	9,740	100.0%

Table 34 - Rent Paid
Data Source: 2011-2015 ACS

Housing Affordability

Number of Units Affordable to Households Earning	Renter Households	Owner Households
30% HAMFI	1,175	No Data
50% HAMFI	4,080	1,275
80% HAMFI	6,995	3,935
100% HAMFI	No Data	5,995
Total	12,250	11,205

Table 35 – Housing Affordability
Data Source: 2011-2015 CHAS

2019 HUD-Established Monthly Rents (FMR and HOME Rents)

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	584	587	777	1,085	1,337
High HOME Rent	584	587	777	1,085	1,238
Low HOME Rent	584	587	773	893	996

Table 36 – Monthly Rent
Data Source: HUD FMR and HOME Rents

Is there sufficient housing for households at all income levels?

To make this comparison, we can consider 2011-2015 CHAS Housing Affordability data provided in Table 35 of this section as well as Number of Households data from Table 6 in the Needs Assessment section of this report (NA-10). This compiled data is presented in the table below, and while the total number of affordable units exceeds the number of 0-80% HAMFI households, there is an estimated deficit of 2,420 housing units for households earning 30% HAMFI. For households earning 50% and 80% HAMFI, there are more affordable units available than what is needed, with an estimated surplus of 555 and 2,680 housing units, respectively.

Household Income Levels	Total Affordable Units	Total Households	Difference Between Units and Households
30% HAMFI	1,175	3,595	(2,420)
50% HAMFI	4,080	3,525	555
80% HAMFI	6,995	4,315	2680
Total	12,250	11,435	815

Data Source: 2011-2015 CHAS, Compiled Data from HUD Tables 6 and 35

This data is consistent with the Needs Assessment analysis in Section 3, reiterating that housing choice is most limited for extremely low income households, those earning 0-30% AMI.

How is affordability of housing likely to change considering changes to home values and/or rents?

The basic housing affordability problem for many residents is the disparity between income levels and housing costs, especially for low and moderate income people. Average housing prices continue to grow faster than income levels, making it difficult or impossible for many families to save enough for a down payment or to afford the monthly cost of a mortgage, interest, insurance and taxes. This problem is worse for people with poor credit histories, especially those people with low and moderate incomes.

Another problem related to housing affordability is a shortage of quality houses in certain price ranges. Housing units that may be affordable to residents within certain income groups often have physical problems that make the units ineligible for financing from private lending institutions, as well as unattractive to potential buyers. In other cases, the houses may be in good enough condition to qualify for a loan but the unit is priced too high for low or moderate income potential buyers to afford.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

Using data from HUD Table 36 above, which considers HUD-established Fair Market Rents for Great Falls, as well as high and low rent limits for rental properties in Great Falls funded by the Home Investment Partnerships (HOME) Program, Fair Market Rents are comparable to HOME rents when considering efficiency, one-bedroom, and two-bedroom units. Gaps increase, however, between HOME rents and FMR when considering larger apartments, those with three and four bedrooms. Comparing Fair Market Rent to Low HOME Rent for a three-bedroom unit shows a \$192 gap between the higher (\$1,085) FMR and lower (\$893) Low HOME Rent. For four-bedroom units, the gap increases, showing a \$341 difference between the higher (\$1,337) FMR and lower (\$996) Low Home Rent. This data compared to the median contract rent of \$539 (HUD Table 33), suggests that large families or families with children in the rental housing market face both limited housing choices and higher costs. Since Table 32 indicates that 25% of renters in Great Falls occupy housing units that consist of three bedrooms or more, this is a significant housing issue in the community.

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

When evaluating the physical condition of housing, it is helpful to consider the age of residential structures. According to 2011-2015 American Community Survey data in Table 38 below, 79% of all

housing units in Great Falls (owner-occupied and renter-occupied) were built before 1980. As the community’s housing units continue to age, increased investment for maintenance, repairs, rehabilitation and replacement will be needed to maintain the quality of living conditions and prevent the deterioration of neighborhoods.

Describe the jurisdiction's definition for "substandard condition" and "substandard condition but suitable for rehabilitation."

Standard condition, for the purposes of this Consolidated Plan, refers to a dwelling unit that passes HUD’s Housing Quality Standard (HQS) inspection and meets all applicable building codes. *Substandard condition* describes a dwelling unit that does not meet some or all the aforementioned requirements. *Substandard condition but suitable for rehabilitation* is defined as a dwelling unit that does not meet HQS requirements and/or some of the applicable building codes, but the rehabilitation of the dwelling unit is financially feasible.

A household is considered to have a housing problem if experiencing any one or more of the following four problems HUD considers in CHAS data:

- Housing unit lacks complete kitchen facilities.
- Housing unit lacks complete plumbing facilities.
- Household is overcrowded.
- Household is cost burdened.

HUD defines “overcrowding” and “cost burden” as:

- Overcrowding – More than 1 person per room
- Severe overcrowding – More than 1.5 persons per room
- Cost burden – monthly housing costs (including utilities) exceed 30% of monthly income
- Severe cost burden – monthly housing costs (including utilities) exceed 50% of monthly income

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	2,745	18%	4,250	44%
With two selected Conditions	45	0%	265	3%
With three selected Conditions	0	0%	0	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	12,665	82%	5,220	54%
Total	15,455	100%	9,735	101%

Table 37 - Condition of Units
Data Source: 2011-2015 ACS

According to the map of Great Falls below, Census Tracts 3, 4, and 108 in downtown and Census Tract 21 in the southeast part of the City contain the highest percentages of low income households with substandard housing, ranging from 1.79-4.24% of households in each tract.

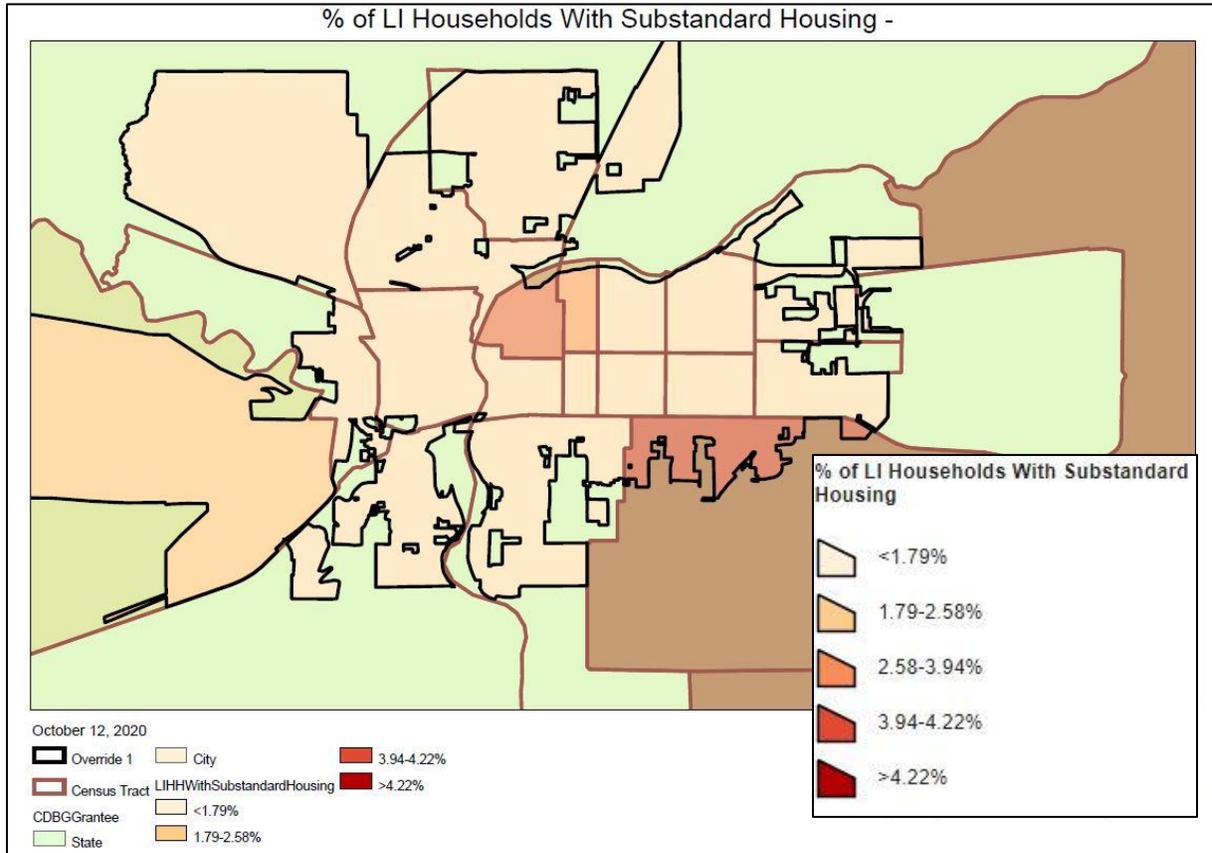


Figure 2 - Percent of Low Income Households with Substandard Housing

Data Source: U.S. Department of Housing and Urban Development, CPD Maps

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	1,460	9%	545	6%
1980-1999	2,080	13%	1,210	12%
1950-1979	8,170	53%	5,375	55%
Before 1950	3,740	24%	2,610	27%
Total	15,450	99%	9,740	100%

Table 38 – Year Unit Built

Data Source: 2011-2015 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	11,910	77%	7,985	82%
Housing Units Built Before 1980 with Children Present	784	5%	530	5%

Table 39 – Risk of Lead-Based Paint

Data Source: 2011-2015 ACS (Total Units) 2011-2015 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	2,151	0	2,151
Abandoned Vacant Units	0	0	0
REO (Real Estate Owned)* Properties	10	0	10
Abandoned REO Properties	0	0	0

Table 40 - Vacant Units

Data Source Comments: Suitability for rehabilitation undetermined using ACS dataset

**A Real Estate Owned (REO) property is a residential property that a lender becomes an owner of after they complete a foreclosure and take possession of the property.*

Need for Owner and Rental Rehabilitation

According to Table 37, which considers Condition of Units, 82% of owner-occupied units have no selected conditions (housing problems as defined by HUD), while only 54% of renter-occupied units met that definition. A total of 6,995 housing units have one selected condition, while 310 units have two selected conditions. There were no units in the three and four selected conditions categories. Of the units with one or two selected conditions, 62% are renter-occupied.

For almost 40 years, the City of Great Falls has offered some type of rehabilitation loan program to its residents. The City currently offers four programs to target the rehabilitation of affordable owner and rental housing units for eligible LMI applicants: the Residential Improvement Loan Program, Rental Improvement Loan Program, Residential Water and Sewer Loan Program, and Rental Water and Sewer Loan Program.

Vacant Units: As noted in Table 40 above, 2018 ACS data estimates that there are 2,141 vacant housing units in Great Falls, with a homeowner vacancy rate of 0.8% and a rental vacancy rate of 6.9%. This is a slight decrease from the 2015 ACS vacancy estimates of 1.7% and 7.3%, respectively.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

Using both ACS and CHAS data sources provided in Table 39, there are approximately 784 owner-occupied units and 530 renter-occupied units built before 1980 with children present. While each accounts for only 5% of their respective total units, a risk to children in our community does exist. Only

21% of housing units in Great Falls were built after 1980, making for a significantly older housing stock than other large Montana cities.

Preventive and rehabilitative measures will be taken in all CDBG and HOME funded housing and public facilities projects that serve young children to ensure the extinction of lead-based paint hazards. All rehabilitation projects in which the building was constructed before 1978 will address lead-based paint regulations. Information about lead-based paint hazards will be provided to all people who apply for City housing rehabilitation loans. If lead-based paint is found during initial testing on a project where families with children under the age of six reside they will be referred for testing for lead-based paint exposure.

All CDBG and HOME funded housing project sites which have visual paint deterioration where rehabilitation will take place will be tested by a certified risk assessor for the presence of lead-based paint using the XRF Technology Lead Analyzer. On any sites that test positive, only contractors certified in safe work practices will be used for abatement. Clearance tests will be performed by an Environmental Protection Agency (EPA) certified risk assessor and a certified laboratory after interim controls are completed.

MA-25 Public and Assisted Housing – 91.210(b)

Introduction

The Great Falls Housing Authority (GFHA) is the only Public Housing Authority within the city of Great Falls. GFHA owns and operates one main public housing site (Chowen Springs) and four scattered public housing sites (Austin Hall, Yeoman-Tynes, Russell Apartments, and Sunrise Court). These properties include a total of 490 apartment units that range in size from 1-4 bedrooms. Additionally, GFHA has budget authority for 250 Housing Choice Vouchers (HCV).

GFHA also manages two affordable housing properties (Sand Hills and Holland Court), which have 16 apartment units each. Eight units at Sand Hills were funded with City HOME funds and are currently within their affordability period per HOME regulations. Eight units at Holland Court were funded with City HOME funds, and although the period of affordability has expired, GFHA continues to set rent for these units within HOME contract limits.

In-depth information regarding GFHA can be found in the Needs Assessment (Section 3) of this Consolidated Plan (NA-35 Public Housing).

Total Number of Units

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
# of units vouchers available			490	250			0	0	0
# of accessible units									

Table 41 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

**includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition*

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

GFHA owns and operates 490 main public housing units, ranging in size from 1-4 bedrooms. GFHA’s mission is to responsibly and respectfully provide safe and affordable housing to qualifying residents. They educate and assist residents to develop skills necessary to maintain successful residency, to improve quality of life, and to pursue self-sufficiency.

The most recent inspection was completed in February 2020. Under PHAS (Public Housing Assessment System), GFHA received a physical indicator score of 27 out of 40. Due to COVID-19, inspections will be listed for completion in late September, with physical inspections beginning in October 2020. Scoring for this inspection will be informational only and scoring will continue in 2021. As of September 2020, GFHA confirms that the issues identified in the most recent inspection have been corrected, with the exception of the concrete project in Chowen Springs, which is nearing completion.

Public Housing Condition

Public Housing Development	Average Inspection Score (of 100)
Austin Hall/Parkdale MT002000001	81
Austin Hall/Parkdale MT002000005	95
PARKDALE MT002000002	78
Sunrise Courts MT002000003	81
Yeoman Tynes/Russel MT02000004	83

Table 42 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

The Housing Authority will continue its multi-year rehabilitation project at the main site (MT2-1 and MT2-2) which involves upgrading the overhead electrical distribution system, street lights, sewer mains, water mains and gas distribution systems for 356 units and major interior renovation of 156 units. The units will be demolished down to the studs and rebuilt, including new roofs; windows; doors; walls; flooring; and electrical, plumbing and heating systems. Exterior sewer, water and electrical services will also be replaced. This modernization project began in 2015 and is expected to take 10 to 15 years to complete, contingent upon funding.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

The Great Falls Housing Authority's mission is to responsibly and respectfully provide safe and affordable housing to qualifying residents. They educate and assist residents to develop skills necessary to maintain successful residency, to improve quality of life, and to pursue self-sufficiency. GFHA encourages tenants to be involved in the management of public housing through having two tenants on the Housing Authority Board of Commissioners. Resident board members serve two-year terms. All members serve without compensation.

In addition to preparing and distributing quarterly newsletters that offer residents seasonal information, updates, and reminders, GFHA hosts public hearings to obtain input from residents as to their needs and opinions, including those related to the annual plan and proposed rehabilitation of housing units. The information obtained from these hearings is considered in the annual grant application.

GFHA offers a number of tenant programs to its residents. These programs are outlined on their [website](#) and are listed below:

- The Great Falls Housing Authority has one full-time Community Police Officer.
- Police Youth Activity Club (PYAC) is an activity group for school-age kids in the City's Public Housing and Section 8 Voucher programs. The PYAC program is directed by Housing Authority Community Police Officers and presents an opportunity for building an atmosphere of trust and mentoring with the Officers, as well as having some great times. Parent participation is encouraged.
- The Great Falls Housing Authority offers a satellite unit of the Boys & Girls Club located at 1722 Chowen Springs Loop.
- GFHA offers scholarships to graduating seniors who plan to pursue higher education. Applicants must be residents of the GFHA's Public Housing or Section 8 Voucher program and must maintain a 2.5 grade point average to apply for the scholarship. GFHA also provides scholarship money for children to assist with extracurricular activities.

- Little Buddies is a monthly program for pre-school children and their parents offering a fun-filled hour of play and an added bonus of lunch for the families.
- Dronen Hall, a community hall attached to the Housing Authority office at 1500 Chowen Springs Loop, is available for tenant use for birthday parties, baby showers, etc. A \$40.00 deposit is required and refunded when the hall is cleaned and the key is returned.

MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

There is a robust network of public service organizations in Great Falls who work to meet the needs of those experiencing homelessness or who are at risk of homelessness. The City participates in the local Continuum of Care for Homelessness (CoC) group, which seeks to make homelessness brief, rare, and non-recurring. The CoC meets monthly to expand understanding of the services needed by those experiencing homelessness, to facilitate consolidation and coordination of homeless services, and to improve service delivery. The CoC meetings provide a networking opportunity and assist in keeping funding options open for future HUD homeless grant funds. The agencies listed below assist with emergency shelter needs in the community:

The Great Falls Rescue Mission (Rescue Mission) includes a men’s shelter, women’s shelter, and family shelter and is the primary emergency shelter provider in Great Falls. Overall, there are 52 beds available in the men’s shelter and 65 beds in the women shelter. In an emergency such as life threatening weather, the Rescue Mission provides additional mats on the floor and foldaway cribs to accommodate need. The Rescue Mission’s Cameron Family Center can serve approximately 134 people experiencing homeless, 70 of which, on average, are children.

The YWCA Mercy Home is the primary provider of emergency/transitional housing and supportive services for victims of domestic abuse and has the capacity to house 30 women & children at one time. The YWCA Great Falls website reports that from July 2018 to June 2019 the organization provided 156 women and children fleeing domestic violence with more than 4,071 shelter nights. Along with housing assistance, victims of domestic violence may require financial assistance for basic needs, counseling, legal assistance and training/education to assist with employment.

St. Vincent de Paul’s Grace Home provides transitional housing for homeless men who are veterans, with the capacity to house 14 men at a time. During cold and/or inclement weather, Grace Home offers shelter services beyond its usual capacity.

The Center for Mental Health provides transitional housing for individuals with severe or serious disabling mental illness who demonstrate a need for additional supportive living services.

Opportunities, Inc., receives Emergency Solutions Grant (ESG) funding and offers emergency assistance through rapid re-housing and homeless prevention services.

Alliance for Youth’s Youth Resource Center serves youth ages 13-20 who are disadvantaged, homeless, or at risk of becoming homeless. Services offered include medical, dental, behavioral health care, substance abuse treatment, housing search support and advocacy. Additionally, drop-in centers operate in tandem with outreach programs, family engagement services, emergency shelters and transitional housing.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	157	0	23	0	0
Households with Only Adults	117	4	33	0	0
Chronically Homeless Households	0	0	0	0	0
Veterans	0	0	14	60	0
Unaccompanied Youth	0	0	0	0	0

Table 43 - Facilities and Housing Targeted to Homeless Households
 Data Source: Continuum of Care Housing Inventory; 2019 CoC Housing Inventory Count Report

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons.

The Great Falls Rescue Mission conducts outreach to chronically homeless people through the day room program and provides sleeping mats to chronically homeless people during nights which have life threatening weather.

The Center for Mental Health has an adult case manager who provides outreach and wellness checks for chronically homeless people.

Alluvion Health is a non-profit Federally Qualified Health Center and offers medical, dental, behavioral, and substance abuse disorder services. Additional services include care coordination, crisis management, and referrals to community and housing services.

Opportunities, Inc., provides support to chronically homeless people through screening for homelessness issues during intake, referrals, limited case management, financial assistance and job training assistance.

The YWCA provides 30 different human service agencies with vouchers for chronically homeless people to use at its used clothing store.

The Indian Family Health Clinic provides community resource information through group sessions provided by staff members.

St. Vincent de Paul of North Central Montana provides weekly outreach to those experiencing unsheltered homelessness and through the food bank and charity services offered at their Angel Services Center.

The organizations referenced above, among others, help coordinate and reduce the duplication of homeless services for individuals and families in Great Falls by participating in the Continuum of Care's bimonthly Case Conferencing meetings.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

Chronically Homeless: The Great Falls Rescue Mission (Rescue Mission) includes a men's shelter, women's shelter, and family shelter and is the primary emergency shelter provider in Great Falls. It is difficult to delineate the specific numbers of beds available for emergency shelter versus transitional housing as the organization does not use governmental funding and is not restricted by specific programming requirements; therefore, they can be flexible regarding bed usage. Whether a specific bed is used for emergency or transitional shelter is driven by actual need that particular day. Overall, there are 52 beds available, with 65 beds in the women shelter. In an emergency such as life threatening weather, the Rescue Mission provides additional mats on the floor and foldaway cribs to accommodate need.

Families with Children: To meet the growing need for shelter services for homeless families, the Great Falls Rescue Mission completed construction of the Cameron Family Center in November of 2016. The Cameron Family Center can serve approximately 134 people experiencing homeless, 70 of which, on average, are children.

Veterans: Volunteers of America provides individualized service coordination to veterans who are homeless or at risk of being homeless through rapid rehousing, homelessness prevention, and emergency shelter as funding allows. St. Vincent de Paul's Grace Home offers transitional housing for homeless veterans, as well as employment and other general assistance.

Unaccompanied Youth: Young Parents Education Center provides on-site developmental day care, family support and outreach, pre-vocational activities and parenting/child development education to assist pregnant and parenting teens and young adults to build self-sufficiency.

MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

While there are numerous agencies in Great Falls that provide services and offer assistance to members of the community with special needs, the search for affordable housing is complicated for individuals facing serious disabilities or other special situations. Public and government agencies have become increasingly aware of the need to work with the private sector and non-profit organizations to develop viable housing options for people with special needs, including the elderly, disabled, homeless and single female-headed households. An important component of successfully addressing housing needs is integrating low income and special needs housing units into the community. In addition, people with disabilities or those individuals who have other special needs require supportive services concurrent with housing assistance.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs.

Persons with Disabilities and Elderly/Frail Elderly: Although it is difficult to identify the precise number of people who have special needs, the 2018 American Community Survey estimates that 8,877 Great Falls residents age five years or older are living with at least one disability, and 10,663 residents are age 65 years and over.

Accessible Space, Inc., provides 23 units of accessible, subsidized housing for low income adults with severe mobility impairments and/or traumatic brain injuries at Southwinds Estates and 17 units at Meadow Lark Apartments. Twenty-four hour personal care attendant services are provided or available at both housing complexes. ASI also provides 47 units of accessible housing with availability of personal care attendant services for low income elderly people at The Portage and 37 units of accessible housing at Voyageur Apartments.

Easter Seals-Goodwill Industries provides a variety of services to people with disabilities and disadvantaging conditions. Services will include supportive and organizational employment, employment placement and training support, supported living, adult day programs, home care and home health care.

Quality Life Concepts, Inc., provides housing services for adults with developmental and/or physical disabilities. QLC will also provide supportive living services for disabled people living in their own homes, as well as provide community-based day programs/services including: day activities and programming; assistance with finances, medical appointments, shopping, transportation and other day-to-day living needs; vocational rehabilitation services; recreational/social activities and assistance to families whose children have a developmental disability or are at risk for delay.

Cascade County Area VIII Agency on Aging provides supportive services such as home meal delivery, home attendants, health promotion, foster grandparents, retired senior volunteer programming and transportation to assist elderly people who are not homeless. The Great Falls Senior Citizens Center will provide on-site, low-cost meals, health and exercise programs, tax return preparation assistance, telephone outreach, educational workshops and recreational/social activities for elderly people in the community.

Health/Mental Health: The City-County Health Department provides a wide variety of health care services to the entire community, including people with low income and who are homeless. These services include disease prevention and control, nutrition education, food supplements, primary health care, dental care, mental health counseling, case management, assistance with obtaining prescriptions and specialty medical care, sexually transmitted disease testing and medication and parenting instruction. The Health Department provides educational services to inform the public and professional community members about lead-based paint hazards when requested.

The Indian Family Health Clinic provides primary medical care, diabetes clinical services, prescription medication, behavioral health programs (including chemical dependency and tobacco prevention, HIV/Hepatitis C prevention), wellness services, limited community resource advocacy and limited mental health counseling.

Alluvion Health is a non-profit Federally Qualified Health Center and offers medical, dental, behavioral, and substance abuse disorder services. Additional services include care coordination, crisis management, and referrals to community and housing services.

Substance Abuse and Drug Addiction: Gateway Community Services provides comprehensive alcohol and drug abuse treatment services, including evaluation, intensive outpatient treatment, adult and adolescent co-occurring mental health services, residential treatment services for low and moderate income people diagnosed with a chemical dependency addiction, case management, relapse prevention, anger management and monthly monitoring, early intervention and community prevention classes and outreach activities for community awareness.

Public Housing Residents: The Great Falls Housing Authority provides 22 units of public housing which are ADA compliant for combined physical, hearing and vision impairments and nine units of handicap

accessible affordable housing at Holland Court and Sand Hills. They will also provide accommodations to all tenants as directed by 504 requirements.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing.

The Center for Mental Health (CMH) provides children and adults with integrated community-based mental health services and substance abuse services. In addition to housing assistance options, services include psychiatric assessment and treatment; medication monitoring; crisis stabilization; individual, group, and family therapy; day treatment; and supportive services such as case management, supported employment and recreational activities. CMH administers the Program for Assertive Community Treatment (PACT), which assists people with chronic severe mental illness in transitioning from the Montana State Hospital to independent living situations. This program offers 24-hour coverage for clients with psychotic disorders and is operated at the Wellness Recovery Center. The agency operates the New Directions Center to provide services such as case management, adult therapeutic aide services, and supported employment. Day treatment educational classes are provided on a part-time basis at the New Directions Center.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

The City of Great Falls will continue to offer CDBG and HOME-funded programs that benefit persons and households with special needs during program year 2020 and the duration of this five-year plan. These programs include:

Public Services: provide support to public service agencies' operating programs that benefit low to moderate income persons. The City of Great Falls will provide CDBG funds to social service agencies for activities that service low to moderate income people or areas.

Affordable Housing: increase and preserve affordable housing opportunities for very low to moderate income renters, homeowners, first-time homebuyers, and those experiencing homelessness. This includes affordable housing efforts that require funding to remediate properties negatively affected by slum and blighted conditions.

Housing Rehabilitation: provide construction and rehabilitation assistance for very low to moderate income homeowners, rental property owners and the Public Housing Authority. The City will focus on upgrading the City's housing stock to meet standard building codes to provide and sustain safe,

affordable housing through its revolving loan fund. The City of Great Falls will address Public Housing Authority rehabilitation or modernization projects with the use of CDBG funding.

Fair Housing: provide funding for activities that affirmatively further fair housing. The City of Great Falls will fund activities that include, but are not limited to fair housing education, counseling, outreach, and referrals pertaining to the laws, rights, and responsibilities related to housing and housing-related transactions, as well as service activities that reduce and remove barriers to fair housing choice.

Public Facilities and Improvements: provide public facility and infrastructure assistance, including but not limited to handicap accessibility, energy efficiency improvements, and removal of slum and blighted properties to provide a suitable living environment. The City of Great Falls will prioritize meeting handicap accessibility requirements in public facilities and infrastructure.

The City's one-year goals are listed in the Annual Action Plan section of this report (AP-35).

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

Great Falls first adopted a zoning ordinance to regulate the use of land and buildings in 1930. The last comprehensive update of these regulations occurred when the Unified Land Development Code was adopted in 2005. The current zoning and subdivision code implements the City's growth policy, Missouri River Corridor Plan, neighborhood plans and Long Range Transportation Plan. The purposes of the code are: 1) to ensure that all development is guided by and gives consideration to the Growth Policy; 2) to provide clear, consistent standards, regulations and procedures for the review of all proposed development within the city; and, 3) to safeguard the public health, safety and general welfare by establishing minimum standards for design and development.

The City reviews development applications to ensure that they are consistent with subdivision regulations, zoning and land use controls and annexation policies. Such codes and policies are designed to create orderly development; provide adequate services including transportation, utilities, and fire and police protection; and promote public health, safety and general welfare.

Costs for building new housing have greatly increased in recent years, but this is due to other factors previously described rather than the cost of meeting code requirements. Existing home prices greatly increased due to low housing stock. The City's Chief Building Official reports there is also the perception that costs of new building permits are high and require a time-consuming process. However, the total estimated cost for construction permits to build a house is approximately 1% of the structure's value. The building codes may require engineered foundations and this could be a significant cost; however,

this is necessary because of the clay formation underlying much of the city. The City works with homeowners to educate them on ways to reduce the cost of permitting whenever possible. The timeline for residential permitting is currently averaging approximately a 7-day turnaround time based on the quality of drawing submittals. There is good accessibility to plans examiners and access to inspectors when needed.

The current zoning and setback requirements can be restrictive for developing affordable housing in situations where developers wish to use odd-size or small lots or construct high density housing. Additionally, no affordable housing incentives such as reduced lot sizes, setback standards or waived building fees are available to developers of affordable housing. Due to land prices and infrastructure costs, smaller lots are being developed for condensed housing at this time. Additionally, the City has worked very successfully with NeighborWorks Great Falls to use the Planned Unit Development process to create customized development standards to support higher density affordable housing development. As result of this partnership, NeighborWorks has successfully completed the Rockcross Apartments project (124 affordable rental units) as well as initiated construction on its Meriwether Crossing subdivision. This subdivision will lead to the eventual addition of 80 affordable, owner-occupied homes into the City's affordable housing inventory.

Traditionally, mobile/manufactured housing has allowed low income families to purchase housing when a conventional home may be out of reach. However, there is limited availability of vacant affordable single lots, mobile home courts will not accept homes that are older than five years, and a zoning change would be required if a new mobile home subdivision were to be developed. There appears to be the demand for an affordable housing option such as improvements to existing mobile/manufactured home parks or development of a new mobile/manufactured home subdivision. Some of those proposed upgrades are cost prohibitive due to some existing mobile home parks being located in the floodplain.

In Montana, property tax is the only way authorized by the legislature for cities to raise money to provide local government service and finance schools. Therefore, the tax burden falls on property owners. The cost of building new housing is also affected by the concept that the user pays. The developer of new housing must pay the full cost of extending water and sewer services, connecting to city utilities and putting in curbs, gutters, sidewalks and paved streets. While these requirements affect the cost of housing, these standards are also important to positively impact the quality, permanence, safety and environmental aspects of the Great Falls community.

Introduction

The economy of Great Falls includes agriculture and livestock, military, state and federal government, light manufacturing, healthcare, and service industries. The labor force in Great Falls continues to expand at a moderate rate. According to the Bureau of Labor Statistics, March 2020 saw an unemployment rate of 3.8%. Unemployment at the time of the 2011-2015 ACS was measured at 5.21%.

Economic Development Market Analysis

Business Activity

Business by Sector	# of Workers	# of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	280	70	1	0	-1
Arts, Entertainment, Accommodations	3,830	4,322	16	16	0
Construction	1,480	1,600	6	6	0
Education and Health Care Services	5,225	5,967	22	23	0
Finance, Insurance, and Real Estate	1,623	1,953	7	7	0
Information	504	606	2	2	0
Manufacturing	929	1,055	4	4	0
Other Services	984	1,041	4	4	0
Professional, Scientific, Management Services	1,220	1,375	5	5	0
Public Administration	0	0	0	0	0
Retail Trade	3,846	4,883	17	19	2
Transportation and Warehousing	787	559	3	2	-1
Wholesale Trade	1,090	1,221	5	5	0
Total	21,798	24,652	--	--	--

Table 45 - Business Activity

Data Source: 2011-2015 ACS (Workers), 2015 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

Labor Force	
Total Population in the Civilian Labor Force	28,995
Civilian Employed Population 16 years and over	27,485
Unemployment Rate	5.21
Unemployment Rate for Ages 16-24	20.29
Unemployment Rate for Ages 25-65	3.09

Table 46 - Labor Force

Data Source: 2011-2015 ACS

Occupations by Sector

Occupations by Sector	Number of People
Management, business and financial	5,750
Farming, fisheries and forestry occupations	945
Service	3,940
Sales and office	6,500
Construction, extraction, maintenance and repair	2,820
Production, transportation and material moving	1,675

Table 47 – Occupations by Sector

Data Source: 2011-2015 ACS

Travel Time

Travel Time	Number (of people)	Percentage
< 30 Minutes	25,825	94%
30-59 Minutes	1,190	4%
60 or More Minutes	450	2%
Total	27,465	100%

Table 48 - Travel Time

Data Source: 2011-2015 ACS

Education

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	1,080	150	1,175
High school graduate (includes equivalency)	6,455	355	1,970
Some college or Associate's degree	8,075	340	2,370
Bachelor's degree or higher	6,515	95	905

Table 49 - Educational Attainment by Employment Status

Data Source: 2011-2015 ACS

Educational Attainment by Age (number of people)

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	110	44	50	205	495
9th to 12th grade, no diploma	750	815	330	955	720
High school graduate, GED, or alternative	2,170	2,220	1,540	5,060	3,865
Some college, no degree	2,210	2,410	1,835	3,715	2,350
Associate's degree	335	970	625	1,605	430
Bachelor's degree	380	1,630	1,130	2,505	1,630
Graduate or professional degree	10	610	635	1,295	745

Table 50 - Educational Attainment by Age

Data Source: 2011-2015 ACS

Educational Attainment – Median Earnings in the Past 12 Months (in dollars)

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	13,635
High school graduate (includes equivalency)	23,253
Some college or Associate's degree	30,013
Bachelor's degree	38,083
Graduate or professional degree	53,355

Table 51 – Median Earnings in the Past 12 Months

Data Source: 2011-2015 ACS

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

Located within the “Golden Triangle” region of agriculture in Montana, the economic base of the city has long been perceived as a regional center for farming needs and healthcare. Data from Table 45 above, however, indicates that this Agriculture, Mining, Oil & Gas Extraction business sector employs only 1% of workers within the city limits and represents 70 jobs.

Education and Health Care Services contain the largest number of workers (5,225) and jobs (5,967) in Great Falls, while Retail Trade and Arts, Entertainment, and Accommodations rank second and third among major employment sectors with 3,846 workers (4,883 jobs) and 3,830 workers (4,322 jobs), respectively.

Describe the workforce and infrastructure needs of the business community.

The Great Falls Development Authority (GFDA) is the primary economic development organization in the community and coordinates its activities with organizations such as the City of Great Falls, Cascade County, the Great Falls International Airport Authority, the Great Falls Chamber of Commerce and various educational institutions. GFDA’s mission is to grow and diversify the Great Falls economy and support the creation of high wage jobs.

GFDA provides a number of key services to assist business development and ensure the creation/retention of higher wage job opportunities. GFDA’s Community Development Finance Institution (CDFI) provides gap and bridge financing assistance for entrepreneurs and businesses. Additionally, their Community Development Corporation (CDC) provides SBA 504 loans. The Small Business Development Center (SBDC) is also housed within GFDA and provides valuable training and technical assistance to businesses, particularly to new startup efforts. Additionally, the GFDA operates a Brownfield Revolving Loan Fund, which provides critical assistance for property owners in identifying and cleaning up previously contaminated properties so they can be redeveloped safely for future use.

Finally, GFDA provides training on procuring government contracts for local businesses through its Procurement Technical Assistance Center (PTAC).

GFDA has two revolving loan funds that originated from CDBG allocations. These revolving loan funds continue to be used by GFDA for the creation of new jobs for persons from low to moderate income households.

As more of the population approaches 55 or older, there may be shortages of entry level workers and an increase in an aging workforce. According to the 2018 American Community Survey, an estimated 18,237 individuals (more than 30% of the population) are age 55 or over, an increase of nearly 10% since 2010, when the Census counted 16,741 individuals age 55 or over.

Travel time is not an issue in the Great Falls community; 94% of workers have a commute less than 30 minutes. Infrastructure (utilities and roads) is generally available to support continued economic growth in the community. Important rail access has been added to the City's AgriTech industrial park. Significant investments have been made to improve the City's Water and Wastewater Plants to keep up with growing demands.

Moving forward, the following workforce needs have been identified: 1) closing the gap between wages and cost of living, 2) meeting the challenge of providing training and upskills to an increasingly aging work force, 3) finding ways to integrate homemakers, disabled individuals, and the underemployed back into the workforce, and 4) increasing the community's overall population growth rate and new job opportunities.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

Despite the community's slow rate of population growth, Great Falls has the advantage of having a stable base of employment through its health care sector, military affiliation, and strategic advantage in capturing agriculture related industries. This allows the community to weather downward trends in the national economy. Unfortunately, economic conditions in Great Falls are suffering in 2020 due to the COVID-19 pandemic. This has led to such impacts as large cutbacks in air travel for the Great Falls International Airport, business closures, evictions, and across the board reductions in revenue for sectors depending on tourism and commerce. This economic downturn will significantly affect the community's use of federal entitlement funds.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

According to Table 50, which considers Educational Attainment by Age, 90% of the 46,384 individuals counted have attained at least a high school diploma or equivalent. 58% of the total represented have attended some college or earned college degrees. According to Table 51, those with graduate or professional degrees record the highest median earnings, an estimated \$53,355. Median earnings are lowest for those without a high school diploma or equivalency.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

Rural Dynamics, Inc., (RDI) is the primary financial education resource within the city. RDI's Assets for Montana project assists families with savings accounts, the use of tax credits, financial education and will expand a website and network of non-profit organizations focused on building assets. RDI holds financial education workshops and free financial literacy classes and administers a youth financial literacy program and Montana Foster Child Independence Program. This agency also provides income tax assistance to help eligible low income people file their federal tax returns and provides matched savings incentive. Families are provided with financial literacy training, one-on-one counseling, and assistance for down payment.

Opportunities, Inc., provides a wide variety of programs to assist very low and low income people. The Human Service Resource Center within Opportunities, Inc., provides emergency services related to food, housing, clothing, eye care, medical care, prescriptions, dental care and transportation. Opportunities, Inc., administers the following programs which focus on assisting people out of poverty:

- Family Self-sufficiency Program which teaches participants how to become self-sufficient;
- Work Force Investment Act Program which provides dropout, low income, at risk and special needs young adults ages 16 through 22 with year round, full-time employment; and
- HeadStart Program which provides education of preschool-age children, child care, parent education, job training, continuing education, GED preparation, life skills classes, assistance with applying for financial aid for college and coordination with other community services.

Opportunities, Inc., provides assistance to low income households through the Low Income Energy Assistance Program and the Weatherization Program which gives financial assistance to low income families to help with utility bills, furnace repair/replacement and other energy efficiency services.

The YWCA of Great Falls offers services that promote self-sufficiency, reduce violence and achieve equal opportunities for people. Services include life skills training classes and women's health workshops. Vouchers are available to community service organizations for used clothing.

Young Parents Education Center provides on-site developmental day care, family support and outreach, pre-vocational activities and parenting/child development education to assist pregnant and parenting teens and young adults to build self-sufficiency.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)? If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

Sweetgrass Development is a private, non-profit corporation created in 2004 to support economic development in the counties of Glacier, Cascade, Pondera, Teton, and Toole, as well as the Blackfoot Nation. It is diverse area that includes a large metropolitan area (Great Falls), small towns, rural farming areas, several Hutterite Colonies, and the Blackfoot Reservation.

The most recent [Comprehensive Economic Development Strategy](#) covers planning years 2017-2021. The Executive Summary of the plan describes economic strengths and weaknesses of the region as follows:

“The SWOT analysis revealed economic strengths of the region including a stable agricultural economic base, strong road and rail transportation systems, ample local infrastructure and proximity to Glacier National Park. Weaknesses include challenges recruiting and retaining skilled workers, lack of workforce housing, limited value-added agriculture and a need for economic diversification. Employers and community leaders are concerned with the aging workforce and the fact few young people are returning to replace workers when they retire.”

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

The Community Planning Development mapping tool ([CPD Maps](#)) provided by HUD identifies a concentration of low income households experiencing any of the four severe housing problems in the city's downtown area, specifically in Census Tracts 4, 7, and 108, with 40-80% of households residing in those tracts experiencing at least one of four severe housing problems. As mentioned elsewhere in this report, HUD uses the following four categories to make such determinations: housing unit lacks complete kitchen facilities; housing unit lacks complete plumbing facilities; household is severely overcrowded (more than 1.5 persons per room); and household is severely cost burdened (monthly housing costs (including utilities) exceed 50% of monthly income).

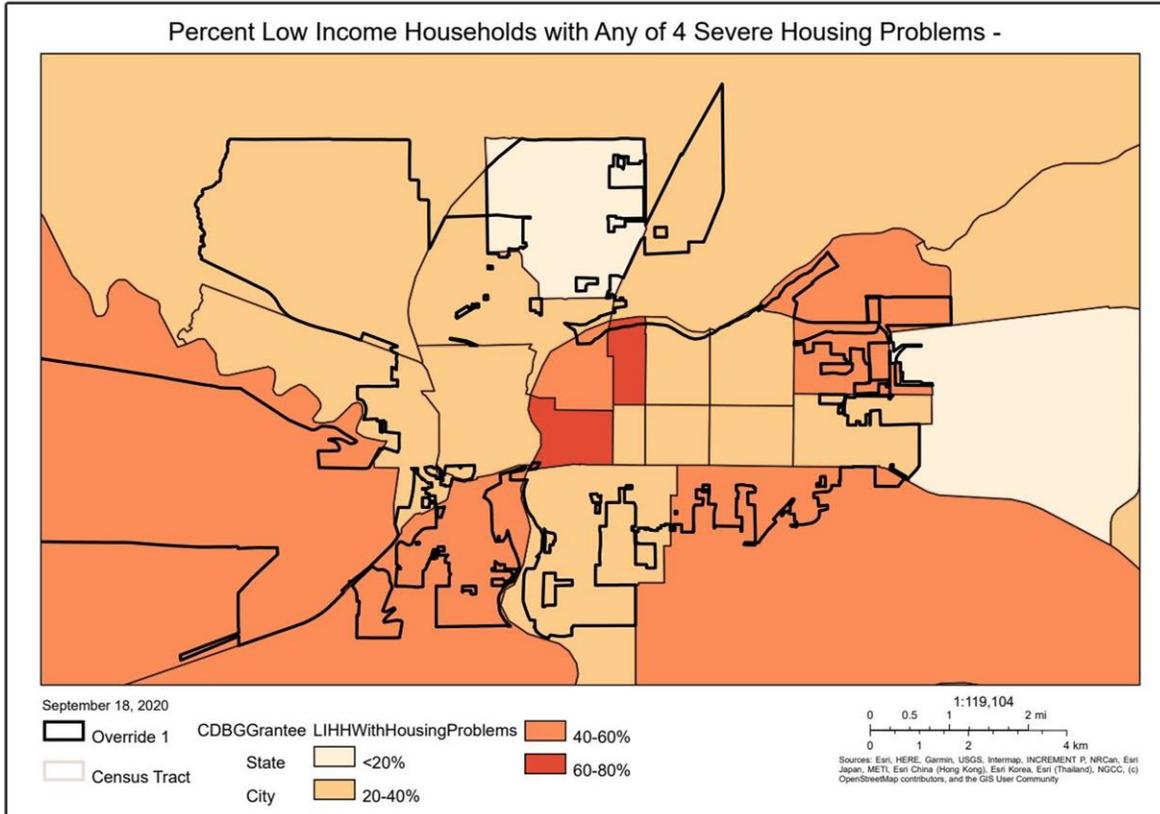


Figure 3 – Percent of Low Income Households with Any of 4 Severe Housing Problems
Data Source: U.S. Department of Housing and Urban Development, CPD Maps

Data tools within the CPD Maps indicate the percentage of low income households in Census Tracts 4, 7, and 108 with any one of the four severe housing problems are 45.76%, 63.77%, and 43.48%, respectively.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

The population of Great Falls is largely White/Non-Hispanic, with minorities representing 12.9% of the total population. American Indian/Alaska Natives make up the largest minority group at 5.8% of the total population, while persons of Hispanic origin make up 4.6% of the population. Asian and Black or African American residents represent less than 1% of the city’s population.

HUD Minority Neighborhood: This is defined as a neighborhood in which the percentage of persons of a particular racial or ethnic minority is at least 20 points higher than that minority's percentage in the housing market as a whole; the neighborhood's total percentage of minority persons is at least 20 points higher than the total percentage of minorities for the housing market area as a whole; or in the case of a

metropolitan area, the neighborhood's total percentage of minority persons exceeds 50 percent of its population.

The most racially-diverse census tract in the region is Tract 7 in the lower south downtown area, where 40% of the 842 total households is made up of minority populations. American Indian/Alaska Native represent the largest minority population in the tract at 12.9%, while persons with Hispanic origin represent 11.97% of the tract's population. In the lower north downtown area (Tract 108), 26% of the tract's 1,546 households are minority households. Again, American Indian/Alaska Native and persons of Hispanic origin represent the largest minority groups in the tract at 13.75% and 6.17%, respectively. Areas of racial and ethnic concentrations exist relative to the small percentage of overall population they represent, but there are no census tracts in the City of Great Falls that qualify as a HUD Minority Neighborhood.

CPD Maps identify areas of low income households across Great Falls as depicted in the map below. The largest percentage of low income households is in the lower north downtown area in Census Tract 108, where nearly 70% of households are low to moderate income. Other tracts in the downtown area have concentrations of low income households, ranging from 30-50% per tract.

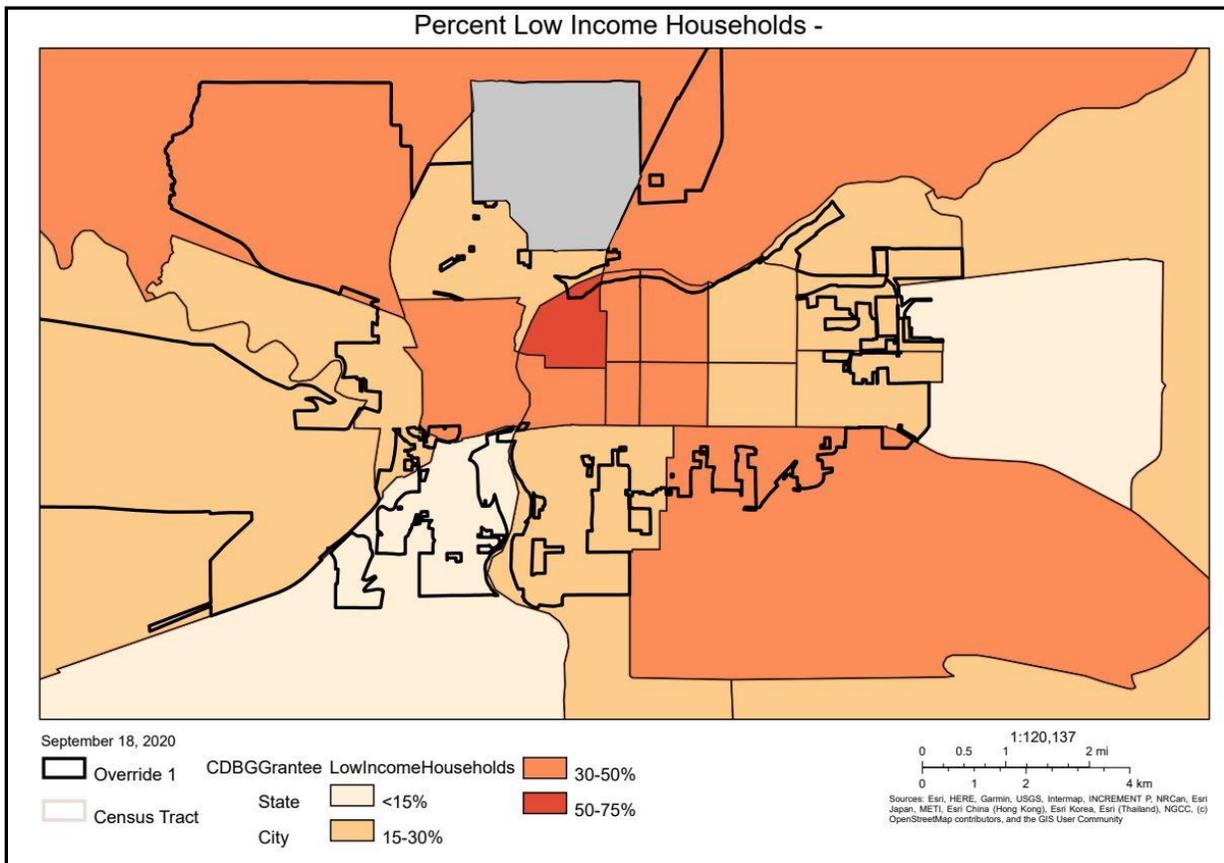


Figure 4 – Percent of Low Income Households, Data Source: U.S. Department of Housing and Urban Development, CPD Maps

Are there any community assets in these areas/neighborhoods?

Census Tract 108 contains the city's historic main street, Central Avenue, and the Central Business Historic District. Tract 108 also contains the Great Falls Historic Railroad District (extending south into Tract 7), Great Falls Northside Residential Historic District and the city's two central parks, Gibson Park and Riverside Park. The Great Falls Housing Authority's main site is located in Tract 9.

The Great Falls Business Improvement District (BID) has focused its activities on façade and interior building improvements; cleaning, maintenance and beautification; new business activity; and residential development in the downtown area. BID provides financial support for façade improvements, new tenant rent payment, and interior renovation projects. Additionally, the BID is active in supporting the beautification and increased vibrancy of downtown through outdoor art projects. They also have a community ambassador program and are a key part of the Downtown Business Watch program which educates people about various safety issues.

The BID will coordinate efforts with organizations such as the City, the GFDA, Chamber of Commerce, Downtown Great Falls Association and NeighborWorks for business development and revitalization of the downtown area.

The City Historic Preservation Officer and the Great Falls-Cascade County Historic Preservation Advisory Commission will continue to promote the use of investment tax credits for certified rehabilitation as an important tool for revitalization of the downtown area. The City will continue to be an active participant in the Downtown Development Partnership and will work to incentivize downtown revitalization. The City, BID, GFDA, the Chamber of Commerce and Great Falls Tourism are actively collaborating on the development of a community wayfinding sign plan to promote enhanced tourism and revitalization of the city's urban core.

Are there other strategic opportunities in any of these areas?

The Downtown Master Plan was adopted in October 2011 in an effort to revitalize several tracts within the downtown core and to consolidate revitalization efforts among interest groups within Great Falls, including the City, nonprofit agencies, and community leaders. The Downtown Master Plan study area extends fifteen blocks east of the Missouri River and encompasses portions of Tracts 4, 7, 8, and 108. The Plan was developed around four community Working Groups:

Vitality: Downtown's role as the center of commerce, culture, and community events—year-round, throughout the day, and into the night.

Livability: the enrichment of the physical, social, and personal well-being of Downtown residents, employees, and visitors.

Character: the physical elements that create a unique sense of place that distinguishes the Downtown area from other parts of the city.

Mobility: the ability of residents, employees, and visitors to have the option of using multiple modes of transportation to reach Downtown destinations in a safe and efficient manner.

These working groups later comprised the Downtown Development Partnership (DDP), an inter-agency cooperative group which meets monthly to discuss issues specific to this area.

The Montana Main Street program, through the Montana Department of Commerce, awards grants to affiliate communities (which include Great Falls) upon providing a quarterly Community Reinvestment Report. All activities within the Downtown Master Plan area are included and consist of all building rehabilitations, volunteer activities, and new businesses. The DDP has been extremely successful in obtaining these grants, which have been successful in implementing the downtown outdoor dining “pedlet” program, a Downtown Block Visioning study, and (in process) development of the community Wayfinding Sign Study.

MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

The 2018 ACS estimates 75% of Great Falls households have a broadband internet subscription. The City has not yet determined what portion of low and moderate income households make up this percentage of the population.

Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

According to broadband deployment information released by the Federal Communications Commission (FCC) in June 2019, there are nine broadband internet service providers in the Great Falls area offering service at speeds greater than or equal to 25/3 Mbps. The FCC map below indicates area access to broadband services as well as the number of fixed residential service providers.

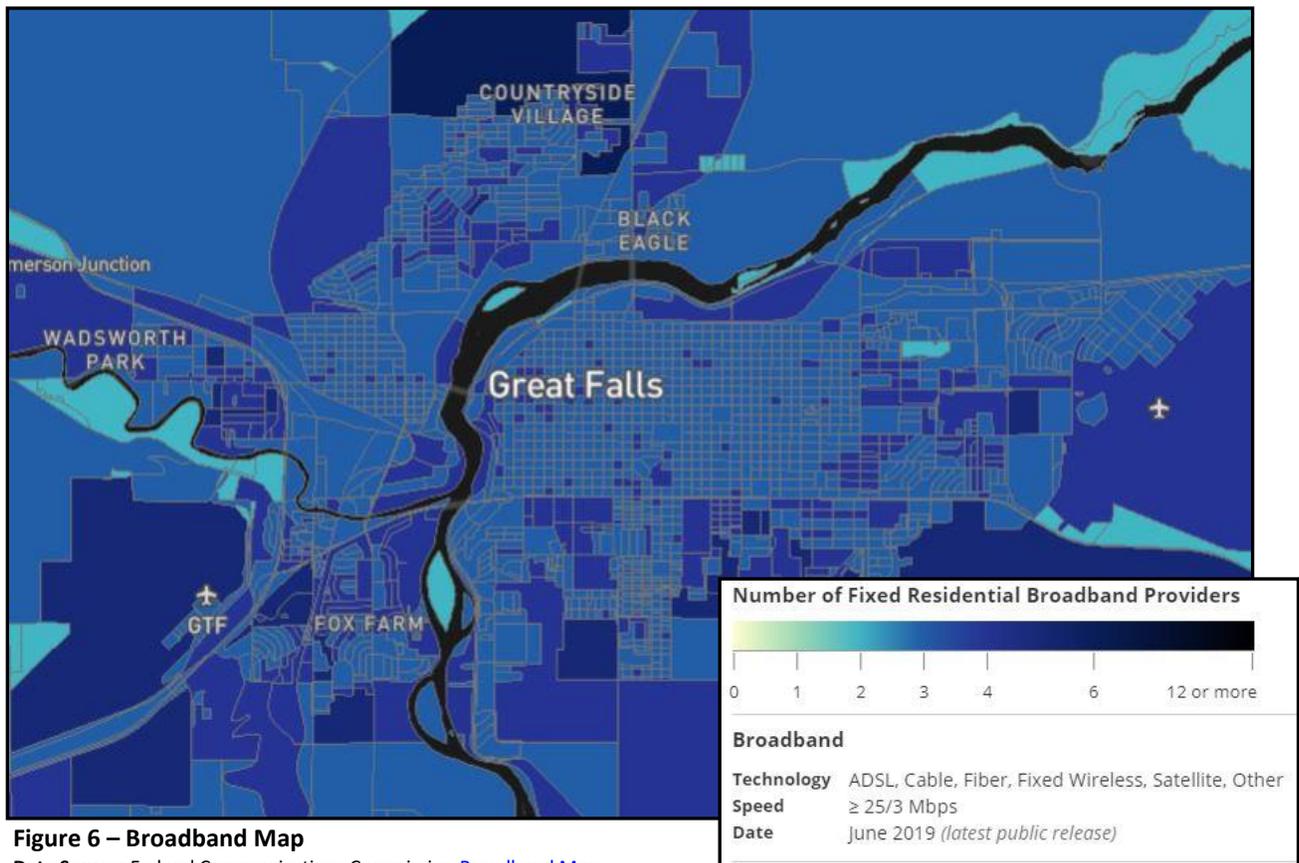


Figure 6 – Broadband Map
Data Source: Federal Communications Commission [Broadband Map](#)

Describe the jurisdiction’s increased natural hazard risks associated with climate change.

According to the 2017 Montana Climate Assessment, annual average temperatures in the state have risen 2-3 degrees Fahrenheit since 1950. This is approximately double the rate of the nation as a whole. Annual average temperatures are projected to increase 4.5-6.0 degrees Fahrenheit by the middle of the century and 5.6-9.8 degrees Fahrenheit by the end of the century. The anticipated results of rising temperatures in the state include reduced snowpack, shifts in streamflow patterns, increases in frequency and severity of wildfires, and added strain on the state’s water supplies.

Governor Bullock issued an executive order on July 1, 2019, creating the Montana Climate Solutions Council and joining the state of Montana to the U.S. Climate Alliance. The Council completed the [Montana Climate Solutions Plan](#) in August 2020, which outlines recommendations and strategies to prepare Montanans for climate impacts, reduce greenhouse gas emissions, foster innovation and advanced manufacturing across Montana’s economy, and address the needs of communities in transition through appropriate economic development and workforce strategies.

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

The Missouri and Sun Rivers run through Great Falls, and the community has suffered severe flooding events in past decades. In particular, major past flooding events caused significant damage to west side neighborhoods that housed a number of low-moderate income residents. After the significant flooding event of the Sun River in 1975, a 7.5 mile levee system was constructed and completed in 1984. This has significantly reduced the severity of community flooding.

The City’s Land Development Code contains up to date floodplain regulations that significantly restrict the amount of residential development that can take place in designated flood hazard areas. Additionally, the City has a dedicated staff person who is a Certified Floodplain Manager. The City participates in the *National Flood Insurance Program Community Rating System*, which means that its flood insurance program meets all requirements of the Federal Emergency Management Agency (FEMA). Despite the City’s rigorous floodplain regulations and program management, there are pre-existing dwelling units, particularly older mobile home parks, which are located in floodplain areas.

SP-05 Overview

Based on data contained in this report as well as input the City has received from the community, the City of Great Falls chose seven (7) objectives or goals to implement the 2020-2024 Consolidated Plan. The goals identified in relation to community needs are: Public Services, Housing Rehabilitation, Economic Development, Affordable Housing, Fair Housing, Public Facilities and Improvements, and Planning and Administration.

SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area

The geographic area for the entitlement city, Great Falls, Montana, is outlined as the area within the city limits as established by the City of Great Falls. The city does not have any census tract areas of minority concentration based on Federal Financial Institutions Examination Council (FFIEC) data. However, the city does have areas of low-income concentration, which are defined as areas where 51% of the population has income at or below 80% AMI.

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction.

The City of Great Falls does not allocate funding priorities based on a geographic preference. Funding priorities are based on community need and the number of individuals or households that can benefit from the limited amount of funding available. Some allocations are based on an area need and focus efforts in LMI areas with 51% LMI residents, based on HUD's area benefit calculation tool. That is the only geographic distinction that is made by the City of Great Falls.

SP-25 Priority Needs - 91.215(a)(2)

All needs identified by the City are considered high priority. Each is listed below and none ranks higher than the other.

Priority Needs

Priority Need	Priority Level	Income Level	Family Types	Homeless Categories	Non-Homeless Special Needs
Public Services	High	Extremely Low, Low, Moderate	Large Families, Families with Children, Elderly, Public Housing Residents	Chronic Homelessness, Individuals, Families with Children, Mentally Ill, Chronic Substance Abuse, Veterans, Persons with HIV/AIDS, Victims of Domestic Violence, Unaccompanied Youth	Elderly, Frail Elderly, Persons with Mental Disabilities, Persons with Physical Disabilities, Persons with Developmental Disabilities, Persons with Alcohol or Other Addictions, Persons with HIV/AIDS and their Families, Victims of Domestic Violence, Non-housing Community Development
Priority Need	Priority Level	Income Level	Family Types	Homeless Categories	Non-Homeless Special Needs
Affordable Housing	High	Extremely Low, Low, Moderate	Large Families, Families with Children, Elderly, Public Housing Residents	Chronic Homelessness, Individuals, Families with Children, Mentally Ill, Chronic Substance Abuse, Veterans, Persons with HIV/AIDS, Victims of Domestic Violence, Unaccompanied Youth	Elderly, Frail Elderly, Persons with Mental Disabilities, Persons with Physical Disabilities, Persons with Developmental Disabilities, Persons with Alcohol or Other Addictions, Persons with HIV/AIDS and their Families, Victims of Domestic Violence

Priority Need	Priority Level	Income Level	Family Types	Homeless Categories	Non-Homeless Special Needs
Housing Rehabilitation	High	Extremely Low, Low, Moderate	Large Families, Families with Children, Elderly, Public Housing Residents	Chronic Homelessness, Individuals, Families with Children, Mentally Ill, Chronic Substance Abuse, Veterans, Persons with HIV/AIDS, Victims of Domestic Violence	Elderly, Frail Elderly Persons with Mental Disabilities, Persons with Physical Disabilities, Persons with Developmental Disabilities, Persons with Alcohol or Other Addictions, Persons with HIV/AIDS and their Families, Victims of Domestic Violence
Priority Need	Priority Level	Income Level	Family Types	Homeless Categories	Non-Homeless Special Needs
Fair Housing	High	Extremely Low, Low, Moderate	Large Families, Families with Children, Elderly, Public Housing Residents	Chronic Homelessness, Individuals, Families with Children, Mentally Ill, Chronic Substance Abuse, Veterans, Persons with HIV/AIDS, Victims of Domestic Violence, Unaccompanied Youth	Elderly, Frail Elderly, Persons with Mental Disabilities, Persons with Physical Disabilities, Persons with Developmental Disabilities, Persons with Alcohol or Other Addictions, Persons with HIV/AIDS and their Families, Victims of Domestic Violence
Priority Need	Priority Level	Income Level	Family Types	Homeless Categories	Non-Homeless Special Needs
Economic Development	High	Extremely Low, Low, Moderate	Large Families, Families with Children, Public Housing Residents		Persons with Mental Disabilities, Persons with Physical Disabilities, Persons with Developmental Disabilities,

					Persons with Alcohol or Other Addictions, Persons with HIV/AIDS and their Families, Victims of Domestic Violence, Non-housing Community Development
<i>Description: Provide funding for projects which create decent paying jobs with benefits for persons from low to moderate income households. The City of Great Falls will fund economic development projects which will result in the creation and retention of jobs for low to moderate income people.</i>					
Priority Need	Priority Level	Income Level	Family Types	Homeless Categories	Non-Homeless Special Needs
Public Facilities and Improvements	High	Extremely Low, Low, Moderate Middle	Large Families, Families with Children, Elderly, Public Housing Residents	Chronic Homelessness, Individuals, Families with Children, Mentally Ill, Chronic Substance Abuse, Veterans, Persons with HIV/AIDS, Victims of Domestic Violence, Unaccompanied Youth	Elderly, Frail Elderly, Persons with Mental Disabilities, Persons with Physical Disabilities, Persons with Developmental Disabilities, Persons with Alcohol or Other Addictions, Persons with HIV/AIDS and their Families, Victims of Domestic Violence, Non-housing Community Development
<i>Description: Provide public facility and infrastructure assistance, including but not limited to handicap accessibility, energy efficiency improvements, and removal of slum and blighted properties to provide a suitable living environment. The City of Great Falls will prioritize meeting handicap accessibility requirements in public facilities and infrastructure.</i>					
Priority Need	Priority Level	Income Level	Family Types	Homeless Categories	Non-Homeless Special Needs
Planning and Administration	High				
<i>Description: City staff to administer, manage, and monitor CDBG and HOME funded activities.</i>					

SP-30 Influence of Market Conditions – 91.215 (b)

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	Median Contract Rent has increased which equates to greater housing costs for renters. The increase in rent negatively affects many of Great Falls’ lowest income residents and many depend on rental assistance.
TBRA for Non-Homeless Special Needs	The search for affordable housing is complicated for individuals facing serious disabilities or other special situations. Both the public and government agencies have become increasingly aware of the need to work with the private sector and non-profit organizations to develop viable housing options for people with special needs. An important component of successfully addressing housing needs is integrating low income and special needs housing units into the community. In addition, people with disabilities or who have other special needs require supportive services concurrent with housing assistance.
New Unit Production	The City has worked with local developers and non-profit agencies to produce new housing opportunities. Unfortunately, the number of new affordable units is still smaller than the demand from low and moderate income residents. Costs for building new housing have greatly increased in recent years. The building codes require over-engineered foundations and this may be a significant cost; however, it is necessary because of the clay formation underlying much of the city. The current zoning and setback requirements can be restrictive for developing affordable housing in situations where developers wish to use odd-size or small lots or construct high density. Additionally, no affordable housing incentives such as reduced lot sizes and setbacks or waived building permit fees are available to developers of affordable housing. Currently, no affordable housing zoning ordinances exist. The City has been successful working with NeighborWorks to use PUD zoning to achieve higher density housing (Rockcross Commons/Meriwether Crossing). This approach will continue in the future as NeighborWorks needs additional lots for affordable housing development.
Rehabilitation	Housing units that are affordable to residents within certain income groups often have physical problems making the units ineligible for financing. Rehabilitation of these units will help bring them up to code, improve physical appearance and maintain affordability.
Acquisition, including preservation	The basic housing affordability problem for many residents is the disparity between income levels and housing costs, especially for low and moderate income people. Average housing prices have grown faster than income levels, making it difficult or impossible for many families to save enough for a down payment or to afford the monthly cost of a mortgage, interest, insurance and taxes. This problem is worse for people with poor credit histories, especially those people with low and moderate incomes. The Great Falls-

	Cascade County Historic Preservation Advisory Commission (HPAC) is included in all projects throughout the area that have historic considerations. This ensures that historic preservation is considered at all levels of City and County decision-making related to the demolition or renovation of structures in historic districts or those that may be eligible for historic designation due to their age.
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Table 54 – Influence of Market Condition

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

The following table describes the City of Great Falls’ CDBG & HOME anticipated resources to carry out the goals of the Consolidated Plan.

Program	Source of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan
		Annual Allocation:	Program Income:	Prior Year Resources:	Total:	
CDBG	public - federal	\$808,208	\$300,327	\$81,333	\$1,189,868	\$3,200,000
<i>Uses of Funds</i>	<i>Acquisition, Economic Development, Housing, Public Improvements, Public Services, Admin and Planning</i>					
<i>Description</i>	<i>CDBG funds are anticipated to be \$800,000 annually for the program years 2020-2024.</i>					
HOME	public - federal	\$280,370	\$453,901	\$823,185	\$1,557,456	\$1,120,000
<i>Uses of Funds</i>	<i>Acquisition, Homebuyer Assistance, Rehabilitation (Multifamily & Homeowner), New Construction (Multifamily & Homeowner), Admin and Planning, TBRA</i>					
<i>Description</i>	<i>HOME funds are anticipated to be \$280,000 annually for the program years 2020-2024.</i>					

Table 55 – Anticipated Resources

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied.

Federal funding will be leveraged with the support of state and local funds as well as outside (private) sources of funding. Both CDBG and HOME projects can maximize local impact with leveraged local resources among area providers.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan.

The City of Great Falls does not anticipate that publicly owned land will be utilized to address needs identified in the Consolidated Plan. However, it is anticipated that the City will be an annual applicant for funds to address public buildings, active transportation needs (sidewalks and trails), as well as public park facilities.

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Geographic Area Served
City of Great Falls	Government	Jurisdiction
<i>Entity's Role</i>	<i>Economic Development, Non-homeless Special Needs, Planning, Neighborhood Improvements, Public Facilities, Public Services, Affordable Housing (Ownership and Rental)</i>	
Great Falls Housing Authority	PHA	Jurisdiction
<i>Entity's Role</i>	<i>Public Housing</i>	

Table 56 - Institutional Delivery Structure

Assess Strengths and Gaps in the Institutional Delivery System

The City is a public entity whose purpose relative to housing and other categories pertinent to CDBG and HOME grant funding involve such areas as planning, financing, code enforcement, zoning enforcement, building inspection, plan review and overall community development. The City’s financial resources for assistance are the CDBG and HOME programs. In addition to having its own housing programs, the City allocates federal funds to housing and non-profit agencies to address housing, economic development, public facility and public services issues. These programs are administered through the Planning & Community Development Department with support, as necessary, from other departments within the City of Great Falls. Policy oversight is provided by the City Commission. Administrative oversight is provided by the City’s department director and the City Manager.

The City works in conjunction with the various entities described in the previous section (such as local housing, community development and social service providers) and groups such as the Continuum of Care for Homelessness to ensure the Consolidated Plan accurately reflects the needs of the community. The City Grant Committee, comprised of staff professionals who are familiar with CDBG and HOME Program requirements, provides application funding recommendations, and the City Commission makes

the final decision on the direction the City will take to meet the needs identified in the Consolidated Plan.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X		
Mortgage Assistance	X		
Rental Assistance	X	X	
Utilities Assistance	X	X	
Street Outreach Services			
Law Enforcement	X	X	
Mobile Clinics			
Other Street Outreach Services	X	X	
Supportive Services			
Alcohol & Drug Abuse	X	X	X
Child Care	X	X	
Education	X	X	X
Employment and Employment Training	X	X	X
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X	X	X
Mental Health Counseling	X	X	X
Transportation	X	X	X

Table 57 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth).

The various entities previously described have a history of collaboration with the City in seeking to meet the needs of low income and at-risk populations, including service needs of the homeless and chronically homeless. This collaboration has become increasingly crucial as funding resources have decreased at most governmental levels. The City anticipates being able to implement the programs/projects proposed in the Consolidated Plan unless federal funds become unavailable, reduced or delayed for a substantial period of time. The City works in conjunction with local housing, community development and social service providers, as well as groups such as the Continuum of Care for Homelessness, to ensure the Consolidated Plan accurately reflects the needs of the community.

Describe the strengths and gaps of the service delivery system for special needs populations and persons experiencing homelessness, including, but not limited to, the services listed above.

Individuals experiencing homelessness and persons with HIV have clear gaps in services. However, service gaps evident for persons with HIV are partially due to the low level of HIV/AIDS population currently in Great Falls. The jurisdiction does not currently receive HOPWA funding, and City-County Health Services provides health and treatment related services to those with HIV rather than providing housing assistance as HOPWA is intended. Gaps in homeless services may be explained by the Great Falls Rescue Mission being the primary emergency shelter and provider of homeless services in the community. As a faith-based organization, the Rescue Mission prefers not to accept federal funding for their projects and is financially supported almost exclusively with donations. Thus, no CDBG funds have been used to support or increase service delivery to homeless individuals.

Locally, the turnover of some non-profit agency leadership due to lack of available funding or retirements have created a gap in experience and knowledge in the local workforce. Mentorship and replacing these key community leaders is essential for maintaining current level of service.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs.

Coordination between local nonprofit agencies and services is essential to overcoming gaps. Discussing current best practices and success stories through collaborative meetings will avoid duplication or gaps in services provided and avoid agencies competing against each other for scarce CDBG/HOME funding dollars when applying yearly.

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Public Services	2020	2024	Homeless, Non-Homeless Special Needs, Non-Housing Community Development	City of Great Falls	Public Services	CDBG: \$475,000	Public service activities other than Low/Moderate Income Housing Benefit: 5000 Persons Assisted
2	Affordable Housing	2020	2024	Affordable Housing, Homeless, Non-Homeless Special Needs	City of Great Falls	Affordable Housing	HOME: \$1,000,000	Homeowner Housing Added: 10 Household Housing Unit Direct Financial Assistance to Homebuyers: 35 Households Assisted
3	Housing Rehabilitation	2020	2024	Affordable Housing, Public Housing, Non-Homeless Special Needs	City of Great Falls	Housing Rehabilitation	CDBG: \$700,000	Rental units rehabilitated: 40 Household Housing Unit Homeowner Housing Rehabilitated: 25 Household Housing Unit
4	Fair Housing	2020	2024	Affordable Housing, Public Housing, Homeless, Non-Homeless Special Needs	City of Great Falls	Fair Housing	CDBG: \$125,000	Public service activities other than Low/Moderate Income Housing Benefit: 600 Persons Assisted
5	Economic Development	2020	2024	Non-Housing Community Development, Economic Development	City of Great Falls	Economic Development	CDBG: \$300,000	Jobs created/retained: 15 Jobs Businesses assisted: 10 Businesses Assisted
6	Public Facilities and Improvements	2020	2024	Public Housing, Non-Homeless Special Needs, Non-Housing Community Development	City of Great Falls	Public Facilities and Improvements	CDBG: \$1,300,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 10000 Persons Assisted

	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Planning and Administration	2020	2024	Planning and Administration	City of Great Falls	Planning and Administration	CDBG: \$800,000 HOME: \$140,000	

Table 58 – Goals Summary

Goal Descriptions

1	Goal Name	Public Services
	Goal Description	Provide support to public service agencies’ operating programs that benefit low to moderate income persons. The City of Great Falls will provide CDBG funds to social service agencies for activities that service low to moderate income people or areas.
2	Goal Name	Affordable Housing
	Goal Description	Increase and preserve affordable housing opportunities for very low to moderate income renters, homeowners, first-time homebuyers, and those experiencing homelessness. This includes affordable housing efforts that require funding to remediate properties negatively affected by slum and blighted conditions.
3	Goal Name	Housing Rehabilitation
	Goal Description	Provide construction and rehabilitation assistance for very low to moderate income homeowners, rental property owners and the Public Housing Authority. The City will focus on upgrading the City’s housing stock to meet standard building codes to provide and sustain safe, affordable housing through its revolving loan fund. The City of Great Falls will address Public Housing Authority rehabilitation or modernization projects with the use of CDBG funding.
4	Goal Name	Fair Housing
	Goal Description	Provide funding for activities that affirmatively further fair housing. The City of Great Falls will fund activities that include, but are not limited to fair housing education, counseling, outreach, and referrals pertaining to the laws, rights, and responsibilities related to housing and housing-related transactions, as well as service activities that reduce and remove barriers to fair housing choice.
5	Goal Name	Economic Development
	Goal Description	Provide funding for projects which create decent paying jobs with benefits for persons from low to moderate income households. The City of Great Falls will fund economic development projects which will result in the creation and retention of jobs for low to moderate income people.
6	Goal Name	Public Facilities and Improvements
	Goal Description	Provide public facility and infrastructure assistance, including but not limited to handicap accessibility, energy efficiency improvements, and removal of slum and blighted properties to provide a suitable living environment. The City of Great Falls will prioritize meeting handicap accessibility requirements in public facilities and infrastructure.
7	Goal Name	Planning and Administration
	Goal Description	City staff to administer, manage, and monitor CDBG and HOME funded activities.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2).

The City of Great Falls estimates the number of LMI families to be as follows:

- Assistance to first-time home buyers (35 households served)
- Affordable Housing Construction & Rehab (10 households served)
- City’s Revolving Loan Fund (30 households served)

This amounts to approximately 75 households served, not including current services provided in subsidized housing.

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

Not applicable.

Activities to Increase Resident Involvement

The Great Falls Housing Authority (GFHA) encourages tenants to be involved in the management of public housing through having two tenants on the Housing Authority Board of Commissioners. Resident board members serve two-year terms. All members serve without compensation.

In addition to preparing and distributing quarterly newsletters that offer residents seasonal information, updates, and reminders, GFHA hosts public hearings to obtain input from residents as to their needs and opinions, including those related to the annual plan and proposed rehabilitation of housing units. The information obtained from these hearings is considered in the annual grant application submitted by GFHA.

In-depth information regarding GFHA can be found in the Needs Assessment and Housing Market Analysis (Sections 3 and 4) of this Consolidated Plan (NA-35 Public Housing; MA-25 Public and Assisted Housing).

Is the public housing agency designated as troubled under 24 CFR part 902?

No

Plan to remove the ‘troubled’ designation

Not applicable. The Great Falls Housing Authority is not currently designated as troubled.

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

Great Falls first adopted a zoning ordinance to regulate the use of land and buildings in 1930. The most recent comprehensive update of the City’s zoning and subdivision regulations occurred when the Unified Land Development Code was adopted in 2005. The new code implements the City’s Growth Policy, Missouri River corridor plan, neighborhood plans and the City’s Long Range Transportation Plan. The purposes of the code are: 1) to ensure that all development is guided by and gives consideration to the Growth Policy; 2) to provide clear, consistent standards, regulations and procedures for the review and approval of all proposed development within the city; and, 3) to safeguard the public health, safety and general welfare by establishing minimum standards for design and development.

The City subjects development applications to subdivision regulations, zoning and land use controls and annexation policies. Such codes and policies are designed to create orderly development; provide adequate services including transportation, utilities, and fire and police protection; and promote public health, safety and general welfare.

Costs for building new housing have greatly increased in recent years, but this is due to other factors previously described rather than the cost of meeting code requirements. Existing home prices greatly increased due to low housing stock. The City’s Chief Building Official reports there is also the perception that costs of new building permits are high and require a time-consuming process. However, the total estimated cost for construction permits to build a house was approximately 1% of the structure’s value. The building codes may require engineered foundations and this could be a significant cost; however, it is necessary because of the clay formation underlying much of the city. The City works with homeowners to educate them on ways to reduce the cost of permitting whenever possible. The timeline for residential permitting is currently at a 7-day turnaround time based on quality of drawing submittals. There is good accessibility to plans examiners and access to inspectors when needed.

The current zoning and setback requirements can be restrictive for developing affordable housing in situations where developers wish to use odd-size or small lots or construct high density housing. Additionally, no affordable housing incentives such as reduced lot sizes, setbacks or waived building fees are available to developers of affordable housing. Due to land prices and infrastructure costs, smaller lots are being developed for condensed housing at this time. As noted previously in this Plan, the City

and NeighborWorks have partnered by using Planned Unit Development zoning to bring both affordable multifamily units and owner occupied homes into the Great Falls market.

Traditionally, mobile/manufactured housing has allowed low income families to purchase housing when a conventional home may be out of reach. However, there is limited availability of vacant affordable single lots, mobile home courts will not accept homes that are older than five years, and a zoning change would be required if a new mobile home subdivision were to be developed. There appears to be the demand for an affordable housing option such as improvements to existing mobile/manufactured home parks or development of a new mobile/manufactured home subdivision. Some of those proposed upgrades are cost prohibitive due to many existing parks being located in the floodplain.

In Montana, property tax is the only way authorized by the legislature for cities to raise money to provide local government services and finance schools. Therefore, the tax burden falls on property owners. The cost of building new housing is also affected by the concept that the user pays. The developer of new housing must pay the full cost of extending water and sewer services, connecting to city utilities and putting in curbs, gutters, sidewalks and paved streets. Meeting storm water quality requirements mandated by the Federal government has increasingly affected the feasibility of some housing development proposals. While these requirements affect the cost of housing, these standards also dictate the quality, permanence, safety and environmental aspects of a community.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

The foundation for the City's fair housing program is the Analysis of Impediments to Fair Housing Choice. The most recent Analysis of Impediments is being conducted as a statewide effort among the State of Montana Department of Commerce and Montana's three CDBG entitlement cities: the City of Billings, the City of Missoula, and the City of Great Falls.

In effort to remove and reduce barriers to affordable housing and housing choice, the City will assist in preserving and increasing access to affordable housing for renters and homeowners through the following CDBG and HOME-funded programs:

CDBG:

- City Revolving Loan Program: City-administered loans for code-related repairs, improvements, and water and sewer upgrades to improve the quality of homeowner and rental housing stock for low to moderate income households
- Projects and activities for the development of affordable housing, including funding for site acquisition and the remediation of properties negatively affected by slum and blighted conditions
- Fair Housing outreach and education

HOME:

- First-time Homebuyer Assistance: downpayment and gap financing assistance for income-eligible households. This program is administered by NeighborWorks Great Falls with HOME program income.
- Projects and activities that fund the development of new construction or rehabilitation of homeowner and rental housing

As part of its fair housing outreach and education activities, the City will distribute pamphlets about fair housing and equal opportunity, landlord and tenant law, accessibility guidelines and HUD programs community-wide, free of charge. Current information will also be available on the City and Housing Authority websites. Fair housing education programs will be presented quarterly at NeighborWorks Great Falls, and the City will provide fair housing information and referral services to landlords and tenants as requested.

The City's Fair Housing Specialist will be involved with activities that pertain to public housing through a partnership between the City of Great Falls and the Housing Authority. Housing Authority procedures that pertain to federal and state landlord and tenant law for public housing will be reviewed. Investigations will be conducted about tenant complaints. When requested by HUD, workshops will be presented to provide information to tenants about their responsibilities and rights under state and federal law.

The City's Chief Building Official will provide a summary of accessibility requirements to each individual who requests an architectural and engineering plan review through the City Planning and Community Development Department. These handouts will include the HUD Accessibility Guidelines *Seven Technical Requirements* pamphlet and a summary listing of the Fair Housing Act accessibility requirements and the Section 504 of the Rehabilitation Act of 1973 accessibility requirements.

SP-60 Homelessness Strategy – 91.215(d)

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The Continuum of Care (CoC) group participates in the annual homeless Point-in-Time Count, which is undertaken to identify the number and demographics of homeless people in the state. On the night of January 31, 2019, there were 223 people counted as homeless in Great Falls. Of the total, 200 were in an emergency shelter, 13 were in transitional housing, and 10 were unsheltered.

Although the City does not receive CoC or Emergency Solutions Grant (ESG) funds to directly impact homelessness, there is a robust network of public service organizations in Great Falls who work to meet

the needs of those experiencing homelessness or who are at risk of homelessness. A complete list of homeless service and outreach providers is included in Section 4 of this report (MA-30 Homeless Facilities and Services).

Addressing the emergency and transitional housing needs of homeless persons

The Great Falls Rescue Mission (Rescue Mission) includes a men's shelter, women's shelter, and family shelter and is the primary emergency shelter provider in Great Falls. It is difficult to delineate the specific numbers of beds available for emergency shelter versus transitional housing as the organization does not use governmental funding and is not restricted by specific programming requirements; therefore, they can be flexible regarding bed usage. Whether a specific bed is used for emergency or transitional shelter is driven by actual need that particular day. Overall, there are 52 beds available in the men's shelter and 65 beds in the women shelter. In an emergency such as life threatening weather, the Rescue Mission provides additional mats on the floor and foldaway cribs to accommodate need. The Rescue Mission's Cameron Family Center can serve approximately 134 people experiencing homeless, 70 of which, on average, are children.

The YWCA Mercy Home, the primary provider of emergency/transitional housing and supportive services for victims of domestic abuse, has the capacity to house 30 women & children at one time; supportive services include crisis intervention, support groups, information and referral, group counseling, personal advocacy, parenting classes, 911 cell phone lending program, transportation, legal advocacy, resume building & employment coaching. The YWCA Great Falls website reports that from July 2018 to June 2019 the organization provided 156 women and children fleeing domestic violence with more than 4,071 shelter nights. Along with housing assistance, victims of domestic violence may require financial assistance for basic needs, counseling, legal assistance and training/education to assist with employment.

St. Vincent de Paul's Grace Home provides transitional housing for homeless men who are veterans, with the capacity to house 14 men at a time. During cold and/or inclement weather, Grace Home offers shelter services beyond its usual capacity.

The Center for Mental Health provides transitional housing for individuals with severe or serious disabling mental illness who demonstrate a need for additional supportive living services.

Opportunities, Inc., receives Emergency Solutions Grant (ESG) funding and offers emergency assistance through rapid re-housing and homeless prevention services.

Alliance for Youth's Youth Resource Center serves youth ages 13-20 who are disadvantaged, homeless, or at risk of becoming homeless. Services offered include medical, dental, behavioral health care, substance abuse treatment, housing search support and advocacy. Additionally, drop-in centers operate

in tandem with outreach programs, family engagement services, emergency shelters and transitional housing.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

Chronically Homeless: As noted previously, the Great Falls Rescue Mission is the primary emergency shelter provider in Great Falls. Opportunities, Inc., receives Emergency Solutions Grant (ESG) funding and offers emergency assistance through rapid re-housing and homeless prevention services.

Families with Children: To meet growing need for shelter services for homeless families, the Great Falls Rescue Mission completed construction of the Cameron Family Center in November of 2016. The Cameron Family Center can serve approximately 134 people experiencing homelessness, 70 of which, on average, are children.

Veterans: Volunteers of America provides individualized service coordination to veterans who are homeless or at risk of being homeless through rapid rehousing, homelessness prevention, and emergency shelter as funding allows. St. Vincent de Paul's Grace Home offers transitional housing for homeless veterans, as well as employment and other general assistance.

Unaccompanied Youth: Young Parents Education Center provides on-site developmental day care, family support and outreach, pre-vocational activities and parenting/child development education to assist pregnant and parenting teens and young adults to build self-sufficiency. Alliance for Youth's Youth Resource Center serves youth ages 13-20 who are disadvantaged, homeless, or at risk of becoming homeless. Services offered include medical, dental, behavioral health care, substance abuse treatment, housing search support and advocacy. Additionally, drop-in centers operate in tandem with outreach programs, family engagement services, emergency shelters and transitional housing.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

Opportunities, Inc., is the central intake point for social service providers in Great Falls. This agency provides a wide range of services for homeless and low income people. Opportunities, Inc., will provide

referral, limited case management and designated payee's status for Social Security recipients to prevent people from becoming homeless. This agency will collaborate with the Center for Mental Health to provide services for homeless individuals who have mental illness by referral for emergency services and direct assistance services.

Kairos Youth Services, Inc., provides emergency shelter, transitional housing and supportive services as noted in the previous chart. Supportive services will include housing, meals, recreational programming, tutoring, coping skills training, independent living skills training, individual treatment planning, case management and individual, group and family counseling. Kairos will operate aftercare/early intervention mentoring programs with the Eighth Judicial District Youth Court, administer the Montana Foster Care Independence Program in Region 2 and provide Psychiatric Residential Treatment Facility Program services.

A sampling of other agencies who will provide a variety of services for people who are homeless or threatened with homelessness include the Great Falls Community Food Bank, St. Vincent de Paul, Great Falls Rescue Mission, Salvation Army and many churches. In addition, numerous programs through government departments such as the Cascade County Office of Public Assistance will work toward meeting the needs of homeless people.

SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

All CDBG and HOME funded housing project sites which have visual paint deterioration where rehabilitation will take place will be tested by a certified risk assessor for the presence of lead-based paint using the XRF Technology Lead Analyzer. On any sites that test positive, only contractors certified in safe work practices will be used for abatement. Clearance tests will be performed by an Environmental Protection Agency (EPA) certified risk assessor and a certified laboratory after interim controls are completed.

The City will pay for lead-based paint testing on all projects through its housing rehabilitation programs, only adding cost to homeowners if a contractor needs to be hired.

Lead-based paint hazards will be taken into consideration on all pertinent CDBG-funded projects being undertaken by sub-grantees.

NeighborWorks Great Falls will comply with all HUD lead safe requirements on all City-funded housing rehabilitation projects for properties constructed prior to 1978. NWGF is a certified abatement company and has staff that is certified in lead safe practices. NWGF will have certified inspectors from the Housing

Authority do initial tests using the XRF Lead Analyzer to check for the presence of lead-based paint in all projects involving a building constructed prior to 1978. If lead-based paint is found, NWGF staff or subcontractors certified in lead safe practices will do abatement or mitigation and obtain laboratory clearance tests from an EPA certified risk assessor after the abatement is completed.

The Housing Authority will provide all new tenants with lead-based paint hazard reduction information and will include lead-based paint considerations in their policies. Lead-based paint hazards will be taken into consideration as part of the Housing Choice voucher program inspections which are done for private rentals. This process will include initial testing using the XRF Analyzer on all houses built prior to 1978 when peeling paint is present and children will be in the home. Safe work practices and clearance testing will be undertaken when the presence of lead-based paint is found.

The Housing Authority has retained an engineering consulting firm to address lead-based paint testing and mitigation, if required, at the main site rehabilitation project. The Housing Authority will provide information regarding previous lead-based paint testing to the City as each building is vacated, along with any clearance test results if abatement is required.

How are the actions listed above related to the extent of lead poisoning and hazards?

Preventive and rehabilitative measures will be taken in all CDBG and HOME funded housing and public facilities projects that serve young children to ensure the extinction of lead-based paint hazards. All rehabilitation projects in which the building was constructed before 1978 will address lead-based paint regulations. Information about lead-based paint hazards will be provided to all people who apply for City housing rehabilitation loans. If lead-based paint is found during initial testing on a project where families with children under the age of six reside, they will be referred for testing for lead-based paint exposure.

How are the actions listed above integrated into housing policies and procedures?

Lead-based paint hazards will be taken into consideration on all pertinent CDBG-funded projects being undertaken by sub-grantees.

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

Rural Dynamics, Inc., (RDI) is a non-profit organization which provides programs designed to assist low to moderate income people to obtain financial security. RDI was awarded grant funds through the Northwest Area Foundation several years ago to provide programs to help people get out of poverty. RDI will use these grant funds locally to provide credit building loans, enroll participants in a small business individual development account program and maintain a support group for people

participating in financial security programs. RDI will hold financial education workshops, provide free financial literacy classes for low income people and administer a youth financial literacy program. The agency will also partner with local agencies to provide income tax assistance sites to assist eligible low income people file their federal tax returns and claim earned income tax credits.

Opportunities, Inc. will provide a wide variety of programs to assist very low and low income people, including administration of the following programs which focus on assisting people out of poverty:

- Work Force Investment Act Program: Provides year-round, full-time employment services for high-school dropouts, those with low incomes, and at risk and special needs young adults ages 16 through 22
- HeadStart Program: Provides education of preschool-age children, child care, parent education, job training, continuing education, GED preparation, life skills classes, assistance with applying for financial aid for college and coordination with other community services
- Low Income Energy Assistance Program and Weatherization Program: Provides financial assistance to low income families to help with utility bills, furnace replacement/repair and other energy efficiency services

Young Parents Education Center will provide on-site developmental day care, family support and outreach, pre-vocational activities and parenting/child development education to assist pregnant and parenting teens and young adults to build self-sufficiency.

The YWCA of Great Falls will offer services that promote self-sufficiency, including life skills training classes, women's health workshops and self-defense training.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan?

The Consolidated Plan is a guiding document for the next five years within the community, and affordable housing is a crucial portion of the Plan, as indicated in the goals set forth in the Strategic Plan and expressly stated in the Executive Summary. The Montana Continuum of Care is the coordinating agency for the chronically homeless and for those at risk of homelessness, but local agencies such as the Great Falls Rescue Mission are essential in supporting those goals.

The City of Great Falls' goals, programs and policies are aligned with local nonprofit, faith-based and private businesses to provide decent, safe, and affordable housing as stated in the goals and objectives. The Consolidated Plan, citizen participation process for every Annual Action Plan, and the monthly coordination meetings between service and housing providers aim to align agency goals with those stated in the Consolidated Plan. Assistance to LMI persons will be guided by the input provided to create the affordable housing objectives outlined in this Plan.

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

The City will be responsible for managing the day-to-day operations of the CDBG and HOME programs. This includes monitoring the performance of all CDBG and HOME subrecipients by reviewing program agreements and requirements with grant subrecipients prior to project start, monitoring projects through project completion, and obtaining required documents prior to paying out full grant funds.

Grant award letters for each CDBG and HOME Program funding agreement will include language regarding the need for timeliness in project implementation. See the following Performance Measurement section regarding actions which will be taken to monitor performance as related to meeting priorities and objectives set forth in the Consolidated Plan. All entities receiving CDBG and HOME funding are required to provide quarterly project updates and project completion information which includes individual and community benefit.

All CDBG subrecipients other than City departments will be monitored on-site at least once during the grant activity period. All CDBG subrecipients receiving and retaining program income will be monitored on-site annually to assure compliance with CDBG regulations.

All rental housing developed with the use of HOME funds will be monitored for property standard requirements and rent restrictions in accordance with HOME requirements and periods of affordability.

All CDBG Revolving Loan Program rental rehabilitation projects undertaken by the City will be monitored in the first year of residency and again in the second year as required by the program policies of the City Rental Improvement Loan Program to verify that rents are being kept within the required range.

All projects which involve construction contracts of more than \$2,000 will be monitored to assure compliance with Davis-Bacon Act regulations.

A current listing of local minority business enterprises (MBEs) taken from the Montana Department of Transportation website will be provided to all subrecipients who will be procuring services with CDBG grant funds. Subrecipients will be encouraged to submit a request for proposal directly to any appropriate MBEs. Bids for an amount over \$80,000 will be required to advertise in a regional newspaper.

Section 6 | Annual Action Plan

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

All staff activities used in creating and implementing the Annual Action Plan are provided from the 20% of CDBG funds allotted for Administrative spending.

The expected resources include the annual allocations of CDBG and HOME Federal Grant Funds that Great Falls receives as an Entitlement City. The grant amounts are actual allocations for Program Year 2020. If the grant funding or program income comes in above or below the expected amounts identified in the Priority Table below, the project allocations (AP-38 Projects Summary) will be adjusted.

Anticipated Resources

Program	Source of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan
		Annual Allocation:	Program Income:	Prior Year Resources:	Total:	
CDBG	public - federal	\$808,208	\$300,327	\$81,333	\$1,189,868	\$3,200,000
<i>Uses of Funds</i>	<i>Acquisition, Economic Development, Housing, Public Improvements, Public Services, Admin and Planning</i>					
<i>Description</i>	<i>CDBG funds are anticipated to be \$800,000 annually for the program years 2020-2024.</i>					
HOME	public - federal	\$280,370	\$453,901	\$823,185	\$1,557,456	\$1,120,000
<i>Uses of Funds</i>	<i>Acquisition, Homebuyer Assistance, Rehabilitation (Multifamily & Homeowner), New Construction (Multifamily & Homeowner), Admin and Planning, TBRA</i>					
<i>Description</i>	<i>HOME funds are anticipated to be \$280,000 annually for the program years 2020-2024.</i>					

Table 59 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

Federal funding will be leveraged with the support of local, state, and outside (private) sources of funding. Both CDBG and HOME projects can maximize their local impact within the Great Falls community when combined with leveraged local resources among area providers.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

None appropriate.

AP-20 Annual Goals and Objectives

Goals Summary Information

	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Public Services	2020	2024	Homeless, Non-Homeless Special Needs, Non-Housing Community Development	City of Great Falls	Public Services	CDBG: \$95,000	Public service activities other than Low/Moderate Income Housing Benefit: 1000 Persons Assisted
2	Affordable Housing	2020	2024	Affordable Housing, Homeless, Non-Homeless Special Needs	City of Great Falls	Affordable Housing	HOME: \$400,000	Homeowner Housing Added: 3 Household Housing Unit Direct Financial Assistance to Homebuyers: 7 Households Assisted
3	Housing Rehabilitation	2020	2024	Affordable Housing, Public Housing, Non-Homeless Special Needs	City of Great Falls	Housing Rehabilitation	CDBG: \$140,000	Rental units rehabilitated: 1 Household Housing Unit Homeowner Housing Rehabilitated: 5 Household Housing Unit
4	Fair Housing	2020	2024	Affordable Housing, Public Housing, Homeless, Non-Homeless Special Needs	City of Great Falls	Fair Housing	CDBG: \$25,000	Public service activities other than Low/Moderate Income Housing Benefit: 120 Persons Assisted

	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Economic Development	2020	2024	Non-Housing Community Development, Economic Development	City of Great Falls	Economic Development	CDBG: \$60,000	Jobs created/retained: 3 Jobs Businesses assisted: 2 Businesses Assisted
6	Public Facilities and Improvements	2020	2024	Public Housing, Non-Homeless Special Needs, Non-Housing Community Development	City of Great Falls	Public Facilities and Improvements	CDBG: \$260,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2000 Persons Assisted
7	Planning and Administration	2020	2024	Planning and Administration	City of Great Falls	Planning and Administration	CDBG: \$161,669 HOME: \$28,042	

Table 60 – Goals Summary

Goal Descriptions

1	Goal Name	Public Services
	Goal Description	The City of Great Falls will provide CDBG funds to social service agencies for activities that provide services for low to moderate income people or areas. The City will focus efforts on meeting the needs of our homeless population, health/mental health needs, and underserved youth this Program Year. Applications will not be limited to these activities; however, the City will give priority to applications that directly address homelessness, health/mental health, and youth services.
2	Goal Name	Affordable Housing
	Goal Description	Increase and preserve affordable housing opportunities for very low to moderate income renters, homeowners, first-time homebuyers, and those experiencing homelessness.
3	Goal Name	Housing Rehabilitation
	Goal Description	Provide construction and rehabilitation assistance for very low to moderate income homeowners, property owners and the Public Housing Authority. The City will focus on upgrading the City's housing stock to meet standard building codes to provide and sustain safe, affordable housing through its revolving loan fund. The City of Great Falls will address Public Housing Authority rehabilitation or modernization with the use of CDBG funding.
4	Goal Name	Fair Housing
	Goal Description	Provide funding for activities that affirmatively further fair housing. The City of Great Falls will fund activities that include but are not limited to fair housing education, counseling, outreach, and referrals pertaining to the laws, rights, and responsibilities related to housing and housing-related transactions, as well as service activities that reduce and remove barriers to fair housing choice.
5	Goal Name	Economic Development
	Goal Description	All Economic Development Activities this Program Year will be carried out by GFDA through the administration of their already established CDBG Revolving Loan Fund for the purpose of job creation and retention for low to moderate income households. This program operates on program income from CDBG.
6	Goal Name	Public Facilities and Improvements
	Goal Description	Provide public facility and infrastructure assistance to provide a suitable living environment. The City of Great Falls will prioritize meeting handicap accessibility requirements in public facilities and infrastructure. There will be a focus on funding activities that are associated with public parks, public safety, public recreation as well as slum and blight removal this program year with the understanding that efforts are not limited solely to these priorities.
7	Goal Name	Planning and Administration
	Goal Description	City staff to administer, manage, and monitor CDBG and HOME funded activities.

Introduction

The City of Great Falls will strategically focus on seven projects for funding from the CDBG and HOME program, which includes funding for administration and planning at the HUD limit.

The Fair Housing Program will be a partnership with the Great Falls Housing Authority. The City will also utilize CDBG funds to carry out the Revolving Loan Fund Program as well as support the Fair Housing Specialist position.

Staff will adjust the recommendations based on Timeliness need. The City is required to have no more than 1.5 times its annual allocation plus program income by May 2nd of every year. Therefore, staff will respond to this HUD requirement as needed, while remaining within the identified and approved priorities.

Program Year 2020 Projects	
	Project Name
1	2020 Public Services
2	2020 Residential Housing Rehabilitation
3	2020 Public Facilities and Improvements
4	2020 Fair Housing Program
5	2020 HOME Investment Partnership Program Projects
6	2020 HOME-NeighborWorks Direct Assistance to Homebuyers
7	2020 HOME CHDO Project
8	2020 Great Falls Development Authority Job Creation
9	2020 CDBG/HOME Administration

Table 61 – Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs.

The funding allocation priorities recommended are primarily driven by community input through a community survey, neighborhood council meetings, focus group meeting, public hearing, and public comment period. Staff intentionally provided multiple avenues of public engagement to ensure the priority-setting process was community driven and inclusive. The City of Great Falls’ recommendation is to respectfully utilize the community’s input in setting these priorities. These community-identified priorities allow for strategic funding in areas of need and will be used by Staff as a guideline for awards

throughout the year.

AP-38 Project Summary

Project Summary Information

1	Project Name	2020 Public Services
	Target Area	City of Great Falls
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$95,000
	Description	The City of Great Falls will provide CDBG funds to social service agencies for activities that provide services for low to moderate income people or areas. The City will focus efforts on meeting the needs of our homeless population, health/mental health needs, and underserved youth this Program Year. Applications will not be limited to these activities; however, the City will give priority to applications that directly address homelessness, health/mental health, and youth services.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	1000 LMI individuals will benefit from the proposed activity.
	Location Description	City of Great Falls
	Planned Activities	The City will focus efforts on meeting the needs of our homeless population, health/mental health needs, and underserved youth this Program Year. Applications will not be limited to these activities; however, the City will give priority to applications that directly address homelessness, health/mental health, and youth services.
2	Project Name	2020 Residential Housing Rehabilitation
	Target Area	City of Great Falls
	Goals Supported	Housing Rehabilitation
	Needs Addressed	Housing Rehabilitation
	Funding	CDBG: \$440,000

	Description	Provide construction and rehabilitation assistance for very low to moderate income homeowners, property owners and the Public Housing Authority. The City will focus on upgrading the City's housing stock to meet standard building codes to provide and sustain safe, affordable housing through its revolving loan fund. The City of Great Falls will address Public Housing Authority rehabilitation or modernization with the use of CDBG funding.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	35 LMI households will benefit from this proposed activity.
	Location Description	City of Great Falls
	Planned Activities	Provide construction and rehabilitation assistance for very low to moderate income homeowners, property owners and the Public Housing Authority. The City will focus on upgrading the City's housing stock to meet standard building codes to provide and sustain safe, affordable housing through its revolving loan fund. The City of Great Falls will address Public Housing Authority rehabilitation or modernization with the use of CDBG funding.
3	Project Name	2020 Public Facilities and Improvements
	Target Area	City of Great Falls
	Goals Supported	Public Facilities and Improvements
	Needs Addressed	Public Facilities and Improvements
	Funding	CDBG: \$326,866
	Description	Provide public facility and infrastructure assistance to provide a suitable living environment. The City of Great Falls will prioritize meeting handicap accessibility requirements in public facilities and infrastructure. There will be a focus on funding activities that are associated with public parks, public safety, public recreation as well as slum and blight removal this program year with the understanding that efforts are not limited solely to these priorities.
	Target Date	6/30/2021

	Estimate the number and type of families that will benefit from the proposed activities	These projects will primarily provide an area benefit to LMI families, an estimated 2000 residents this year.
	Location Description	City of Great Falls
	Planned Activities	Provide public facility and infrastructure assistance to provide a suitable living environment. The City of Great Falls will prioritize meeting handicap accessibility requirements in public facilities and infrastructure. There will be a focus on funding activities that are associated with public parks, public safety, public recreation as well as slum and blight removal this program year with the understanding that efforts are not limited solely to these priorities.
4	Project Name	2020 Fair Housing Program
	Target Area	City of Great Falls
	Goals Supported	Fair Housing
	Needs Addressed	Fair Housing
	Funding	CDBG: \$25,000
	Description	This is a shared position with the Great Fall Housing Authority to provide funding for activities that affirmatively further fair housing. The City of Great Falls will fund activities that include but are not limited to fair housing education, counseling, outreach, and referrals pertaining to the laws, rights, and responsibilities related to housing and housing-related transactions.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	120 LMI Families will benefit from the proposed activity.
	Location Description	City of Great Falls
	Planned Activities	The City of Great Falls will fund activities that include but are not limited to fair housing education, counseling, outreach, and referrals pertaining to the laws, rights, and responsibilities related to housing and housing-related transactions, as well as service activities that reduce and remove barriers to fair housing choice.

5	Project Name	2020 HOME Investment Partnership Program Projects
	Target Area	City of Great Falls
	Goals Supported	Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	HOME: \$364,166
	Description	Allocate HOME Investment Partnership Program (HOME) funds towards new construction and homeownership. HOME funds will be granted to continue the City's mission to improve and grow the community's affordable housing stock. HOME funding can be utilized towards building, buying, and/or rehabilitating affordable housing for rent or homeownership or providing direct rental assistance to low-income people.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	At least 3 Low-Income Households will benefit from this project.
	Location Description	City of Great Falls
	Planned Activities	Allocate HOME Investment Partnership Program (HOME) funds towards new construction and homeownership. HOME funds will be granted to continue the City's mission to improve and grow the community's affordable housing stock. HOME funding can be utilized towards building, buying, and/or rehabilitating affordable housing for rent or homeownership or providing direct rental assistance to low-income people.
6	Project Name	2020 HOME-NeighborWorks Direct Assistance to Homebuyers
	Target Area	City of Great Falls
	Goals Supported	Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	HOME: \$300,000
	Description	NeighborWorks Great Falls will utilize HOME program income to provide direct assistance to first-time homebuyers.
	Target Date	6/30/2021

	Estimate the number and type of families that will benefit from the proposed activities	7 LMI Families will benefit from the proposed activity.
	Location Description	City of Great Falls
	Planned Activities	NeighborWorks Great Falls will utilize HOME program income to provide direct assistance to first-time homebuyers.
7	Project Name	2020 HOME CHDO Project
	Target Area	City of Great Falls
	Goals Supported	Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	HOME: \$42,063.90
	Description	15% set-aside for HOME CHDO Project
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	At least 1 Low-Income Household will benefit from this project.
	Location Description	City of Great Falls
	Planned Activities	Activities to increase affordable housing stock.
8	Project Name	2020 GFDA Job Creation
	Target Area	City of Great Falls
	Goals Supported	Economic Development
	Needs Addressed	Economic Development
	Funding	CDBG: \$60,000
	Description	All Economic Development Activities this Program Year will be carried out by GFDA through the administration of their already established CDBG Revolving Loan Fund for the purpose of job creation and retention for low to moderate income households. This program operates on program income from CDBG.

	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	3 LMI jobs created/retained and 2 business assisted.
	Location Description	City of Great Falls
	Planned Activities	All Economic Development Activities this Program Year will be carried out by GFDA through the administration of their already established CDBG Revolving Loan Fund for the purpose of job creation and retention for low to moderate income households. This program operates on program income from CDBG.
9	Project Name	2020 CDBG/HOME Administration
	Target Area	City of Great Falls
	Goals Supported	Planning and Administration
	Needs Addressed	Planning and Administration
	Funding	CDBG: \$161,669.40 HOME: \$28,042.60
	Description	City staff to administer, manage, and monitor CDBG and HOME funded activities.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	n/a - City staff to administer, manage, and monitor CDBG and HOME funded activities.
	Location Description	City of Great Falls
	Planned Activities	City staff to administer, manage, and monitor CDBG and HOME funded activities.

AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

The geographic area for the entitlement city, Great Falls, Montana, is outlined as the area within the city limits as established by the City of Great Falls. Minority populations represent less than 14% of the city's

total population, and the population of minority groups is greater in Census Tracts 3, 4, 7, and 108 when compared to the rest of the city. However, Great Falls does not have any areas of minority concentration according to Federal Financial Institutions Examination Council (FFIEC) data or as defined by HUD Minority Neighborhoods. The city does, however, have areas of low-income concentration, which are defined as areas where 51% of the population has income at or below 80% AMI.

Geographic Distribution

Target Area	Percentage of Funds
City of Great Falls	100

Table 62 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City of Great Falls does not allocate funding priorities based on a geographic needs. Funding priorities are based on community need and the number of individuals or households that can benefit from the limited amount of funding available. Some allocations are based on an area need and focus efforts in LMI areas with 51% LMI residents as calculated using the HUD area benefit calculation tool. That is the only geographic distinction made by the City of Great Falls.

AP-55 Affordable Housing – 91.220(g)

Introduction

The City of Great Falls will be using CDBG and HOME funds to support a number of affordable housing projects within the city limits.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	15
Special-Needs	0
Total	15

Table 64 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	2
Rehab of Existing Units	6
Acquisition of Existing Units	7
Total	

Table 65 - One Year Goals for Affordable Housing by Support Type

AP-60 Public Housing – 91.220(h)

Introduction

The City of Great Falls relies on the Great Falls Housing Authority (GFHA) to provide public housing within the City. The GFHA will responsibly and respectfully provide safe, basic, affordable housing for qualified residents.

GFHA currently manages five public housing sites and two affordable housing sites. These facilities provide 490 units to income qualifying residents through the GFHA’s subsidized housing program and another 32 units that are not subsidized but are affordable to low/moderate income households through the GFHA’s affordable housing programs.

GFHA is also a manager for Housing Choice Vouchers, formerly known as the Section 8 Program. This program allows private landlords to contract with the GFHA, who inspects the units for Housing Quality Standards and subsidizes the rent for the approved tenant.

Actions planned during the next year to address the needs to public housing

The Housing Authority will continue its multi-year rehabilitation project at the main site (MT2-1 and MT2-2) which involves upgrading the overhead electrical distribution system, street lights, sewer mains, water mains and gas distribution systems for 356 units and major interior renovation of 156 units. The units will be demolished down to the studs and rebuilt, including new roofs; windows; doors; walls; flooring; and electrical, plumbing and heating systems. Exterior sewer, water and electrical services will also be replaced. This modernization project began in 2015 and is expected to take 10 to 15 years to complete, contingent upon funding.

Actions to encourage public housing residents to become more involved in management and

participate in homeownership

GFHA encourages tenants to be involved in the management of public housing through having two tenants on the Housing Authority Board of Commissioners. Resident board members serve two-year terms. All members serve without compensation.

GFHA does not provide direct involvement in supporting homeownership. However, they connect tenants who are interested in homeownership to other organizations within the city that provide financial management training, homeownership training, and other forms of assistance.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance.

The Great Falls Housing Authority is not currently designated as troubled.

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

The City will assist with the facilitation of the local Continuum of Care for Homelessness (CoC) group. The CoC group will meet monthly throughout the upcoming year to expand understanding of the services needed by those who are homeless, to facilitate consolidation and coordination of homeless services and to improve service delivery to homeless people. The City will provide support to the meetings. The CoC meetings will provide a networking opportunity and assist in keeping funding options open for future HUD homeless grant funds.

The trend of gradually increasing numbers and needs of homeless people continues in Great Falls. In particular, the Great Falls Rescue Mission continues to see a significant increase in the number of families seeking assistance.

The City will encourage application for federal homeless grant funds for projects assisting homeless people through the Montana Continuum of Care Coalition (MT CoCC) statewide application process. The MT CoCC is a statewide group which addresses homelessness issues and is the main vehicle for organizations in Montana to apply for federal homeless grant funds. The local CoC Chair will be the local liaison with the MT CoCC. If local agencies pursue projects through the MT CoCC, the CoC will support all appropriate proposals.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including Reaching out to homeless persons (especially unsheltered persons) and assessing

their individual needs.

The City of Great Falls does not provide direct assistance to homeless outreach programs. There are a number of agencies within the city that provide special outreach services for homeless persons and their individual needs. The City will continue to work with these organizations to reduce and eventually end homelessness. Opportunities, Inc., continues to be a great resource for the city, facilitating a number of local, state, and federal programs to assist with homelessness. Additionally, NeighborWorks Great Falls, Habitat for Humanity, Rural Dynamics, Inc., St. Vincent de Paul of North Central Montana, Volunteers of America, Alliance for Youth, and YWCA, among others, provide services to help prevent homelessness.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City of Great Falls will provide grant funding to address the housing needs of homeless persons through public service activities and its housing rehab program.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The Great Falls Rescue Mission (Rescue Mission) is the primary emergency shelter provider in Great Falls. It is difficult to delineate the specific numbers of beds available for emergency shelter versus transitional housing, as the organization does not use governmental funding and is not restricted by specific programming requirements. As a result, the Mission can be flexible regarding bed usage. Whether a specific bed is used for emergency or transitional shelter is driven by actual need on that particular day. Overall, there are 52 beds available in the men's shelter and 65 beds in the women's shelter. In an emergency such as life threatening weather, the Rescue Mission will also provide additional mats on the floor for men and women and foldaway cribs for children.

The Rescue Mission has recently constructed the Cameron Family Center, a ~43,000 square foot facility that accommodates 114 beds and focuses on housing homeless families. The beds are set up in 28 rooms with private bathrooms to provide a more private place for families to be together. The facility also has space available for supportive services including a medical/dental clinic, year-round youth programs, and coordinated social services.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving

assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

Opportunities, Inc., provides assistance with eviction prevention and counseling. The City Fair Housing Specialist provides opportunities for training for landlords and tenants on how to avoid evictions. NeighborWorks Great Falls offers foreclosure prevention counseling and financial assistance as well as rental counseling, while Habitat for Humanity offers foreclosure prevention for their partner families. Additionally, Young Parents Education Center offers individual counseling and group classes to help young adults with life skills, referrals to avoid eviction, assistance with rental applications, and coordination with landlords to prevent eviction and homelessness. The Center for Mental Health provides individual counseling and assistance for people being discharged from mental health facilities.

Discussion

The Center for Mental Health has an adult case manager who will provide outreach and wellness checks for chronically homeless people. The Center provides outreach to the mentally ill homeless population and conducts evaluations to determine whether symptoms of a mental disorder are evident. The agency coordinates with organizations such as Opportunities, Inc., Office of Public Assistance, Great Falls Rescue Mission, Salvation Army, and St. Vincent DePaul to provide assistance with housing, food, clothing and payee services.

Opportunities, Inc., provides support to chronically homeless people through screening for homelessness issues during intake, referrals, limited case management, financial assistance, and job training assistance.

The YWCA provides 30 different human service agencies with vouchers for chronically homeless people to use at its used clothing store. The YWCA Mercy Home offers emergency shelter and supportive services for women and children who are victims of domestic violence. The Mercy Home can accommodate 30 women and children. The support services provided include crisis intervention, support groups, information and referral, group counseling, personal advocacy, parenting classes, a 911 cell phone lending program, transportation, legal advocacy, resume building and employment coaching.

The Indian Family Health Clinic provides community resource information through group sessions provided by staff members.

AP-75 Barriers to affordable housing – 91.220(j)

Introduction

Great Falls first adopted a zoning ordinance to regulate the use of land and buildings in 1930. The last comprehensive update of these regulations occurred when the Unified Land Development Code was adopted in 2005. The current zoning and subdivision code implements the City's growth policy, Missouri

River Corridor Plan, neighborhood plans and Long Range Transportation Plan. The purposes of the code are: 1) to ensure that all development is guided by and gives consideration to the Growth Policy; 2) to provide clear, consistent standards, regulations and procedures for the review of all proposed development within the city; and, 3) to safeguard the public health, safety and general welfare by establishing minimum standards for design and development.

The City reviews development applications to ensure that they are consistent with subdivision regulations, zoning and land use controls and annexation policies. Such codes and policies are designed to create orderly development; provide adequate services including transportation, utilities, and fire and police protection; and promote public health, safety and general welfare.

Costs for building new housing have greatly increased in recent years, but this is due to other factors previously described rather than the cost of meeting code requirements. Existing home prices greatly increased due to low housing stock. The City's Chief Building Official reports there is also the perception that costs of new building permits are high and require a time-consuming process. However, the total estimated cost for construction permits to build a house is approximately 1% of the structure's value. The building codes may require engineered foundations and this could be a significant cost; however, this is necessary because of the clay formation underlying much of the city. The City works with homeowners to educate them on ways to reduce the cost of permitting whenever possible. The timeline for residential permitting is currently averaging approximately a 7-day turnaround time based on the quality of drawing submittals. There is good accessibility to plans examiners and access to inspectors when needed.

The current zoning and setback requirements can be restrictive for developing affordable housing in situations where developers wish to use odd-size or small lots or construct high density housing. Additionally, no affordable housing incentives such as reduced lot sizes, setback standards or waived building fees are available to developers of affordable housing. Due to land prices and infrastructure costs, smaller lots are being developed for condensed housing at this time. Additionally, the City has worked very successfully with NeighborWorks Great Falls to use the Planned Unit Development process to create customized development standards to support higher density affordable housing development. As result of this partnership, NeighborWorks has successfully completed the Rockcross Apartments project (124 affordable rental units) as well as initiated construction on its Meriwether Crossing subdivision. This subdivision will lead to the eventual addition of 80 affordable, owner-occupied homes into the City's affordable housing inventory.

Traditionally, mobile/manufactured housing has allowed low income families to purchase housing when a conventional home may be out of reach. However, there is limited availability of vacant affordable single lots, mobile home courts will not accept homes that are older than five years, and a zoning change would be required if a new mobile home subdivision were to be developed. There appears to be the demand for an affordable housing option such as improvements to existing mobile/manufactured

home parks or development of a new mobile/manufactured home subdivision. Some of those proposed upgrades are cost prohibitive due to some existing mobile home parks being located in the floodplain.

In Montana, property tax is the only way authorized by the legislature for cities to raise money to provide local government service and finance schools. Therefore, the tax burden falls on property owners. The cost of building new housing is also affected by the concept that the user pays. The developer of new housing must pay the full cost of extending water and sewer services, connecting to city utilities and putting in curbs, gutters, sidewalks and paved streets. While these requirements affect the cost of housing, these standards are also important to positively impact the quality, permanence, safety and environmental aspects of the Great Falls community.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

The Great Falls City Commission sets policy addressing barriers to affordable housing for the city. The Planning and Community Development Department (PCD) deals with all policies related to land use, zoning ordinances, building codes, growth limitations, and fees and charges. The Department researches policy questions and looks for best practices in following the policies set forth by the Commission. Recommendations to the Administration and the Commission are made with input from the public as well as stakeholders that are interested in the policies.

PCD completed an update to the City's Growth Policy in 2013. The Growth Policy strengthened and highlights existing initiatives while creating the pathway for others. It is utilized for guidance in land use, service delivery, policy making and decision making regarding annexation, rezoning, and other discretionary land use decisions. It is anticipated that the Growth Policy document will be updated during the timeframe of the 2020-2024 Consolidated Plan. This update will address future housing and community development needs.

AP-85 Other Actions – 91.220(k)

Introduction

The Planning and Community Development (PCD) department administers the CDBG and HOME grant funds that the City is allocated each year. For the 2020/2021 program year, PCD will administer more than one million dollars in funding for projects in public services, affordable housing, housing rehabilitation, fair housing, economic development, and public facilities. These funds come from both

federal dollars and program income.

Actions planned to address obstacles to meeting underserved needs

The City will collaborate with non-profit agencies and other governmental departments to seek funding to fill the gaps needed to make projects financially feasible so they can serve low to moderate income families. Efforts will be made to work with social service and housing agencies to encourage collaboration when providing supportive services and housing services. In addition, ongoing technical support and coordination with housing providers and social services agencies will assist with meeting federal requirements in as timely, efficient manner as possible to avoid delays in obtaining federal funding.

Actions planned to foster and maintain affordable housing

Affordable housing will be one of the priorities to be addressed by the City. The City will focus efforts for affordable housing with both HOME and CDBG Funding. The overall housing strategy is described in detail in the Consolidated Plan. The strategy was developed based on a market analysis, an assessment of housing needs and extensive community involvement.

By regulation, at least 15% of HOME funds must be set-aside for a Community Housing Development Organization (CHDO). As NeighborWorks Great Falls is currently the only CHDO in the community, they will be allocated at least 15% of HOME funds for the upcoming year.

Actions planned to reduce lead-based paint hazards

Preventive and rehabilitative measures will be taken in all CDBG and HOME funded housing and public facilities projects that serve young children to ensure the extinction of lead-based paint hazards. All rehabilitation projects in which the building was constructed before 1978 will address lead-based paint regulations. Information about lead-based paint hazards will be provided to all people who apply for City housing rehabilitation loans. If lead-based paint is found during initial testing on a project where families with children under the age of six reside they will be referred for testing for lead-based paint exposure.

All CDBG and HOME funded housing project sites which have visual paint deterioration where rehabilitation will take place will be tested by a certified risk assessor for the presence of lead-based paint using the XRF Technology Lead Analyzer. On any sites that test positive, only contractors certified in safe work practices will be used for abatement. Clearance tests will be performed by an Environmental Protection Agency (EPA) certified risk assessor and a certified laboratory after interim controls are completed.

The City will pay for lead-based paint testing on all projects through the City's housing rehabilitation programs, with homeowners only incurring greater costs if a contractor has to be hired. The City will

provide outreach activities for lead-based paint hazards through notifying contractors of the availability of lead-based paint certification classes if certified private companies hold such classes during the upcoming year. Lead-based paint hazards will be taken into consideration on all pertinent CDBG-funded projects being undertaken by sub-grantees.

Actions planned to reduce the number of poverty-level families

All planned 2020/2021 activities will promote the reduction of poverty-level families by providing resources and opportunities to assist low-income individuals to be able to grow and prosper. One specific example is the 15% of the CDBG Budget, approximately \$120,000, will be allocated to provide public services to reduce the number of poverty-level families. This will provide funding toward public service projects that specifically focus on addressing barriers in the areas of Youth Services/Childcare, Alcohol and Drug Treatment/Healthcare/Suicide Prevention/Mental health, Senior Services, Homelessness, and Housing Counseling and Education. The Public Service priorities were identified by the received community feedback. All public service projects must be new and/or expanding services that benefit low-to-moderate income persons.

The City will also work with Opportunities, Inc., which provides a number of programs to assist LMI families.

Actions planned to develop institutional structure

The City has no plans at this time to make any significant institutional structure changes. The Planning and Community Development Department will continue to further develop and implement best practices to streamline the administration of federal funds. It is anticipated that the City will expand the size of its staff Grant Committee and also modify its grant application process to implement a compressed grant application cycle as opposed to allowing grants to be filed throughout the program year.

Actions planned to enhance coordination between public and private housing and social service agencies

In addition to the formal structure inherent in administering CDBG and HOME funds, the City will pursue informal communication and coordination with public and private housing agencies, other government agencies, private businesses, non-profit community agencies and other entities who work to meet the housing assistance and support service needs of low income and moderate income people in the community. The City will coordinate with local agencies to help reduce duplication of programs, to emphasize efficient service delivery for local, state and federal programs and to identify and overcome gaps in the institutional structure for carrying out the previously described strategies developed to address the priority needs.

The nine Neighborhood Councils will meet on a regular basis to discuss neighborhood issues. It is

anticipated that local, non-profit agencies and governmental departments will use Neighborhood Council meetings as a forum to disseminate information about their organizations. There will be an ongoing agenda item at all City Commission meetings to give Neighborhood Council members an opportunity to report on specific issues of concern. The Neighborhood Councils will hold three Council of Council meetings in the upcoming year to discuss matters of citywide importance. The City Communications Specialist serves as the Neighborhood Council coordinator and will communicate regularly with City management on issues brought up by the Neighborhood Councils. The Communications Specialist will actively participate in a variety of groups and committees to help increase governmental coordination with community members.

The Continuum of Care for Homelessness will meet in an ongoing effort to identify needs and coordinate delivery of services for people experiencing homelessness. The City will continue its close working relationship with the Great Falls Housing Authority. This relationship will include such aspects as sharing of staff, review of loan requests, environmental clearances and fair housing activities. The City Commission appoints the Housing Authority Board of Commissioners and the City Manager appoints the Executive Director of the Housing Authority. Housing Authority staff is made up of City employees. The Housing Authority Board acts as a loan committee and reviews loan requests for the City's CDBG-funded housing rehabilitation programs. This agreement was last reviewed in July 2013. The City will complete environmental reviews for all Housing Authority sponsored construction and rehabilitation projects; therefore, the City will be aware of and review any proposed development projects or proposed demolition of public housing units.

The City will work with private and public organizations to foster communication and delivery of information to the public regarding housing and social services to be provided.

AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

Introduction

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following Table also identifies program income that is available for use.

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table of this section. The following Table also identifies program income that is available for use.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	70.00%

HOME Investment Partnership Program (HOME) Reference 24 CFR 91.220(l)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

Great Falls does not intend to use any other form of investment beyond eligible activities listed in 24 CFR 92.205(a).
2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

All City HOME funds used as subsidies augmenting the affordable purchase by low to moderate income first-time homebuyer families of newly constructed or rehabilitated single family homes will be through NeighborWorks Great Falls (NHS) for its Owners in Partnership (OIP) program where NeighborWorks Great Falls operates as the owner and developer of the properties. NeighborWorks

Great Falls is the City's only Community Housing Development Organization (CHDO). All City HOME funds used for first-time homebuyers down payment and closing cost assistance will be through NeighborWorks Great Falls in its role as a HOME grant subrecipient. The HOME funds will be secured with a deed restriction. Each down payment assistance grant to homebuyers is secured with a deed restriction stating that if the house is sold, the grant monies must be returned.

NeighborWorks Great Falls will comply with the Recapture Provisions established in §92.254(a)(5)(ii). Recapture permits the original homebuyer to sell the property to any willing buyer during the period of affordability while NeighborWorks Great Falls is able to recapture all or a portion of the HOME-assistance provided to the original homebuyer. Two key concepts in the recapture requirements – *direct subsidy to the homebuyer* and *net proceeds* - must be understood in order to determine the amount of HOME assistance subject to recapture, and the applicable period of affordability on the unit. The recapture approach requires that all or a portion of the *direct subsidy* provided to the homebuyer be recaptured from the *net proceeds* of the sale.

Direct HOME Subsidy - is the amount of HOME assistance, *including any program income* that enabled the homebuyer to buy the unit. The direct subsidy includes down payment, closing costs, interest subsidies, or other HOME assistance provided directly to the homebuyer. In addition, direct subsidy includes any assistance that reduced the purchase price from fair market value to an affordable price. If HOME funds are used for the cost of developing a property and the unit is sold below fair market value the difference between the fair market value and the purchase price is considered to be directly attributable to the HOME subsidy.

Net Proceeds - are defined as the sales price minus superior loan repayment (other than HOME funds) and any closing costs. Under no circumstances can NeighborWorks Great Falls recapture more than is available from the net proceeds of the sale. The recapture option is used because it is generally easier to administer than the resale option. The recapture option works well when the sale of the property will most likely preserve affordability without the imposition of resale restrictions.

Of the four basic recapture options that are described in the HOME rule and discussed in CPD 12-003, NeighborWorks Great Falls uses "**3. Shared Net Proceeds.**" In this option, the HOME rule states that if the net proceeds are not sufficient to recapture the entire HOME investment or a reduced amount as described above, plus enable the homebuyer to recover the amount of the down payment and any investment in the form of capital improvements made by the homebuyer since purchase, NeighborWorks may share the net proceeds. In practice, this approach has been the most widely used model and has been applied to all recapture situations, not just insufficient net proceeds. Shared net proceeds, in combination with the pro rata reduction over time, is the most commonly used approach.

To calculate the amount of net proceeds (or shared appreciation) to be returned:

- 1) Divide direct HOME subsidy by the sum of the direct HOME subsidy and the homebuyer's investment,
- 2) Multiply by the net proceeds to calculate the amount of HOME investment to return,

$$\frac{\text{Direct HOME Subsidy}}{\text{Direct HOME Subsidy} + \text{Homebuyer Investment}} \times \text{Net Proceeds} = \text{HOME Recapture}$$

To calculate the amount of net proceeds (or shared appreciation) available to the homebuyer:

- 1) Divide the homebuyer's investment by the sum of the direct HOME subsidy and the homebuyer's investment,
- 2) Multiply by the net proceeds to calculate the amount of homebuyer investment to return to the homebuyer.

$$\frac{\text{Homebuyer Investment}}{\text{Direct HOME Subsidy} + \text{Homebuyer Investment}} \times \text{Net Proceeds} = \text{Amount to Homebuyer}$$

Written Agreements – NeighborWorks Great Falls executes a set of HOME written agreements that accurately reflects the recapture provisions with the homebuyer at the time of sale. These detailed written agreements, including an Occupancy Agreement, HOME rider to the Deed of Trust, and Deed Restriction Agreement, ensure that all parties are aware of the specific HOME requirements applicable to the unit (i.e., period or affordability, principal residency requirement, terms and conditions of either the resale or recapture requirement), and helps NeighborWorks and the City of Great Falls enforce those requirements. When revisions to the recapture provisions in the City of Great Falls Annual Action Plan are submitted, homebuyer written HOME agreements are modified to reflect any changes. The written agreement creates a legal obligation for the City of Great Falls, NeighborWorks and the homebuyer. The HOME written agreements are separate legal documents from any loan instrument and comply with the requirements of §92.504(c)(5) of the HOME rule.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds (See 24 CFR 92.254(a)(4)) are as follows:

A Deed Restriction will be used to enforce HOME Program requirements and contain the following provisions:

- Principal residency requirement (including a separate Home Occupancy Agreement signed by the borrower)
- Recapture provision based on net proceeds available from sale (voluntary or

involuntary)

- Deed Restriction will be executed at time of closing and recorded at that time. An agreement between NeighborWorks Great Falls and the City of Great Falls ensures that the CHDO complies with all recapture provisions established, most recently updated in 2015. It notes when and how recapture is scheduled to occur. While a deed restriction acts as the primary agreement between borrower and lender, information provided in the Program Income Policy clearly states the terms of recapture to the prospective homeowner, the required length of affordability, and strongly associates responsibility to (ultimately) the Participating Jurisdiction, the City of Great Falls. This policy is attached to this 2020-2024 Consolidated Plan as Appendix C.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

Great Falls has no current plans to use HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds.

Appendices

Appendix A: CDBG SF-424 and Certifications.....	A-1
Appendix B: HOME SF-424 and Certifications.....	B-1
Appendix C: NeighborWorks Great Falls Home Program Income Plan.....	C-1
Appendix D: Citizen Participation Plan.....	D-1
Appendix E: Meeting Attendee Lists.....	E-1
Appendix F: Legal Notices.....	F-1
Appendix G: Public Comments.....	G-1

Appendix A

Application for Federal Assistance SF-424

* 1. Type of Submission:

- Preapplication
 Application
 Changed/Corrected Application

* 2. Type of Application:

- New
 Continuation
 Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

12/01/2020

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

B-20-MC-30-0002

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:

City of Great Falls

* b. Employer/Taxpayer Identification Number (EIN/TIN):

81-6001269

* c. Organizational DUNS:

0602670930000

d. Address:

* Street1:

2 Park Drive S.

Street2:

PO Box 5021

* City:

Great Falls

County/Parish:

Cascade

* State:

MT: Montana

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

59403-5021

e. Organizational Unit:

Department Name:

Planning & Community Develop.

Division Name:

CDBG/HOME

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Mr.

* First Name:

Craig

Middle Name:

* Last Name:

Raymond

Suffix:

Title: Director of Planning & Community Development

Organizational Affiliation:

* Telephone Number:

406-455-8530

Fax Number:

406-454-3181

* Email:

craymond@greatfallsmt.net

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

*** Other (specify):**

*** 10. Name of Federal Agency:**

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

CFDA Title:

*** 12. Funding Opportunity Number:**

14-216

*** Title:**

Community Development Block Grant

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

*** 15. Descriptive Title of Applicant's Project:**

City of Great Falls 2020/2021 Annual Action Plan including certifications for a participating jurisdiction.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="808,208.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="808,208.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

a. This application was made available to the State under the Executive Order 12372 Process for review on

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative: 

* Date Signed:

ASSURANCES - CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title, or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal interest in the title of real property in accordance with awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progress reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE <i>city manager</i>
APPLICANT ORGANIZATION <i>City of Great Falls</i>	DATE SUBMITTED <i>12/22/20</i>

CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing.

Uniform Relocation Act and Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;

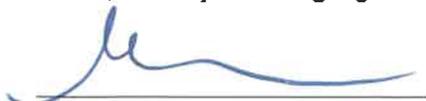
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and

3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.


Signature of Authorized Official

12.1.20
Date

City Manager
Title

Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Following a Plan -- It is following a current consolidated plan that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2020 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

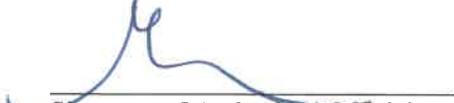
Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

Compliance with Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

Compliance with Laws -- It will comply with applicable laws.



Signature of Authorized Official

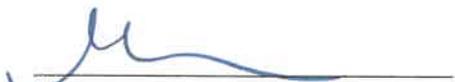
12.1.20
Date

City manager
Title

OPTIONAL Community Development Block Grant Certification

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.



Signature of Authorized Official

12.1.20
Date

City Manager

Title

Specific HOME Certifications

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

Eligible Activities and Costs -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

Subsidy layering -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;


Signature of Authorized Official

12.1.20
Date

city manager
Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Appendix B

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: 12/01/2020	4. Applicant Identifier: <input type="text"/>	
5a. Federal Entity Identifier: <input type="text"/>	5b. Federal Award Identifier: M-20-MC-30-0218	
State Use Only:		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
8. APPLICANT INFORMATION:		
* a. Legal Name: City of Great Falls		
* b. Employer/Taxpayer Identification Number (EIN/TIN): 81-6001269	* c. Organizational DUNS: 0602670930000	
d. Address:		
* Street1: 2 Park Drive S.	<input type="text"/>	
Street2: PO Box 5021	<input type="text"/>	
* City: Great Falls	<input type="text"/>	
County/Parish: Cascade	<input type="text"/>	
* State:	MT: Montana	
Province:	<input type="text"/>	
* Country:	USA: UNITED STATES	
* Zip / Postal Code: 59403-5021	<input type="text"/>	
e. Organizational Unit:		
Department Name: Planning & Community Develop.	Division Name: CDBG/HOME	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: Mr.	* First Name: Craig	<input type="text"/>
Middle Name:	<input type="text"/>	
* Last Name: Raymond	<input type="text"/>	
Suffix:	<input type="text"/>	
Title: Director of Planning & Community Development		
Organizational Affiliation: <input type="text"/>		
* Telephone Number: 406-455-8530	Fax Number: 406-454-3181	
* Email: craymond@greatfallsmt.net		

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

CFDA Title:

*** 12. Funding Opportunity Number:**

14-239

* Title:

HOME Investment Partnership Program

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

*** 15. Descriptive Title of Applicant's Project:**

City of Great Falls 2020/2021 Annual Action Plan including certifications for a participating jurisdiction.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="280,370.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="280,370.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- a. This application was made available to the State under the Executive Order 12372 Process for review on
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

- Yes No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative: 

* Date Signed:

ASSURANCES - CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

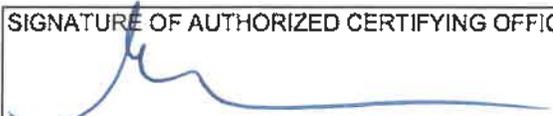
PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title, or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal interest in the title of real property in accordance with awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progress reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE <i>City manager</i>
APPLICANT ORGANIZATION <i>City of Great Falls</i>	DATE SUBMITTED <i>12/22/20</i>

CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing.

Uniform Relocation Act and Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-L.L.L., "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.



Signature of Authorized Official

12.1.20
Date

City manager
Title

Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Following a Plan -- It is following a current consolidated plan that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2020 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

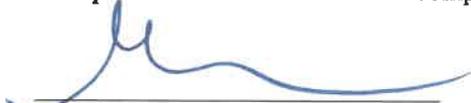
Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

Compliance with Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

Compliance with Laws -- It will comply with applicable laws.



Signature of Authorized Official

12.1.20
Date

City manager
Title

OPTIONAL Community Development Block Grant Certification

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.



Signature of Authorized Official

12.1.20
Date

City manager
Title

Specific HOME Certifications

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

Eligible Activities and Costs -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

Subsidy layering -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;



Signature of Authorized Official

12.1.20
Date

City Manager
Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Appendix C

2020-2024 PROGRAM INCOME PLAN FOR NEIGHBORWORKS GREAT FALLS

Introduction:

NeighborWorks Great Falls has been the recipient of HOME funding from the City of Great Falls. The HOME funding has been critical to NeighborWorks efforts to meet the needs of low and moderate income homebuyers in their homeownership quest. The funding has been used for down payment assistance and for construction and renovation of homes in target neighborhoods.

The HOME funds provided by the City of Great Falls are used to fund deferred mortgage loans to HOME-eligible homeowners to purchase new or existing homes which meet Housing Quality Standards (HQS). A second use of HOME funds is to provide funds for construction of homes in target neighborhoods, to revitalize neighborhoods and provide affordable homes. The HOME construction funds are left in the home as a deferred mortgage.

Program income will be generated from the repayment of the HOME loans and the previous equity share provisions. There will be three types of program income generated in general. More narrowly construed, "Program Income" is any income earned from HOME-supported activities, such as repayments of principal and equity share from loans to homeowners after the period of affordability has ended. "Recaptured funds" are HOME funds recouped during the period of affordability when a first-time homebuyer is no longer the principal resident of the home. Additionally NeighborWorks is certified as a City of Great Falls Community Housing Development Organization (CHDO), therefore program income resulting from the CHDO set-aside funds invested by NeighborWorks is designated as "CHDO proceeds."

Any program income earned prior to the closeout of the HOME grant by year will be added to the funds committed to the project and used to support HOME-eligible activities or spent on costs allowable for HOME funds before NeighborWorks Great Falls will request an additional drawdown of funds from its HOME account.

NeighborWorks Great Falls will use the non-CHDO program income including recaptured funds to continue the activities from which it is derived, that is primarily for down payment assistance resulting in deferred mortgage loans for first-time homebuyers purchasing homes. All uses of HOME program income must qualify as eligible uses of HOME funds.

NeighborWorks Great Falls will use CHDO proceeds for new construction or rehabilitation of affordable single family housing with associated first-time homebuyer down payment and closing assistance resulting in deferred mortgage loans, and for other eligible CHDO reserve activities. Additionally, NeighborWorks may use CHDO proceeds for programs which support down payment assistance loans, including homebuyer education, one-on-one homeownership planning, and foreclosure mitigation counseling when approved by the City HOME program administrator, as well as other eligible CHDO proceeds activities.

NeighborWorks Great Falls will comply with the Recapture Provisions established in §92.254(a)(5)(ii). Recapture permits the original homebuyer to sell the property to any willing buyer during the period of affordability while NeighborWorks Great Falls is able to recapture all or a portion of the HOME-assistance provided to the original homebuyer. Two key concepts in the recapture requirements – *direct subsidy to the homebuyer* and *net proceeds* - must be understood in order to determine the amount of HOME assistance subject to recapture, and the applicable period of affordability on the unit. The recapture approach requires that all or a portion of the *direct subsidy* provided to the homebuyer be recaptured from the *net proceeds* of the sale.

Direct HOME Subsidy - is the amount of HOME assistance, *including any program income* that enabled the homebuyer to buy the unit. The direct subsidy includes down payment, closing costs, interest subsidies, or other HOME assistance provided directly to the homebuyer. In addition, direct subsidy includes any assistance that reduced the purchase price from fair market value to an affordable price. If HOME funds are used for the cost of developing a property and the unit is sold below fair market value the difference between the fair market value and the purchase price is considered to be directly attributable to the HOME subsidy.

Net Proceeds - are defined as the sales price minus superior loan repayment (other than HOME funds) and any closing costs. Under no circumstances can NeighborWorks Great Falls recapture more than is available from the net proceeds of the sale. The recapture option is used because it is generally easier to administer than the resale option. The recapture option works well when the sale of the property will most likely preserve affordability without the imposition of resale restrictions.

Long Term Affordability:

Under recapture, there is no requirement that the original HOME-assisted homebuyer sell the unit to another low-income homebuyer. Instead, if the homebuyer transfers the property either voluntarily or involuntarily during the period of affordability, NeighborWorks Great Falls recovers, from available net proceeds, all or a portion of the HOME assistance to the homebuyers.

Acceptable Recapture Models:

Of the four basic recapture options that are described in the HOME rule and discussed in CPD 12-003, NeighborWorks Great Falls uses “**3. Shared Net Proceeds**”.

In this option, the HOME rule states that if the net proceeds are not sufficient to recapture the entire HOME investment or a reduced amount as described above, plus enable the homebuyer to recover the amount of the down payment and any investment in the form of capital improvements made by the homebuyer since purchase, NeighborWorks may share the net proceeds. In practice, this approach has been the most widely used model and has been applied to all recapture situations, not just insufficient net proceeds. Shared net proceeds, in combination with the pro rata reduction over time, is the most commonly used approach.

To calculate the amount of net proceeds (or shared appreciation) to be returned:

- 1) Divide direct HOME subsidy by the sum of the direct HOME subsidy and the homebuyer's investment,
- 2) Multiply by the net proceeds to calculate the amount of HOME investment to Return,
- 3)
$$\frac{\text{Direct HOME Subsidy} \times \text{Net Proceeds}}{\text{Direct HOME Subsidy} + \text{Homebuyer Investment}} = \text{HOME Recapture}$$

To calculate the amount of net proceeds (or shared appreciation) available to the homebuyer:

- 1) Divide the homebuyer's investment by the sum of the direct HOME subsidy and the homebuyer's investment,
- 2) Multiply by the net proceeds to calculate the amount of homebuyer investment to return to the homebuyer.
- 3)
$$\frac{\text{Homebuyer Investment} \times \text{Net Proceeds}}{\text{Direct HOME Subsidy} + \text{Homebuyer Investment}} = \text{Amount to Homebuyer}$$

Written Agreements:

NeighborWorks Great Falls executes a set of HOME written agreements that accurately reflects the recapture provisions with the homebuyer at the time of sale. These detailed written agreements, including an Occupancy Agreement, HOME rider to the Deed of Trust, and Deed Restriction Agreement, ensure that all parties are aware of the specific HOME requirements applicable to the unit (i.e., period or affordability, principal residency requirement, terms and conditions of either the resale or recapture requirement), and helps NeighborWorks and the City of Great Falls enforce those requirements. When revisions to the recapture provisions in the City of Great Falls Annual Action Plan are submitted, homebuyer written HOME agreements are modified to reflect any changes. The written agreement creates a legal obligation for the City of Great Falls, NeighborWorks and the homebuyer. The HOME written agreements are separate legal documents from any loan instrument and comply with the requirements of §92.504(c)(5) of the HOME rule.

Foreclosure, Transfer in Lieu of Foreclosure, or Assignment to HUD:

NeighborWorks Great Falls has the recapture agreements in place, therefore is not subject to the affordability requirements after the HOME funds are recaptured in accordance with its written agreements. Prior to foreclosure, NeighborWorks Great Falls makes efforts to purchase the home in order to recapture the HOME funds, during the period of affordability. When ownership of the housing is conveyed pursuant to a foreclosure or other involuntary sale, NeighborWorks attempts to recoup any net proceeds that may be available through the foreclosure sale. Because all recapture provisions must be limited to net proceeds, NeighborWorks repayment obligation is limited to the amount of the HOME subsidy, if any, that it is able to recover.

Investment of Additional HOME Funds:

The HOME rule at §92.254(a)(9) provides NeighborWorks Great Falls with the flexibility to invest additional HOME funds in homebuyer projects to preserve affordability. When faced with foreclosure, NeighborWorks Great Falls may use additional HOME funds to acquire the housing. NeighborWorks Great Falls may also use HOME funds to rehabilitate any housing acquired through foreclosure, provided the total amount of the original HOME investment, plus any additional HOME investment, does not exceed the maximum per-unit subsidy limit in §92.250. Additional HOME funds may also be used to provide assistance to another eligible homebuyer following either the acquisition of a foreclosed unit or a sale of a unit under recapture provisions during the period of affordability. If NeighborWorks Great Falls provides HOME assistance to another eligible HOME buyer, the additional HOME investment must be treated as an amendment to the original project. Consequently, the additional HOME investment may extend the original period of affordability.

The long-term affordability period for HOME-assisted homebuyer housing is determined by the per-unit amount of HOME assistance that enabled the homebuyer to purchase the property, as follows:

- If the per-unit HOME assistance is less than \$15,000, the affordability period is five years.
- If the per-unit HOME assistance is between \$15,000 and \$40,000, the affordability period is ten years.
- If the per-unit HOME assistance is greater than \$40,000, the affordability period is 15 years.

Activities:

In support of the HOME project goals and in keeping with the City of Great Falls Consolidated Housing Plan goals that are outlined in the 2020-2024 Consolidated Plan, the following activities will be given priority in use of program income:

- Deferred mortgages for down payment and closing costs for the purchase of new or existing homes which meet Housing Quality Standards
- Construction financing for new homes, which remains in the home as a deferred mortgage
- Provision of homebuyer education, one-on-one homeownership planning and foreclosure mitigation counseling for residents of the City of Great Falls

Implementation:

NeighborWorks will establish a program income account to be used for deposit and disbursement of program income funds. Separate accounting for CHDO proceeds as a type of HOME program income having greater flexibility for eligible uses, will be maintained. The City's Finance Director will assist program administration staff to monitor the program income account activity and ensure that loan repayments are posted to the account.

Evaluation:

NeighborWorks Great Falls will provide quarterly reports to the City of Great Falls regarding HOME program activities, the program income account activities, and assess the success

of the program with regard to addressing housing needs within the City of Great Falls. Further, NeighborWorks Great Falls will re-adopt or rewrite the Program Income Plan based on that evaluation, in consultation with the City of Great Falls. NeighborWorks Great Falls will submit any and all documentation to the City of Great Falls as per HOME contract conditions. The City has an internal Policy and Procedure Manual for tracking and managing funds maintained by the subrecipient. These Policies will be followed.

Appendix D

**City of Great Falls, Montana
Citizen Participation Plan for the
Consolidated Plan and
Consolidated Annual Performance Evaluation Report**

UPDATED June 1, 2020

**PURPOSE OF CITIZEN PARTICIPATION IN DEVELOPING THE CONSOLIDATED
PLAN AND CONSOLIDATED ANNUAL PERFORMANCE EVALUATION REPORT**

The City of Great Falls (City) must develop a Consolidated Plan to be eligible to receive Community Development Block Grant (CDBG) and HOME Investment Partnership Program (HOME) federal grant funds from the Department of Housing and Urban Development. A key component in creating the Consolidated Plan is citizen participation in all steps of the planning development process. Additionally, citizen participation is an integral component of the Consolidated Annual Performance Evaluation Report (CAPER) which is also required by HUD to receive federal grant funds. To ensure citizens in Great Falls have the opportunity to take part in creating the Consolidated Plan, the Annual Action Plan and the CAPER, the City has developed and commits to implement the following elements of the Citizen Participation Plan.

THE CITIZEN PARTICIPATION PLAN

Participation: The City will provide for, and encourage, citizen participation emphasizing the involvement of low to moderate income residents in areas where housing and community development funds may be spent, particularly those in slum and blighted areas. The City will also inform and offer opportunities for comment to residents of low to moderate income neighborhoods (neighborhoods having 51% or higher low to moderate income populations). The City will encourage the participation of the Great Falls Housing Authority public/assisted housing residents and Opportunities, Inc. assisted housing residents in Great Falls.

The City will make reasonable efforts to consult with other public, private and non-profit agencies that provide housing, health service, and social services. In particular, agencies to be consulted will be those that focus on service to children/families with children, elderly persons, racial/ethnic minorities, persons with disabilities, female heads of household, non-English speaking persons, and other persons in need of services. The City will encourage input and solicit information from each of the nine Neighborhood Councils and will notify the Councils about public hearings, the Consolidated Plan or the Annual Action Plan development process and solicit comments. The City will encourage community input through surveys, focus groups, and public meetings.

When preparing the portion of the Consolidated Plan or Annual Action Plan regarding lead-based paint hazards, the City will consult with the City and Great Falls Housing

Authority certified lead-based paint risk assessors to define what specific activities will be undertaken to mitigate and abate lead-based paint in housing units subsidized to be affordable for low to moderate income households. Activities required for lead-based paint hazards will also be addressed in non-profit facilities which receive CDBG grant funds as sub-recipients of the City where children spend the amount of time which meets the minimum threshold criteria.

The City Commission is the final citizen policy body that reviews and takes action on the Citizen Participation Plan, Annual Action Plan, and Consolidated Plan. After receipt and consideration of public comments, the City Commission votes on these Plans. During all City Commission meetings, citizens have the opportunity to provide public comment.

Meetings and Public Hearings: The City will provide notification of meetings two weeks in advance so all citizens can attend public hearings. Notice shall be provided to the public via email, mail, broadcast or cable media, or social media, and will also be published twice in the publication designated by the City of Great Falls for legal notices prior to any hearing date.

*If virtual hearings are used, real-time responses and accommodation for persons with disabilities and/or with limited English proficiency will be made available to the greatest extent possible. Also, the virtual hearing method will only be used in lieu of an in-person hearing if national or local health authorities recommend social distancing and limit public gatherings for public health reasons.

Access to Information: The City will provide citizens, public agencies and other interested parties with reasonable and timely access to information and records relating to the Consolidated Plan, Annual Action Plan and all of its components, and the City's planned use of financial assistance received under the relevant federal programs during the upcoming year. The public will have the opportunity to receive information, review and submit comments on any proposed HUD submission, including the Consolidated Plan adopted by the City Commissioners and any plan amendments.

Information will also be available on the range of programs, the amount of assistance the City expects to receive, the amount of funds available and the estimated amount proposed to benefit low to moderate income residents. These groups will have access to the City's plans to minimize displacement of residents and businesses and assist those displaced because of these activities. The City will also provide citizens, public agencies and other interested parties with reasonable and timely access to information and records relating to all processes associated with the CAPER.

The final version of the current Consolidated Plan, Annual Action Plan, CAPER, and Annual Community Assessment will be available on the City website on an ongoing basis.

Technical Assistance: The City will provide appropriate technical assistance to all groups that request assistance in developing proposals for financial assistance under any of the programs covered by the Consolidated Plan. An annual application workshop will be held to provide applicants with information on how to complete application forms. Individuals with specific special needs should contact the City one week before workshop date to make arrangements if they wish to attend.

Public Hearings: The City will provide multiple opportunities to obtain citizens opinions. The City program year begins July 1 and ends June 30. Public hearings will address and respond to proposals and comments on:

1. Grant Policies
2. Housing and community development needs
3. Development of proposed activities
4. Review of proposed uses for funding
5. Review of program performance

The City will hold public hearings that are conveniently timed for people who are likely to benefit from program funds, accessible to people with disabilities and adequately publicized with sufficient information about the subject of the hearing to encourage informed comment. Material presented at the public hearing will be made available in electronic format on the City's webpage. Individuals with specific special needs should contact the City one week before public hearing dates to make arrangements if they wish to attend.

Throughout the year, citizens may attend City Commission meetings and public hearings to provide input as to the distribution of federal funds into the City. There will be one formal public hearing conducted by the City Commission annually. The public hearing will give citizens the opportunity to comment and provide input on the following:

- Any housing and non-housing community development needs they have identified
- How funding proposals may meet community development needs in Great Falls
- Performance of the City in administering and distributing federal funds
- Citizens may comment on the adoption of the Citizens Participation Plan every five years or any time the Citizen Participation Plan has substantial revisions or has been re-written. Prior to adopting the Citizen Participation Plan, the City will distribute the plan for review and comment for a 15 day period.

The City Commission will offer two additional opportunities for the citizens to comment on the following:

- Adoption of the Goals for the Consolidated Plan or Annual Action Plan
- Use of federal funds
- Performance of the administration and implementation of funded projects
- Grant Policies

*For projects utilizing CDBG funding under Program Year (PY) 2019 and 2020, and the CARES Act CDBG-CV funding, the City of Great Falls may provide a 5-day notice/comment period for proposed amendments necessary to expedite and facilitate the use of funds to prevent, prepare for, and respond to coronavirus.

Timely Response: The City will consider any comments or views of citizens, agencies, units of general local government or other interested parties concerning the Consolidated Plan or Annual Action Plan, any amendments to these plans, and the CAPER. Comments can be submitted to the Planning & Community Development Department (PCD) via written submission, phone, or email, or oral comment at public hearings. The Montana Relay number will be included in notifications to facilitate deaf, hard-of-hearing, and people with speech disabilities the ability to submit comments via phone. The PCD Department will address any complaints with written responses to written complaints within 15 working days, where practical. Depending on the nature of the complaint, staff may refer the issue to the City Manager or the City Commission if the response from staff is unsatisfactory to the complainant. As appropriate, an attachment of summary of comments and responses to complaints to the final submission of the Consolidated Plan, Consolidated Plan amendments, Annual Action Plan and the CAPER will occur.

Non-English Speaking Residents: The City will provide translation services for non-English speaking residents at public hearings upon request and within reason.

Substantial Amendments: Substantial changes in the City's Consolidated Plan or Annual Action Plan will require a Substantial Amendment. The following criterion determines substantial change and governs Consolidated Plan or Annual Action Plan amendments:

1. Change in allocation priorities or method of distribution
2. Carrying out new activities, not identified in the Consolidated Plan or Annual Action Plan
3. Change in purpose, scope, location or beneficiaries of activities identified in the Consolidated Plan or Annual Action Plan

The City will provide a notice, published twice in a publication designated by the City of Great Falls for legal notices and have notifications on the City internet site. The City will also make available any substantial amendments to the Consolidated Plan or Annual Action Plan for citizen comment for a 30 day period.

*The CARES Act has made available additional funding through the Community Development Block Grant Coronavirus (CDBG-CV) program. The CARES Act adds

additional flexibility for both the CDBG-CV grant and, in some cases, for the annual Program Year 2019 and 2020 CDBG grants due to hardship associated with the COVID-19 pandemic. The public comment period is reduced to not less than 5 days, grantees may use virtual public hearings when necessary for public health reasons, the public services cap is suspended during the emergency, and states and local governments may reimburse costs of eligible activities incurred for pandemic response regardless of the date.

In addition, the CARES Act authorizes the Secretary to grant waivers and alternative requirements of statutes and regulations the Secretary administers in connection with the use of CDBG-CV funds and Program Year PY 2019 and 2020 CDBG funds (except for requirements related to fair housing, nondiscrimination, labor standards, and the environment). Waivers and alternative requirements can be granted when necessary to expedite and facilitate the use of funds to prevent, prepare for, and respond to coronavirus.

These revisions do not change current citizen participation policies but have been modified to allow for necessary expedited actions during times of declared disaster or emergencies.

Minor Amendment: Minor amendments represents any changes to the Consolidated Plan or Annual Action Plan that do not qualify as “substantial amendments.” Minor amendments require the signature of the Planning and Community Development Director or Deputy Director, but do not require public notice of 30 days or City Commission approval.

Consolidated Annual Performance Evaluation Report: The Proposed CAPER will be available to all citizens for review and comment on the City internet site and at the City Planning & Community Development Department for a 15 day comment period. Notice will also be published in a publication designated by the City of Great Falls for legal notices. All comments received regarding the CAPER will be considered and a summary of all comments will be attached to the report. The final version of the current CAPER will be available on the City website on an ongoing basis.

SOLICITATION OF CITIZEN COMMENTS ON THE CITIZEN PARTICIPATION PLAN:

Prior to the adoption of the Citizen Participation Plan and approval by the City Commission, a notice will be published twice in a publication designated by the City of Great Falls for legal notices..Notices of the Citizen Participation Plan and/or any amendments to this plan will be available for a 15 day comment period and will designate the sites where a citizen may obtain a copy of the plan. These sites will include the City internet site and the City Planning & Community Development Department. State relay 711 and reasonable accommodations are available upon request.

*As noted in the public participation process for Substantial Amendments in the

previous section, the CARES Act has made available additional funding in the Community Development Block Grant Coronavirus (CDBG-CV) program. The CARES Act adds additional flexibility for both the CDBG-CV grant and, in some cases, for the annual Program Year PY 2019 and 2020 CDBG grants in these unprecedented times. The public comment period is reduced to not less than 5 days, grantees may use virtual public hearings when necessary for public health reasons, the public services cap is suspended during the emergency, and States and local governments may reimburse costs of eligible activities incurred for pandemic response regardless of the date.

In addition, the CARES Act authorizes the Secretary to grant waivers and alternative requirements of statutes and regulations the Secretary administers in connection with the use of CDBG-CV funds and Program Year PY 2019 and 2020 CDBG funds (except for requirements related to fair housing, nondiscrimination, labor standards, and the environment). Waivers and alternative requirements can be granted when necessary to expedite and facilitate the use of funds to prevent, prepare for, and respond to coronavirus.

These revisions do not change current citizen participation policies but have been modified to allow for necessary expedited actions during times of declared disaster or emergencies.

SOLICITATION OF CITIZEN COMMENTS IN PREPARING THE CONSOLIDATED PLAN OR THE ANNUAL ACTION PLAN:

1. The City will contact local affordable housing and public service agencies, the Great Falls Housing Authority and the Neighborhood Councils to obtain information and comments to make citizens aware of the Consolidated Plan or Annual Action Plan process. The City will make reasonable efforts to consult with other public, private and non-profit agencies that provide housing, health service, and social services. In particular, agencies to be consulted will be those that focus on service to children/families with children, elderly persons, racial/ethnic minorities, persons with disabilities, female heads of household, non-English speaking persons, and other persons in need of services. State relay 711 and reasonable accommodations are available upon request.
2. The proposed Consolidated Plan or Annual Action Plan will be available to all citizens on the City internet site and the City Planning & Community Development Department. Citizens will be informed about the availability of the proposed Consolidated Plan or Annual Action Plan by notifications on the City website, publishing display advertisements in the Great Falls Tribune and emailing notices to a wide variety of public service agencies. Notification will describe the availability of the plan and the 30 day period to receive public comment.
3. The City Commission will provide three public meetings requesting input from citizens and representatives of low to moderate income level people on grant

policies and as to the needs of the community, including but not limited to housing, community development, infrastructure, economic development and homeless assistance.

*As noted in the previous sections, the CARES Act has made available additional funding in the Community Development Block Grant Coronavirus (CDBG-CV) program. The CARES Act adds additional flexibility for both the CDBG-CV grant and, in some cases, for the annual Program Year PY 2019 and 2020 CDBG grants in these unprecedented times. The public comment period is reduced to not less than 5 days, grantees may use virtual public hearings when necessary for public health reasons, the public services cap is suspended during the emergency, and States and local governments may reimburse costs of eligible activities incurred for pandemic response regardless of the date.

In addition, the CARES Act authorizes the Secretary to grant waivers and alternative requirements of statutes and regulations the Secretary administers in connection with the use of CDBG-CV funds and Program Year PY 2019 and 2020 CDBG funds (except for requirements related to fair housing, nondiscrimination, labor standards, and the environment). Waivers and alternative requirements can be granted when necessary to expedite and facilitate the use of funds to prevent, prepare for, and respond to coronavirus.

These revisions do not change current citizen participation policies but have been modified to allow for necessary expedited actions during times of declared disaster or emergencies.

The City will provide free copies of the Consolidated Plan or Annual action Plan to citizens and groups upon request. Electronic copies will be made available for download from the City's website. All information and public records will be available during regular business hours in the City's Planning & Community Development Department. Special arrangements will be available to accommodate access to information for persons with disabilities and/or limited English proficiency upon request and within reason, including alternative formats for important documents associated with the public participation process.

*For projects utilizing CDBG funding under Program Year PY 2019 and 2020, and the CARES Act CDBG-CV funding, the City of Great Falls may provide a 5-day notice/comment period for proposed amendments necessary to expedite and facilitate the use of funds to prevent, prepare for, and respond to coronavirus.

All meeting venues associated with the Citizen Participation Plan process will be fully accessible to persons with disabilities and reasonable accommodations are available upon request.

Appendix E

GREAT FALLS CITIZENS COUNCIL
Council of Councils Meeting

AGENDA

Tuesday, January 28, 2020

Gibson Room—Civic Center—7:00 p.m.

Please note: *The Great Falls Citizens Council agenda format allows citizens to speak on each issue prior to Council action. We encourage your participation. In the interest that all parties can be heard, please limit your comments.*

CALL TO ORDER—Sandra Guynn, Neighborhood Council #4 Chairing

ROLL CALL

OLD BUSINESS

1. **Approval of minutes from the October 29, 2019 meeting**

NEW BUSINESS

1. **Election of Officers – 10 minutes**
2. **City of Great Falls Community Risk Reduction Program Introduction– Steve Hester, Fire Chief, 45 minutes***
3. **GFPD update – Dave Bowen, Police Chief, 15 minutes***
4. **Overview of Community Needs Survey – Tom Micuda, 10 minutes***
5. **2020 Census – City Commissioner Owen Robinson and County Commissioner Jim Larson, 10 minutes**
6. **Nuisance Property – Lisa Meyers, NC7 Chair, 10 minutes***
7. **Impact Study Request – Commissioner Moe, 10 minutes***

***includes Q&A**

OTHER BUSINESS

1. **Council Information Sharing - 20 minutes (approx. 2 mins each)**
2. **May Agenda Suggestions**
 - **Madison Foodpark Update**
 - **Bylaw Review**
 - **GFPD Update**
 - _____

PETITIONS AND COMMUNICATIONS *(Public comment on any matter that is not on the agenda of the meeting and that is within the jurisdiction of the Neighborhood Council. In the interest that all parties can be heard, please limit your comments. When addressing the Council, state your name and address for the record.)*

1. **Resident Concerns**

ADJOURN

Next meetings: Tuesday, May 26, 2020 | Tuesday, October 27, 2020

Great Fall Citizen's Council
Council of Council Meeting
Tuesday, January 28, 2020
Gibson Room-Civic Center-7 PM
MINUTES OF MEETING

Delegates Present: 9 councils representatives, Commissioner Mary Moe, and Mayor Kelly were in attendance.

Additional in Attendance: 16 Residents and Commissioner Owen Robinson

Delegates Absent:

Sandra Guynn Presiding

Meeting called to order and recital of Pledge of Allegiance 7:01 PM

OLD BUSINESS

Minutes from October 29, 2019 were asked to be amended by Brett Doney. Scott Miranti made a motion to change the wording to "judgmental" vs. "aggressive". 2nd by Kathleen Gessaman and all approved. Minutes were amended with new wording to "judgmental". Sandra Guynn made a motion to approve minutes, 2nd by Eric Ray, with unanimous approval of minutes.

New Business:

1. Election of Officers:

- a. Scott nominated Sandra for Chairperson, Kathleen 2nd.
- b. Scott nominated Lisa for Vice-Chair, Ron 2nd.
- c. Sandra nominated Scott for Secretary, Lisa 2nd.
- d. Scott nominated Eric Ray for Special Delegate, Kathleen 2nd.

All officers were unanimously voted in favor.

Sandra Guynn Chairperson

Lisa Meyers Vice Chair

Scott Miranti Secretary

Eric Ray Official Delegate

2. **Presentation by Fire Chief Steve Hester** with Fire Marshall Dirk Johnson, and GFFR Jeremy Jones. Question and answer along with talks about CC Risk Relocation Program, public safety, create/innovate, resources, and prevention through education. Talked of GFFD readiness. Talked about strategic goals, risk reduction standards of response and number of firefighters on the scene, etc. Also talked about response time with 8,500 calls last year. Spoke about the impact of the city's growth on coverage, and need for closing station #4 for repairs and how to get coverage for #4's area. Spoke of outside resources and the mutual aid standard. Additionally, spoke of Fire Prevention Bureau, core enforcement and arson investigation, fire injury and death investigation. Highly informative presentation about GFFD.
3. **GFPD Chief Dave Bowen** gave a presentation on the state of the City. GFPD got 48,680 calls last year -way up from previous year. 123% increase in violent crimes recorded in the last 9 years. Much more violence against police officers recorded. He spoke about specific crimes in the city- illegal drugs are up and mental health calls are up. Chief Bowen will be asking the City to fund an additional 6 new officers. He spoke of the "justice

reinvestment” program. GF is 2nd in MT in violent crimes per capita. He spoke of a violent crime task force and his plans with the Sherriff to host a town meeting in the future. Talked about using citizen’s voluntary video footage to help solve crimes. Also spoke of “crime view”-an interactive analytics program that gives a birds eye view of crime statistics in GF. Highly informative presentation.

4. **Tom Micuda** spoke of community needs survey and how money can be put back into the community. The survey helps leaders know how to better use the grants (about \$800,000) every year. He talked of a 5-year consolidated plan. 5-year plan approximately \$5 million in funding to facilitate housing for the community. Low-moderate income targeted. Link for survey: www.surveymonkey.commmmm/r/gpdf7fv website: gf.mt.net
5. **City Commissioner Owen Robison and County Commissioner Jim Larson** spoke of the 2020 Census and the importance politically and monetarily of the census to Montana. Encouraged all to complete Census forms.
6. **Lisa Meyers** spoke of a nuisance property ordinance. This would refer a property owner with multiple violations on a weekly or monthly basis. Talked of other cities implementing such an ordinance. Spoke of possible opposition from MT Landlords Association. Topic to be discussed in future.
7. **Impact study request** as to the potential impact a slaughterhouse would bring to the city of GF. Eric Ray presented to City Commission. Process and concerns were discussed asking for endorsements of council-to present to state and county for their consideration. Information and feedback very important-City to be proactive if possible.
8. **3 minute Public Comment:** Brett Doney (405 3NW), Sue Dickenson (620 River Dr. E) and Carolyn Craven (101 18th Ave S) spoke.
9. **Council Information Sharing**
 - a. Council #1 -Impact of fire station #4 shutdown.
 - b. Council #2: Government classes attendance is up
 - c. Council #3: passed a proposal-MFD and refinery update
 - d. Council #4: No Nov/Dec meetings. 2 new members. Construction update.
 - e. Council #5: Scam presentation. KEY: “kids education yes”
 - f. Council #6: 5 new members. Cupcake social.
 - g. Council #7: Drafted letter to A. Finch as to installing a round-a-bout in the neighborhood.
 - h. Council #8: 3 new members and election of officers.
 - i. Council #9: GFHS construction update. Kranz park update. Protocols of who to call in city when neighborhood problems arise.

Motion to **ADJOURN** made by Sandra Guynn at 9:01 PM. Second by Lisa Meyers, all in Favor.
Meeting adjourned at 9:01 PM.

Respectfully Submitted,
Scott Miranti, Neighborhood Council #9

Appendix F

GREAT FALLS TRIBUNE

PART OF THE USA TODAY NETWORK

Order Confirmation for Ad #: 0004232209

Customer:	GF CITY PLANNING BOARD
Address:	PO BOX 5021 GREAT FALLS MT 59403 USA
Acct. #:	FAL-004704
Phone:	4067711180
GF CITY PLANNING BOARD	
Ordered By:	Alicia Eatherly

OrderStart Date: 06/14/2020

Order End Date: 06/14/2020

<u>Tear Sheets</u>	<u>Affidavits</u>	<u>Blind Box</u>	<u>Promo Type</u>	<u>Materials</u>	<u>Special Pricing</u>	<u>Size</u>
0	1					1 X 0.00

<u>Net Amount</u>	<u>Tax Amount</u>	<u>Total Amount</u>	<u>Payment Method</u>	<u>Payment Amount</u>	<u>Amount Due</u>
\$62.10	\$0.00	\$62.10	Invoice	\$0.00	\$62.10

Ad Order Notes:

Sales Rep: sbeaton

Order Taker: sbeaton

Order Created 06/10/2020

Product	# Ins	Start Date	End Date
FAL-gftribune.com	1	06/14/2020	06/14/2020
06-14-20, FAL-GreatFallsTribune	1	06/14/2020	06/14/2020
06-14-20,			

* ALL TRANSACTIONS CONSIDERED PAID IN FULL UPON CLEARANCE OF FINANCIAL INSTITUTION

Text of Ad: 06/10/2020

**PUBLIC NOTICE
CITY OF GREAT FALLS
Amendment to 2019-2020 Annual
Action Plan**

The City of Great Falls is making an amendment to its 2019-2020 Annual Action Plan available to the public through this notice. This amendment will enable the City of Great Falls to receive and administer a special allocation from the U.S. Department of Housing and Urban Development (HUD) to prevent, prepare for, and respond to the coronavirus (COVID-19) pandemic. This allocation was authorized by the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) and includes \$475,515 under Community Development Block Grant (CDBG-CV). This amendment is available for a 5-day public review and comment period from June 19, 2020, through June 23, 2020. The amended 2019-2020 Annual Action Plan will be available for viewing at the Great Falls Public Library, the Planning and Community Development Office, Civic Center, Room 112, during regular business hours, and on the City of Great Falls website (<https://greatfallsmt.net/planning>). As part of this amendment, the City of Great Falls has revised the Consolidated Plan's Citizen Participation Plan to include the 5-day comment period as indicated above in order to expedite and facilitate the use of CDBG-CV funds. The revised Citizen Participation Plan is available for review on the City of Great Falls website (<https://greatfallsmt.net/planning>). Any interested agencies, groups, or persons may submit written comments during the public review and comment period to Tonya Shumaker, City of Great Falls Planning & Community Development Department, P.O. Box 5021, Great Falls, MT 59403-5021, or tshumaker@greatfallsmt.net. Special arrangements will be available to accommodate access to information for persons with disabilities and/or limited English proficiency upon request and within reason, including alternative formats for important documents associated with the public participation process. For further information, please call 455-8443 or TDD number 454-0495.

(4232209) 6/14/2020

MNAXLP

Post Office Box 5468
Great Falls MT 59403
866-858-0496

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GF CITY PLANNING BOARD
FISCAL SERVICES
PO BOX 5021
GREAT FALLS MT 59403-5021



CUSTOMER NO.	INVOICE NO.
004704	0002901762
DUE DATE	AMOUNT DUE
04/21/18	291.40
FOR THE PERIOD	THRU
03/01/18	03/31/18
AMOUNT PAID	

**PLEASE RETURN THIS TOP SECTION WITH PAYMENT
AND INCLUDE YOUR CUSTOMER NUMBER ON REMITTANCE**

DATE	EDT	CLASS	DESCRIPTION	TIMES RUN	COL	DEPTH	TOTAL SIZE	RATE	AMOUNT
0301			PREVIOUS BALANCE						.00
0330	TCLS	0597	4/17 publi CDBG & HOME NEEDS	2	1	64.00	128.00		163.48
0330	TCLS	0597	City parti CITY OF GREAT FAL	2	1	50.00	100.00		127.92

CURRENT	OVER 30 DAYS	OVER 60 DAYS	OVER 90 DAYS	OVER 120 DAYS	TOTAL DUE
291.40	.00	.00	.00	.00	291.40

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		DUE DATE	
		04/21/18	

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GREAT FALLS TRIBUNE

PART OF THE USA TODAY NETWORK

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THE GREAT FALLS TRIBUNE
205 RIVER DR S
GREAT FALLS, MT 59405
Phone: (406) 791-1444
Toll Free (800) 438-6600

GF CITY PLANNING BOARD
PO BOX 5021
GREAT FALLS, MT 59403

REFERENCE: FAL-004704 CASE NO:
0002821849 City participation plan

CITY OF GREAT FALLS
PROPOSED CITIZEN
PARTICIPATION PLAN
FOR THE CONSOLIDATED PLAN
AND PERFORMANCE EVALUATION
REPORT

The City of Great Falls is requesting comments and views on the Proposed Citizen Participation Plan. In order for the City of Great Falls to continue to receive Community Development Block Grant and HOME Investment Partnership Program federal grant funds, the City must prepare a Citizen Participation Plan as a component of the Consolidated Plan. This Plan provides for and encourages citizen participation, emphasizing the involvement of low and very low income residents. The Plan ensures that citizens have adequate, timely notification of all hearings and the availability of a report detailing the proposed and actual use of Department of Housing & Urban Development funds.

The Proposed Citizen Participation Plan will be available for viewing at the Great Falls Public Library, the City of Great Falls web page (www.greatfallsmt.net) and City CDBG/HOME Office, Civic Center, Room 112, during regular business hours. The 15 day comment period will begin March 30, 2018, and end April 16, 2018. Any interested agencies, groups, or persons may submit comments pertaining to the Proposed Citizen Participation Plan to Maria Porter, City of Great Falls Planning & Community Development Department, P.O. Box 5021, Great Falls, MT 59403-5021, or mporter@greatfallsmt.net. For further information, please call 455-8407.

(2621849) 3/30/18.

MNAXLP

Elizabeth Jenkins being first duly sworn deposes and says that GREAT FALLS TRIBUNE COMPANY is a corporation duly incorporated under the laws of the State of Delaware, that the said GREAT FALLS TRIBUNE COMPANY is the printer and publisher of the GREAT FALLS TRIBUNE, a daily newspaper of general circulation of the County of Cascade, State of Montana, and that the deponent is the principal clerk of said GREAT FALLS TRIBUNE COMPANY, printer of the GREAT FALLS TRIBUNE; and that the advertisement here to annexed.

CITY OF GREAT FALLS PROPOSED CITIZEN PARTICIPATION
PLAN FOR THE CONSOLIDATED PLAN AND PERFORMANCE
EVALUATION REPORT The Ci

Has been correctly published 1 times in the regular and entire issue of said paper on the following dates:

03/30/18



STATE OF MONTANA
County of Cascade

On this 30th day of March 2018, before me the undersigned, a Notary Public of the State of Montana, personally appeared

Elizabeth Jenkins

known to me to be the person whose name is subscribed to the within instrument and acknowledged to me that she executed the same.

In witness whereof, I have hereunto set my hand and affixed my Notarial Seal of the day and year first above written.

Cheryl A Haynes
Print Name

Cheryl A Haynes
Signature

FILED ON: 03/30/2018



GREAT FALLS TRIBUNE

PART OF THE USA TODAY NETWORK

Order Confirmation for Ad #: 000445280

Customer:	GF CITY PLANNING BOARD
Address:	PO BOX 5021 GREAT FALLS MT 59403 USA
Acct. #:	FAL-004704
Phone:	4067711180
GF CITY PLANNING BOARD	
Ordered By:	Alicia Eatherly

OrderStart Date: 11/15/2020

Order End Date: 11/22/2020

<u>Tear Sheets</u>	<u>Affidavits</u>	<u>Blind Box</u>	<u>Promo Type</u>	<u>Materials</u>	<u>Special Pricing</u>	<u>Size</u>
0	1					1 X 0.00

<u>Net Amount</u>	<u>Tax Amount</u>	<u>Total Amount</u>	<u>Payment Method</u>	<u>Payment Amount</u>	<u>Amount Due</u>
\$177.40	\$0.00	\$177.40	Invoice	\$0.00	\$177.40

Ad Order Notes:

Sales Rep: ammarsh

Order Taker: ammarsh

Order Created 11/04/2020

Product	# Ins	Start Date	End Date
FAL-gftribune.com	2	11/15/2020	11/22/2020
11-15-20, 11-22-20, FAL-GreatFallsTribune	2	11/15/2020	11/22/2020
11-15-20, 11-22-20,			

* ALL TRANSACTIONS CONSIDERED PAID IN FULL UPON CLEARANCE OF FINANCIAL INSTITUTION

NOTICE OF PUBLIC HEARING

City of Great Falls 2020-2024 Consolidated Plan & 2020 Annual Action Plan

Notice is hereby given that the City Commission of the City of Great Falls will conduct a public hearing on the City's proposed 2020-2024 Consolidated Plan, which includes the 2020 Annual Action Plan, on December 1, 2020, at 7:00 o'clock p.m. in the Gibson Room 212, Civic Center Building, 2 Park Drive South, Great Falls, Montana.

The City of Great Falls is an entitlement recipient of federal funds from the U.S. Department of Housing and Urban Development (HUD) under the Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) Programs, which are designed to benefit low and moderate income persons. In order to receive these funds, the City must adopt a five-year Consolidated Plan (2020-2024) that also outlines its Annual Action Plan for the first Program Year (2020-2021). The draft 2020-2024 Consolidated Plan outlines proposed activity allocations for the next five years, along with goals and objectives the City would like to accomplish. The 2020-2021 Annual Action Plan describes the proposed allocation and use of funds for the first Program Year of the Consolidated Plan and how these projects and activities will help achieve the City's overall goals and objectives outlined in the Consolidated Plan. Documents pertaining to these agenda items are posted on the City's website at <https://greatfallsmt.net/planning/consolidated-plan-annual-action-plan> and are on file for public inspection during regular office hours at the City Clerk's Office, 2 Park Drive South, Room 204, Great Falls, MT, or contact us at (406) 455-8451.

Any interested person may appear and comment for or against said proposed activity allocations and use of funds or submit in writing any comments to the City Clerk prior to or during the Commission Meeting. This hearing is not meant to be a format for agencies to discuss or promote their individual grant applications.

Due to the COVID-19 health concerns, the format of the City Commission meeting will be held in a virtual video-conferencing environment. In order to honor the Right of Participation and the Right to Know (Article II, Sections 8 and 9 of the Montana Constitution), modifications have also been made for public participation. Public participation is welcome in the following ways:

- Attend in person. Refrain from attending in person if you are not feeling well. The City will require social distancing at the meeting, and may limit the number of persons in the Commission Chambers according to applicable health guidelines.
- Provide public comments via email. Comments may be sent via email before 12:00 PM on Tuesday, December 1, 2020, to: commission@greatfallsmt.net

commission@greatfallsmi.net.

Include the agenda item or agenda item number in the subject line, and include the name of the commenter and either an address or whether the commenter is a city resident. Written communication received by that time will be shared with the City Commission and appropriate City staff for consideration during the agenda item and before final vote on the matter; and, will be so noted in the official record of the meeting.

- Call-in. The public may call in during specific public comment periods at 406-761-4786. All callers will be in a queued system and are asked to remain on hold and be patient. Calls will be taken in the order in which they are received. Callers will be restricted to customary time limits. We ask for your patience in the event there are technical difficulties.

/s/ Lisa Kunz

City Clerk

(4455280) 11/22/2020

MNAXLP

Appendix G

Consolidated Plan Focus Group
February 27, 2020
Civic Center, Gibson Room

Comments/Questions to open group following presentation:

Sherrie Arey (NWGF):

1. Asked for clarification on purposes of Consolidated Plan and Annual Action Plan and how they correlate.
2. Asked when the determination is made to reconsider what hasn't worked in the past – when does the City make changes to what hasn't been successful?
3. Commented on City's additional regulations on already over-regulated HUD programs

Brett Doney (GFDA):

1. Asked City to consider larger, overall community goals and to incorporate those into the ConPlan, thinking beyond what only CDBG and HOME can address and how all available funding sources are leveraged.
2. Commented that stakeholders should meet more frequently in order to work together to accomplish Plan goals.
3. Echoed Sherrie Arey's comments about City regulations that compound HUD's regulations.

Shyla Patera (NCIL):

1. Asked if HUD gives specific direction or outlines priorities for current Con Plan or Annual Action Plan.

Comments/Questions following Focus Group exercise:

Sherrie Arey, Susie McIntyre, Shyla Patera:

1. All commented on getting additional partners at the "Stakeholder" table other than grantees/potential grantees. (i.e., Benefis, Developers, vulnerable populations)

 Reply all | 
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City of Great Falls 2020 -2024 Consolidated plan



Shyla Patera <ncils.patera@bresnan.net>

Tue 11/24, 11:24 AM

Tonya Shumaker; Alicia Eatherly; Craig Raymond; +3 more 

 Reply all | 

Inbox

This message was sent with high importance.

My name is Shyla Patera. I am an Independent Living Specialist employed by North Central Independent Living Services, Inc. Our agency is an Independent Living Center and disability advocacy agency that serves north central Montanans with disabilities. I wish to submit written comment regarding the 2020-2024 City of Great Falls Consolidated Pan.

NCILS wishes to commend the City of Great Falls for its housing work regarding city residents with disabilities and others in housing crisis to find more stability in their individual housing situations. However, NCILS feels that more needs to be done regarding physical accessibility, visit ability, and universal design both in our rental and homebuyer housing stock. Montana Housing and the Community Development Division should undertake an assessment of not only its physical housing stock, but also the programs, policies, and partnerships it is forming to ensure that all are accessible and being utilized by those with disabilities that may need the programs most. Community shelters, public housing and LIHTC units should be accessible to all including those with mobility, sensory, and chemical disabilities. The City and potential CDBG applicants for Home CDBG funds need to focus on visit ability and universal design in new construction, but we also need to focus on financing home modifications in older homes.

In regards to housing and homeless issues, NCILS asks that people with disabilities and veterans who have experienced homelessness have a seat in our Continuum of Care planning meetings. NCILS staff sees opportunities for partnership and collaboration offered by the FUSE grant and Supportive Housing work that members of the COC are pursuing.

In regard to short term COVID 19, issues, NCILS would like to see the City of Great Falls ask HUD for a relaxing of HUD rules regarding move in into HUD subsidized accessible units. We need to encourage Congressional funding of and HUD flexibilities in the use of said funding and vouchers so that OPP INC and the Great Falls Housing Authority can apply for and utilize HUD Mainstream Housing Vouchers, Tenant Based Rental Assistance For those on Medicaid and those applying for Medicaid Services the City need to ask and partner with DPHHS, our HCBS waiver our Montana statewide CoC to ensure the City is not discharging to homelessness.

NCILS hopes that city subdivision designers, CDBG applicants, and community advocates can support programs which will assist accessible parking including enforcement and modification of Montana code to include language regarding van accessible aisle ways. Advocates are also asking some clarification in definition as to what constitutes Public Rights of Way versus commercially developed or private property development occurs when sidewalks are non continuous or in need of pavement preservation repair. As a first step NCILS asks that pandemic plans include accessibility in transit and other community systems so that a citizen of Great Falls can stay in their homes following treatment for COVID-19 as well as any

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NCILS would encourage that the City partner with Montana Department of Transportation and the Community Development Division to partner with cities ,towns and prospective CDBG applicants to highlight accessible community planning in community MPO planning processes. I know that there has been some discussion on which standard for accessibility in Montana communities should be enforced. NCILS would recommend using PROWAG. NCILS would also hope that pedestrian and accessibility needs could be considered in the Statewide Transit Management Plan. NCILS hopes that traffic signals and timing studies are undertaken as future community roadways are repaired. Roadways need wider shoulders on our interstates,urban roads and community connector roads where possible.

To facilitate employment of people with disabilities , NCILS encourages partnerships between Great Falls Development Authority and the Great Falls Vocational Rehabilitation to promote telework where possible as well as employment in competitive integrated employment settings and competitive wages. Employers and employees should provide PPE. Thank you .

Shyla Patera
IL Specialist North Central Independent Living Services, Inc..
1120 25 th Avenue North East
Black Eagle, Montana 59414
406 452-9834
spatera@ncils.org

JOURNAL OF COMMISSION PROCEEDINGS
December 1, 2020

Regular City Commission Meeting

Mayor Kelly presiding

CALL TO ORDER: 7:00 PM

Civic Center Gibson Room 212

PLEDGE OF ALLEGIANCE

Due to the COVID-19 health concerns, the format of the City Commission Meeting was held in a virtual video-conferencing environment.

ROLL CALL/STAFF INTRODUCTIONS: City Commission members participated electronically via Zoom Webinar: Bob Kelly, Tracy Houck, Mary Sheehy Moe, Owen Robinson and Rick Tryon. City Staff participating electronically were: City Manager Greg Doyon and Deputy City Manager Chuck Anderson; Budget Analyst Kirsten Myre; Park and Recreation Director Steve Herrig; Planning and Community Development Director Craig Raymond; and, Public Works Director Paul Skubinna. Staff present: City Attorney Sara Sexe; Police Chief Dave Bowen; and City Clerk Lisa Kunz.

To honor the Right of Participation and the Right to Know (Article II, Sections 8 and 9 of the Montana Constitution), modifications have also been made for public participation as follows:

- Attend in person. **The City will be following the Current Governor’s Directives and the Public Health Officer Orders regarding public meetings conducted by, staffed by or held in the facilities of the city.** Masks will be required, social distancing will be enforced, and the total number of persons in the meeting room will be limited to a maximum of 25. Public following these directives may view and participate in the meeting from the Gibson Room. Please refrain from attending in person if you are not feeling well.
- Provide public comments via email. Comments may be sent via email before 12:00 PM on Tuesday, December 1, 2020, to: commission@greatfallsmt.net.
- Electronically. Register via the link on the meeting’s agenda to attend the virtual Zoom Webinar meeting or to participate by phone.
- The agenda packet material is available on the City’s website: <https://greatfallsmt.net/meetings>. The Public may view and listen to the meeting on cable channel 190, or online at <https://greatfallsmt.net/livestream>.

AGENDA APPROVAL: There were no proposed changes to the agenda by the City Manager or City Commission. The agenda was approved as presented.

CONFLICT DISCLOSURE/EX PARTE COMMUNICATIONS: None.

**PETITIONS AND COMMUNICATIONS/NEIGHBORHOOD COUNCILS/
BOARDS AND COMMISSIONS**

1. MISCELLANEOUS REPORTS AND ANNOUNCEMENTS.

Commissioner Robinson announced that the City County Health Board meets the first Wednesday of every month. As the City representative on that board, he will provide updates to the

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Commission during the second Commission meeting of each month.

Mayor Kelly encouraged everyone to continue to wear masks and follow the Governor's directives as healthcare workers are incredibly taxed and the capacity at the hospital is not improving.

2. REAPPOINTMENTS TO THE REGIONAL AIRPORT AUTHORITY BOARD.

Commissioner Robinson moved, seconded by Commissioner Moe, that the City Commission reappoint Anthony Aretz and Todd Timboe to the Great Falls Regional Airport Authority Board for three-year terms through December 31, 2023.

Mayor Kelly asked if there were any comments from the public or any discussion amongst the Commissioners.

Commissioner Robinson pointed out a clerical error in the summary of the agenda report that should read: Anthony Aretz and Todd Timboe were appointed to the Airport Board for three-year terms from January 1, 2018 through December 31, 2020.

There being no further discussion, Mayor Kelly called for the vote.

Motion carried 5-0.

3. APPOINTMENTS TO THE ETHICS COMMITTEE.

City Attorney Sara Sexe reported that on June 18, 2019 the City Commission adopted Ordinance 3201 which revised the Official Code of the City of Great Falls (OCCGF) §2.21.080 by adding one alternate member to serve on the Ethics Committee in case of a member being unavailable or unable to attend a meeting.

At the recommendation of the Ethics Committee, the City Commission appointed John Hackwith on November 20, 2019 to serve as the Alternate Member. Mr. Hackwith was subsequently appointed to the Police Commission in July and has resigned from the Ethics Committee.

An agenda item to appoint a new Alternate Member was scheduled for the September 1, 2020 Commission meeting. Commissioner Moe requested the proposed agenda item be removed to allow for additional time to clarify the qualifications sufficiently and the appointment process.

The advertisement was reopened on October 6, 2020 with the following information included in the posting: *Members of the Ethics Committee must be – and must be perceived as – impartial and even-handed in the conduct of their duties. Their communications on social media and their relationships with the City or City employees should raise no questions about their ability to render impartial judgment of employees' conduct.*

Staff reached out to the two candidates and received a response from Mr. Grohs asking to still be considered for the Committee.

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Committee member Carl Rostad's term will expire on December 31, 2020 and he is not interested in reappointment. The Commission will need to appoint a member to fill this vacancy also. The City received one additional application from Ms. Robin Beatty.

The requested action is to appoint one member and one alternate member to the Ethics Committee.

Commissioner Robinson moved, seconded by Commissioner Moe, that the City Commission appoint Robin Beatty to a three-year term through December 31, 2023 and appoint Justin Grohs as an Alternate Member to the Ethics Committee for the remainder of a three-year term through December 31, 2022.

Mayor Kelly asked if there were any comments from the public or any discussion amongst the Commissioners.

Commissioner Tryon commented that Mr. Grohs works for a vendor of the City of Great Falls. He inquired whether it would be appropriate for Mr. Grohs to serve as an alternate member on the Ethics Committee.

Commissioner Moe commented that City Attorney Sexe responded to her same concern that one of the reasons for the alternate member is that a conflict of interest could occur for anyone on a particular item and that person would recuse himself or herself.

There being no further discussion, Mayor Kelly called for the vote.

Motion carried 5-0.

CITY MANAGER

4. MISCELLANEOUS REPORTS AND ANNOUNCEMENTS.

City Manager Greg Doyon made the following announcements:

- He has been out of the office recovering from Covid.
- To avoid crowds and social distancing the Commission meetings have been held in a virtual environment. City staff is still working through the mechanics of it all. The Gibson Room will remain open for public comment and City staff will rotate appearing from that room to assist with the public. Let him know if there is interest in shortening the agenda as it was several months ago.
- On December 4, 2020, the Civic Center Renovation project will begin by relocating some City offices. The Finance Department payment window for utility billing will move to the Will Call office in the Civic Center, or there are options for on-line payments. Finance Department clerks will be relocated. Construction could take up to 120 days to renovate the Finance Department area. During this time, the office hours will be 8:30 a.m. to 4:30 p.m.

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- Fire Chief Jeremy Jones was selected to serve on the Board of the Montana State Fire Chiefs Association.

Manager Doyon provided some background information and a status update on the Aquatics/Recreation Facility project. In summary, the project sites had challenges with wetlands and potentially bad soils. Soil samples taken at the School District owned location were not great and the bedrock was at 60 feet. This has created a foundation estimate of approximately \$2.6 million. He has asked the Office of Economic Adjustment (OEA) if the City could look at another location with better soils and is awaiting that response. OEA has reached out to Malmstrom Air Force Base to ask their thoughts. There are some large park areas that the City could easily transition and, if approved by OEA, soil samples taken to determine if they are more compatible. If OEA does not approve the request, the City will fully price out what the cost will be to do a helical system or some system that will tolerate those soils as recommended by the engineers, and look at a business plan to determine if it is possible for the project to move forward.

Commissioner Moe expressed disappointment by the lack of progress and concern about taking on a fiscal problem that will be handed down to future commissions.

Commissioner Tryon expressed disappointment and commented that he was disturbed by the entire process from the beginning.

Commissioner Robinson reported that the Census 2020 final numbers would be released in March.

CONSENT AGENDA.

5. Minutes, November 17, 2020, City Commission Meeting.
6. Total Expenditures of \$1,520,521 for the period of November 1, 2020 through November 18, 2020, to include claims over \$25,000, in the amount of \$1,461,493.
7. Contracts List.
8. Approve Final Payment for the Jaycee Park – Pickleball, Basketball, and Pavilion Improvements, in the amount of \$27,222.04 to United Materials and \$274.97 to the State Miscellaneous Tax Fund and authorize the City Manager to make the payments. **OF 1740.2**
9. Postpone the Public Hearing for the Great Falls Saddle Club Lease Agreement of City owned property located in Wadsworth Park to the December 15, 2020 Commission Meeting.

Commissioner Moe moved, seconded by Commissioner Tryon, that the City Commission approve the Consent Agenda as presented.

Mayor Kelly asked if there were any comments from the public or any discussion amongst the Commissioners. Hearing none, Mayor Kelly called for the vote.

Motion carried 5-0.

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PUBLIC HEARINGS

10. 2024 CONSOLIDATED PLAN AND 2020 ANNUAL ACTION PLAN FOR THE COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) AND HOME INVESTMENT PARTNERSHIPS PROGRAM.

Mayor Kelly declared the public hearing open and asked for presentation of the staff report.

Planning and Community Development Director Craig Raymond reported that this item for Commission consideration is a request to adopt the 2024 Consolidated Plan as well as the 2020 Annual Action Plan. Every five years the City is required to adopt a new five-year plan which encompasses our over-all broad goals to serve the low to moderate-income citizens of Great Falls with our annual CDBG and HOME Investment Partnership Program allocations.

Due to Covid staff has had to adapt and revise the plans and priorities, amend the 2019 adopted Annual Action Plan, and then return their attention back to the Consolidated Plan.

Director Raymond reported that there are not many dramatic changes to the existing five-year plan. The smaller changes include:

- Transitional Housing was folded into the larger goal of Affordable Housing under the proposed Plan.
- Descriptions of Slum and Blight Removal were added under the goals of Affordable Housing and Public Facilities and Improvements.
- Based on community input, the following priorities have been identified to guide selection for Public Service agency grant awards: 1) services that target homelessness, 2) support for persons with mental, physical, and developmental disabilities, 3) supporting services that addresses alcohol and other addiction problems, 4) crime prevention services, and 5) youth and children's services.
- Supporting language was added to address facility improvements for the Housing Authority under the Housing Rehabilitation goal. This will make it possible for the Housing Authority to apply for funding.

Based on past experience, knowledge of community priorities from community partners, as well as survey results, the proposed plans are submitted for Commission consideration and adoption.

Mayor Kelly asked if the Commission members had any clarifying questions.

Commissioner Moe noted that she received answers to her questions today that she felt were helpful. She commented that the data before the Commission does not have the benefit of the things the City may have learned in this pandemic. She asked Director Raymond to address her concern regarding the point in time survey being almost two years old.

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Director Raymond responded that the City relies on some of its partners to provide statistics and data. As far as the local survey, some things were addressed in the 2019 Plan amendment with the Covid funds, and they moved forward with the data they had.

Commissioner Moe commented that there does not seem to be any particular focus on housing shortages or the difficulties that deal with racism and minorities in terms of the priorities.

Director Raymond responded that, in general, whenever low to moderate-income is addressed they are targeting a disproportionate number of minority populations. When they make efforts to support or target the low to moderate-income levels, they know minority populations will be affected on some levels; but it is difficult to know just how much of an effect the programs had on those particular outcomes.

Mayor Kelly asked if there were any public comments in support of or in opposition to the 2024 Consolidated Plan and 2020 Annual Action Plan for the CDBG and HOME Investment Partnership Programs.

Appearing electronically, **Brett Doney**, Great Falls Development Association, commented that the public input on the economic development section is very weak. He encouraged the City to take a closer look at the economic needs of its residents. He does not think the needs assessment in the Consolidated Plan adequately describes the distress many City residents have in not being able to earn enough to pay for their costs of living.

Director Raymond noted that **Shyla Patera**, North Central Independent Living Services, Inc. submitted written comments that were attached to the agenda report and included in the plan. Mr. Doney's comments were well noted and would have been more helpful had he responded to the community survey.

There being no one further to address the Commission, Mayor Kelly asked the will of the Commission.

Commissioner Moe moved, seconded by Commissioner Tryon, that the City Commission adopt the 2024 Consolidated Plan and 2020 Annual Action Plan.

Mayor Kelly asked if there was any discussion amongst the Commission members.

Commissioner Moe commented that the document illustrates some things that are important for the Commission and it is the opportunity for the Commission to shape the use of these funds. She thinks the City is seeing some things from the pandemic that have meaning, but because we are in the middle of it, we do not have time to collect data. She pointed out that one in four households do not have internet connectivity. Internet connectivity has been a game changer for how people do school and work during the pandemic. It is an important area for future commissions to keep track of. She commented that the voluminous data in the report gets lost because she does not think the dots are connected between the data in this report and the data that the School District, Cascade County Jail and Great Falls Police Department have to get a picture of what that experience is for minorities. The most significant difference to her between the 2015 numbers and

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the numbers in this report is that although there is roughly the same number of Native Americans they have fallen disproportionately into the lower income levels.

Mayor Kelly inquired about the Commission's ability to adapt this plan going forward as more data comes in from post pandemic situations.

Director Raymond responded that what staff has learned from collaborating with other entitlement communities and attending trainings is to keep the plan relatively general so that many different types of projects can be incorporated within the plan. If the plan is too specific it makes it difficult to be adaptable without doing a major amendment to the plan, which is time consuming and takes substantial effort. The plan is general and vague because staff does not know who in the community is going to take on these challenges and seek the City's help and funding. The City does not undertake projects. The City supports community partners with funding in undertaking these tasks.

There being no further comments, Mayor Kelly called for the vote.

Motion carried 5-0.

11. **REQUEST FROM JOSHUA JOHNS WITH SKYLINE HEIGHTS, LLC TO ANNEX AND ASSIGN ZONING.**
 - A. **RESOLUTION 10378 TO ANNEX THE SOUTH 153.4 FEET OF THE N1/2 SW1/4 SW1/4 NW1/4 EXCEPTING THE WEST 30.0 FEET WHICH IS COUNTY ROAD IN SECTION 35, T21N, R3E, P.M.M., CASCADE COUNTY, MONTANA; THE ADJOINING RIGHT-OF-WAY OF 6TH STREET NW; THE ADJOINING RIGHT-OF-WAY OF SKYLINE DRIVE NW EXTENDED TO THE WEST RIGHT-OF-WAY LINE OF 6TH STREET NW.**
 - B. **ORDINANCE 3226 TO ASSIGN PROPERTY DESCRIBED ABOVE AS R-6 MULTI-FAMILY HIGH DENSITY ZONING.**

Mayor Kelly declared the public hearing open and asked for presentation of the staff report.

Planning and Community Development Director Craig Raymond reported that this item is a public hearing for consideration of the annexation and application of zoning on approximately 2.15 acres in the Skyline neighborhood, located on the southeast corner of 6th Street NW and Skyline Drive NW, and directly adjacent to a city-owned water storage reservoir.

Owner of the subject property, Skyline Heights, LLC, filed for annexation and is requesting R-6 zoning in order to proceed with the intended plan of developing a high-density multi-family project. Director Raymond characterized the plans received to date as preliminary, but noted that so far the proposed development plan appears consistent with the underlying regulations pertaining to R-6 zoning. The formal action being taken tonight is not to approve of a specific site plan. The applicant has requested annexation and zoning of the subject property. No other permits have been filed at this time. The agenda report exhibits contain some specific plans. The owner of the property either today or subsequent owners may propose any use that is consistent with R-6 zoning.

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Based on the scale, mass and proposed use of the property, public concern from surrounding neighbors has largely been associated with traffic and fit for the neighborhood. These concerns were brought to the attention of the Planning Board at their public hearing held on October 13, 2020. Ultimately, the Planning Board did vote to recommend that the City Commission approve the annexation and R-6 zoning request. To this end, staff has submitted a traffic analysis and recommendations to the Commission for consideration of the project. Essentially, the developer will be required to improve Skyline Drive from its current completed location westward to the intersection with 6th Street NW. The owner will also be obligated to pay a proportionate share of costs associated with the improvement of 6th Street NW when that project becomes a reality. At this time, staff is still not in a position to declare when that improvement can move forward. Multiple issues need to be resolved prior to design and construction. What is known is that 6th Street NW is still under both county and city jurisdiction. There is also rights-of-way that would need to be secured in order to widen the roadway. Additionally, there has not been sufficient funding identified to pay for the project. In any case, staff continues to seek answers to these obstacles so that improvements can be constructed and new development can continue to be promoted. As is typical for annexation, zoning and development projects, the project applicant will be required to pay for and construct improvements such as water, sewer, storm water, as well as street and sidewalk infrastructure.

Applicant Joshua Johns was present and noted he was available if the Commission had any questions.

Mayor Kelly asked if the Commission members had any clarifying questions.

Commissioner Tryon noted that the apartments rent for \$850-\$1,200/month. He inquired about eligibility for Section 8 housing subsidies.

Director Raymond responded that information has not been shared with staff and is not criteria to be used in the decision making process.

Commissioner Moe inquired about location of curb and gutter.

Director Raymond responded that he sees that happening on Skyline because the entire width of the roadway is being improved along the lane.

Commissioner Robinson referred to the city/county road and inquired if and how it could become a 6th Street NW expansion or widening project inside the City limits.

Director Raymond responded that the City would make a concerted effort to join the County in a mutual project or proactively annex the remaining right-of-way. That would probably take place at the same time that additional rights-of-way would be purchased prior to construction.

Mayor Kelly asked if there were any public comments in support of or in opposition Resolution 10378 or Ordinance 3226.

Appearing electronically, **Brett Doney**, Great Falls Development Authority, spoke in support of the project. He commented that the only way to keep housing prices in check is to keep producing

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housing stock. Building more apartments is important for the economic and social well-being of the community. He also noted support of the findings of fact.

There being no one further to address the Commission, Mayor Kelly closed the public hearing and asked the will of the Commission.

Commissioner Houck moved, seconded by Commissioner Robinson, that the City Commission adopt Resolution 10378 to annex the property as legally described in the staff report including the adjoining right-of-way of Skyline Drive NW and 6th Street NW and the accompanying Findings of Fact, and approve the Improvement Agreement, all subject to the Conditions of Approval being fulfilled by the applicant.

Mayor Kelly asked if there was any discussion amongst the Commission members.

Commissioner Houck commented that she is pleased this project is coming together, and appreciative of all the pieces in the Improvement Agreement.

There being no further discussion, Mayor Kelly called for the vote.

Motion carried 5-0.

Commissioner Robinson moved, seconded by Commissioner Tryon, that the City Commission adopt Ordinance 3226 to assign R-6 Multi-Family High Density zoning to the property as legally described in the staff report and the accompanying Findings of Fact, subject to the Conditions of Approval being fulfilled by the applicant.

Mayor Kelly asked if there was any further discussion amongst the Commission members. Hearing none, Mayor Kelly called for the vote.

Motion carried 5-0.

12. RESOLUTION 10379, AUTHORIZING THE EXPENDITURE OF APPROXIMATELY \$8,829,810 IN FUNDS FROM THE DOWNTOWN URBAN RENEWAL TAX INCREMENT FINANCING DISTRICT TOWARDS THE CIVIC CENTER FACADE RENOVATION PROJECT.

Mayor Kelly declared the public hearing open and asked for presentation of the staff report.

Planning and Community Development Director Craig Raymond reported that this item for consideration is a request from Planning and Community Development to conduct a public hearing and approve the expenditure of approximately \$8.8 million dollars to finance the renovation of the Civic Center Façade.

It is well documented that the Civic Center façade has been deteriorating for a number of years. Since at least 2011, City staff has been working towards developing a renovation project and securing adequate funding to finance the renovation. While the project has not formally gone out

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for public bid, it is estimated that the renovation construction cost will be approximately \$5.5 million to \$6 million dollars. Contingency, underwriting costs, and interest paid over time is estimated to bring the total cost to approximately \$8.8 million dollars. Based on current interest rates and estimated costs, the total annual debt service is estimated to be \$441,490. The estimated tax increment financing (TIF) increment left over after debt service would be approximately \$960,000 for other eligible projects.

In early 2020, the City Commission directed staff to investigate and pursue the possible use of TIF funds to be used as a guarantee in a bond sale. On October 6, 2020, the City Commission approved an amendment to the Downtown Urban Renewal Plan (DURP), making it clear that the Civic Center facility and property should be specifically considered for TIF funding allocations. Before this amendment, the only property specifically listed in the DURP is the property known as the “Rocky Mountain Building.” The plan otherwise lays out other strategies for improving the downtown urban renewal area including blight removal, pedestrian improvements, bicycle network, connectivity to amenities including the River’s Edge Trail and other projects like Wayfinding.

Although some people in the downtown community have expressed reservations or opposition to the use of TIF funds for this purpose, it is very clear that the project is consistent with statutory eligibility requirements in every aspect and it is the only method of financing this rehabilitation project without raising taxes on the community at this point in time. Furthermore, this funding strategy significantly benefits the downtown community who may be in a position to apply for TIF funds for future projects as the bonding element of this project will extend the life of the district and increase opportunities that otherwise would not be available. If approved, Resolution 10379 authorizes the City to use TIF funds from the Downtown Urban Renewal District in the amount of approximately \$8.8 million dollars.

Mayor Kelly asked if the Commission members had any clarifying questions. Hearing none, Mayor Kelly asked if there were any public comments in support of or in opposition to Resolution 10379.

Appearing electronically, **Brett Doney**, Great Falls Development Authority, spoke in support of this proposal for three reasons: (1) addresses the pressing need for the Civic Center facility; (2) lengthens the length of time for the Downtown Tax Increment Financing District; and (3) it is a way to address a community facility challenge without increasing taxes. Mr. Doney further commented that private investment needs to be supported for downtown development.

Appearing electronically, **Scott Reasoner**, City resident, commented that he is partners in two downtown businesses, owns a downtown building that has a development plan, and he resides downtown. Mr. Reasoner commented that he is not against the use of TIF funds for this project, but he urged the Commission to delay action on this use of TIF funds until the City, the community and the Commission could approve an updated use plan for the downtown TIF district as a whole. Mr. Reasoner concluded that it is placing the cart before the horse if this use is approved and the TIF district is extended by 20 years without first understanding goals and best use of the fund.

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Appearing electronically, **Shane Etwiler**, Great Falls Area Chamber of Commerce, 100 1st Avenue North, concurred with both previous speakers' comments. He shared that a major concern of downtown business owners is use of downtown TIF funds for this project. The Civic Center is an iconic feature downtown that brings in a lot of entertainment, venues and businesses that is a benefit to downtown. TIF is intended for infrastructure and economic development. He expressed concern about how this project will increase and improve development downtown for the long term.

Director Raymond commented that staff is working with members of the Downtown Development Partnership, Downtown Great Falls Association, and the Business Improvement District to come up with new elements to the plan that will be presented at an upcoming work session. In response to Mr. Reasoner, the City does have a TIF plan. The Downtown Urban Renewal Plan was recently amended by the City Commission and sets forth a vision and a plan moving forward.

There being no one further to address the Commission, Mayor Kelly closed the public hearing and asked the will of the Commission.

Commissioner Robinson moved, seconded by Commissioner Moe, that the City Commission adopt Resolution 10379, authorizing the expenditure of approximately \$8,829,810 of funds from the Downtown Urban Renewal Tax Increment Financing District towards the Civic Center Façade Renovation project.

Mayor Kelly asked if there was any discussion amongst the Commission members.

Commissioner Robinson commented that at first he had reservations because everyone in the district was taxed except for the City. What changed his mind is the amount of TIF funds that are generating every year. There will be funds for other downtown projects. It is important to recognize that the Civic Center is the center of downtown. Commissioner Robinson concluded that he is a huge advocate of downtown, and he made the motion believing it is in the best interest of the downtown.

Commissioner Moe noted prior comments were that the City should also consider dealing with the interior as long as it is dealing with the exterior. It has been put off a long time. This is a pressing safety concern and she thinks this is the best way to address it.

Mayor Kelly commented that this is an excellent opportunity for the City to use these funds to benefit the entire community without having to pass a bond issue and put the burden of the tax upon people who are already incredibly stressed.

City Manager Doyon held up a piece of façade that had fallen off the Civic Center. He commented that there is no better instrument to repair the building than to use TIF funds at this point. The TIF fund has grown in value. If not all of the TIF funding is used, there is not anything that would restrict the City Commission from allocating that unused TIF back to the taxing jurisdictions for other needs.

There being no further discussion, Mayor Kelly called for the vote.

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Motion carried 5-0.

OLD BUSINESS

NEW BUSINESS

ORDINANCES/RESOLUTIONS

13. RESOLUTIONS 10380, 10381 AND 10382 REPEALING AND REPLACING RESOLUTIONS 10264, 10265 AND 10266 FOR THE MERIWETHER CROSSING SUBDIVISION FOR THE PURPOSE OF ADJUSTING THE PROPOSED PHASES OF THE PROJECT'S ANNEXATION.

Planning and Community Development Director Craig Raymond reported that this agenda item is a request to amend an annexation approved by the City Commission in October 2018. For background, Meriwether Crossing was intended to be a mix of products including NeighborWorks Great Falls self-help building program as well as typical subdivision and market driven home construction. Due to the funding source for the NeighborWorks program, the homes must be built in the County and then immediately annexed into the City upon completion. The annexations would be filed with the County Clerk and Recorder's Office in phases as they were complete. Some of the market driven lots which were slated for sale were already recorded and some lots sold. Similarly, initial phases of the self-help homes have also been completed and annexed. There was a distinct plan on which lots were to be annexed and in what order to ensure that infrastructure and facilities would be planned and constructed in a logical and orderly fashion.

The developer, NeighborWorks Great Falls, now proposes to change the timing and order of lots to be annexed so that additional lots can be sold at this time. To accomplish this, Resolutions to Repeal and Replace prior adopted resolutions that have not been recorded are before the Commission for action. To be clear, the only elements that are changing related to the original 2018 approval is the configuration and order of the phases. The developer is not proposing an increase in lot density or changing provisions in the Improvement Agreement.

City Staff and the developer originally worked through a detailed Improvement Agreement which defines the roles and responsibilities of the developer and the City. The developer shall pay for all street, water, sewer and storm water improvements which are necessary to support this development. The City will pay for upsizing of utility lines as may be specifically requested by the City for utility continuity and future growth.

Director Raymond noted that he received a word of caution from the County Planning Director that the County is not a fan of this subdivision/annexation process that the City has used to support affordable housing in Great Falls. He expects that the City and County will enter into discussions and a Memorandum of Understanding before the City undertakes future similar projects.

Commissioner Tryon moved, seconded by Commissioner Moe, that the City Commission adopt Resolution 10380, repealing and replacing Resolution 10264 for the purpose of amending the annexation of the Meriwether Crossing Subdivision.

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Mayor Kelly asked if there were any comments from the public or any discussion amongst the Commissioners.

Appearing electronically, **Brett Doney**, Great Falls Development Authority, commented that what NeighborWorks is doing is incredibly important for the City. It is important that affordable home ownership, as well as rental housing opportunities, be provided. He encouraged the City to continue to support creative projects.

Commissioner Robinson disclosed that he recently made a significant donation to the NeighborWorks Foundation. Because there will be no financial benefit to him or his family if he votes in support of this item, he will not be recusing himself.

There being no further discussion, Mayor Kelly called for the vote.

Motion carried 5-0.

Commissioner Moe moved, seconded by Commissioner Houck, that the City Commission adopt Resolution 10381, repealing and replacing Resolution 10265 for the purpose of amending the annexation of the Meriwether Crossing Subdivision.

Mayor Kelly asked if there were any comments from the public or any discussion amongst the Commissioners.

Hearing none, Mayor Kelly called for the vote.

Motion carried 5-0.

Commissioner Moe moved, seconded by Commissioner Robinson, that the City Commission adopt Resolution 10382, repealing and replacing Resolution 10266 for the purpose of amending the annexation of the Meriwether Crossing Subdivision.

Mayor Kelly asked if there were any comments from the public or any discussion amongst the Commissioners.

Hearing none, Mayor Kelly called for the vote.

Motion carried 5-0.

CITY COMMISSION

14. MISCELLANEOUS REPORTS AND ANNOUNCEMENTS.

Commissioner Tryon commented that LR-130 restricts municipalities from making law that restricts carrying of firearms. In light of the passage of LR-130, he asked for the support of the Commission members to ask the City Attorney to review Title 9, Chapter 8 of the Official Code of the City of Great Falls and take appropriate action to keep in compliance with state law. He

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also requested support to ask the City Attorney and staff to look at the City's zoning as it relates to the recent passage of the use of recreational marijuana.

City Attorney Sara Sexe responded that both ballot issues have been on her radar. The Legislature is going to address questions regarding LR-130 and I-190 and some of those elements that may be more pragmatic that staff will have to deal with. She provided a Legal Opinion in 2017 that concealed carry in parks would be allowed. Work needs to be done with regard to that ordinance so that it is consistent with LR-130 and the statute. In the interim, she advised to wait to see what the Legislature may do with regard to both issues, and not necessarily enforce the provisions of the ordinance that may conflict with the statute.

City Manager Doyon added that he will pass along information he hears from other communities or the Montana League of Cities and Towns.

With regard to I-190, City Attorney Sexe concluded that the City has consistently indicated it could not comply with permitting of those businesses in the Great Falls area because it would conflict with federal law.

Commissioner Robinson requested that if two items are scheduled for presentation on the December 15th work session that the Maclean update be heard first.

Commissioner Moe requested written material in advance of the work session.

City Manager Doyon noted the options are to start the work session early and have a longer meeting or call a special work session. He will follow up with everyone regarding availability.

Commissioner Moe noted the passing of Ken Maddox, a teacher at East Middle School, who died from complications from Covid. Mr. Maddox taught, coached and refereed for the School District for 33 years. He is an example of the unsung work that the teachers throughout the community are doing. He is a loss to our community and will be missed.

ADJOURNMENT

There being no further business to come before the Commission, **Commissioner Moe moved, seconded by Commissioner Robinson, to adjourn the regular meeting of December 1, 2020, at 9:11 p.m.**

Motion carried 5-0.

Mayor Kelly

City Clerk Lisa Kunz

Minutes Approved: December 15, 2020