

**City of Great Falls  
2019-2020 Annual Action Plan**



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HUD APPROVED: Pending

## **Executive Summary**

### **AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)**

#### **1. Introduction**

The City of Great Falls Annual Action Plan for program year 2019 is scheduled for review by the Great Falls City Commission on June 4, 2019 following a 30 day comment period extending from April 17, 2019 through May 17, 2019. City Commission action on the Annual Action Plan follows a plan development process which included the development of the Great Falls and Cascade County Comprehensive Housing Affordability Strategy 2010–2020 (CHAS) undertaken by a diverse community group; input from local organizations; and input from a community assessment, which included one Neighborhood Council of Councils meeting (1/29/2019), a Community Survey, and a public needs hearing (4/2/2019).

The purpose of the Annual Action Plan is to implement the 2015-2019 Consolidated Plan and identify the housing and community development needs of low income people in the community 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 2019/2020 and serves as the budget for the City of Great Falls 2019/2020 Community Development Block Grant (CDBG) Program and Home Investment Partnership Program (HOME). The City's community grant goals and priorities, recommended for the upcoming year, are described in detail in the Action Plan.

The Consolidated Plan and yearly Annual Action Plan are 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. Combining the submission requirements for these two programs 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 income households in Great Falls. These needs were identified primarily through the process undertaken to develop the CHAS, including four separate community surveys, individual interviews, focus groups and working groups during 2009, as well as two additional participatory meetings and an agency survey in early 2015. Census data and other published data were also reviewed to assist in identifying needs.

## **2. Summarize the objectives and outcomes identified in the Plan**

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

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In the Consolidated Plan, the City of Great Falls chose seven (7) objectives or goals, as displayed in the following table. The 2019 Annual Community Assessment allows the City to identify specific needs to address in the 2019-2020 Grant Year. The Goals identified in relation to community needs are: Economic Development, Residential Housing Rehabilitation, and Public Improvements. Additionally, the City will allocate 15% of CDBG funds to Public Services. It should be noted that all Residential Housing Rehabilitation projects will be serviced through the City's revolving loan fund.

1	<b>Goal Name</b>	Public Improvements
	<b>Goal Description</b>	Provide public facility and infrastructure assistance including handicap accessibility and energy efficiency improvements to provide a suitable living environment. The City of Great Falls will prioritize meeting handicap accessibility requirements in public facilities and infrastructure. Other activities that will be funded will primarily address structural deficiencies and basic code upgrades for public facilities and non-profit agencies that serve the general population.
2	<b>Goal Name</b>	Transitional Housing
	<b>Goal Description</b>	Provide assistance for transitional housing with supportive services benefitting homeless or special needs persons. Over the next five years, the City of Great Falls will fund qualified projects to construct or rehabilitate transitional housing with supportive services for the homeless, homeless youth, young parents under the age of 18 years, homeless single head of household families who do not meet criteria for public housing, victims of abuse, and others
3	<b>Goal Name</b>	Public Services
	<b>Goal Description</b>	Provide support to public service agencies operating programs that benefit low to moderate income persons. Over the next five years the City of Great Falls will provide funds to social service agencies to fund scholarships for child and youth day care/recreational/educational programs, purchase food for elderly home meal programs and other activities for the provision of services to low income people.
4	<b>Goal Name</b>	Homeownership
	<b>Goal Description</b>	Provide direct first-time homebuyer assistance to low to moderate income families. Partner agencies have included NeighborWorks Great Falls and Habitat for Humanity using HOME and non-HOME funding.
5	<b>Goal Name</b>	Housing Rehabilitation
	<b>Goal Description</b>	Provide construction and rehabilitation assistance for very low to moderate income homeowners, property owners with very low to moderate income rental units to upgrade the city's housing stock to meet standard building codes to provide and sustain safe, affordable housing. The City of Great Falls will provide loans to low income homeowners through the Deferred Payment Loan program. The City of Great Falls will provide loans to property owners to rehabilitate rental units that will be rented to low income people through the Rental Improvement Loan program.
6	<b>Goal Name</b>	Fair Housing
	<b>Goal Description</b>	Provide affordable housing opportunities for very low and low income renters, particularly the elderly and/or disabled. The City of Great Falls will continue to provide non-profit, social service agencies with CDBG funds to rehabilitate and subsidize rental housing for the elderly and/or disabled. Project-based rental assisted housing providers should apply for housing upgrades using CDBG dollars (Community Development Council) when available.
7	<b>Goal Name</b>	Economic Development
	<b>Goal Description</b>	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 of jobs for low to moderate income people. Such projects will include funding to the Great Falls Development Authority (GFDA) revolving loan fund to provide gap financing to existing and start-up businesses to create new jobs for low to moderate income people. Economic Development was recently allocated 10% of CDBG dollars in FY 2015 and this allocation is predicted to continue through the next five years.



## **2015-2019 Goals and Objectives**

### **3. Evaluation of past performance**

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

First looking at the Consolidated Plan, objectives from the previous 2010-2015 Consolidated Plan for the City of Great Falls have been maintained or reinforced for use as goals in the new 2015-2019 plan. A needs assessment meeting that was attended by 25 nonprofit agency representatives on March 3, 2015 asked participants, goal by goal, which priorities should be emphasized, kept in place, or removed based on current housing (and non-housing) conditions. No items were removed, with extensive public comment providing support for stated goals.

In preparation for the planning of the FY18 Grant Year and the Annual Action Plan, the City evaluated past performance. After careful review of the City's practices, it was decided to update the Grant Policies and Citizen Participation Plan to streamline the process to meet the City's current capacity and be more strategic to create a sustainable community grant program. Past performance demonstrated that the City was collaborating with multiple non-profit agencies, relying solely on sub-recipients to reach community goals. The City is now implementing practices that balance the use of sub-recipients and providing direct programming. Another policy change was to narrow the focus to strategically provide larger amounts of funding toward a goal to see a bigger impact. Past performance demonstrated that the City was funding many small grants. Another challenge that was identified is that public facility projects were difficult for non-profits to implement due to the federal requirements. Lastly, past performance also demonstrated that many of the same agencies continuously requested funding. The evaluation of these issues led to updating the Grant Policies, which continue to be implemented in the FY19 Grant Year. The community-identified FY19 Goals are:

#### **Residential Housing Rehabilitation**

Provide funding towards low interest loans for property owners, to assist very low to moderate income individuals to bring properties up to code, and upgrade the city's housing stock to provide safe, affordable housing.

#### **Economic Development**

Provide funding to assist with the creation of decent paying jobs with benefits for persons from low to moderate income households. In prior years the City has fulfilled this need by providing low-interest loans to new and expanding businesses. After meeting with Great Falls Development Authority, the City identified new opportunities to assist with economic growth. The City plans to encourage job creation

and business growth in the community by providing funding support for microenterprise activity, infrastructure installation, and alleviation of spot slum and blight.

### **Public Improvements**

Enhance public infrastructure such as sidewalks, curb ramps, City facility accessibility and playground equipment to enhance ADA access.

### **Public Services**

Provide funding toward public service projects specifically focused on addressing Youth Services/Childcare, Alcohol and Drug Treatment/Healthcare/Suicide Prevention, Senior Services, Employment Training, and Housing Counseling and Education. The Public Service priorities were identified through extensive community feedback. All public service projects must be new and/or expanding services that benefit low-to-moderate income persons.

## **4. Summary of Citizen Participation Process and consultation process**

Summary from citizen participation section of plan.

Achieving buy-in from members of the community, LMI residents as well as the nonprofit agency leaders who provide services to those residents, is critical to the effective use of CDBG funds throughout the 2015-2019 five year period, including the 2019 Annual Action Plan. A Citizen Participation Plan was approved in April of 2019, which outlines the Citizen Participation Process regarding the Annual Action Plan, Consolidated Plan, and CAPER. This Plan includes public hearings, public comment period, community survey, publishing in local newspapers, Neighborhood Council of Councils meeting, and engagement of community stakeholders. A copy of the Citizen Participation Plan (2019) can be found in Appendix C of this document and online at <http://www.greatfallsmt.net/planning/citizen-participation-plan>.

Two public meetings were used to gather citizen participation in the creation of the Consolidated Plan draft, and a final meeting to review the draft occurred on May 19, 2015 with no public comment. The comments and themes addressed in these meetings were transcribed and attached to this document. Twenty five public agencies, nonprofit agencies, and faith-based representatives attended the March 13, 2015 Community Input meeting, along with the mailing of nearly 200 agency surveys to these same agencies; 15 responded either by mail or email after indicating they could not attend the meeting.

The Comprehensive Housing Affordability Strategy (CHAS) sent surveys to over 1,400 city and county residents, including the targeting of LMI households. This process involved agency questionnaires, opinion surveys, needs assessment, homeless survey, focus group findings, a collection of past housing efforts, and funding sources. Many of the views and opinions within this particular document, combined with more recent participatory events, formed the goals and objectives within the 2015-2019 Consolidated Plan. See Appendix B for this extensive participatory process.

## **5. Summary of public comments**

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

A summary of public input sessions (Comprehensive Housing Affordability Strategy, Community Input meeting, etc) can be found in their respective Appendices.

No public comment was received during the draft 2015-2019 Consolidated Plan 30-day period, lasting from May 2 - May 31, 2015. No comments were provided at the May 19 City Commission public meeting, nor via email/mail or telephone correspondence.

All comments received during the 30-day comment period from April 17 – May 17, 2019, are summarized and/or attached to the 2019 Annual Action Plan.

## **6. 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 and Annual Action Plan where applicable.

## **7. Summary**

The needs of 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, coordination of public and nonprofit leaders seeks 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 solve needs indicated by the community. Great Falls is the only municipality in Montana with this position.

## PR-05 Lead & Responsible Agencies – 91.200(b)

### 1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the 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

**Table 1 – Responsible Agencies**

### Narrative (optional)

The Planning and Community Development Department is responsible for administering Community Development Block Grant (CDBG) and Home Investment Partnerships (HOME) programs within the City of Great Falls, Montana. A Consolidated Plan including Annual Action Plans are required by U.S. Housing and Urban Development (HUD) in order to receive federal assistance annually. The City of Great Falls has received these funds as an entitlement community and participating jurisdiction, respectively. The City Commission reviews and approves the Annual Action Plan and will continue to do so in 2019.

The City of Great Falls is seeking HUD approval for the 2019 Annual Action Plan in June 2019 following the required thirty (30) day public comment period and City Commission approval. The City program year begins July 1 and ends June 30.

### Consolidated Plan Public Contact Information

**On the web:** <http://www.greatfallsmt.net/planning/community-development-block-grant-cdbg-and-home-investment-partnership-home-grant-programs>

**Call:** (406) 455-8407 or (406) 455-8435

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



## **AP-10 Consultation – 91.100, 91.200(b), 91.215(l)**

### **1. Introduction**

Creation of the 2019 Annual Action Plan was 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). Nonprofit service agencies and affordable housing agencies were heavily involved in both the creation and fulfillment of past Consolidated Plan goals and objectives and are crucial to the further fulfillment of those goals throughout the five-year period.

Sources of public data used in creating the plan include: U.S. Department of Housing and Urban Development (HUD User, CHAS, Office of Community Planning and Development), National Low Income Housing Coalition, Montana Department of Public Health and Human Services (2014 and 2015 Montana Homeless Survey), Montana Human Rights Bureau (AI), and the U.S. Bureau of the Census. Individual interviews were used for updated information from partner agencies and all citizen participation meetings were documented as appendices with attendance.

### **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(l))**

The City enhances the coordination between public and assisted housing providers and private and governmental health, mental health, and service agencies by practicing the outreach efforts identified in the Citizen Participation Plan adopted on April 2, 2019. In addition to these outreach efforts, the City collaborates with multiple agencies to achieve the goals identified in the Consolidated Plan. As mentioned prior, the City partners with the Great Falls Housing Authority to fund a Fair Housing Program Specialist. The City is also actively engaged with the local Continuum of Care to assist with the collaboration of multiple agencies, including mental health and service agencies, to address homelessness. The City also partners with local Economic Development and Affordable Housing agencies to collaborate on enhancing community growth and providing opportunity for low-income individuals.

### **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 last survey was held on January 31, 2019 and included volunteers surveying the Great Falls area on foot.

The City will continue to help facilitate the local Continuum of Care for Homelessness (CoC) group. The CoC group now 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 homeless people. The City will assist with the facilitation of the meetings. The CoC meetings provide a networking opportunity and assistance in keeping funding options open for future HUD homeless grant funds. Since September 2017, the CoC has incorporated a Coordinated Entry System and bi-monthly Case Conferencing meetings. The progression of the CoC has allowed the community service providers to collaborate, partner, and offer wraparound services to address the community's need.

The City encourages local applications 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 addresses homelessness issues and is the main vehicle for organizations in Montana to apply for federal homeless grant funds. Unfortunately, the Great Falls community has not been awarded any federal homeless grant funds, despite the best efforts to submit applications to the State. If local agencies pursue projects through the MT CoCC, the CoC will continue to support all appropriate proposals. In addition, the City will continue to encourage application for federal homeless grant funds for such projects through the MT CoCC statewide application process. The City will remain proactive in attempting to bring federal homeless grant funds into the Great Falls community, as it is much needed.

The City will also encourage the 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 12 years, the City will cooperate with the MT CoCC as much as possible to meet whatever requirements are established.

The CoC group participates in the annual statewide housing status (homeless) survey which is undertaken to identify the number and demographics of homeless people in the state.

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

ESG funds are not projected from the city PY 2015-2019.

**2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities**

**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	NEIGHBORWORKS GREAT FALLS
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Education Regional organization Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Attended public meetings, responded/distributed community surveys, provided input on community needs, attends CoC meetings, and attended meetings with staff to better understand possible uses of HOME funds.
2	<b>Agency/Group/Organization</b>	Rural Dynamics, Inc.
	<b>Agency/Group/Organization Type</b>	Services-Education Services-Employment Regional organization Financial Education/Coaching
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Needs - Veterans
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Attended public meetings, responded to surveys, provided input on community needs

3	<b>Agency/Group/Organization</b>	GREAT FALLS DEVELOPMENT AUTHORITY
	<b>Agency/Group/Organization Type</b>	Services-Education Services-Employment Regional organization Planning organization Business Leaders Community Development Financial Institution
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Attended public meetings, responded to surveys, provided input on community needs, and attended multiple meetings with City staff to develop potential project ideas for proposed Economic Development funds.
4	<b>Agency/Group/Organization</b>	QUALITY LIFE CONCEPTS
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Employment Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Needs - Veterans
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Attended public meetings, responded to surveys, provided input on community needs

5	<b>Agency/Group/Organization</b>	MONTANA INSTITUTE OF FAMILY LIVING/PARK MANOR
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Elderly Persons Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Attended public meetings, responded to surveys, provided input on community needs
6	<b>Agency/Group/Organization</b>	GREAT FALLS AREA HABITAT FOR HUMANITY
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Education
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Attended public meetings, responded to surveys, provided input on community needs
7	<b>Agency/Group/Organization</b>	CITY PARK AND RECREATION - COMMUNITY RECREATION CENTER
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Persons with Disabilities Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Facilities/ADA Improvements



	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Attended public meetings, responded/distributed community surveys, and provided input on community needs.
8	<b>Agency/Group/Organization</b>	Great Falls Rescue Mission
	<b>Agency/Group/Organization Type</b>	Services-homeless Religious Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Attended public meetings, responded/distributed community surveys, provided input on community needs, and attends CoC meetings and bi-monthly case conferencing meetings
9	<b>Agency/Group/Organization</b>	Family Promise of Great Falls
	<b>Agency/Group/Organization Type</b>	Services-homeless Religious Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Attended public meetings, responded/distributed community surveys, provided input on community needs, and attends CoC meetings and bi-monthly case conferencing meetings
10	<b>Agency/Group/Organization</b>	CENTER FOR MENTAL HEALTH
	<b>Agency/Group/Organization Type</b>	Housing Services-Persons with Disabilities Services-Health Health Agency
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	They were consulted through the community survey and the CoC. The outcome will improve overall community collaborations. Attends monthly COC meetings and bi-monthly case conferencing meetings.
11	<b>Agency/Group/Organization</b>	Great Falls Senior Citizens Center
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons
	<b>What section of the Plan was addressed by Consultation?</b>	Anti-poverty Strategy Elderly Services/Need
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Responded/distributed community surveys and provided input on community needs
12	<b>Agency/Group/Organization</b>	Great Falls Public Housing Authority
	<b>Agency/Group/Organization Type</b>	PHA Service-Fair Housing Other government - Local

	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Attended public meetings, responded/distributed community surveys, provided input on community needs, and attends CoC meetings and bi-monthly case conferencing meetings
13	<b>Agency/Group/Organization</b>	INDIAN FAMILY HEALTH CLINIC
	<b>Agency/Group/Organization Type</b>	Services-Health Health Agency Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Responded/distributed community surveys, provided input on community needs, attends monthly COC meeting
14	<b>Agency/Group/Organization</b>	OPPORTUNITIES INCORPORATED
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-homeless Services-Health Services-Education Services-Employment Regional organization

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Attended public meetings, responded/distributed community surveys, provided input on community needs, and attends CoC meetings and bi-monthly case conferencing meetings; is the lead HMIS agency for Great Falls
15	<b>Agency/Group/Organization</b>	YOUNG PARENTS EDUCATION CENTER
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Education Services-Employment Service-Fair Housing Childcare
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Homelessness Strategy Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Responded/distributed community surveys, provided input on community needs, attends monthly COC meetings

16	<b>Agency/Group/Organization</b>	YWCA
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Victims of Domestic Violence Services-homeless Services - Victims
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Families with children
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Attended public meetings, responded/distributed community surveys, provided input on community needs, and attends CoC meetings and bi-monthly case conferencing meetings
17	<b>Agency/Group/Organization</b>	St. Vincent de Paul
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-homeless Food Boxes
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Needs - Veterans Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Attended public meetings, responded/distributed community surveys, provided input on community needs, provides funding support for the Fair Housing Specialist position, and attends CoC meetings and bi-monthly case conferencing meetings. Participant in April 2016 Veteran Homelessness Forum.
18	<b>Agency/Group/Organization</b>	VOLUNTEERS OF AMERICA
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-homeless Services-Employment



	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Families with children Homelessness Needs - Veterans
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Attends bi-monthly Case Conferencing meetings hosted by City, CoC meetings; participant in April 2016 Veteran Homelessness Forum

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

The City contacts local agencies through print media (newspapers), monthly Continuum of Care meetings, as well as through the 2010-2020 Comprehensive Housing Affordability Study (CHAS) undertaken over several years. Our community is noteworthy for its numerous existing social service and housing agencies and all play a key role in participatory and advisory sessions that shape our Annual Action Plan.

### 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	In 2017 multiple agencies assisted in creating a strategy for ending Veteran's homelessness and in 2019, the strategy continues to be implemented.
City of Great Falls Growth Policy Update	City of Great Falls	Dedicated Housing section informs needs for all four housing goals (fair, affordable, rental rehab, homeownership)

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

### Narrative (optional)

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. Malmstrom Air Force Base is also adjacent but outside city limits. 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. The City of Great Falls has multiple building inspectors, one of whom is Lead Certified. Additionally, the City’s Community Loan Specialist is Lead Certified and will be consulted with all Lead-Based Paint Strategies for HOME and CDBG projects.

## **AP-12 Participation – 91.105, 91.200(c)**

### **1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting**

The FY19 Goals are completely driven by community input through a community survey, Neighborhood Council of Councils meeting, public hearing, and public comment period. The City intentionally provided multiple avenues of public engagement to ensure the priority-setting process was community driven and inclusive. The FY19 Goals utilize the community's identified priorities, which allows for strategic funding in areas of need. These funding priorities will be used by City Staff as a guideline for awards throughout the year.

## Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Hearing	Non-targeted/broad community	Notice of public hearing was given in the local news publication according to HUD guidelines. Additional, direct outreach was made to neighborhood councils and key stakeholder agencies. One stakeholder agency attended the public hearing and made comments regarding community outreach, specifically about focus groups.	The stakeholder agency in attendance provided comments regarding community outreach, specifically about focus groups.	No comments were rejected.	
2	Public Meeting	Non-targeted/broad community	Attended Neighborhood Council of Councils Meeting on 1/29/19		No comments rejected.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Community Survey	Non-targeted/broad community	The Community Survey was available to the public January 14 - February 18, 2019. It was available online as well as at the Planning and Community Development office and the City's Public Library. The City received 318 survey responses.	Community responses reflected the following priorities for the use of CDBG and HOME funds: Residential Housing Rehabilitation, Economic Development, and Public Improvements.	No comments rejected.	



4	Stakeholder Meetings	One-on-One Stakeholder Agency Meetings	One-on-one stakeholder agency meetings were held with lead agencies within the community.	The City met with Great Falls Development Authority, the lead Economic Development stakeholder in Great Falls, to discuss the need in the community and best practices to address those needs. Through the discussion with GFDA, two key strategies were identified: Microenterprise Assistance and Infrastructure Improvements. The City also met with NeighborWorks Great Falls, the largest Affordable Housing provider and developer in Great Falls, to discuss housing	No comments rejected.	
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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
				needs and strategies for HOME Grant funding.		

**Table 4 – Citizen Participation Outreach**

## Expected Resources

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

#### Introduction

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

The expected resources include the CDBG and HOME Federal Grant Funds annual allocation as an Entitlement City. The grant amounts are estimated using last year's allocation. If the grant funding comes in above or below the expected amount identified in the Priority Table below, the project allocations (AP-38 Projects Summary) will be adjusted based on the percentage increased or decreased.

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	794,666	522,540	561,754	1,878,960	1,878,960	CDBG funds are anticipated to be \$700,000 annually for the program years 2016-2020, program income includes revolving loan funds and is estimated based on prior year.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	273,088	273,288	637,410	1,183,786	1,183,786	HOME funds are anticipated to be \$180,000 annually for the program years 2016-2020, program income includes revolving loan fund and is estimated based on prior year. All HOME funded projects, except planning and admin, will include a 25% match of non-federal funds by the subrecipient facilitating the project.
General Fund	public - local	Admin and Planning Public Improvements Public Services	0	0	0	0	0	
Other	public - federal	Other	475,515	0	0	475,515	0	CDBG-CV Funds to be used to prevent, prepare for and respond to the COVID-19 Coronavirus.

**Table 5 - 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**

**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.

**Discussion**

N/A

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
<b>1</b>	Public Improvements	2016	2020	Public Housing Non-Homeless Special Needs Non-Housing Community Development	City of Great Falls	Public Improvements	CDBG: \$372,144	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 4624 Persons Assisted
<b>3</b>	Public Services	2016	2020	Non-Homeless Special Needs Non-Housing Community Development	City of Great Falls	Public Services	CDBG: \$104,235	Public service activities other than Low/Moderate Income Housing Benefit: 491 Persons Assisted
<b>4</b>	Homeownership	2016	2020	Affordable Housing	City of Great Falls	Homeownership Housing Rehabilitation	HOME: \$1,115,515	Homeowner Housing Added: 5 Household Housing Unit Homeowner Housing Rehabilitated: 5 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Housing Rehabilitation	2016	2020	Affordable Housing	City of Great Falls	Fair and Affordable Rental Housing Housing Rehabilitation Public Services	CDBG: \$764,024	Rental units constructed: 5 Household Housing Unit Rental units rehabilitated: 5 Household Housing Unit Homeowner Housing Rehabilitated: 10 Household Housing Unit
7	Economic Development	2016	2020	Non-Housing Community Development Economic Development	City of Great Falls	Economic Development	CDBG: \$418,662	Jobs created/retained: 10 Jobs

**Table 6 – Goals Summary**

## Goal Descriptions

1	<b>Goal Name</b>	Public Improvements
	<b>Goal Description</b>	The 2019 annual community needs assessment identified Public Improvements as the third priority. The allocation will provide funding to enhance public infrastructure such as sidewalks, curb ramps, City facility accessibility and playground equipment to enhance ADA access.



<b>3</b>	<b>Goal Name</b>	Public Services
	<b>Goal Description</b>	The 2019 annual community needs assessment identified Public Services as the sixth priority. This will provide funding towards public service projects, specifically focused on addressing Youth Services/Childcare; Alcohol and Drug Treatment/Healthcare/Suicide Prevention; Senior Services; Employment Training; and Housing Education and Counseling. 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.
<b>4</b>	<b>Goal Name</b>	Homeownership
	<b>Goal Description</b>	HOME Investment Partnership Program (HOME) funds will be utilized towards new construction and homeownership. HOME funds, approximately \$858,423, will be able to be granted to continue to further the City's mission to improve and grow the 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.
<b>5</b>	<b>Goal Name</b>	Housing Rehabilitation
	<b>Goal Description</b>	The annual community assessment identified Residential Housing Rehab as the first priority. The goal is to provide construction and rehabilitation assistance for very low to moderate income homeowners, property owners with very low to moderate income rental units to upgrade the city's housing stock to meet standard building codes to provide and sustain safe, affordable housing. The City of Great Falls will provide loans to low income homeowners through the Deferred Payment Loan program. The City of Great Falls will provide loans to property owners to rehabilitate rental units that will be rented to low income people through the Rental Improvement Loan program.
<b>7</b>	<b>Goal Name</b>	Economic Development
	<b>Goal Description</b>	The community identified the need of Economic Development funding to assist with the creation of decent paying jobs with benefits for persons from low to moderate income households. In prior years the City has fulfilled this need by providing low-interest loans to new and expanding businesses. After meeting with Great Falls Development Authority, the City identified new opportunities to assist with economic growth. In FY19 the City will provide funding towards Microenterprise Assistance and Infrastructure with the ultimate goal of job creation.

## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

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

Five projects are exclusively funded through the CDBG program, whereas the Fair Housing Program will be a partnership with the Great Falls Housing Authority. The CDBG program is proposed to fund Residential Housing Rehab, Economic Development, Public Improvements, Public Services, the Loan Program Specialist, and a Fair Housing Program Specialist. Public Service projects will not exceed the 15% HUD limitation. The City will accept applications starting July 1st, 2019 that will address the strategic annual goals.

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

#### Projects

#	Project Name
1	2019 Residential Housing Rehab
2	2019 Economic Development
3	2019 Public Improvements
4	2019 Public Services
5	2019 Fair Housing Specialist
6	2019 Loan Program Specialist
7	2019 CDBG/HOME Administration
8	2019 HOME Investment Partnership Program
9	2019 CHDO Project
10	CV-Public Services
11	CV-Economic Development
12	CV-CDBG Admin

**Table 7 - Project Information**

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

The funding allocation priorities recommended are completely driven by community input through a

community survey, neighborhood council meetings, 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 chosen top three priorities, as well as continue to allocate a percentage of funds to Public Services not to exceed the 15% limit set by HUD. 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. For amendments staff will take into consideration the previous survey and public input and will also hold a public hearing and public comment period in accordance with the Citizen Participation Plan.

**AP-38 Project Summary**  
**Project Summary Information**

1	<b>Project Name</b>	2019 Residential Housing Rehab
	<b>Target Area</b>	City of Great Falls
	<b>Goals Supported</b>	Housing Rehabilitation
	<b>Needs Addressed</b>	Housing Rehabilitation Fair and Affordable Rental Housing
	<b>Funding</b>	CDBG: \$764,259
	<b>Description</b>	This will provide funding towards low interest loans for property owners, to assist very low to moderate income individuals to bring properties up to code, and upgrade the city's housing stock to provide safe, affordable housing.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	15 LMI Families will benefit from the proposed activity.
	<b>Location Description</b>	City of Great Falls
2	<b>Planned Activities</b>	This will provide funding towards low interest loans for property owners, to assist very low to moderate income individuals to bring properties up to code, and upgrade the city's housing stock to provide safe, affordable housing.
	<b>Project Name</b>	2019 Economic Development
	<b>Target Area</b>	City of Great Falls
	<b>Goals Supported</b>	Economic Development
	<b>Needs Addressed</b>	Economic Development
	<b>Funding</b>	CDBG: \$418,662
	<b>Description</b>	The community identified the need of Economic Development funding to assist with the creation of decent paying jobs with benefits for persons from low to moderate income households. In prior years the City has fulfilled this need by providing low-interest loans to new and expanding businesses. After meeting with Great Falls Development Authority, the City identified new opportunities to assist with economic growth. In FY19 the City will provide funding towards Microenterprise Assistance and Infrastructure with the ultimate goal of job creation.
	<b>Target Date</b>	6/30/2020

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	10 jobs will be created for LMI individuals from the proposed activity.
	<b>Location Description</b>	City of Great Falls
	<b>Planned Activities</b>	The community identified the need of Economic Development funding to assist with the creation of decent paying jobs with benefits for persons from low to moderate income households. In prior years the City has fulfilled this need by providing low-interest loans to new and expanding businesses. After meeting with Great Falls Development Authority, the City identified new opportunities to assist with economic growth. In FY19 the City will provide funding towards Microenterprise Assistance and Infrastructure with the ultimate goal of job creation.
<b>3</b>	<b>Project Name</b>	2019 Public Improvements
	<b>Target Area</b>	City of Great Falls
	<b>Goals Supported</b>	Public Improvements
	<b>Needs Addressed</b>	Public Improvements
	<b>Funding</b>	CDBG: \$372,144
	<b>Description</b>	This project will provide funding to enhance public infrastructure such as sidewalks, curb ramps, City facility accessibility and playground equipment to enhance ADA access. The Public Improvements designation will include that, at minimum, 20% of the total annual budget must be specifically allocated to retrofit ADA Access projects.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	These projects will primarily provide an area benefit to LMI Families.
	<b>Location Description</b>	City of Great Falls
	<b>Planned Activities</b>	This project will provide funding to enhance public infrastructure such as sidewalks, curb ramps, City facility accessibility and playground equipment to enhance ADA access. The Public Improvements designation will include that, at minimum, 20% of the total annual budget must be specifically allocated to retrofit ADA Access projects.

4	<b>Project Name</b>	2019 Public Services
	<b>Target Area</b>	City of Great Falls
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$83,077
	<b>Description</b>	This will provide funding towards public service projects, specifically focused on addressing Youth Services/Childcare, Alcohol and Drug Treatment/Healthcare/Suicide Prevention, Senior Services, Employment Training, 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.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	50 LMI Families will benefit from the proposed activity.
	<b>Location Description</b>	City of Great Falls
	<b>Planned Activities</b>	This will provide funding towards public service projects, specifically focused on addressing Youth Services/Childcare, Alcohol and Drug Treatment/Healthcare/Suicide Prevention, Senior Services, Employment Training, and Housing Counseling and Education.
5	<b>Project Name</b>	2019 Fair Housing Specialist
	<b>Target Area</b>	City of Great Falls
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Fair and Affordable Rental Housing
	<b>Funding</b>	CDBG: \$21,158
	<b>Description</b>	Partner with Great Falls Housing Authority to provide funding towards a Fair Housing Specialist, to ensure Fair Housing needs are addressed within the City through education, collaboration, and case management. This position also engages with the local Continuum of Care on the Coordinated Entry System process to house homeless individuals.
	<b>Target Date</b>	6/30/2020

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	130 LMI Families will benefit from the proposed activity.
	<b>Location Description</b>	City of Great Falls
	<b>Planned Activities</b>	Partner with Great Falls Housing Authority to provide funding towards a Fair Housing Specialist, to ensure Fair Housing needs are addressed within the City through education, collaboration, and case management.
<b>6</b>	<b>Project Name</b>	2019 Loan Program Specialist
	<b>Target Area</b>	City of Great Falls
	<b>Goals Supported</b>	Housing Rehabilitation
	<b>Needs Addressed</b>	Housing Rehabilitation
	<b>Funding</b>	CDBG: \$60,727
	<b>Description</b>	Administrative staff to facilitate Rehab Loan Program.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	15 LMI Families will benefit from the proposed activity.
	<b>Location Description</b>	City of Great Falls
	<b>Planned Activities</b>	Administrative staff to facilitate Rehab Loan Program.
<b>7</b>	<b>Project Name</b>	2019 CDBG/HOME Administration
	<b>Target Area</b>	City of Great Falls
	<b>Goals Supported</b>	Public Improvements Public Services Homeownership Housing Rehabilitation Economic Development



	<b>Needs Addressed</b>	Public Improvements Public Services Homeownership Housing Rehabilitation Fair and Affordable Rental Housing Economic Development
	<b>Funding</b>	CDBG: \$158,933 HOME: \$27,308
	<b>Description</b>	Staff to Administer, Manage, and Monitor the CDBG and HOME Grant.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A- Staff to Administer, Manage, and Monitor the CDBG and HOME Grant.
	<b>Location Description</b>	City of Great Falls
	<b>Planned Activities</b>	Staff to Administer, Manage, and Monitor the CDBG and HOME Grant.
8	<b>Project Name</b>	2019 HOME Investment Partnership Program
	<b>Target Area</b>	City of Great Falls
	<b>Goals Supported</b>	Homeownership Housing Rehabilitation
	<b>Needs Addressed</b>	Homeownership Housing Rehabilitation Fair and Affordable Rental Housing
	<b>Funding</b>	HOME: \$1,115,515
	<b>Description</b>	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 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.
	<b>Target Date</b>	6/30/2020

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	10 LMI Families will benefit from the proposed activity.
	<b>Location Description</b>	City of Great Falls
	<b>Planned Activities</b>	HOME Investment Partnership Program (HOME) funds towards new construction and homeownership. HOME funds, approximately will be granted to continue the City's mission to improve and grow the 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.
<b>9</b>	<b>Project Name</b>	2019 CHDO Project
	<b>Target Area</b>	City of Great Falls
	<b>Goals Supported</b>	Homeownership Housing Rehabilitation
	<b>Needs Addressed</b>	Homeownership Housing Rehabilitation Fair and Affordable Rental Housing
	<b>Funding</b>	HOME: \$40,963
	<b>Description</b>	15% set-aside for HOME CHDO Project
	<b>Target Date</b>	7/1/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	At least 2 Low-Income Households will benefit from this project
	<b>Location Description</b>	City of Great Falls
	<b>Planned Activities</b>	Increasing the affordable housing stock.
<b>10</b>	<b>Project Name</b>	CV-Public Services
	<b>Target Area</b>	City of Great Falls
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Public Services

	<b>Funding</b>	CDBG-CV: \$190,206
	<b>Description</b>	Public service activities specifically to LMI individuals. This includes but is not limited to providing equipment, supplies, and materials to new or expanding public service activities that are directly related to prevent, prepare for, or respond to the Coronavirus.
	<b>Target Date</b>	6/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	30 LMI families will be served
	<b>Location Description</b>	All activities will be undertaken within the City of Great Falls.
	<b>Planned Activities</b>	Public service activities specifically to LMI individuals. This includes but is not limited to providing equipment, supplies, and materials to new or expanding public service activities that are directly related to prevent, prepare for, or respond to the Coronavirus.
11	<b>Project Name</b>	CV-Economic Development
	<b>Target Area</b>	City of Great Falls
	<b>Goals Supported</b>	Economic Development
	<b>Needs Addressed</b>	Economic Development
	<b>Funding</b>	CDBG-CV: \$190,206
	<b>Description</b>	Assistance to private for profit entities and microenterprise businesses to assist with economic development activities, to include job retention. All economic development assistance activities will be directed to the prevention, preparation for, and response to the Coronavirus.
	<b>Target Date</b>	6/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	5 LMI jobs will be created/retained and 5 businesses will be assisted.
	<b>Location Description</b>	All activities will be undertaken within the City of Great Falls.

	<b>Planned Activities</b>	Assistance to private for profit entities and microenterprise businesses to assist with economic development activities, to include job retention. All economic development assistance activities will be directed to the prevention, preparation for, and response to the Coronavirus.
<b>12</b>	<b>Project Name</b>	CV-CDBG Admin
	<b>Target Area</b>	City of Great Falls
	<b>Goals Supported</b>	Public Services Economic Development
	<b>Needs Addressed</b>	Public Services Economic Development
	<b>Funding</b>	CDBG-CV: \$95,103
	<b>Description</b>	Staff to Administer, Manage, and Monitor the CDBG Grant.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	All activities will be undertaken within the City of Great Falls.
	<b>Planned Activities</b>	Staff to Administer, Manage, and Monitor the CDBG Grant.

## **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. The city does not have any census tract areas of minority concentration based on Federal Financial Institutions Examination Council (FFIEC) data. Low-income concentration, defined as an area where 51% of the population has income at or below 80% AMI, are located in census tracts 4, 7, 9, 16, 21, and 108.

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
City of Great Falls	100

**Table 8 - Geographic Distribution**

### **Rationale for the priorities for allocating investments geographically**

The City of Great Falls does not allocate funding priorities based on a geographic basis. 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 in an area need and focus efforts in LMI census tracts with 51% LMI residents. That is the only distinction that is made by the City of Great Falls.

### **Discussion**

## Affordable Housing

### 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 9 - 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	7
Rehab of Existing Units	8
Acquisition of Existing Units	0
Total	15

**Table 10 - One Year Goals for Affordable Housing by Support Type**

#### Discussion

## **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 make safe, basic, affordable housing for qualified residents.

The 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.

The 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 home for Housing Quality Standards and subsidizes the rent for the approved client.

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

CDBG funds were awarded to the GFHA in 2015 for redesign, removal, and replacement of all concrete, asphalt, sidewalks, parking lots, and ADA ramps around their Holland Court housing units. Eight units are currently ADA accessible units.

CDBG funds were awarded to the GFHA in 2016 to replace the existing fire alarm system in their Austin Hall apartments with a new system that is up to code. All apartments within Austin Hall serve as homes for the elderly or people who need housing assistance due to a disability. Five units are currently ADA accessible units.

CDBG funds were awarded to the GFHA in 2017 to replace two new boilers and a security door entry system in their Austin Hall apartments and 40 new furnaces in Parkdale Community.

### **Actions to encourage public housing residents to become more involved in management and participate in homeownership**

The GFHA does not provide direct involvement in management and 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.

**Discussion**



## **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.

Transitional housing with supportive services is identified as one of the priority needs for individuals and families who are homeless, as well as special populations such as teenagers, young parents, ex-felons or people who have mental illness. To meet this need, The City will support development of transitional housing or other housing options for homeless people or people who are at risk of becoming homeless if appropriate application is made for CDBG/HOME funding for new construction or rehabilitation projects.

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. In addition, the City will encourage application for federal homeless grant funds for such projects through the MT CoCC statewide application process.

### **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 will also continue to work with a number of organizations within the city 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, and Rural Dynamics, Inc., provide services to help prevent homelessness.

The City of Great Falls does not provide direct assistance to homeless outreach programs. There are a

number of agencies that provide special outreach services for homeless persons and their individual needs.

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

During the 2019/2020 program year, the City of Great Falls will provide grant funding towards addressing the housing needs of homeless persons through public service activities and a 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 71 beds available in the men's shelter and 74 beds in the women and family shelter. The number of people who can be housed at the women and family shelter depends on the composition of the family. In an emergency such as life threatening weather, the Rescue Mission will also provide an additional 20 mats on the floor for men and five mats and foldaway cribs for women and 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

office provides opportunities for training for landlords and tenants on how to avoid evictions. NeighborWorks Great Falls offers foreclosure prevention loans, 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 will have an adult case manager who will provide outreach and wellness checks for chronically homeless people. The Center will do outreach with the mentally ill homeless population and will evaluate to determine whether symptoms of a mental disorder are evident. The agency will coordinate 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. will provide support to chronically homeless people through screening for homelessness issues during intake, referrals, limited case management, financial assistance and job training assistance.

The YWCA will provide 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 will provide 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. A complete re-write was undertaken and the Unified Land Development Code was adopted in 2005. The new code implements the City's comprehensive plan, Missouri River Corridor Plan, neighborhood plans and its 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 increased in recent years, but this is due to other factors previously described rather than the cost of meeting code requirements. The City Building Official reports there is the perception costs of 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 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 City works with homeowners to educate them on ways to reduce the cost of permitting whenever possible. The timeline for permitting is currently a 10-day turnaround time based on approved drawings, and there is good accessibility to inspections and access to inspectors. However, the time line for annexation is properties is approximately four months.

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 size, setback or building fees are available to developers of affordable housing. Creating such incentives has been discussed. Currently, no affordable housing zoning ordinances exist. In order to build homes on small lots, a zoning variance is needed through the City's Board of Adjustment. This board has meetings scheduled monthly.

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 also dictate the quality, permanence, safety and environmental

aspects of a 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 public and parties 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.

#### **Discussion:**

The 2015-2019 Analysis of Impediments to Fair Housing, as part of the 2015-2019 Consolidated Plan, provides greater detail into the barriers and impediments to both fair and affordable housing in our community.

## **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 2019/2020 program year the PCD will administer over one million dollars in funding for projects in affordable housing, public facilities, and public services areas. These funds come from both federal dollars and program income.

### **Actions planned to address obstacles to meeting underserved needs**

The CDBG and HOME programs will fund activities which assist in meeting the needs of individuals who are handicapped and/or underserved.

The following projects proposed for allocation of 2019/2020 CDBG funds will benefit people with disabilities: 1) at least 20% of the annual allocation dedicated to ADA Access Projects; and 2) a Fair Housing Program Specialist dedicated to community outreach and case management.

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 highest priorities to be addressed by the City. The City proposes to allocate \$1,500,000 from the HOME Grant, Residential Rehab Program, and Fair Housing Program annual budgets to affordable housing activities. 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). Thus far, NeighborWorks Great Falls is the only CHDO in the community, they will be allocated at least. The majority of the projects which will address affordable housing will be implemented through a variety of City and nonprofit housing programs.

### **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 and the only added cost to the homeowner is 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 2019/2020 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 15% of the CDBG Budget, approximately \$119,999 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, Senior Services, Employment Training, 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**

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

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The City will pay for lead-based paint testing on all projects through the City's housing rehabilitation programs and the only added cost to the homeowner is 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 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 encourage collaboration and to help reduce duplication of programs. The City will emphasize efficient service delivery for local, state and federal programs and identify and overcome gaps in 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 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 also 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 needed services and coordinate delivery of services for homeless people. The City will continue its close working relationship



with the 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 2016. The City will do environmental reviews for all Housing Authority sponsored construction and rehabilitation projects; therefore, the City will be aware of and review any proposed development sites or proposed demolition of public housing.

The City will work with both private and public organizations to provide open communication that will allow for greater information flow regarding housing and social services to be provided to the public.

**Discussion:**

## Program Specific Requirements

### AP-90 Program Specific Requirements – 91.220(l)(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 identifies program income that is available for use that is included in projects to be carried out.

#### Community Development Block Grant Program (CDBG)

##### Reference 24 CFR 91.220(l)(1)

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

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
<b>Total Program Income:</b>	<b>0</b>

#### 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:

Thus far, 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 have been granted to NHS for its Owners in Partnership (OIP) program where NHS operates as the owner and developer of the properties. NHS is the City's only Community Housing Development Organization (CHDO). Also, NHS has used HOME funds for first-time homebuyer's down payment and closing cost assistance as a HOME grant sub-recipient. The HOME funds will be secured with a deed restriction.

All NHS HOME program income, including 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 to NHS to be used for down payment assistance to another qualifying buyer.

All HOME funded activities for homebuyer assistance and rehabilitation will be within the HOME affordable homeownership limits, based on the 95% median purchase price of the area determined by Federal FHA single family mortgage program data, provided by HUD annually for Cascade County. Please visit <https://www.hudexchange.info/resource/2312/home-maximum-purchase-price-after-rehab-value/> for the 2018 HOME limits.

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:

Eligible applicants for the City's HOME Grant program, include non-profit organizations with housing experience. The application is available on the City's website and a paper copy is available upon request. Completed applications are accepted year-round in a first-come first-serve basis within the grant cycle of July 1, 2019-June 30,2020. The City solicits applications through various public outreach methods; such as press releases, media interviews, and direct contact with the local non-profits.

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)

- Equity share provision upon resale of the home purchased with HOME fund assistance
  - 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 the 2015-2019 Consolidated Plan as **Appendix G.**
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 secured by multifamily housing that is rehabilitated with HOME funds.

## Attachments

## Citizen Participation Comments

 <b>City of Great Falls</b> <b>CDBG/HOME Annual Action Plan Schedule</b>	
Public Needs Assessment- Neighborhood Councils (1/29/19 Council of Councils), and Community Survey	January 14, 2019- February 18, 2019
<b>City Commission Work Session</b> to review Community Survey Results, <b>City Commission Meeting</b> to set date for Public Needs Hearing	Tuesday March 5, 2019 (Agenda Report Due 2/21/19)
<b>City Commission Meeting</b> to vote on Grant Policies and <i>Citizen Participation Plan</i> , <u>Public Needs Hearing</u>	Tuesday April 2, 2019 (Agenda Report Due 3/19/19)
<b>City Commission Work Session</b> to review Staff recommendation on funding priorities	Tuesday April 16, 2019
30-day comment period for proposed 2019/2020 Annual Action Plan	April 17, 2019 – May 17, 2019
<b>City Commission Meeting</b> to review and vote on the Annual Action Plan	Tuesday June 4, 2019 (Agenda Report Due 5/23/19)
ConPlan/Annual Action Plan submitted to HUD	By June 30, 2019

Staff attendance at Council of Councils - 1/29/19

## Community Grant Survey Distribution List

### Organization

Boys and Girls Club  
Cascade County Self Help Law Center  
Center For Mental Health  
Family Connections  
Great Falls Development Authority  
Great Falls Housing Authority  
Great Falls Public Library  
Great Falls Public Schools District Office  
Great Falls Rescue Mission  
Great Falls Senior Center  
Habitat for Humanity  
Indian Family Health  
Meals on Wheels  
Missouri River Youth Home  
NeighborWorks Great Falls  
North Central Independent Living  
Opportunities, Inc.  
Paris Gibson Square  
Park Manor  
Quality of Life Concepts  
Rural Dynamics, Inc.  
St. Vincent de Paul of North Central Montana  
United Way of Cascade County  
Young Parents Education Fund  
Youth Dynamics  
YWCA

## Community Grant Survey Results

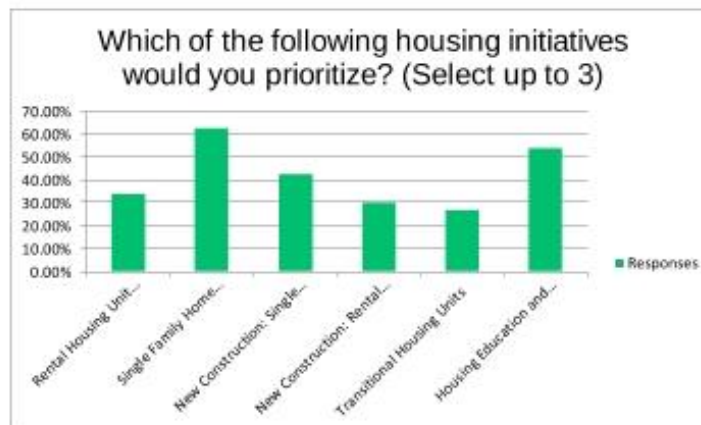
<b>Q1 Public Improvements:</b> Enhance public infrastructure such as sidewalks, curb ramps, City Park accessibility and playground equipment to enhance ADA access, to further the City's ADA Transition Plan.									
Strongly Agree		Agree		Neutral		Disagree		Strongly Disagree	
28.80%	91	40.82%	129	19.94%	63	5.38%	17	5.06%	16
Answered: 316		Weighted Average: 2.17							
Skipped: 2		Rank: 3 of 6							
<b>Q2 Transitional Housing:</b> Increase transitional housing opportunities within the community. Transitional housing is designed to provide homeless individuals and families with the interim stability and support to successfully move to and maintain permanent housing. ( <a href="http://www.hudexchange.info">www.hudexchange.info</a> )									
Strongly Agree		Agree		Neutral		Disagree		Strongly Disagree	
19.37%	61	41.90%	132	21.59%	68	13.33%	42	3.81%	12
Answered: 315		Weighted Average: 2.40							
Skipped: 3		Rank: 5 of 6							
<b>Q3 Public Services:</b> Provide support to public service agencies so they can provide new and/or expanding services that benefit low to moderate income persons.									
Strongly Agree		Agree		Neutral		Disagree		Strongly Disagree	
18.06%	56	38.71%	120	28.39%	88	10.32%	32	4.52%	14
Answered: 310		Weighted Average: 2.45							
Skipped: 8		Rank: 6 of 6							
<b>Q4 Residential Housing Rehabilitation:</b> Provide low-interest rehabilitation loans for very low to moderate income property owners to bring properties up to code and upgrade the City's housing stock to provide safe, affordable housing.									
Strongly Agree		Agree		Neutral		Disagree		Strongly Disagree	
36.22%	113	43.91%	137	12.18%	38	5.13%	16	2.56%	8
Answered: 312		Weighted Average: 1.94							
Skipped: 6		Rank: 1 of 6							
<b>Q5 Homeownership:</b> Provide funding to increase the construction of new affordable housing stock for homeownership for low to moderate income families.									
Strongly Agree		Agree		Neutral		Disagree		Strongly Disagree	
35.03%	110	27.71%	87	20.38%	64	13.06%	41	3.82%	12
Answered: 314		Weighted Average: 2.23							
Skipped: 4		Rank: 4 of 6							
<b>Q6 Economic Development:</b> Provide low-interest loans to new and expanding businesses that will create decent paying jobs with benefits for persons from low to moderate income households.									
Strongly Agree		Agree		Neutral		Disagree		Strongly Disagree	
37.70%	118	40.89%	128	13.42%	42	4.47%	14	3.51%	11
Answered: 313		Weighted Average: 1.95							
Skipped: 5		Rank: 2 of 6							



### Community Grant Survey Results

Which of the following housing initiatives would you prioritize? (Select up to 3)

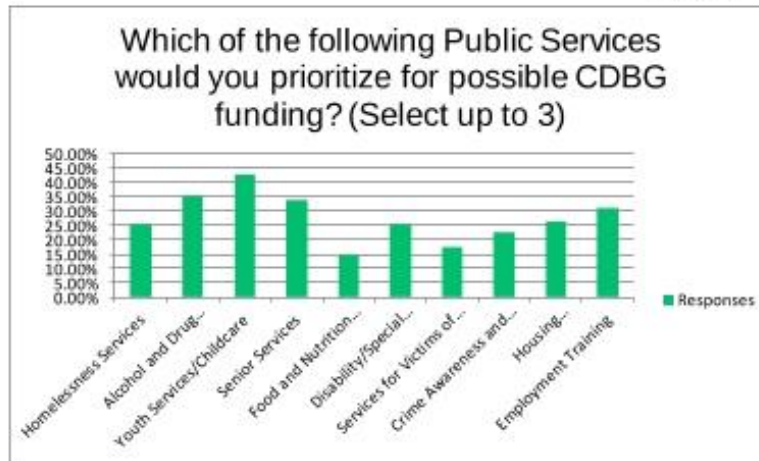
Answer Choices	Responses	
Rental Housing Unit Rehabilitation	33.65%	105
Single Family Home Rehabilitation	62.50%	195
New Construction: Single Family Homes	42.31%	132
New Construction: Rental Units (apartments, duplexes, etc.)	29.81%	93
Transitional Housing Units	26.60%	83
Housing Education and Counseling for Renters, Homebuyers, and Homeowners	53.85%	168
<b>Answered</b>		<b>312</b>
<b>Skipped</b>		<b>6</b>



### Community Grant Survey Results

Which of the following Public Services would you prioritize for possible CDBG funding? (Select up to 3)

Answer Choices	Responses	
Homelessness Services	25.55%	81
Alcohol and Drug Treatment/Healthcare/Suicide Prevention	35.33%	112
Youth Services/Childcare	42.90%	136
Senior Services	33.75%	107
Food and Nutrition Services	14.83%	47
Disability/Special Needs Services	25.55%	81
Services for Victims of Domestic Violence	17.67%	56
Crime Awareness and Prevention	22.40%	71
Housing Counseling/Financial Education	26.18%	83
Employment Training	31.23%	99
Answered		317
Skipped		1



### Community Grant Survey Results

If you have any other ideas about future priorities for the City's use of CDBG funds, please include them here. Thank you!	
Responses	
1	The best use of these dollars would be in a way that helps address multiple issues. If new construction takes down a severely blighted property, you've not only built a house, you've lifted up the whole neighborhood and probably reduced crime. New construction provides the community the best return on investment. Without CDBG funds, that cannot happen, and the whole community suffers.
2	curbs and gutters
3	Fund things that actually help tax paying, responsible citizens. Not in favor of More low income rental property/housing, particularly with the vast majority of money awarded to NeighborWorks GF.
4	increase services for mental health assistance
5	Park upkeep
6	We need more homes that families can afford to rent and buy, so some CDBG should be dedicated to new homes and apartments.
7	Nothing at the moment but will think further
8	Do not give any money to organizations related to City Commissioners.
9	make our city great and more businesses
10	The city should utilize the money itself to help the widest variety of citizens with essential needs like food and shelter. The city SHOULD NOT give the money to non-profits, such as Paris Gibson Square Museum (which is a non-essential service). Also NeighborWorks and other organizations that have damaged the public trust through past abuse of CDBG conflicts of interest SHOULD NOT get any money.
11	Pledge money to build an large events center at Fairgrounds. Net result: city growth, jobs, new hotels, more shopping, more food venues, downtown development, etc. You have to spend money to grow this city or we will die a slow and painful death.
12	A new indoor pool.....!
13	Keep up the good work.
14	City park renovation and maintenance.
15	Collaboration with workforce services to create more career skills training (online subscription services like Lynda.com - Udemy or onsite journeyman recruitment). Unless those funds cannot be used for such a venture.

### Community Grant Survey Results

16	Economic development is very important, I would like to see the city fund economic development.
17	These suggested ones are great. Housing in any form.
18	Improve year round indoor recreation facilities with warm hydrotherapy swimming pool in partnership with MT State. AND build solar powered bus shelter at East end of town in partnership with Transit District. (these are health and safety priorities for a livable city)
19	I would like to see more focus on neighborhood rehabilitation instead of whole subdivisions that are new construction. I believe Great Falls needs more urban re-development and it needs to be focused on whole neighborhoods.
20	Homeless teen housing options and non-criminal group home care for teens
21	Teardown old abandoned buildings
22	Maintain the assets we have rather than close them such as the Natatorium. What a loss and a waste!
23	Please use the funds for economic development.
24	Drug testing for all applicants!!!
25	The income limit for the Residential Housing Rehabilitation is too low for low earning but double income families. A 10,000 repair is still to much for medium income paycheck to paycheck people.
26	recreational trails
27	Develop zoning tightly so the city commission could not willey nilley change it to benefit some rather ill thought out project
28	Thanks
29	Parking Garage Updates
30	Most other cities use the CDBG funds to aid economic development. We need to concentrate our efforts there.
31	ADA compliance
32	Funding to Neighborworks to revitalize neighborhoods.

### Community Grant Survey Results

33	<p>When I see the above list of needs, I also think of all the community agencies who are attempting to make a positive difference for people needing the service and also our community.</p> <p>How do we as a community prioritize these needs and how do we better coordinate the time and energy towards these needs?</p> <p>I encouraged United Way to add a question and metrics to gauge effectiveness in their agency application process. After awhile of participating in the allocations process, I found myself asking "so what" when it seemed the needs and amount of funding never changed. It indicated to me the most advantageous solution had not yet been discovered.</p>
34	None
35	Prioritizing affordable housing for LMI individuals should be a priority, thank you.
36	Public Library just spent big \$\$ on new boiler, which is great! But, there are still substantial problems with elderly pipes spring pin leaks that lead to floods that can damage books. The library serve rich, poor, young and old.
37	Whatever you fund needs to be part of a comprehensive multi-year strategic plan.
38	Having quality child care in place is the one of the first hurdles and stepping stones for these families to rehabilitate. This will give them opportunities to go to job interviews and work, attend meetings to get into housing or visit appointments so that they can ensure they are meeting the needs of their families.
39	Need to clear out houses that are beyond repair and put in decent houses where people can live. Houses that are in bad shape bring in the criminal element and squatters.
40	Why do you not just turn it over to Neighborworks of Great Falls? They have all the programs in place.
41	Indoor Pool!!!
42	I answered all questions with the expectation that the monies will be handled by competent honest people. I dont trust the county or the city at the highest levels.

### Community Grant Survey Results

43	CDBG funds should be used to further enhance the tax base of great falls. We should take the funds and dedicate them to building businesses. In turn we could take some to develop the business districts to support new business but ultimately we should use the funds to build low interest and low credit loan programs so that more entrepreneurs could get into the market. We should also fund advertising programs that advertise across the nation for our local businesses.
44	Better start using it WISELY
45	Curbs and gutters in original downtown neighborhoods
46	Do NOT cheat the citizens of Great Falls.
47	Great falls needs to invest in bringing outside money in. We need to invest money in bringing tourists to great falls. Also, how is it ok to get grant money and then turn that grant money into loans and profit from citizens that way? Seems unethical to me... It really seems like the old people in charge of this town just want to slip as much money as they can into their pockets.
48	Please invest in economic development!!!!!! We are way behind the rest of Montana.
49	Thank you for all your hard work! Please know your appreciated!
50	One of the best uses for CDBG funds is to enhance housing by supporting Neighborworks especially for better housing in the core area of Great Falls. It helps build our core city and much of the funding is leveraged so it is a good investment.
51	Forceably taking money from taxpayers to redistribute to other groups is theft. It is time to go back to allowing charities to provide, and put the nanny state out of business.
52	not sure who covers keeping the city clean, but go to so many other big cities in MT and you will see how clean those cities look, you drive back into great falls you see dirty, garbage, run down look shops and stores right along 10th. sad to see. also I think turning the visitor center on flag hill into a coffee shop would be amazing. again not sure who is over that but these are my thoughts and ideas.
53	Learn to take into consideration the whole community not just low and moderate income families. Community development should focus on the whole community not a small segment of it. Great Falls also needs to do a better job with Disaster Preparedness it's very poor throughout this city as well as the county at all levels especially individual and private sector businesses and NPO's.

### Community Grant Survey Results

54	Help our veterans
55	Education for people for things that will help lift themselves up and create jobs.
56	Build a new indoor pool and this time maintain it!
57	Maybe something to help the middle class out that's actually working to survive
58	Non-profits with a proven track record of building affordable housing, such as Neighborworks and Habitat for Humanity, should receive assistance.
59	There needs to be services/housing for homeless youth. If a person is under 18 they cannot access housing in this town. There also needs to be childcare scholarships so people can go to work and school.
60	Housing for homeless children under the age of 18 who are living on their own and not a ward of the state. Grants to help parents receive childcare so they can better their chances at fulfilling household needs. Grants to help fund rehabilitation to undergraduates and help them to achieve higher education or teach them how to be successful in the future.
61	Public Service is very important to fund.
62	Down payment assistance to help people buy homes
63	Accessible recreation and Communication facilities
64	Housing and financial coaching
65	Tiny houses or village for seniors....affordable and safe!
66	Artful Bike Racks Plant a Tree Project More alleys into Public Art Studios Portable spotlight - once a month/quarter move the spotlight to a new building that is being renovated Fix up your porch Summer Contest - paint/stain, decorations, plants
67	Help the working class and businesses serving the working class develop ways to decrease taxes and reward increased wages.
68	Your survey options, particularly in regard to economic development, are far too limiting. Creating higher wage jobs with benefits should be a high priority for the city, yet Great Falls is one of the few cities in the country that does not do economic development.
69	Build up a tax source other than home owners!



# Council of Councils Meeting

Tuesday, January 29, 2019

Gibson Room; Civic Center; 7:00 p.m.

## Minutes of Meeting

Delegates Present: Council #1 Laura Dever, Council #2 Sue Ann Strickland, Council #4 Sandra Guynn, Council #5 Eric Ray, Council #6 Julie Parker, Council #8 Karen Grove, Council #9 Karen Gray, Mayor Bob Kelly

Delegates Absent: Council #3 and Council #7

Guests: Tom Micuda-City Staff

## Sandra Guynn Presiding.

Meeting called to order and recital of Pledge of Allegiance at 7:01 PM

Minutes from October 30, 2018 meeting: Sandra Guynn motioned; Eric Ray seconded. Approved unanimously.

Re-Ratification of election of officers was approved unanimously.

## New Business:

- Police Advisory Board: Chief Bowen discussed the dissolution of the board.
- Chief Bowen and the council members discussed the decline of the quarterly council reports by officers. The GFPD has lost a dozen officers. Eric Ray suggested to moving the quarterly reports to a different month than currently (same month as the c of c meetings) to keep the information flowing.
- The GFPD is compiling year end data and Chief Bowen offered to present those numbers at a later date.
- Overview of the Community Needs Survey – Tom Micuda
  - CDBG and Home Investment Partnership Program. The programs help low to low moderate incomes. Last year was the first year they used a survey of citizens to determine how the grant money was spent. 2018 the survey responses determined the ADA accessibility throughout the city received 50%; 45% was made available to upgrade housing; 5% was given to community organizations. The 2019 survey is currently underway. 2019 surveys were passed out and Tom said he would email links to the online survey.

Bootlegger Trail – Speed zone study – Chuck Anderson

An investigation was done and recommendations made. The question was raised as to what part of the changes are in the county and/or city.

Neighborhood Council Updates during Commission Work Sessions – Chuck Anderson

The Councils need to designate which work session they would like to attend from the list provided.



Replacing Patty Cadwell – Chuck Anderson

The position was expanded. First round interviews have been conducted. Second round interviews are underway and Chuck expects to have someone starting in the position in a month or so.

#1 Laura Dever: DNRC is selling a large parcel of land. County jurisdiction – zoned residential.

#2 Sue Ann Strickland: They have a large contingent of students attending. The council has starting involving the students in the meetings and have been asking for their input.

#4 Sandra Guynn: Congestion on 38<sup>th</sup> Street due to Lewis & Clark Elementary. 36<sup>th</sup> Street S. traffic has increased to the point where it seems to be a through street. Waiting until the new Ace Hardware is open and see what traffic changes that brings.

#5 Eric Ray: UP has a building program and to increase enrollment. They are offering a scholarship to students who live in Cascade County.

#6 Julie Parker: Officer Gearhart spoke at their last meeting. Captain Vogt spoke about fire safety. The council is looking for a good neighborhood project.

#8 Karen: The students from GFHS attend their meetings. Giant Spring school area residents said that the traffic pattern and access are well designed and working well. Traffic on 1<sup>st</sup> and 2<sup>nd</sup> Avenue North – cars on the sides of the street have been hit.

#9 Karen Gray: GFHS construction issues and update.

Petition, Communications: Mayor Kelly

MSU sponsors No More Violence. Scheduled this year for April 1<sup>st</sup> – 4<sup>th</sup>.

Meeting adjourned at 8:43 PM

Respectfully submitted by Karen Gray

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**Text of Ad:** **03/11/2019**

**CDBG & HOME NEEDS**

**PUBLIC HEARING**

The City Commission invites you to a public hearing to offer your comments and ideas on community issues that may be addressed with Community Development Block Grant (CDBG) and HOME Partnership Program (HOME) funds. The City of Great Falls received approximately \$776,621 in CDBG and \$285,631 in HOME grant funding last year. The Federal allocation for this fiscal year is undetermined at the time of this publication.

The hearing is scheduled for:

**TUESDAY, APRIL 2, 2019 AT 7:00 PM**

**CIVIC CENTER,**

**CITY COMMISSION CHAMBERS**

**Low and moderate income people, minorities and single heads of households are urged to attend. Handicap access is available on the north side of the building.**

Issues being considered will include but are not limited to affordable housing, economic development, public facility improvements, public service and homeless assistance. All comments on the best use of CDBG and HOME grant funds for the benefit of low and moderate income residents and/or removal of slum and blight are welcome. Comments may also be made regarding performance of the CDBG and HOME grant programs.

Your comments are a very important part of the grant process. However, this hearing is not meant to be a format for agencies to discuss or promote their individual grant applications.

Written comments and ideas may be mailed to Thomas Micuda, Planning and Community Development Department, City of Great Falls, PO Box 5021, Great Falls, MT 59403-5021, or emailed to [tmicuda@greatfallsmt.net](mailto:tmicuda@greatfallsmt.net) by April 2, 2019. If you have any questions or comments, call 455-6432 or TDD number 454-9495.

(3434118) 3/17, 3/24/2019  
**MNAXLP**

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JOURNAL OF COMMISSION PROCEEDINGS  
April 2, 2019

Regular City Commission Meeting

Mayor Kelly presiding

CALL TO ORDER: 7:00 PM

Commission Chambers Room 206

PLEDGE OF ALLEGIANCE

ROLL CALL/STAFF INTRODUCTIONS: City Commission members present: Bob Kelly, Tracy Houck, Owen Robinson, Bill Bronson, and Mary Sheehy Moe. Also present were the City Manager Greg Doyon and Deputy City Manager Chuck Anderson; Deputy City Clerk Darcy Dea; Public Works Engineer Dave Dobbs; Finance Director Melissa Kinzler; Planning and Community Development Director Craig Raymond; City Attorney Sara Sexe; and, Police Chief Dave Bowen.

AGENDA APPROVAL: There were no changes proposed by the City Manager or the City Commission. The agenda was approved as submitted. City Manager Doyon explained that Initiatives for Item #19 will be discussed during that portion of the meeting.

CONFLICT DISCLOSURE/EX PARTE COMMUNICATIONS: Commissioner Bronson announced that he would be abstaining from the discussion and vote on Item #15

1.

**PROCLAMATIONS**

Commissioner Moe read Week of the Young Child; Commissioner Houck read Public Safety Telecommunicators Week; and Mayor Kelly read Esophageal Cancer Awareness Month.

**PETITIONS AND COMMUNICATIONS**

2.

**MISCELLANEOUS REPORTS AND ANNOUNCEMENTS.**

John Hubbard, 615 7<sup>th</sup> Avenue South, inquired about the status of the water quality, and expressed concern with regard to tax increases, as well as the cost of the Gore Hill Water Tower logo.

Referring to Mr. Hubbard's water quality inquiry, Public Works Engineer Dave Dobbs responded that the most recent tests came back below the limits, and the chlorine is down as a result of the new ultraviolet system. Engineer Dobbs clarified that the water was never toxic and is safe to drink.

Laura Hodges, 2204 3<sup>rd</sup> Avenue North, expressed concern with regard to Ordinances not being enforced for vehicles parked on sidewalks. Ms. Hodges commented that walkability is a quality of life issue.

Mayor Kelly encouraged Ms. Hodges to discuss her concerns at a Neighborhood Council 8 meeting.

**NEIGHBORHOOD COUNCILS**

Page 1 of 16

JOURNAL OF COMMISSION PROCEEDINGS  
April 2, 2019

3. APPOINTMENTS TO THE GREAT FALLS CITIZEN'S COUNCIL.

Mayor Kelly moved, seconded by Commissioner Robinson, that the City Commission appoint Commissioners Bronson and Houck to serve on the Great Falls Citizen's Council also known as Council of Councils for the May 29, 2019 meeting.

Mayor Kelly asked if there were any comments from the public, or discussion amongst the Commissioners.

Commissioner Houck commented that she may not be available; however, she would find a replacement.

There being no further discussion, Mayor Kelly called for the vote.

Motion carried 5-0.

Mayor Kelly commented that appointments to the Council of Councils for the October 29, 2019 meeting will be made at a later date.

4. MISCELLANEOUS REPORTS AND ANNOUNCEMENTS.

Mayor Kelly encouraged Neighborhood Council members to update the Commission either at a Work Session or Commission meeting.

**BOARDS & COMMISSIONS**

5. MISCELLANEOUS REPORTS AND ANNOUNCEMENTS FROM BOARDS AND COMMISSIONS.

Mayor Kelly noted that the Parking Advisory Commission gave an update at the April 2, 2019 Work Session.

**CITY MANAGER**

6. MISCELLANEOUS REPORTS AND ANNOUNCEMENTS.

City Manager Greg Doyon announced:

- The City 190 system upgrade has been ordered and installation and training will be in May, 2019.
- Congratulations to Adam Jordan and Jed Sauder for being promoted to firefighter first class, as well as Joe Tinsley who completed his paramedic training.
- The Planning and Community Development Department will be closed Friday, May 3, 2019 for Development Review Training.
- Congratulations to Public Works Traffic Manager Jerry McKinley on his retirement.

Page 2 of 16

JOURNAL OF COMMISSION PROCEEDINGS  
April 2, 2019

- Current Board and Commission openings include: the Housing Authority, Library Board of Trustees, Business Improvement District (BID), Police Commission, City-County Health Board, Golf Advisory Board and Advisory Commission on International Relationships.
- Feedback has been well received for the new format of the Utility Bills.

Police Chief Dave Bowen announced that there is a Swearing in Ceremony for five new police officers on Thursday, April 4, 2019. Two recruits graduated from the Montana Law Enforcement Academy, and Taylor Crouch received the Overall Academic Award.

CONSENT AGENDA.

7. Minutes, March 19, 2019, Commission meeting.
8. Total expenditures of \$1,399,713 for the period of March 1, 2019 through March 20, 2019, to include claims over \$5,000, in the amount of \$1,120,321.
9. Contracts list.
10. Approve Change Order No. 1 in the amount of \$13,762 and the Final Payment for the Public Works Fuel Tank Purchase and Installation in the amount of \$33,094.99 to NWESTCO LLC., and \$334.29 to the State Miscellaneous Tax Fund and authorize the City Manager to execute the necessary documents and make the payments. OF 1455.9
11. Approve Change Order No. 1 in the amount of \$15,517.51 and approve Final Payment for the Meadowlark Drive Sewer Main Reroute in the amount of \$27,597.25 to Geranios Enterprises, Inc. and \$278.76 to the State Miscellaneous Tax Fund and authorize the City Manager to execute the necessary documents and make the payments. OF 1674.9
12. Award a contract in the amount of \$416,751 to EJ Carpentry for the Public Works Facilities Repairs, and authorize the City Manager to execute the construction contract documents. OF 1733

Commissioner Moe moved, seconded by Commissioner Robinson, 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.

PUBLIC HEARINGS



JOURNAL OF COMMISSION PROCEEDINGS  
April 2, 2019

13. RESOLUTION 10286 TO ANNEX AND ORDINANCE 3202, TO ESTABLISH ZONING ON LOT 5 OF GRANDVIEW TRACTS, SECTION 13, T20N, R3E, P.M.M., CASCADE COUNTY, MONTANA CURRENTLY OWNED BY STEVEN AND CRYSTAL JOHNSON.

Planning and Community Development Director Craig Raymond reported that the owners of the subject property located at 335 21<sup>st</sup> Avenue South, and legally described as Lot 5 of Grandview Tracts, Cascade County, Montana, have filed for annexation of their property in order to be eligible to receive city water and sewer services. The lot is also located within what is known as the Upper/Lower River Road Water and Sewer District, Phase 5. As such, city utility mains have already been extended into the area and the owners within the district will be able to access those services if the Commission approves of annexation. The improvement agreement spells out who is responsible for what, what fees will be required of whom, and lists any on-site or off-site improvements that may be necessary as a result of the proposal.

The property being proposed for annexation is adjacent to current city limits on the north, south and west side. This annexation would be in keeping with the previously agreed to Memorandum of Understanding between the City and the Upper Lower River Road Water and Sewer District, and promote a logical and orderly expansion of the city limits. The designation of R-2 Single Family Medium Density zoning is also consistent with surrounding properties.

On February 12, 2019, the Great Falls Zoning Commission recommended that the Commission approve of the annexation, assignment of R-2 zoning, and that the Commission approve the annexation agreement.

Mayor Kelly declared the public hearing open.

No one spoke in support of or opposition to Resolution 10286.

Mayor Kelly closed the public hearing and asked the will of the Commission.

Commissioner Bronson moved, seconded by Commissioner Houck, that the City Commission adopt Resolution 10286 to annex Lot 5 of Grandview Tracts, and approve the Improvement Agreement pertaining to the property and the accompanying Findings of Fact.

Mayor Kelly asked if there was any discussion amongst the Commissioners.

Commissioner Bronson inquired if it is unusual to annex just one property for the Upper/Lower River Road Water and Sewer District.

Director Raymond responded that it is unusual for an individual parcel like this; however, the property is eligible for annexation because of their contiguous proximity to the city limits.

There being no further discussion, Mayor Kelly called for the vote.

Motion carried 5-0.

JOURNAL OF COMMISSION PROCEEDINGS  
April 2, 2019

Commissioner Houck moved, seconded by Commissioner Bronson, that the City Commission adopt Ordinance 3202 and the accompanying Findings of Fact.

Mayor Kelly asked if there was any discussion amongst the Commissioners. Hearing none, Mayor Kelly called for the vote.

Motion carried 5-0.

14. CDBG & HOME GRANT/COMMUNITY NEEDS PUBLIC HEARING.

Planning and Community Development Director Craig Raymond reported that this public hearing is for the Commission to provide an opportunity for the community to provide testimony related to observed needs in the community that the City could address through targeted specific Community Development Block Grant (CDBG) funding. The Commission will not take action as the information will be compiled by staff and brought to the Commission along with other input received through community surveys and regular communication with community partners. Staff will also bring forward specific recommendations on possible funding strategies.

Staff has continued their emphasis on community outreach in a number of ways.

- A survey which was widely distributed around the community and circulated to many of the customary agencies which have been traditional community partners as well as other agencies that may not have traditionally been targeted.
- Attendance at the Council of Council's meeting.
- Discussions with city departments on community infrastructure needs that might serve low and moderate income (LMI) areas and aggressively improve Americans with Disabilities Act (ADA) access throughout the city.

Mayor Kelly declared the public hearing open.

Shyla Patera, North Central Independent Living Services, 1120 25<sup>th</sup> Avenue Northeast, expressed support of the construction of homes and rentals that are handicap accessible. Ms. Patera concurred with a previous speaker with regard to the importance of sidewalk mobility, as well as addressing parking issues. Referring to the ADA Transition Plan, Ms. Patera commented that she would like to see pavement preservation continue. She concluded that LMI affordable housing and economic development, as well as the City partnering with employers that will hire citizens with disabilities, should be a priority.

Sherry Arey, NeighborWorks Executive Director, 2700 3<sup>rd</sup> Avenue North, commented that allowing Staff to maneuver the levels that are to be funded in the different projects would give Staff more leeway. Ms. Arey encouraged Staff to consider CDBG funds for single-family home rehab, and expressed support with regard to the City using CDBG and Home funds to accomplish a variety of priorities.

Page 5 of 16

JOURNAL OF COMMISSION PROCEEDINGS  
April 2, 2019

There being no one further to address the Commission, Mayor Kelly asked again if the Commissioners had any questions of staff.

There being no one further to address the Commission, Mayor Kelly closed the public hearing.

15. LEASE OF CITY-OWNED PROPERTY, CURRENTLY HELD BY PUBLIC WORKS SANITATION DIVISION, PARCELS 3016300 & 3015100 LOCATED THREE AND ONE HALF MILES NORTH OF THE MANCHESTER EXIT, COMPRISING OF 316.5 ACRES FOR A PERIOD OF THREE (3) YEARS TO RONALD LAUBACH IN THE AMOUNT OF \$7,000 PER YEAR.

Public Works Engineer Dave Dobbs reported that after a site selection involving approximately 50 properties, the Sanitation Division purchased two parcels north of Manchester on September 10, 1991, for a total of \$149,708.74, as a potential landfill site. The City Sanitation Division currently uses the High Plains Landfill leased by Montana Waste Systems. The current contract between the City of Great Falls and Montana Waste Systems expires on January 1, 2025.

These parcels were approved as Conservation Reserve Program (CRP) in 1993. Annual rental payments received from the CRP program totaled \$122,901. This program expired on September 30, 2011. With the CRP program phased out for governmental properties, the City looked into leasing the property to the private sector.

By leasing the Manchester property, the City would keep its options open and allow the City Sanitation Division to have leverage in future disposal contract negotiations with Montana Waste Systems. Entering into a crop lease with Ronald Laubach would continue to give the City Sanitation Division additional revenue.

Commissioner Bronson stepped out at 7:47 p.m. and returned at 7:49 p.m.

Mayor Kelly declared the public hearing open.

No one spoke in favor of or opposition to the lease agreement.

Mayor Kelly closed the public hearing, and asked the will of the Commission.

Commissioner Moe moved, seconded by Commissioner Houck, that the City Commission approve the cash farm lease agreement from Ronald Laubach for the lease of City-Owned property parcels 3016300 & 3015100 located three and one half miles north of the Manchester Exit, comprising of 316.5 acres for a period of three (3) years.

Mayor Kelly asked if there was any discussion amongst the Commissioners.

Commissioner Robinson expressed concern that the City could lose its leverage if it is unable to get out of the lease before the second extended period.



JOURNAL OF COMMISSION PROCEEDINGS  
April 2, 2019

City Attorney Sara Sexe responded that the lease has an automatic renewal for two additional two year terms, first and second extended terms, unless there is a six month notice prior to the expiration.

Mayor Kelly inquired what the rate for the five year lease was for Arrow Kay Farms, as well as Arrow Kay Farms not renewing their lease.

Public Works Engineer Dobbs responded that he would provide that information to the Commission once he receives it.

Motion carried 4-0-1. (Commissioner Bronson abstaining)

**OLD BUSINESS**

**NEW BUSINESS**

16. WESTWOOD PLAZA – MINOR SUBDIVISION, A SUBDIVISION OF LOT 2 OF THE AMENDED PLAT OF BLOCK 1, WESTWOOD NO. 2 ADDITION LOCATED IN THE N ½ OF SECTION 2, TOWNSHIP 20 NORTH, RANGE 3 EAST, P.M.M., CASCADE COUNTY, MT.

Planning and Community Development Director Craig Raymond reported that the applicant is requesting a minor subdivision of the subject property to create two lots. The new lot, Lot 2C, is proposed to be 0.885 acres in size and will become a pad site for a new commercial building along the Northwest Bypass. The proposed new lot conforms to the C-2 General Commercial district development standards in terms of lot area and lot width.

There were a few critical issues that surfaced during the processing of the application and working with the developer. Those items include:

**Existing Encroachments:** There is an existing encroachment on the westerly property boundary of the proposed Lot 2C. This encroachment is related to several parking spaces associated with the adjoining business to the west. The owners are working with the neighboring property to eliminate the encroachment or provide a parking easement on the plat that both parties can agree upon. There is also a dumpster that partially encroaches on the lot that is being used by the adjoining business to the east. All existing encroachments on the newly created lot must be removed or reflected in shared agreements with adjoining property owners.

An existing free-standing sign for Staples is located on the proposed Lot 2C parcel. The Staples store is located on the existing parcel that has been proposed for subdivision. The proposed subdivision would change the status of this sign from "on-premise" to "off-premise." This will require a sign easement, and the applicant should be aware that the continued presence of the sign will require compliance with specific regulations contained in the City Sign Code.

**Access:** The applicant has been in discussion with the Montana Department of Transportation (MDT) regarding access to the site from the Northwest Bypass. MDT will only allow, a "right-in"

Page 7 of 16

JOURNAL OF COMMISSION PROCEEDINGS  
April 2, 2019

turn for westbound motorists. As a result, the applicant will have to provide egress from the new lot through the adjoining property to the west. Shared parking and access arrangements already exist that simply need to be updated to reflect the new lot configuration.

Utilities: A sewer main currently runs underneath the Northwest Bypass and should be readily available for connection to future development of Lot 2C. A City storm drain line runs along the north side of the Bypass and can be used to outlet storm water. A full drainage report which demonstrates that water quality and quantity standards can be met will need to be provided to the Public Works Department for review. There is an existing water main that is not on either Lot 2B or 2C that would need to be extended to the west to provide domestic water to the site.

The Planning Advisory Board reviewed and approved the draft amended plat for the proposed subdivision on March 12, 2019.

Commissioner Bronson moved, seconded by Commissioner Robinson, that the City Commission approve the amended plat for a minor subdivision of lot 2 of Westwood Plaza No. 2 Addition, located in the N ½ of Section 2, Township 20 N, Range 3 East, P.M.M. City of Great Falls, Cascade County, Montana 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 were any comments from the public or any discussion amongst the Commissioners.

Hearing none, Mayor Kelly called for the vote.

Motion carried 5-0.

17. 2019/2020 COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) POLICIES AND CITIZEN PARTICIPATION PLAN.

Planning and Community Development Director Craig Raymond reported that the Citizen Participation Plan outlines the program requirements for ensuring that the citizens of Great Falls are informed about all aspects of the CDBG and HOME program. In particular, the Plan must provide for involvement of those citizens that will be most impacted by the program, low to moderate income (LMI) citizens.

The Plan requires the City to make every reasonable effort to consult with public, private and non-profit agencies that provide service to LMI residents such as housing, health care, and social services. In particular, extra attention must be paid to outreach with agencies that focus services on the elderly, disabled community, and minority populations.

Other components of the Plan include: 1) notification requirements for hearings, 2) making sure all program information is readily accessible, 3) requirements for timely response to public requests, and 4) requirements for amendments to program documents.

JOURNAL OF COMMISSION PROCEEDINGS  
April 2, 2019

City staff and the City Commission made sweeping changes to the Community Development Block Grant program last year. Over the course of the last year, staff has been working through these changes, communicating with historical community partners, interested citizens and HUD as the year has progressed. This year, staff is not recommending many significant changes to either the Citizen Participation Plan or programmatic policies; however, staff is recommending some minor changes and one substantial change as follows:

- Appeals of City funding decisions for grant requests: Recently, the City Commission adopted Resolution 10283 designating the Board of Appeals as the body to hear any request from grant applicants who disagree with staff's decision relative to grant application funding. This appeal process has been added to the Grant Policies document.
- Elimination of a focus group meeting from the process to determine funding priorities: A focus group meeting was built into the citizen participation process during 2018 to determine the priorities for the current fiscal year. Staff determined that this meeting was not a valuable data collection tool.
- Clarification on the review of loan applications: A clarification was added noting that only loan applications that are "non-emergency" in nature require review by a 3rd party loan board. Currently, emergency loans (for example, loans addressing broken utility lines) only require two City staff signatures.
- Elimination of references to the City's Code Enforcement Officer: In 2018, the City removed this position from being partially funded through the CDBG program.

Commissioner Houck moved, seconded by Commissioner Robinson, that the City Commission adopt the Community Development Block Grant Policies; and adopt the Citizen Participation Plan.

Mayor Kelly asked if there were any comments from the public or any discussion amongst the Commissioners.

Sherry Arey, NeighborWorks Executive Director, 2700 3<sup>rd</sup> Avenue North, expressed support of the CDBG Policies and Citizen Participation Plan; however, expressed concern with regard to cancelling the focus group.

Mayor Kelly inquired about the focus group being determined not to be a valuable data collection tool.

Director Raymond responded that there were so many small groups at the same time, making it difficult for staff, who had limited knowledge of CDBG, to manage. Director Raymond mentioned that a focus group could be an option for next year.

JOURNAL OF COMMISSION PROCEEDINGS  
April 2, 2019

Manager Doyon received clarification that the focus group from last year's process was eliminated and everything else has been maintained with regard to public participation.

Commissioner Houck expressed concern that only two citizens provided input for the Consolidated Plan Community Needs Public Hearing. She inquired if notification about the Needs Public Hearing was made available to all service providers.

Director Raymond responded that notice of the Needs Public Hearing was made available to all Great Falls Housing Authority residents and given to the nine Neighborhood Councils, local non-profit agencies, and City Departments, as well as posted on the City's website. Over the past few years, the majority of citizens that provided input at the Needs Public Hearing were in the public service category, which has been significantly reduced.

Commissioner Robinson received clarification that the elimination of the focus group would not affect CDBG allocations.

Commissioner Bronson encouraged staff to take another look at how to better manage a focus group for next year, and to seek public input to the funding allocation process.

Commissioner Moe requested that staff provide the CDBG Policies and Citizen Participation Plan earlier in the future.

There being no further discussion, Mayor Kelly called for the vote.

Motion carried 4-1 (Commissioner Moe dissenting).

18. AMENDMENT NO. 1 TO DEVELOPMENT AGREEMENT BETWEEN THE CITY OF GREAT FALLS, GREAT FALLS AGRITECH PARK, LLC AND GREAT FALLS AGRITECH PARK OWNERS ASSOCIATION, LLC.

Finance Director Melissa Kinzler reported that on July 21, 2015, the Commission adopted Ordinance 3134 and approved a Development Agreement with Great Falls Agritech Park, LLC, the Developer, Great Falls Development Authority (GFDA) and the Owners Association, Great Falls Agritech Park Owners Association, LLC pertaining to East Industrial Park Tax Increment Financing Industrial District. The Development Agreement provides for reimbursement to the Owners Association of up to \$6,789,867 for infrastructure improvements consisting of road, water, sewer and rail improvements from tax increment of the District. Reimbursements for the Infrastructure Improvements were agreed to be reimbursed in three phases as set forth in Exhibit B to the Development Agreement. The reimbursements would begin upon the completion and acceptance by the City of each phase of Infrastructure Improvements.

Issues arose from GFDA's execution of the Infrastructure Improvements. As a result, GFDA raised the following issues which would require amendment of the Development Agreement: (1) reimbursement by the City for costs associated with Northwestern Energy's utility work that was not covered by the Development Agreement; (2) the Developer to become the payee for purposes of the reimbursement obligations instead of the Owner Association; and (3) reapportionment of the

Page 10 of 16

JOURNAL OF COMMISSION PROCEEDINGS  
April 2, 2019

aggregate dollar amount of the reimbursements among the build-out phases due to the Developer's changes in build-out planning and construction bidding.

Commissioner Robinson moved, seconded by Commissioner Moe, that the City Commission approve Amendment No. 1 to Development Agreement with Great Falls Agritech Park, LLC and Great Falls Agritech Park Owners Association, LLC.

Mayor Kelly asked if there were any comments from the public or any discussion amongst the Commissioners.

Lillian Sunwall, 709 2<sup>nd</sup> Avenue North, Great Falls Development Authority (GFDA), representing the Great Falls Agritech Park, LLC and Great Falls Agritech Park Owners Association, LLC, expressed appreciation to City staff for their efforts.

Mayor Kelly reiterated that there is no overall fiscal impact on the district, and the dollar amount remains the same.

There being no further discussion, Mayor Kelly called for the vote.

Motion carried 5-0.

19. GREAT FALLS ANIMAL SHELTER CATTERY ADDITION (OF 1673).

Deputy City Manager Chuck Anderson reported that in 2012, the Animal Shelter staff began working with Nelson Architects to develop a Master Plan for the shelter. The plan identified current, desired, and future space needs for the facility and options for achieving those needs. The plan focused on additions to the existing building, including a cattery addition, canine area expansion, interior office and reception area remodeling, exterior façade renovation, site work, and landscaping, and provided cost estimates. The plan was developed due to the increasing Animal Shelter usage and how to best reduce animal stay time in the facility by increasing animal capacity space.

The Commission approved the professional services agreement with Nelson Architects for architectural/engineering services in May, 2013, and in October, 2013 approved the Master Plan facility and funding recommendations provided by staff. Additionally, at the April, 2017 Commission Retreat, the Animal Shelter was given approval to pursue dollar-for-dollar grant matches from the American Society for the Prevention of Cruelty to Animals (ASPCA).

Over the last six-years, the Animal Shelter staff has hosted more than 50 adoption and major fundraising events. Through the combined efforts of the staff and the community partners, the Animal Shelter has raised \$463,185.56 to fund this project.

The proposed Cattery Addition is part of a phased-approach to expand the current facility and to provide new and/or improved services. With this addition, the Animal Shelter will be able to receive and install a new Hydro-Incinerator.



JOURNAL OF COMMISSION PROCEEDINGS  
April 2, 2019

The Hydro-Incinerator is a state-of-the-art device that uses water to mimic the natural decomposition process, introducing a more environmentally friendly alternative to the current cremation process. Once installed, it's estimated to save at least \$30,000 per year in operating costs. Additionally, having this new incinerator will relieve the Animal Shelter from the \$2,300 annual repair and maintenance costs of the current incinerator.

The Animal Shelter is the only facility in the region that provides any animal cremation service, and the service is used by numerous local/county veterinarians and private citizens. Additionally, this service to the community results in an annual revenue stream in excess of \$40,000 for the shelter. The Hydro-Incinerator is being purchased separately through Bio-Response Solutions Inc., and will be installed during this construction project.

Commissioner Robinson moved, seconded by Commissioner Moe, that the City Commission postpone action on a contract to Detailed Construction in the amount of \$462,000 for the Great Falls Animal Shelter Cattery Addition until September 3, 2019.

Mayor Kelly asked if there were any comments from the public or any discussion amongst the Commissioners.

Written correspondence in support of the Cattery Addition was received from Mark Metzger, ticket 122019e77, and Linda Metzger, ticket 1223151a7.

Commissioner Robinson expressed concern with regard to the Great Falls Animal Shelter Cattery Addition and the Maclean Animal Adoption Center combining resources with the Animal Shelter being in conflict with one another. Commissioner Robinson commented that the Animal Shelter building is obsolete, and expressed concern with putting further resources into it. Commissioner Robinson expressed concern with regard to donations intended specifically for the Cattery Addition, as well as continuing with the Commission Initiative. Commissioner Robinson expressed support to the purchase of the new incinerator; however, commented that the bid does not separate the purchase of a new Hydro-Incinerator and the Cattery Addition. He concluded that postponing the bids until May 7, 2019 would keep them current; however, would not allow enough time to consider the Commission Initiative of having conversations with regard to combining the Great Falls Animal Shelter with the Maclean Animal Adoption Center.

Commissioner Bronson expressed concern that having conversations with the Maclean Animal Adoption Center would never result in a situation where everything would be combined with the Great Falls Animal Shelter. Based upon the structure and operations of the Great Falls Animal Shelter in 2007, Commissioner Bronson commented that a recommendation was made to not put any further resources into the building; however, the concept behind the 2007 Masterplan was to continue to operate the Animal Shelter into the future despite the conditions of the building.

By postponing the decision, Commissioner Bronson expressed concern that individuals who made donations for the Cattery Addition could potentially request their donation back, as well as creating an atmosphere of confrontation instead of cooperation.

JOURNAL OF COMMISSION PROCEEDINGS  
April 2, 2019

Commissioner Houck received clarification that postponing action until September 3, 2019 effectively rejects the bid from Detailed Construction. Commissioner Houck commented that donations were raised specifically for the Cattery Addition, and expressed concern with regard to losing such an incredible bid.

Commissioner Moe commented that she believes Commissioner Robinson can lead the conversations with regard to combining the Great Falls Animal Shelter and the Maclean Animal Adoption Center. She concluded that the two entities have a very similar mission with regard to "Animals First."

Commissioner Robinson explained that he and Commissioner Moe are the Commission representatives for the Animals First group, which meets weekly to discuss combining the Great Falls Animal Shelter and the Maclean Animal Adoption Center.

Commissioner Bronson inquired about proceeding with the Animal Shelter Cattery Addition causing problems with regard to negotiations.

Commissioner Robinson responded that the Maclean Animal Adoption Center already has a Cattery. If the two entities were combined, it would be possible that the Animal Shelter would no longer be used.

With regard to the Animal Shelter Cattery Addition, Commissioner Moe commented that it would be duplicating the same service, as well as making a financial commitment.

Mayor Kelly commented that there is an opportunity for combining two entities in a new environment to be utilized in a way that was meant to improve the health of the animals. Mayor Kelly explained that a Cattery Addition is definitely needed; however, determining the location needs to be discussed. The City's obligation to the tax payers is to create efficiencies, and exploring conversations with regard to combining the Great Falls Animal Shelter and the Maclean Animal Adoption Center need to be explored one final time. Mayor Kelly expressed concern about losing such a decent bid for the Cattery Addition; however, he commented that moving forward with the Cattery Addition and Hydro-Incinerator would bring pressure to negotiations for combining the Animal Shelter and the Maclean Animal Adoption Center.

Commissioner Houck received clarification that a Cattery Addition is needed; however, determining the location is the issue.

There being no further discussion, Mayor Kelly called for the vote.

Motion carried 3-2 (Commissioners Houck and Bronson dissenting).

**ORDINANCES/RESOLUTIONS**

20. ORDINANCE 3197, AMENDING TITLE 1, CHAPTER 2, OF THE OFFICIAL CODE OF THE CITY OF GREAT FALLS (OCCGF) ADDING SECTION 050 ESTABLISHING A PUBLIC HEARING PROCEDURE.

Page 13 of 16

JOURNAL OF COMMISSION PROCEEDINGS  
April 2, 2019

City Attorney Sara Sexe reported that Ordinance 3197 establishes standard procedures for conducting public hearings for all City boards, commissions, committees, and councils. This will provide a consistent standard for City officials and staff, along with the public, that will improve efficiency and continue to protect public participation and due process considerations.

Commissioner Bronson moved, seconded by Commissioner Robinson, that the City Commission accept Ordinance 3197 on first reading and set second reading for April 16, 2019.

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.

21. ORDINANCE 3198, AMENDING TITLE 17, CHAPTER 16, ARTICLE 6, OF THE OFFICIAL CODE OF THE CITY OF GREAT FALLS (OCCGF), PERTAINING TO PUBLIC HEARINGS.

City Attorney Sara Sexe reported that Ordinance 3198 will provide assistance to presiding officers in conducting public hearings fairly and efficiently, in educating and informing the public as to the procedures by which public hearings are held, and in allowing a uniform process for public participation in City government.

Ordinance 3198 will require applicants to provide written materials before the public posting of the agenda for the subject meeting. The applicant would be allowed to supply additional materials up to 72 hours before the scheduled meeting, if it chooses to do so after review of the posted staff report. These changes will provide more opportunity for the governing body, the public, and staff to review the materials for substance prior to hearing. This would also reduce the need for postponing actions on agenda items.

Ordinance 3198 will also provide for an additional public hearing after the receipt of new, relevant and credible information during the public hearing. This would allow the information to be fully considered by the governing body, the public, and staff.

Additionally, Ordinance 3198 includes the opportunity for additional public comment on a motion, in limited situations. These situations would be after a hearing is closed, and the motion presented substantially deviates from the publicly advertised motion which was suggested by staff. This would allow the body to hear limited public comment regarding the motion without the need to either set an additional public hearing at a later time, or to postpone the action on the item. Staff anticipates that the need for this additional public comment opportunity would occur very infrequently.

Commissioner Bronson moved, seconded by Commissioner Moe, that the City Commission accept Ordinance 3198 on first reading and set second reading for April 16, 2019.

Page 14 of 16



JOURNAL OF COMMISSION PROCEEDINGS  
April 2, 2019

Mayor Kelly asked if there were any comments from the public or any discussion amongst the Commissioners.

Mayor Kelly recommended a flowchart be included for the second reading on April 16, 2019.

City Attorney Sexe commented that, if Ordinance 3198 is adopted, the Legal Department will provide board training.

There being no further discussion, Mayor Kelly called for the vote.

Motion carried 5-0.

22. ORDINANCE 3203, AMENDING TITLE 2, CHAPTER 21, SECTION 090, OF THE OFFICIAL CODE OF THE CITY OF GREAT FALLS (OCCGF), PERTAINING TO THE GREAT FALLS ETHICS COMMITTEE MEETING SCHEDULE.

City Attorney Sara Sexe reported that the Great Falls Ethics Committee was established in 2017 to help ensure that City officials and staff continue to comply with Mont. Code Ann. Title 2, Chapter 2, pertaining to code of conduct for public officials and the Official Code of the City of Great Falls (OCCGF) Title 2, Chapter 21. As the Code is currently written, the Committee is required to meet on the first Wednesday of the month in the City Commission Chambers after a matter has been referred to the Committee.

Coordinating Committee members' schedules to meet these specific provisions has become difficult, resulting in rescheduling or cancellation of meetings. Staff is recommending to remove this "first Wednesday" requirement to allow greater flexibility in scheduling Ethics Committee meetings. Additionally, Staff recommends to remove the requirement that the meetings be held in the City Commission Chambers, to allow for use of other areas of the Civic Center, as needed. These changes will improve efficiency and allow for more timely meetings.

Staff also recommends that Ordinance 3203 allow for the City Attorney, in addition to the City Manager, to refer issues to the Ethics Committee. This is necessary for situations which arise where the City Manager may be unable or unwilling to refer the issue.

Commissioner Moe moved, seconded by Commissioner Bronson, that the City Commission accept Ordinance 3203 on first reading and set second reading for April 16, 2019.

Mayor Kelly asked if there were any comments from the public or any discussion amongst the Commissioners.

Commissioner Moe commented that the Ethics Committee should be dissolved, and to rely on the statute that covers Ethics matters.

There being no further discussion, Mayor Kelly called for the vote.

Motion carried 5-0.

JOURNAL OF COMMISSION PROCEEDINGS  
April 2, 2019

CITY COMMISSION

23. MISCELLANEOUS REPORTS AND ANNOUNCEMENTS.

Mayor Kelly expressed appreciation to Commissioner Bronson for filling in as Mayor Pro Tempore at the March 19, 2019 Commission meeting.

Mayor Kelly extended an invitation for community discussion in conjunction with No More Violence Week at the Great Falls College MSU on April 4, 2019 at 6:00 p.m., and encouraged the public to access the website for Alliance for Youth or No More Violence on Facebook to view the full schedule.

Commissioner Houck announced that there is a reception at the Paris Gibson Museum on April 5, 2019 at 4:30 p.m. for Great Falls Public School students to showcase their art at Paris Gibson Square Museum of Art. Commissioner Houck commented that No More Violence Week will wrap up the week with "Rock the Town in Hope."

Commissioner Houck announced that former State Representative Jean Price had passed away, and commented that the community is a much better place because of her.

24. COMMISSION INITIATIVES.

None.

25. LEGISLATIVE INITIATIVES.

None.

ADJOURNMENT

There being no further business to come before the Commission, Commissioner Robinson moved, seconded by Commissioner Bronson, to adjourn the regular meeting of April 2, 2019, at 9:15 p.m.

Motion carried 5-0.

\_\_\_\_\_  
Mayor Bob Kelly

\_\_\_\_\_  
Deputy City Clerk Darcy Dea

Minutes Approved: April 16, 2019

JOURNAL OF CITY COMMISSION WORK SESSION  
April 16, 2019

City Commission Work Session  
Civic Center, Gibson Room 212

Mayor Kelly presiding

CALL TO ORDER: 5:30 p.m.

CITY COMMISSION MEMBERS PRESENT: Bob Kelly, Bill Bronson, Tracy Houck, Owen Robinson, and Mary Sheehy Moe.

STAFF PRESENT: City Manager Greg Doyon and Deputy City Manager Chuck Anderson; City Attorney Sara Sexe; Finance Director Melissa Kinzler; Human Resources Director Gaye McInerney; Park and Recreation Director Steve Herrig; Planning and Community Development Director Craig Raymond, Deputy Director Tom Micuda, and CDBG Administrator Maria Porter; Public Works Director Jim Rearden; and, City Clerk Lisa Kunz.

PUBLIC COMMENT

Shyla Patera, North Central Independent Living Services, 1120 25<sup>th</sup> Avenue NE, thanked the City for its work on the Community Needs Assessment and the sizable amount for ADA improvements. Ms. Patera spoke in support of HB 16 that establishes the affordable housing loan program, and building accessible housing. She also encouraged the City to enforce the van accessible loading and unloading zones and suggested adding a volunteer to assist with parking enforcement. Ms. Patera also encouraged the City to continue with ADA sidewalks and curb cuts, as well as programs to assist homeowners to keep up with preservation of same.

1. CITIZENS FOR CLEAN ENERGY

Shannon Wilson, 1201 6<sup>th</sup> Avenue South, on behalf of Citizens for Clean Energy (CCE) reported that CCE is a volunteer group of Montana citizens from many backgrounds and political persuasions. CCE has been active in the community to promote adequate, clean, efficient, and cost effective energy without destroying health, lifestyle, environment, and heritage. CCE sponsors annual awards for middle school and high school students at the Region II Science Fair, and has donated funds to the Ice Plex to help with costs to replace lighting with LED fixtures.

CCE's objective is to promote and assist the City in working to create a more sustainable, resilient community. Ms. Wilson continued that a big step has been taken already by the Planning and Community Development Department by having McKinstry Engineering complete a study that included energy savings.

Ms. Wilson provided educational and employment background information. She commented that many communities now are taking action on developing solutions for conservation and sustainability, including the Montana cities of Bozeman, Livingston, Missoula, Red Lodge and Whitefish. As a long term solution, it would be a benefit to Great Falls to be a city that wants to go green, conserve energy and sustainability, to attract companies also willing to go green.

04/16/2019

Ken Thornton, 31 Paradise Lane, discussed the importance of cutting back on fossil fuels, and totally eliminating fossil fuels by 2050. Examples of the enormity of that task is 94 million barrels of oil, and a trainload of coal stretching from Great Falls to Los Angeles, are burned every day. Mr. Thornton provided a graph showing the price of solar panels from about \$77/watt in 1977 to more recently under \$0.50/watt. A six to eight kilowatt system would provide for a resident's needs, and the solar panels come with a 20 year warranty. Mr. Thornton commented that the solar panels are being installed on awnings over parking lots and the systems are paying for themselves. He encouraged the City to start looking at these ideas.

Shannon Wilson concluded that there are grants available to assist with the costs that will result in medium to long term benefits. She provided helpful links for resources to assist the City with conservation, efficiency and sustainability efforts. She referred to the City of Missoula and suggested that the City of Great Falls also adopt an Action Plan.

Commissioner Houck commented that it would be good timing for Great Falls to be looking at grants and developing an Action Plan.

## **2. BUILDING ACTIVE COMMUNITIES INITIATIVES – WALKABILITY STUDY**

Jerry Clark and Shyla Patera, North Central Independent Living, and Kim Skornogoski, Building Active Communities Initiative (BACI), reviewed and discussed the attached PowerPoint presentation of the Great Falls City Park Walk Audit. They covered the strengths and weaknesses of Heron Park, Rhodes Park, Sandhills Park, Grande Vista Park, and Jaycees Park. Strengths included picnic tables under awnings, benches along pathways, playground equipment, neighborhood connectivity, free library, and pet stations. Weaknesses included lack of connectivity to the neighborhood due to lack of curb cuts, no buffer zone between street and sidewalk, signage not visible, needed path repairs, playground equipment needing upgraded or replaced, tennis court in terrible shape, and inaccessibility issues.

Participants of the audit included members from Building Active Communities Initiative (BACI), Get Fit Great Falls, City of Great Falls, North Central Independent Living Services, MSU Nursing students, and Montana Fish, Wildlife, and Parks.

## **3. CDBG PROCESS UPDATE – PROPOSED FUNDING ALLOCATIONS**

CDBG Administrator Maria Porter discussed staff's proposed grant annual allocation based on the community assessment that was completed earlier in the year. She reported that CDBG and HOME programs are federal programs administered by HUD to help fund local community development. The goal is to assist low and moderate income persons. The 2019/2020 CDBG award is \$794,666, and the 2019/2020 HOME award is \$273,088.

She explained that staff's recommendations are based on the community survey that received 318 results, Neighborhood Council and Council of Councils feedback, the public needs hearing, and from meetings with the Great Falls Development Authority and NeighborWorks Great Falls.

The proposed budget is as follows:

04/16/2019

	Estimated Amount (FY19 Annual Allocation)	Approximate Percentage
Administration	\$158K	
Loan Program	\$61K	
Fair Housing Program (Public Service)	\$22K	
Public Services	\$83K	15%
Economic Development	\$249K	45%
Public Improvements 20% ADA	\$221K	40%
Affordable Housing	\$1.5 Million	HOME Grant/Revolving Loan Program

CDBG Administrator Porter commented that targeted marketing will be focused on youth services as that was the number one need identified in the community survey.

CDBG Administrator Porter provided the CDBG/HOME Annual Action Plan Schedule. Following tonight's briefing to the Commission on staff's recommended funding priorities, there will be a 30-day comment period. The Annual Action Plan will come before the Commission for consideration on June 4, 2019.

#### 4. ETHIC COMMITTEE UPDATES

Retained Attorney Jordan Crosby, Ugrin Alexander Zadick PC, and City Attorney Sara Sexe, explained that, after the first Ethic Committee hearing, it was determined that the process was too complex and confusing. Attorneys Crosby and Sexe recommended that the Commission maintain the process, but proposed the following changes to the Official Code of the City of Great Falls:

##### 2.21.100 Committee duties.

The Committee shall meet and be presented testimony regarding matters referred to it. When considering an ethics complaint ~~Based on the information and testimony presented,~~ the Committee shall determine whether a complaint appears to be substantiated based on the information and testimony presented. If the Committee determines that a complaint appears to be substantiated, it may refer the matter to the Cascade County Attorney, or to the supervisor of a public employee who may be the subject of the complaint, for disposition. The Committee shall make written findings of its decision, which will be filed with the City Clerk.

- A. ~~Make a written finding, filed with the City Clerk, as to whether there is an appearance of a violation of any provision on Mont. Code Ann. Title 2, Chapter 2, or a violation of this chapter;~~
- B. ~~Make a written finding, filed with the City Clerk, as to whether the appearance of a violation rises to a level of an actual violation; and~~
- C. ~~Make a written recommendation, filed with the City Clerk, in consultation with the City Attorney's Office, as to the correct course of action to eliminate any violation and/or reduce the appearance of any violation.~~

04/16/2019

The proposed changes mirror the statutory requirements of an ethics committee as set forth in Mont. Code Ann. § 2-2-144, rather than making it more detailed.

The proposed changes, as well as complaint and response forms, will be presented to the Ethics Committee at their next meeting.

Commissioner Bronson requested a copy of a recent court decision in a Bozeman case that Attorney Crosby indicated would be applicable to the City of Great Falls.

Commissioner Moe commented that the Ethics Committee will seldom meet. Her concern is that they will be inexperienced and not familiar, as Courts are, with the protocols of due process.

Attorney Crosby responded that if the Great Falls Ethics Committee were dissolved, the decision would be made by the County Attorney. The likelihood that a County Attorney would have any more experience than the Great Falls Ethics Committee is minimal. Counties don't see these complaints at the same level municipalities do.

Commissioner Houck discussed the lack of process and noted that the hearing was painfully awkward. She was in favor of a better process and for forms for both the person articulating the complaint and the respondent.

It was the consensus of the Commission for staff to add the proposed changes to a Commission meeting agenda for consideration.

#### DISCUSSION OF POTENTIAL UPCOMING WORK SESSION TOPICS

City Manager Greg Doyon reported that topics for the May 7<sup>th</sup> work session include radios for the Police Department and an update from the City-County Health Department.

#### **ADJOURN**

There being no further discussion, Mayor Kelly adjourned the informal work session of April 16, 2019 at 6:52 p.m.

04/16/2019

Text of Ad: 04/10/2019

CITY OF GREAT FALLS

2019-2020 Annual Action Plan

The City of Great Falls is requesting comments and views on the proposed 2019-2020 Annual Action 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 2019-2020 Annual Action Plan as a component of the 2015-2019 Consolidated Plan. The Proposed Annual Action Plan will be available for viewing at the Great Falls Public Library, the City of Great Falls web page ([www.greatfallsmt.net](http://www.greatfallsmt.net)) and City CDBG-HOME Office, Civic Center, Room 112, during regular business hours. The 30 day comment period will begin April 17, 2019, and end May 17, 2019. Any interested agencies, groups, or persons may submit comments pertaining to the Proposed Annual Action 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](mailto:mporter@greatfallsmt.net). For further information, please call 455-8467.

(3497938) 3/17/2019

MNAXLP



## Maria Porter

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**From:** Shyla Patera <ncils.patera@bresnan.net>  
**Sent:** Wednesday, May 8, 2019 3:26 PM  
**To:** Maria Porter  
**Subject:** Annual action plan

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

I, Shyla Patera, wish to submit the following comments on the annual Consolidated Action Plan and Evaluation Report (CAPER) for the 2019 -2020 year on behalf of North Central Independent Living Services, Inc. We, at NCILS, wish to commend the Board of Housing for much of its work regarding HOME funds, CDBG funds, HOPWA Funds, ESG Funds and more to assist Montanans with disabilities and others in housing crisis to find more stability in their individual housing situations. However, we feel that more needs to be done regarding physical accessibility, visitability, and universal design both in our rental and homebuyer housing stock. The Montana Board of Housing and the City of Great Falls 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 should be accessible to all including those with mobility, sensory, and chemical disabilities.

NCILS applaud the undertaking of efforts to address coordinated entry for homelessness. However, as federal funds may become extremely narrow in scope over the next years, NCILS encourages innovative practices and policies to ensure that low income Montanans have access to rental housing. We also would ask that the Board of Housing, the State of Montana as well as the City of Great Falls advocate for those who wish to reintegrate into Montana communities that have lived in institutional settings i.e. the Montana Developmental Center, Warm Springs, correctional, and other nursing home settings. We believe that the City should explore 811 Housing, TBRA and other appropriate DPHHS and housing supports available in order to facilitate successful community transitions and meet Montana's Olmstead priorities. To meet this goal, we are advocating for both state wide and local housing navigators to be hired on staff when possible. Given potential funding constraints, we encourage public private partnerships and training to meet this goal. The City of Great Falls needs to study its community policies and ordinances so that people with disabilities can live in our homes and apartments not be placed in nursing homes or assisted living settings. We need to focus on visitability and universal design in new construction, but we also need to focus on financing home modifications in older homes. Given the potential impacts of potential funding losses in future federal budgets, Montana and other states should begin building educational coalitions to ensure that Montanans understand the economic impacts that housing plays in our communities.

Shyla Patera  
IL Specialist North Central Independent Living Services, Inc.  
1120 25 th Avenue North East  
Black Eagle, Montana 59414  
406 452-9834  
ncils.patera@bresnan.net Shyla Patera  
[jclark@ncils.org](mailto:jclark@ncils.org) Jerry Clark



City of Great Falls e-mails may be subject to Montana's Right To Know law (Article II Sec 9, Montana Constitution) and may be a Public Record (2-6-1002, M.C.A.) and available for public inspection

## Grantee Unique Appendices

Public Hearing on the City's amendment to the 2019-2020 Annual Action Plan was held on 07/07/2020.

No public comments were made during the public hearing.

City Commissioners unanimously passed the amendment to the 2019 -2020 Annual Action Plan which was to address the newly allocated CDBG-CV Funding.

Text of Act: 08/11/2020

**PUBLIC HEARING NOTICE  
CITY OF GREAT FALLS  
Amendment to 2019-2020 Annual Action Plan**

Notice is hereby given that the City Commission will be holding a public hearing to consider an amendment to the 2019-2020 Annual Action Plan to incorporate a special allocation of funds 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). As part of this amendment, the City of Great Falls has revised the Consolidated Plan's Citizen Participation Plan to provide reasonable notice and opportunity for the public to comment in order to expedite and facilitate the use of CDBG-CV funds. The amended 2019-2020 Annual Action Plan and revised Citizen Participation Plan are available for review on the City of Great Falls website (<https://greatfallsmt.net/planning/>).

The hearing is scheduled for:

**TUESDAY, JULY 7, 2020 AT 7:00 PM  
CITY COMMISSION CHAMBERS, CIVIC CENTER BUILDING  
GREAT FALLS, MONTANA**

Issues being considered will include but are not limited to Economic Development and Public Service activities to prevent, prepare for, and respond to COVID-19. All comments on the best use of CDBG-CV funds for the benefit of low and moderate income citizens in response to COVID-19 are welcome.

Handicap access is available on the north side of the building.

The agenda packet will be made available on the City's website: <https://greatfallsmt.net/meetings>. The public may view or listen to the meeting on government access channel City-190, cable channel 1901 or online at <https://greatfallsmt.net/vesiregion/>.

Due to COVID-19 health concerns, the format of the City Commission meeting may be held in a virtual video-conferencing environment, with the meeting location shifting to the Gibson Room within the Civic Center Building. If a virtual meeting method is used, in order to honor the Right of Participation and the Right to Know (Article II, Sections 8 and 9 of the Montana Constitution), the City of Great Falls will make every effort to meet the requirements of open meeting laws by use of the following process:

- City Commission members will attend the meeting via a remote location, using a virtual meeting method.
- Public participation in the meeting is welcome and can occur in the following ways:
  - 1) Attendance in person in the Gibson Room. The City will require social distancing and may limit the number of persons in the Gibson Room according to applicable health guidelines.
  - 2) Provide public comments via email or U.S. mail. Comments may be sent via email before 1:00PM on Tuesday, July 7, 2020, to: [tshumaker@greatfallsmt.net](mailto:tshumaker@greatfallsmt.net). Include the agenda item or agenda item number in the subject line, and include the name and address of the commenter. Written communication received by that date and 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; one will be so noted in the official record of the meeting.
  - 3) 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 as patient. Calls will be taken in the order in which they are received. Callers will be restricted to customary time limits and will be required to provide their name and address.

Your comments are a very important part of the grant process. However, this hearing is not meant to be a format for agencies to discuss or promote their individual grant applications.

Written comments and ideas may be mailed to Tanya Shumaker, Planning and Community Development Department, City of Great Falls, PO Box 5021, Great Falls, MT 59403-5021, or emailed to [tshumaker@greatfallsmt.net](mailto:tshumaker@greatfallsmt.net) by 1:00 PM, July 7, 2020. If you have any questions or comments, call 406-8443 or TDD number 406-8443. 7/23/2020 1:21, 8/28/2020.

MMAXLP

Text of Ad: 06/16/2020

**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 15, 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 (<http://cityofgreatfalls.mt.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 (<http://cityofgreatfalls.mt.net/planning>). Any interested agencies, groups, or persons may submit written comments during the public review and comment period to Tanya Shumaker, City of Great Falls Planning & Community Development Department, P.O. Box 3021, Great Falls, MT 59403-3021, or [tshumaker@greatfalls.mt](mailto:tshumaker@greatfalls.mt). 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 405-5443 or TDD number 454-0455. (405)209-5142/200

MNAXLP

## Tonya Shumaker

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**From:** Shyla Patera <ncils.patera@bresnan.net>  
**Sent:** Tuesday, June 23, 2020 1:43 AM  
**To:** Tonya Shumaker; Lisa C. Kunz; Thomas Micuda; Alicia Eathley  
**Subject:** Covid Amendment comments for the Great Falls Consolidated plan submission and July / 2020 Commission meeting

**Importance:** High

My name is Shyla Patera. I am an Independent Living Specialist employed by North Central Independent Living Services, Inc. and also a citizen of Great Falls with a disability. Covid 19 has changed how we as community provide services. Nonprofits have had to break down silos and work together to solve community needs particularly as gaps have emerged in many areas from housing security, food security, employment, education, medical and transportation services. People with disabilities need to access community services in the most accessible way possible. We encourage the City of Great Falls to include disabilities accessibility in local pandemic planning. We know that there often gaps in services on a day to day basis.

For all the transportation and transit success which has occurred during this time, Montanans definitely noticed gaps during the pandemic and stay at home order. The connectivity gap connecting frontier Montana to our small urban medical hub cities definitely became a concern as we watched and worried for our friends and neighbors in nursing homes and other congregate settings wonder how they would transport loved ones with accessibility needs if a Covid 19 diagnosis and extensive treatment were required and available in other cities and communities. 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 other disability. We ask that communities in the state of Montana that are affiliated with transit and transit options write not only pandemic plans, but also ADA transition plans to assist communities in securing accessible transportation options as accessible vehicles. Walking and rolling were paramount for many during this time. NCILS asks the City of Great Falls prioritize the need for accessible sidewalks and curb cuts in our communities. We also ask that you help Montana's disability community by defining what is public right of way versus privately owned sidewalks in Great Falls.

In the housing and homeless arena, NCILS is appreciative of the rental and housing emergency assistance that is being offered through through the State of Montana. NCILS is also appreciative of our local Great Falls revolving home loan fund. We need accessible affordable housing stock built in Great Falls. I believe that we should be exploring local and state wide policies which will enhance universal design and accessible home building. In short term issues NCILS would like to see relaxing of HUD rules regarding move in into HUD subsidized accessible units. With out transit access many didn't have access to grocery stores so a meals on wheels delivery program to low income transit dependent people upon request may be helpful.

On employment, NCILS supports telework options that benefit people with disabilities. Thank you for allowing me to comment.

Shyla Patera  
IL Specialist

North Central IL Services, Inc.  
1120 25 th Avenue NE  
Black Eagle, Montana 59414  
406 452-9834  
ncils.patera@bresnan.net

**Tonya Shumaker**

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**From:** Maria Porter <mz.porter@live.com>  
**Sent:** Friday, June 19, 2020 2:55 PM  
**To:** Tonya Shumaker  
**Cc:** Bob Kelly; Mary Sheehy Moe  
**Subject:** Public Comment- Annual Action Plan Amendment

*I am making this comment in response to the Public Comment Period for the City of Great Falls CDBG-CV Allocation. The comment reflects my personal view and is not associated with the agency I work for.*

Normally CDBG funds have a HUD cap of 15% of the Annual Allocation to provide public services, yet public service agencies are who needs and requests the most funding. It is the most competitive with the least available funds. The HUD CDBG-CV funds eliminates this restrictive cap so that the funding can go to those most vulnerable and effected by COVID. It is an opportunity to help the community, and it is being missed by the City of Great Falls. Please let's take this opportunity to give funding to the agencies that need it and have historically made the biggest impact with CDBG funds. I sit at the table with the hero's of our community, the agencies and people that work for nothing and give everything to help the homeless and abused, I advocate for them. We face people who due to COVID have lost jobs, childcare, friends, family.... their way of life and offer them what small support and comfort we can. The CDBG-CV funding is to help prevent, prepare for, or respond to the Coronavirus. It is the City's resource to directly help agencies serving those effected by this worldwide trauma. It is most needed in public services. The Continuum of Care, a team of agencies in Great Falls, pulled together communicated and provided available transportation, housing, food, healthcare and shelter. Opportunities, Inc stepped up and funneled emergency calls and redirected funding to serve the emergency needs. These services and agencies need the funds to support our low-income community impacted by COVID.

In the 2019-2020 AAP \$158,933 CDBG and \$27,308 HOME funds are being allocated, a total of \$186,241 to the City Administration for "Staff to Administer, Manage, and Monitor the CDBG and HOME Grant." In the amended Annual Action Plan, an additional \$95,103 of CDBG funding, through the CDBG-CV, is being awarded to the City Administration for "Staff to Administer, Manage, and Monitor" the CDBG. This gives the City \$281,344 in one year for 3 Staff. Why is CDBG-CV funding going to City Administration? Can you please explain the need of City Staff for this COVID Funding and **how are they helping to prevent, prepare for, or respond to the Coronavirus?** Managing and Monitoring the grant programs are already funded through the annual allocation, why are COVID funds being allocated to the City when those facing poverty need it more? The City is proposing to allocate \$95,103 to themselves and \$190,206 to Public Services, **the City Admin is receiving 50% of what Public Services are receiving.** Think of how many more people can be served. Just because the City can legally allocate 20% of the CDBG-CV funding to themselves does not mean it is right or moral.

In conclusion, more funding needs to go directly to the agencies who make the biggest impact in our community. Please increase funding, while you can since HUD eliminated the 15% Public Service cap, to agencies who will directly help low-income to help prevent, prepare for, or respond to the Coronavirus. These Public Services are the boots on the ground and they need our support.

Sincerely,

Maria Porter

1

1100 East Fiesta  
Great Falls, MT 59404



**Tonya Shumaker**

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**From:** Carol Juneau <cjuneau@3rivers.net>  
**Sent:** Monday, June 22, 2020 11:52 AM  
**To:** Tonya Shumaker  
**Subject:** comments  
**Attachments:** Letter to City of Great Falls on use of CARE Funds.docx

Hi Tonya..

Thanks for returning my call so fast.

Here you go – comments on the plan for use of CARE Funds for City of Great Falls.

Carol Juneau

June 22 2020

Tonya Shumaker  
City of Great Falls Planning and Community Development  
PO Box 5021  
Great Falls, Montana 59403-5021

RE: Comments on use of CARES Funds

Dear Ms. Shumaker:

Following are some comments in regards to the use of funds that Great Falls will be receiving under the CARES Program.

1. Insure that there is racial equity in the distribution and use of any funds that are budgeted for economic development, housing, education, and other programs for the City of Great Falls.
2. The reduction of rate of poverty in Great Falls should be a priority in the use of funds. If we spend money on efforts that do not address this systemic issue of income inequality we are not addressing any long term change to grow our community's families. Example: Insure that any business or organization that utilizes these funds provide a living wage of \$15.00 an hour for its employees.
3. Provide internet access to all people in the city of Great Falls. Access to technology is a huge racial inequity in Montana and the United States. It should be available to all families at no charge. (How often do we reach for our phone, ipad or computer to seek an answer, to get information, to connect to others – we must remember many families do not have this capability.)
4. Provide on going training to all law enforcement personnel to address the issues of systemic racism that has created the disparities in our justice systems for people of color. Insure that the police have body cameras and that they are turned on at all times when the police are on duty/patrol.

Thank you for allowing comments to this plan.

Carol Juneau  
916 – 37th Avenue NE  
Great Falls, Montana 59404  
csjuneau@3rivers.net

**Tonya Shumaker**

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**From:** Brett Doney <bdoney@growgreatfalls.org>  
**Sent:** Sunday, June 21, 2020 7:42 PM  
**To:** Tonya Shumaker  
**Cc:** Joiane Schalper; Jason Nitschke; Jill Kohles; L'Han Sunwall; Craig Raymond  
**Subject:** CDBG Action Plan Amendments Public Comment

Tonya,

I am writing on behalf of the Great Falls Development Authority to voice support for the proposed amendments to the City's CDBG Action Plan for use of Covid supplemental funds.

If GFDA can help in any way, please let me know.

Brett

Brett Doney  
President & CEO  
Great Falls Montana Development Authority  
High Plains Financial  
Direct Mobile 1-406-750-2119

*Unleash Your Entrepreneurial Spirit in Great Falls Montana*  
[GrowGreatFallsMontana.org](http://GrowGreatFallsMontana.org)  
Follow us on social media: [Facebook](#) | [LinkedIn](#) | [Instagram](#) | [Twitter](#)  
Connect with me on [LinkedIn](#)!

[Click here to get the latest regional business news delivered to your inbox with the Great Falls Top Ten!](#)

*For resources, virtual live meetups, and learning opportunities (recorded and live) to help navigate the COVID-19 crisis, please see our [Crisis Toolkit webpage](#).*

**City of Great Falls, Montana  
Citizen Participation Plan**

**June 1, 2020 Update & Revisions  
(COVID-19 Update)**

The Citizen Participation Plan has been revised on June 1, 2020 to:

- Include virtual hearings as an allowed method for citizen participation when necessary for public health reasons;
- 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.
- Allow for minor edits that do not change current citizen participation policies. Please be advised that if virtual hearings are used, real-time responses and accommodations for persons with disabilities and/or with limited English proficiency will be made available to the greatest extent possible;
- Include provisions relative to the Consolidated Planning process and public participation waivers made available under the Coronavirus Aid, Relief, and Economic Security (CARES) Act;
- Include provisions related to funding from the Community Development Block Grant (CDBG) program and other applicable U.S. Department of Housing and Urban Development funding made available under the Coronavirus Aid, Relief, and Economic Security (CARES) Act;

**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 B

### GREAT FALLS AND CASCADE COUNTY COMPREHENSIVE HOUSING AFFORDABILITY STRATEGY 2010 – 2020

#### Special Thanks to:

Cascade County  
City of Great Falls \*  
First Interstate Bank \*  
NeighborWorks Great Falls \*  
Montana Department of Commerce -  
Census and Economic Information Center  
Great Falls Housing Authority  
Opportunities, Incorporated  
University of Great Falls  
Rural Dynamics  
A.W.A.R.E.



## Page #

Annual Action Plan  
2019

## GREAT FALLS AND CASCADE COUNTY COMPREHENSIVE HOUSING AFFORDABILITY STRATEGY 2010 – 2020 EXECUTIVE SUMMARY

Following a citywide meeting of professionals and others interested in housing, a housing plan group was formed to focus on the development of a comprehensive housing affordability plan for Great Falls and Cascade County, with the goal of assisting local organizations and the city and the county to address the housing and community development needs into the next decade.

The housing plan group gathered information and data from four different surveys, fifteen focus groups, and town meetings in Belt and Cascade. The state Department of Commerce contributed a community profile. From the data gathered over a period of two years and five months, the housing plan group produced a summary of strategies to meet the greatest needs identified. The summary was presented to the full Great Falls/Cascade County Housing Planning Group on February 25, 2010. The full planning group adopted key strategies to meet housing needs. The strategies denoted in italics below and combined into seven priorities to meet unmet needs in our community were adopted for inclusion in the Great Falls/Cascade County Housing Plan 2010-2020:

- Construct or rehabilitate buildings to create transition housing with support services for individuals and families who are homeless, teenagers, young parents, ex-felons or suffer from mental illness.
- Address the need for affordable student/health worker rental housing in the medical-education district near university, college of technology, and hospital such as the newly constructed student housing at UGF or pursue creative leasing options for existing housing.
- *Address the affordable housing needs of the community's growing senior population*
  - Construct affordable, accessible rentals for seniors, such as the planned Accessible Space project.
  - Expand the existing senior home improvement programs to reach more people.
  - Increase the number of Medicaid waiver slots and find more assisted living facilities that will accept the waivers.
  - Encourage combination facilities where in-home services can be provided to seniors.

- Create middle income condominiums or townhomes in the downtown area as a key to downtown redevelopment. Utilize incentives to make renovation possible. Support historic building renovation.
- Adopt affordable housing zoning ordinances to include universal accessibility and energy efficiency features. Expedite zoning approval in return for housing affordable or lower households.
- Improve the quality of rental housing stock available to those receiving Housing Choice vouchers. Build or rehabilitate more rental housing stock to meet HQS standards and to be more energy efficient.
- Preserve existing manufactured housing communities.

The Group emphasized that there are current housing activities identified in the study as needs and strategies that are already being handled well, these strategies need to be a part of the continuing plan and effort to address the need for safe, affordable housing in our community during the upcoming years:

- Conduct Fair Market Rent Survey for Cascade County, eliminating sub-standard housing which reduces the average rents paid and reduce the time to provide HQS inspections and compliance.
- Address the need for affordable rental housing near the hospital and medical services, such as the Great Falls Housing Authority accessible 4-plex project.
- Establish a fund providing rent and utility deposits or to address other barriers to accessing affordable housing.
- Address the continued need for decent, affordable homes for first-time homebuyers with new construction or renovation of homes.
- Utilizing additional funding sources, offer higher deferred mortgage with equity share subsidies to make owning decent, affordable homes a possibility for lower income first-time income homebuyers.
- Construct new homes using the Mutual Self-Help model where families cooperatively build their own homes.
- Use Neighborhood Stabilization Program (NSP) funding will be used to serve homebuyers below 50% AMI.
- Create a rent-to-own program for credit-impaired, but stable, homebuyers.
- Develop a workable Section 8 to Homeownership program.

- Solicit donations of city or county-owned land for the creation of land trusts or other legal configurations to create permanently affordable homes
- Explore the use of Neighborhood Stabilization Program funds to provide downtown housing.
- Encourage local non-profit developers to use the Low Income Housing Tax Credit program to augment affordable rental housing stock.
- Fund a housing ombudsman to appeal rejected applications.
- Continue to upgrade rental property using the CDBG Rental Improvement Fund zero interest loans.



GREAT FALLS/CASCADE COUNTY  
COMPREHENSIVE HOUSING AFFORDABILITY STRATEGY  
MARCH 2010

INTRODUCTION

On September 28, 2007 a citywide meeting was called to host a facilitated discussion about the housing needs in the Great Falls area. The meeting was attended by 42 citizens representing a broad cross section of public and private interests in our community. Brainstorming produced a discussion of the many economic factors and community development needs that impact affordable housing for all citizens in Great Falls and Cascade County. A large working group with five sub-groups working on separate focus areas evolved from the gathering. One of the sub-groups focused on development of a housing plan with strategies to assure affordable housing needs in the Great Falls area will be met. (Please see Appendix A for the minutes of the meeting.)

Over the period of January 2008 to May 2009, the Great Falls/Cascade County Housing Planning Group undertook a combined Community Development Needs Assessment and Comprehensive Housing Affordability Strategy process with the housing plan subgroup at the helm. The combined approach was the first comprehensive development study completed in decades. The goal for the process was to create a plan for the area that would assist Great Falls and Cascade County housing, human services and community development organizations, as well as the city and the county, to more effectively utilize existing resources and compete for additional resources to address the housing and community development needs into the next decade.

To gather information, data and input, four types of surveys were conducted by the Housing plan sub-group : 1) Public agencies and non-profit organizations, business and trade groups were surveyed in February of 2008 to determine housing and community development needs and to inform the construction of an comprehensive needs assessment questionnaire. Twenty-three responses were received to the lengthy survey from agencies and 45 responses from organizations. 2) In June 2008, an extensive questionnaire was sent to 8,000 randomly selected households to assess community needs for housing, public facilities and services, education, and economic development. 1496 surveys were returned, making the survey not only statistically valid, but providing a wealth of information from our citizens. 3) In September, 2008, a one-page housing survey was sent to 1,400 low-income families and distributed through a number of social service agencies. A total of 612 lower income citizens responded to the survey. 4) In January of 2009, the City of great Falls conducted a survey in conjunction with the statewide homeless survey coordinated through the Montana Continuum of Care Coalition. The Great Falls Rescue Mission played a pivotal role in locating and surveying possible homeless people. The point-in-time count identified 193 homeless people (individuals and families) on the night of January 29, 2009, in Great Falls.

After the data and input from the four surveys conducted were compiled, a number of small focus groups with a wide array of housing specialists were conducted to determine the extent and character of the needs identified through the surveys. Interview focus groups were held with shelter care agencies, senior housing providers, realtors, lenders, housing agencies serving persons with disabilities, organizations operated subsidized housing, agencies working with teens, public schools and higher education, City of Great Falls code enforcement officials, economic development professionals, landlords and representatives of church groups and social service agencies.

Additionally, town meetings were held in Belt and Cascade as part of an effort to understand more directly the unique needs of smaller towns in Cascade County. The State Commerce Department provided our group with an updated Community Profile of Great Falls and Cascade County

Following the surveys and focus groups, the housing plan sub-group of the Planning Group worked to produce a summary of outstanding needs, and strategies to meet those needs to present to the Great Falls/Cascade County Housing Planning Group for discussion, prioritization, and adoption. On February 25, 2010, the full planning group adopted seven key needs and strategies to meet unmet housing needs for inclusion as priorities in the Great Falls/Cascade County Housing Plan 2010-2020.

The Comprehensive Housing Affordability Strategy and Community Housing Plan will be presented for adoption by the City and County Commissions.

## COMMUNITY PROFILE FOR CITY OF GREAT FALLS AND CASCADE COUNTY

Prepared by Susan Ockert, Census and Economic Information Center,  
Montana Department of Commerce, August 4, 2008

### Introduction

This report provides data on the City of Great Falls and Cascade County. The first section describes the city and county from a historical perspective. Second, the Demographic section describes the population's characteristics and growth. The Economic Section provides data on employment in the various industries. Lastly, the Housing Section uses survey data to illustrate the housing situation in the city and county.

### Community Profile

Lewis and Clark described the area where the Marias River flows into the Missouri River as "pleasantly beautiful" with "great falls". This area was incorporated in 1888 as Great Falls in Cascade County. In 2008, 82,026 residents called Cascade County home with 72% of them living within the city limits of Great Falls. Between 2000 and 2008, the city population grew nearly 4.5%. Cascade County was designated a Metropolitan Statistical Area (MSA) in 1960; however the MSA is called Great Falls.<sup>1</sup>

Cascade County ranks 5<sup>th</sup> in the state in population and has grown only 2.1% since Census 2000. Montana's population has increased 7.2% with Gallatin County the highest at 32.4% and Treasure County losing 26.0% of its residents.

Cascade County's economy is quite diversified with military, agriculture, energy, information, education and health care all important components. Columbia Grain International, Montana Malting Company, and Pasta Montana all use wheat and barley grown in the Golden Triangle. As the Electric City, energy is abundant in the area. Five dams are located in Cascade County plus one oil refinery. Wind mills are popping up in the county while a new transmission line called the Montana Alberta Tie Limited to Great Falls is proposed. The Great Falls Tribune has been a source of information since 1885 and currently serves nearly 70,000 readers daily in a 13-county region. Great Falls is host to the University of Great Falls, a private Catholic

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<sup>1</sup> The Metropolitan Statistical Area thus encompasses the entire county and not just within the city limits of Great Falls. Therefore any data related to Great Falls MSA is the entire county.

university, and MSU Great Falls College of Technology. Cascade County and surrounding residents have access to modern healthcare techniques. Benefis Healthcare employs over 1,000 workers while the Golden Triangle Community Mental Health Care facility has between 100 and 249 workers.

Cascade County's workforce is well educated. According to the 2006 – 2008 American Community Survey, a U.S. Census Bureau publication, 91% of Cascade County residents had graduated from high school while 23.2% had bachelor degrees or higher. Over 33% of the workforce are employed as managers or are in professional positions. Median household income in Cascade County in 2008 was \$42,528, the 16th highest in the state.

Unemployment in the county in November 2009 was 5.5%, below Montana's average of 6.4%. The United States unemployment rate was 9.4% in this same month.

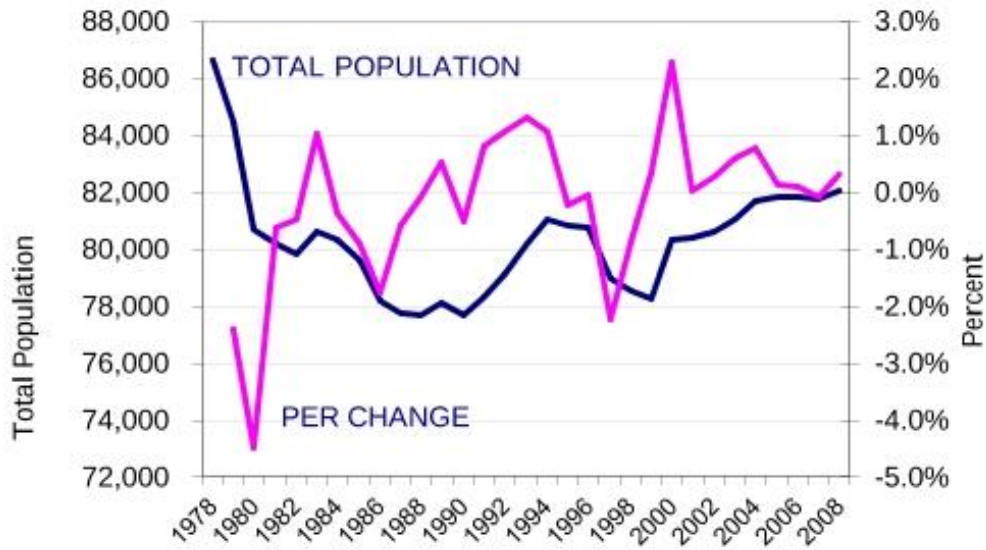
Not only did Lewis and Clark find Great Falls magnificent, so do visitors. The Lewis and Clark Interpretive Center sits on the bluffs above the Missouri River and offers views similar to what Lewis and Clark encountered in the early 1800's. Over 74,000 visitors enjoyed this view in 2005, according to the Institute for Tourism and Recreation Research at the University of Montana.

#### Demographic, Economic and Housing Profiles

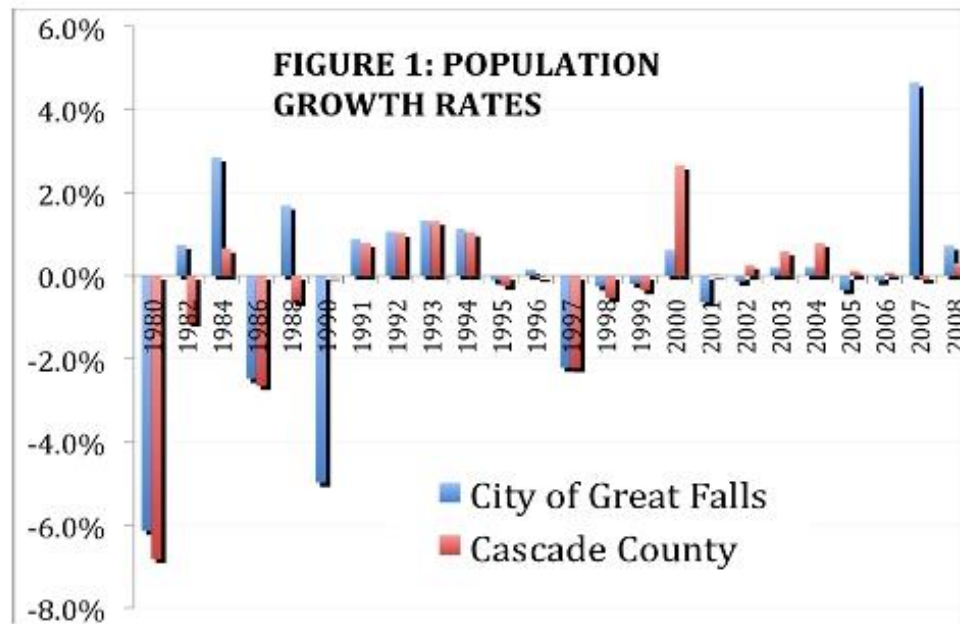
Demographic and economic trends for Cascade County are presented using data provided by the U.S. Census Bureau, the Bureau of Economic Analysis (BEA), the Bureau of Labor Statistics (BLS) and the Montana Department of Labor and Industry. Population projections from Woods and Poole Economics, Inc. are used.

Population data is presented from 1978 to 2008 while most economic data covers the period between 2000 and 2008. (For some data sources, 2005 is the most current available.) Cascade County has seen its population decline 5.3% between 1978 and 2008. In 1978 Cascade County only trailed Yellowstone County in terms of population. In 1990, Missoula County surpassed Cascade County. Cascade County's rank then fell to fourth when Flathead County surged ahead in 2005. One year later, Gallatin County's population jumped over Cascade's.

## Cascade County Population



Cascade County's population peaked at 86,600 in 1978. The City of Great Falls population followed a similar trend as the county. Figure 1 below compares the county and city's population growth rates.



5

As goes the county, so goes the city, in terms of population that is. When Cascade County's population grew, so did the city's, for the most part. Table 1 provides the population for the county and city.

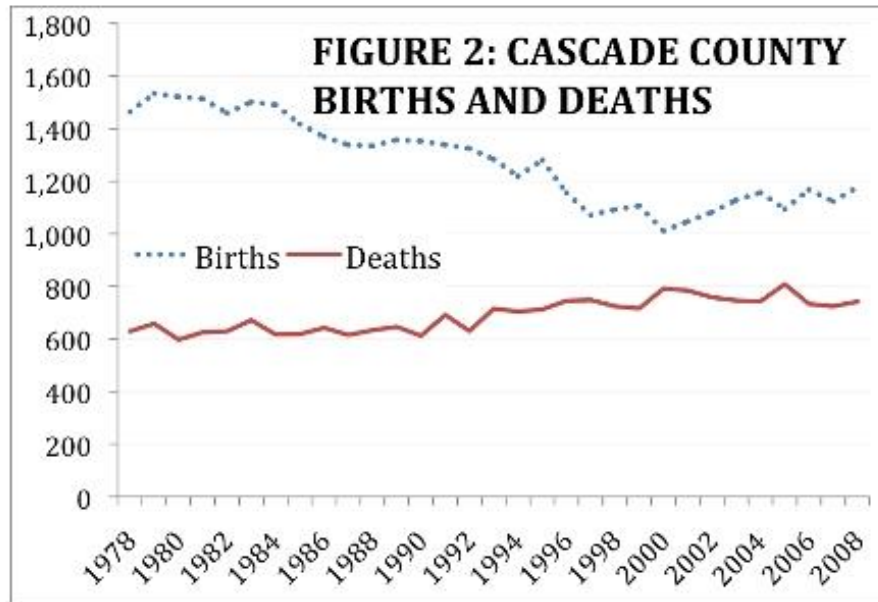
**Table 1: Population Growth Rates**  
1978 - 2008

Year	City of Great Falls	Population Growth Rate	Cascade County	Population Growth Rate
1978	60,438		86,600	
1980	56,725	-6.1%	80,696	-6.8%
1982	57,143	0.7%	79,791	-1.1%
1984	58,769	2.8%	80,318	0.7%
1986	57,310	-2.5%	78,179	-2.7%
1988	58,280	1.7%	77,681	-0.6%
1990	55376	-5.0%	77,691	0.0%
1991	55867	0.9%	78,314	0.8%
1992	56458	1.1%	79,132	1.0%
1993	57212	1.3%	80,172	1.3%
1994	57864	1.1%	81,015	1.1%
1995	57799	-0.1%	80,819	-0.2%
1996	57881	0.1%	80,777	-0.1%
1997	56596	-2.2%	78,977	-2.2%
1998	56447	-0.3%	78,558	-0.5%
1999	56340	-0.2%	78,282	-0.4%
2000	56,690	0.6%	80,357	2.7%
2001	56,324	-0.6%	80,380	0.0%
2002	56,245	-0.1%	80,590	0.3%
2003	56,364	0.2%	81,059	0.6%
2004	56,486	0.2%	81,690	0.8%
2005	56,287	-0.4%	81,791	0.1%
2006	56,215	-0.1%	81,854	0.1%
2007	58,827	4.6%	81,784	-0.1%
2008	59,251	0.7%	82,026	0.3%

Source: U.S. Census Bureau

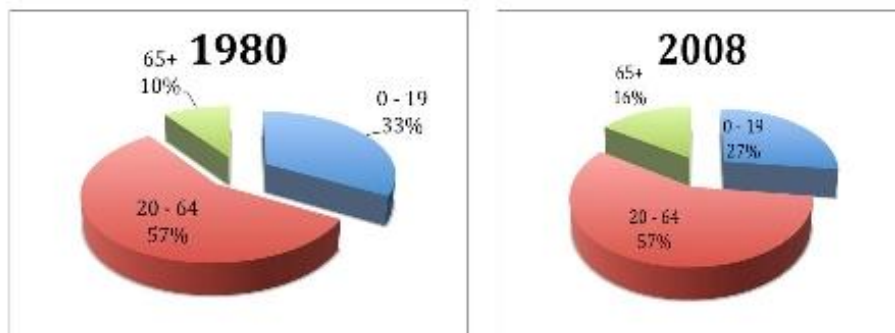
Dovetailing with Cascade County's declining population is a falling birth rate. In 1980, nearly 19 children were born for every 1,000 residents. This rate fell to 12 in 2000, reflecting both the highest and lowest rates in the county between 1978 and 2008.

The death rate, despite the population in general living longer, has increased.



The declining birth rate and rising death rate both reflect an aging population. As Figure 3 demonstrates, only 10% of the population in the county were age 65 and over in 1980. By 2008 that percent rose to 16%. The declining birth rate is also demonstrated by the reduction in the percentage of 0 – 19 year olds; 33% in 1980 and 27% in 2008.

**FIGURE 3: CASCADE COUNTY AGE DISTRIBUTION**



A comparison of various demographic characteristics between the Cascade County and the City of Great Falls is found in table 2. The county is 80% urban while the city is nearly 100% urban. On a percentage basis, more females live in the city than the county. The older population (65 and over) and a large percent of Native Americans reside in the city.

Table 2:  
2006-2008 Population and Household Characteristics  
Cascade County and City of Great Falls

Population Characteristics	Cascade County	City of Great Falls
Population	82,026	59,251
Urban	65,674	58,462
Percent of Total	80.1%	98.7%
Rural	16,352	58
Gender		
Female	41,746	30,531
Male	40,142	27,989
Percent Female	51.8%	52.2%
Age		
< 20	22,040	15,292
Percent of Total	26.9%	26.1%
20-64	47,552	33,701
Percent of Total	58.1%	57.6%
65+	12,296	9,527
Percent of Total	15.0%	16.3%
Median Age	39.7	40.1



#### Race

White	73,374	52,272
Percent of Total	89.6%	89.3%
Native American	3,142	2,544
Percent of Total	3.8%	4.3%
Other	5,372	3,704
Percent of Total	6.6%	6.3%

#### Household Characteristics

2006 - 2008 Households	32,482	24,015
2006 - 2008 Persons per Household	2.52	2.44
1 Person Households	9,124	7,545
2+ Person Households	23,358	16,470
Families	21,754	15,096

Source: U.S. Census Bureau

Special needs households, those experiencing poverty and disability, are shown in Table 3 for Cascade County and Montana. From a poverty standpoint, Cascade County residents experience a lower poverty rate than the state. The percent of individuals below the federal poverty level is also lower in the county than the state. Just the opposite trend occurs for persons with disabilities, i.e., a larger percentage exists in the county than the state.

Table 3: 2008 Special Needs Households -  
Cascade County and State of Montana

Characteristic	Cascade County		Montana	
	Number	Percent	Number	Percent
Elderly (65+)	12,296	15.0%	133,294	13.9%
In Poverty	10,881	13.7%	132,963	14.3%
Percent of population at or below federal poverty level	Number	Percent	Number	Percent
100% (2008)	10,881	13.7%	132,963	14.3%
150% (2008)	17,932	22.6%	222,331	23.9%
200% (2008)	26,770	33.7%	321,411	34.5%
Single Parent Households	4,178	18.9%	45,223	19.0%
Disability (2006)				
Persons 16+ with Go-outside-home/Self-Care Disabilities	7,125	12.2%	64,514	8.7%
Disabled persons 5+ Sensory/Physical/Mental*	19,301	27.7%	202,954	23.3%

\* Persons can have more than one disability

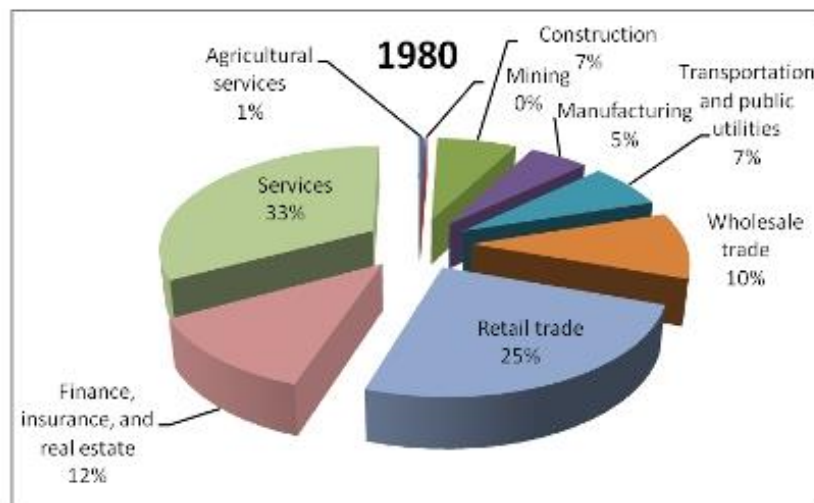
Source: U.S. Census Bureau, Population Estimates and American Community Survey

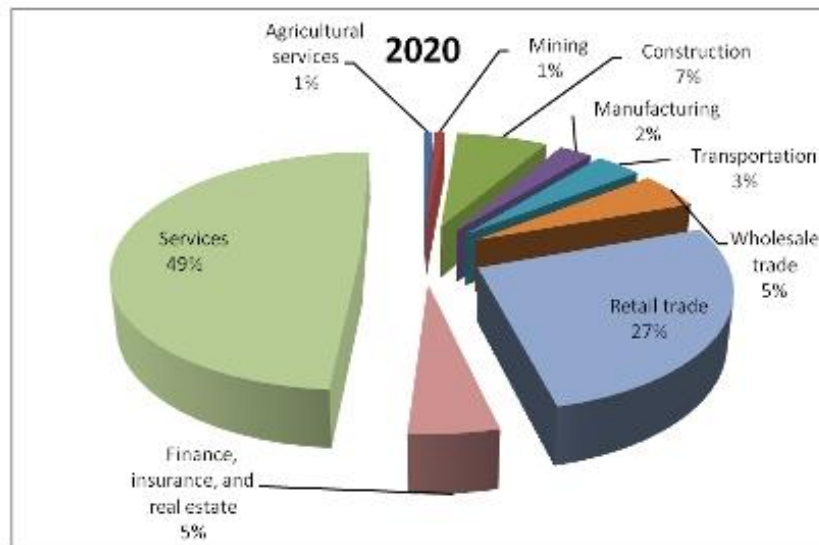
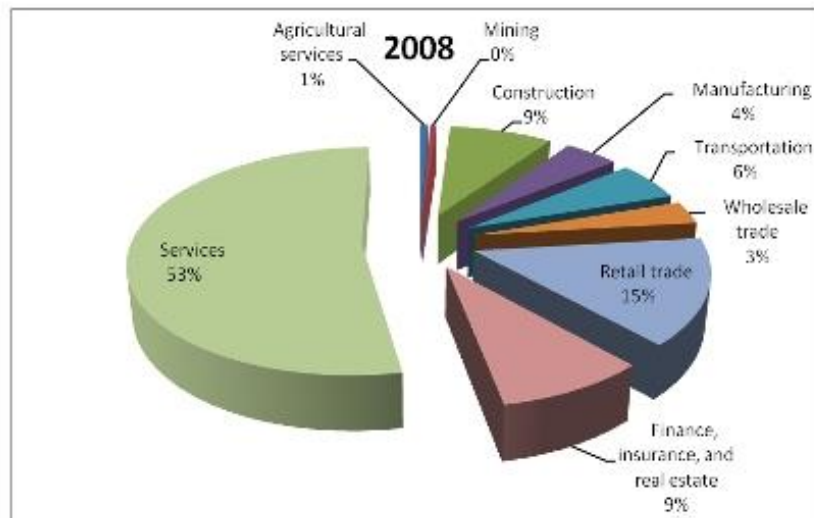
## Economic

### Employment

Due to Cascade County's location in the state, the county and especially the City of Great Falls is considered a trade center. Employment numbers reflect that status. Retail trade comprises around 15% of all private employment in 2008; however it is projected to grow to 27% by 2020. The Services sector, which encompasses education, health care, information technology, professional services, and consumer services was 33% in 1980 and has grown to 53% in 2008. Finance, insurance and real estate employment as a percentage of total employment, though, is expected to decline from 9% in 2008 to 5% in 2020. Figure 4 presents the breakdown of private employment in the county for 1980, 2008 and 2020.

FIGURE 4: EMPLOYMENT BY INDUSTRY FOR CASCADE COUNTY





Source: U.S. Bureau of Economic Analysis and Woods and Poole Economics, Inc.

Farm employment is predicted to rise between 1980 and 2020, bucking the national trend of declining farm employment. Military employment declined 25% between 1980 and 2008 but is expected to bounce back in 2020 with a 7% increase. See table 4.

Table 4: Population and Employment - Cascade County

1980 – 2020							
Category	Actual				Projected		
	1980	1990	2000	2008	2010	2015	2020
Population	80,696	77,691	80,357	82,026	82,450	83,620	85,000
Total Employment	42,973	43,517	48,647	51,930	52,590	54,950	57,310
	1980	1990	2000	2008	2010	2015	2020
Farm employment	1,039	1,036	1,296	1,250	1,280	1,310	1,330
Nonfarm employment	41,934	42,481	47,351	50,680	51,310	53,640	55,980
Private employment	31,377	32,058	38,046	33,743	38,961	41,239	43,516
Agricultural services	153	368	250	230	240	260	280
Mining	60	66	370	180	340	350	350
Construction	2,226	1,862	2,687	2,895	2,860	2,960	3,070
Manufacturing	1,661	1,246	1,439	1,524	1,110	1,110	1,109
Transportation	2,196	2,160	2,062	1,888	1,600	1,580	1,560
Wholesale trade	3,216	2,364	1,930	1,111	2,090	2,120	2,150
Retail trade	7,771	8,673	10,163	5,046	10,580	11,090	11,600
Finance, insurance, and real estate	3,794	3,126	4,089	2,980	1,831	1,979	2,127
Services	10,300	12,193	15,052	17,889	18,310	19,790	21,270
Government	10,557	10,423	9,305	9,510	9,270	9,620	9,700
Federal, civilian	1,773	1,780	1,531	1,620	1,510	1,470	1,420
Military	4,989	4,726	3,905	3,750	3,690	3,990	4,030
State and local	3,795	3,917	3,869	4,140	4,070	4,160	4,250

Source: Regional Economic Information System, Bureau of Economic Analysis, U.S. Department of Commerce and Woods and Poole Economics, Inc.

The top private employers in Cascade County are listed in Table 5. The companies are listed in alphabetical order with the size class provided.

**Table 5: Largest Private Employers in Cascade County**

Top 20 Private Employers in Cascade County based on 2<sup>nd</sup> quarter 2008 data:

Business	Size Class*
<b>Albertson's Food &amp; Drug</b>	7
Benefis Hospital	9
Centene Corporation	6
Center for Mental Health	6
D. A. Davidson & Co.	6
Easter Seals - Goodwill	7
Great Falls Clinic	8
Great Falls Tribune	6
Heritage Inn	6
Macaroni Grill/Chilis	7
<b>McDonald's</b>	6
Missouri River Manor	6
National Electronics	8
Warranty	
North Central	6
Independent Living	
Park Place Health Care	6
Center	
Quality Life Concepts	6
Sletten Construction	6
Town Pump	6
University of Great Falls	6
Wal-Mart	8

Source: Montana Department of Labor and Industry, Research and Analysis Bureau

\*Size Class Breakdown:

Size Class 3 = 10-19 employees;

Size Class 4 = 20-49 employees;

Size Class 5 = 50-99 employees;

Size Class 6 = 100-249 employees;

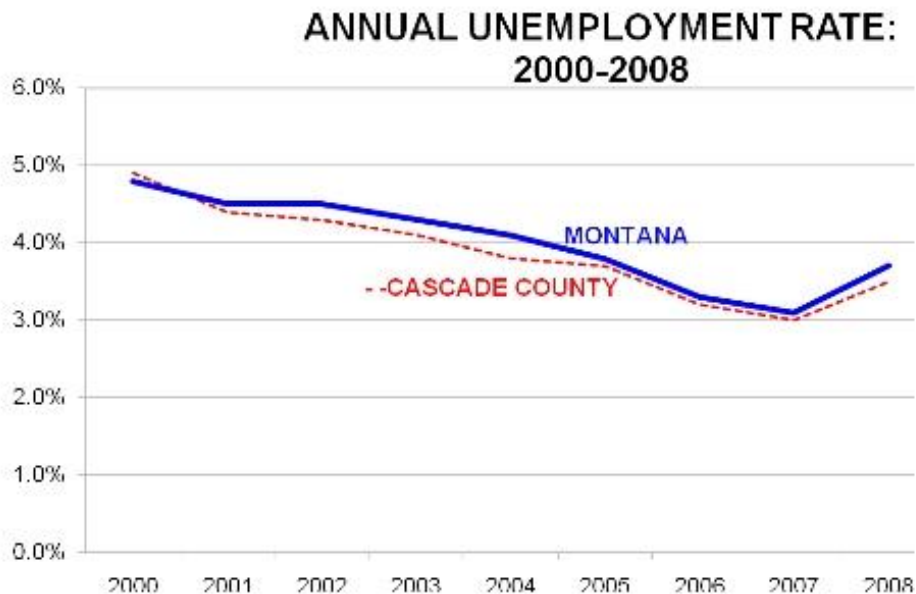
Size Class 7 = 250-499 employees;

Size Class 8 = 500-999 employees;

Size Class 9 = 1,000 and over employees.

Cascade County's annual unemployment rate, since 2000, has been lower than the state's. See Figure 5.

Figure 5: Annual Unemployment Rate for Montana and Cascade County



Source: Montana Department of Labor and Industry

## Income

Per capita income in Cascade County as a percent of the state per capita income was over 100% between 1995 and 2008. However, the percentage is declining, from 108% in 1995 to 103% in 2007. Cascade County's per capita income, when compared to the nation, has remained steady at 89%. Cascade County's average wage per job as a percent of the state's has also declined, but by two percentage points only (104 to 102). Nationally the percentage has declined from 77% in 1995 to 73% in 2008. Figure 5 depicts the above phenomenon.

Pay for pharmacists increased 43% between 2000 and 2008, placing them fifth highest in 2000 and first in 2008. The top five highest paying jobs are listed in Table 6 along with the salary received by employees in the largest employers in the county.

Table 6: Personal Income and Wage Data  
Cascade County, Selected Years

Per capita personal income			
	1995	2000	2007
United States	\$ 23,076	\$ 29,845	\$ 38,615
Montana	\$ 18,349	\$ 22,933	\$ 33,225
Cascade	\$ 19,899	\$ 24,539	\$ 34,417
Per Capita % of Montana	108.4%	107.0%	103.6%
Per Capita % of United States	86.2%	82.2%	89.1%

Average Wage Per Job			
	1995	2000	2008
United States	27,437	34,718	\$ 45,716
Montana	20,283	24,084	\$ 33,299
Cascade	21,020	24,657	\$ 33,481
Average Wage % of Montana	103.6%	102.4%	100.5%
Average Wage % United States	76.6%	71.0%	73.2%

Source: Bureau of Economic Analysis, U.S. Department of Commerce



Highest Paying Jobs (Annual)			
	2000		2008
Securities and Financial Agents	\$85,550	Pharmacists	\$87,743
Insurance Sales Agents	\$82,400	Chief Executives	\$92,044
Chief Executives	\$68,790	Financial Managers	\$86,398
Engineering Managers	\$65,710	Education Administrators	\$71,584
Pharmacists	\$61,550	Civil Engineers	\$70,497

Salary by Largest Employer:		
	2000	2007
Health Care	\$26,572	\$ 34,883
Retail Trade	\$17,836	\$ 22,559
Eating and Drinking Places	\$ 9,568	\$ 11,846

Source: U.S. Bureau of Economic Analysis, U.S. Bureau of Labor Statistics and Montana Department of Labor and Industry

#### Malmstrom Air Force Base and Montana Air National Guard

The federal government is a major force in the Great Falls economy via Malmstrom Air Force Base, which controls 150 nuclear-tipped missiles in silos throughout nine central Montana counties. Malmstrom contributes \$134.2 million a year in payroll and direct spending in the area, including construction. Add in the indirect impact of Malmstrom on area businesses, and the total rises to about \$284 million. That means the base, just east of Great Falls at the end of 2nd Avenue North, accounts for 35 percent of the city's economic base. There are about 3,363 military employees with some 5,000 dependents. MAFB also employs about 370 civilian workers, while 1,273 other people do at least some work involving Malmstrom under private contracts. The base also affects the economy in less obvious ways. Some 1,400 retired military people live in the Great Falls area, in part because of services available at the base. The 15,000

people with at least some base connections make up more than 20 percent of Cascade County's population. The base has about 1,400 housing units, and a continuing effort to replace or remodel outdated dormitory and family housing units is under way

The Montana Air National Guard, (MANG), with an annual economic impact of \$36 million, is a significant presence in the Great Falls area. More than a thousand guardsmen, spending \$26 million in full-time and part-time salaries, live and raise families and retire in our communities. With 350 full-time people who live in and around Great Falls, MANG is one of the largest employers in the city. The F-16s share the airport runways with commercial aircraft. The fire and rescue crews providing a 24-hour response are Montana Air National Guard firemen operating under a cooperative agreement with the Airport Authority.

#### HOUSING SUPPLY AND CONDITIONS

Since 2000, 727 new housing units have been built in the city of Great Falls. Over half of the housing units were single family homes.

Table 7: Housing Inventory City of Great Falls

Geography	2000 Units	Authorized Construction	Housing Stock, Jan 1, 2008	% Change
Single Family	16,450	381	16,831	2.3%
Multifamily	7,441	51	7,492	0.7%
Mobile Home	1,342	295	1,637	22.0%
Boat, RV	20	N/A	20	0.0%
Total	25,253	727	25,980	2.9%
Population Change	56,690	2,137	58,827	3.8%

N/A Not Available

Source: U.S. Census Bureau, Census 2000;  
Montana Department of Labor and Industry  
Building Permits

As shown in table 7, the estimated growth in the housing stock for single-family units in Great Falls has not kept pace with the population growth. However, the addition of mobile or manufactured homes exceeded population growth, 22.0% to 3.8% respectively.

The Housing White Paper published by the Montana Department of Commerce in 2007 and updated in 2009, describe housing conditions in Cascade County. The median home cost in 2006 was \$136,680; while the homes affordable to a median income family was \$136,772, with a median income of \$36,786. The affordability gap (difference between median house price and home affordable to a median income family) was expected to grow to \$78,000 by the year 2020. For a single wage earner, the affordability gap in 2006 was \$31,527. The percentage of a senior citizen on SSI to rent a 1 –bedroom apartment in 2006 was 45.9%, compared to an affordable percentage of 30%. Poor conditions homes were estimated at 8,353, of which 1,279 were multi-family rentals and 1,855 were manufactured homes.

In October of 2009, Great Falls was still enjoying a relatively stable real estate market, with the median home price of \$160,000 or \$87 per square foot. The median list price was slightly over last year at the same time. Days on the market was 64, seven percent longer than one year ago. Prices had been cut on 17% of the listing, but the percentage of price cuts was less than one year ago. (Zillow.com)

## Survey Results

### Agency and Organization Questionnaire

An on-line survey was sent to a large group of agencies and organizations, including local businesses in early May 2008, resulting in 68 responses. Some staff members from the same agencies completed the survey, so the number of agencies or organizations totaled 49.

The responses point out certain common themes related to housing and community development, particularly the quality of life challenges for persons who are lower-income or have special needs. Some excerpts from the survey responses follow and complete survey responses are available. The agency and organization survey was very helpful in structuring the comprehensive survey. Some excerpts from the survey follow

► A complete compilation of all responses is available at the City Community Development Office.

#### Great Falls Job Service Workforce Center

There is a gap between people who have very limited income renting for almost nothing and a young working family who does not make enough to make a big rent payment but who makes too much to qualify for assistance.

#### St. Martin de Pores Mission – St. Jude Conference

Rental housing is often very inadequate. This fact generates an increasing number of requests for aid with rent and utilities. The 2007 grant for utilities assistance ran out by the end of October, even before winter really set in. At times it was possible to give some help through cooperative arrangements with Opportunities, Inc; Salvation Army; St. Vincent de Paul Society; and/or local churches.

#### The Salvation Army

More people needing housing. A number of older housed need to be condemned. They are a disgrace to even think of renting. insufficient insulation etc. Makes utilities higher, which makes people make a choice of paying Rent, Utilities, buying food or getting prescriptions they need.

#### Easter Seals - Goodwill

Finding affordable housing for clients that do not have Section 8 vouchers is very hard. Example: client with SSI renting apartment for 475.00 month which leaves very limited funding for other needs.

#### Mental Health Association of Great Falls

We have had guest speakers come to our group and share the burden felt by people struggling to get assistance which then delays their ability to get housing. Former inmates who do not have family in the community have a large burden of trying to establish housing.

#### Great Falls Housing Authority

Our section 8 voucher holders are having a very difficult time finding private housing to rent with their vouchers that is adequate and affordable.

**Center for Mental Health**

A lot of our folks do live in sub-standard conditions and even worse, they may have a record because of desperate attempts to better their lives that results in them being black listed from even sub-standard housing. They do not have respect from landlords because they are viewed as undesirable tenants.

We need more low income units to meet the needs of the seriously mentally ill. Expanded emergency housing for our homeless folks, in a setting that understands the needs of the population.

**Big Brothers Big Sisters**

Many of our families-especially grandparents raising grandchildren live in substandard housing or simply housing that is too small. We have grandparents raising their 2 grandchildren living in a one bedroom apartment where the children sleep in the living room.

**Life Way Pregnancy Services**

We have had numerous clients who have had to rent a motel or stay at Rescue Mission while waiting for housing to open up. Many of our clients have trouble coming up with the deposit monies needed to get into housing.

**Young Parents' Education Center**

Ideally there would be an adult supervised apartment complex that teen parents could rent their own apartment from with rules to follow. Right now if a teen parent needs to rent an apartment they have to drop out of school to work full time in order to afford rent. This creates long term poverty patterns due to lack of education.

**YWCA Mercy Home**

We are also serving more victims that are not eligible for public housing until they pay a past due balance from a previous rental. This past due balance is often due to damages caused by an abusive partner which are not the fault of the victim, yet she and her children are being penalized.

**Stockman Bank**

Many of the borrowers I interview are comfortable in the lower housing sector, \$50,000 to \$100,000. With their comfort level in this house payment range, the inventory of quality homes is sparse.

**City of Great Falls – City Manager's Office**

HOME and CDBG resources available but limited to help low income. No resources for workforce housing, keeping housing affordable or to encourage landlords to take section 8 clients in market rate apartments.

► For a list of agencies and organizations that participated in answering the online questionnaire see [Appendix B](#).

### Great Falls/Cascade County Community Opinion Survey

The Great Falls Area Comprehensive Housing Affordability Strategy Work Group, composed of a broad cross-section of organizations whose primary concern is the promotion of quality, affordable housing for all citizens of Great Falls and Cascade County, conducted a community opinion survey mailed to 8000 households during late June and early July of 2008. The survey was designed to assess overall Community Development Needs of Great Falls and Cascade County.

#### Opinion Survey Purpose

The purpose of the study is to determine the public perception of housing, public services, education, healthcare, recreation and social opportunities, and economic development within Cascade County and the City of Great Falls. The survey was designed to target a range of community issues. The study objectives are to:

1. identify specific housing affordability concerns and needs;
2. isolate specific housing conditions in the community;
3. determine the level of satisfaction with public services;
4. ascertain the public's perception of the transportation infrastructure;
5. determine the level of satisfaction with the education system;
6. identify specific healthcare concerns and needs;
7. determine the level of with the existing health care services in the community;
8. determine the adequacy of the community's recreational and social opportunities;
9. examine the employment capacity within the community;
10. identify the public's perception of business recruitment, retention, and expansion;
11. examine the community financial needs; and
12. examine socio-demographic differences in public perception of housing, public services, education, healthcare, recreation, social opportunities, and economic development.

Ultimately, the results of the study will aid the City of Great Falls, and Cascade County, as well as other area agencies, and non-profit or for-profit organizations in:

1. evaluating current housing, public services, education, healthcare, recreation, social opportunities, and the economic development programs;
2. planning and developing new housing, public services, education, healthcare, recreation, social opportunities, and economic development programs; and
3. creating public education programs that may address the issues and concerns found herein.

This study, in addition to information gathered by the Work Group by means of other surveys, focus groups and public meetings, is intended to be utilized in creating a comprehensive Affordable Housing Strategy and Housing Plan for Great Falls and Cascade County.

## Opinion Survey Methods

### Population

The universe of interest consists of all residents in Cascade County, Montana. Based on the findings of the US Census Bureau there are approximately 32,225 households in the county.

### Sample Size and Sampling

The unit of analysis for the study is a household unit in Cascade County, Montana. With a population size of 32,225 households, the necessary sample size to achieve a 5% confidence interval at a 95% confidence level would be 384 households. To allow for a more complete sample of subset groups, 8,000 households were sampled, yielding 1496 completed surveys.

A sample frame was generated by a postal service business that maintains a comprehensive database of residential addresses in Cascade County. Nonresidential addresses were eliminated and apartment unit addresses were compiled from multi-family dwellings to insure all households have equal probability of selection. A randomization technique was used to extract 8,000 households from the population. Surveys were distributed proportionately to households with zip codes outside of the Great Falls city limits. This technique provided a probability sample of households for Cascade County, MT.

### Survey Instrument

The survey instrument was developed by the Great Falls Area Housing Plan Work Group by modifying a model previously developed by a survey professional for another Montana community. The work group included individuals from the following entities: 1) the City of Great Falls' Community Development department; 2) NeighborWorks Great Falls; 3) Rural Dynamics, Incorporated with the Consumer Credit Counseling Service of Montana; 4) First Interstate Bank; and 5) AWARE; 6) the Great Falls Ministerial Association and 7) the University of Great Falls. Instrument structure entailed the measurement of housing conditions, affordability, and needs; the use and need of public facilities and services; education system quality and assessment; health care quality and satisfaction; recreational and social opportunities and needs; and economic development perspectives (see Appendix C).

### Survey Administration

A mail survey was utilized versus other survey modes for the following reasons: 1) numerous households do not have hard-wire telephones due to the proliferation of cell phones; 2) households with more than one hard-wire telephone (i.e., home-occupation business, internet, teenager, etc.) would be over-sampled; 3) the survey instrument will be too long for telephone administration; and 4) the geographic area is too great for face-to-face interviews.

The survey instrument was mailed to each of the selected households in the sample with a cover letter describing the study (see Appendix C) and its purpose, the first week of May 2008. The head of the household was instructed to complete the survey and return in the self-addressed, stamped envelope as provided. The respondent was given the option of taking the survey on-line and was provided the web link. In order to

increase the response rate, a drawing for one \$300 prize, two \$200 prizes, two \$100 prizes, and two \$50 prizes were offered as an incentive in order to increase the response rate for surveys received either by mail or on-line by July 9, 2008.

#### Data Analysis

Descriptive statistics such as frequency distributions, counts, percentages, medians, and means were primarily used in analysis. In order to examine differences in distributions, bivariate, inferential statistical tests were used with a significance level set at  $p \leq 0.05$ .

### Opinion Survey Results

#### The Sample

By the end of September 2008, 1496 surveys were received with data entry complete. The goal of the sampling design was to achieve a representative sample of households for Cascade County. According to the US Census Bureau in the year 2000, there are 32,225 households in the county. One assumption is that the population of households tends to be fairly homogeneous. Secondly, no population subgroups were to be targeted in the study (e.g., urban, elderly, etc.). Based on these assumptions and the following formula it is possible to determine the confidence level and confidence interval for the obtained sample size of 1496.

$$n = ((Z \sqrt{PQ}) / C)^2$$

where,  $Z = 1.96$ , for 95% confidence that a result lies within a given confidence level;  
 $P$  = the percentage about which a confidence interval is computed, expressed as a proportion;  
 $Q = 1 - P$ ;  
 $C$  = the size of the confidence interval, expressed as a decimal; and  
 $n$  = sample size, 1496.

Assuming the worst-case scenario,  $n$  is largest when  $P = 0.5$  and  $Q = 0.5$ . That is, the percentage split is unknown (e.g., 50% respondents answering a certain way with the remaining 50% responding the opposite). Thus, with the confidence level set at 95% and a sample size ( $n$ ) of 1496, solving for  $C$ , it is found that the confidence interval is 0.025.

In conclusion, the accuracy level for a probability sample size of 1496, which is quite substantial, is the situation in which one is 95% certain that no estimated percentage or proportion is off by more than  $\pm 2.5\%$ .

Table 1 summarizes the sample and the comparisons to the population. Some differences between the sample and population may be addressed as follows:

1. the sample age is that of the head of household versus age of all county residents;
2. the respondents were more likely to be female head of households;



3. income for the sample was measured as household income versus family income as measured by the US Census. Some households may contain more than one family; and
4. the percent owner-occupied perhaps indicates that owner-occupied households may be more committed to their community and were then more likely to respond.

Despite these differences the sample appears to be fairly representative of the population.

TABLE 1 Sample Summaries and Population Comparisons

Variable	Sample (n=1496)	Cascade County: 2000	Variable	Sample (n=1496)	Cascade County: 2000
Sex			Children in Household		
Percent Male	35.2	49.5	Percent with Child under Age 18	26.5	28.9
Percent Female	60.2	50.5	Housing Occupancy		
Age			Percent Owner-occupied	84.4	64.9
Median Age	54	36.7	Percent Renter-occupied	15.6	35.1
Educational Attainment			Type of Housing Unit		
Percent Less than 12th, No Diploma	4.0	12.9	Percent Apartment	11.8	N/A
Percent High School Graduate	25.5	33.3	Percent Condominium	3.0	N/A
Percent Vocational Training	9.8	N/A	Percent Mobile Home	10.0	N/A
Percent Some College	22.8	32.3	Percent Single-family	75.1	N/A
Percent Bachelor's Degree	20.4	14.8	Average Household Size	2.36	2.41
Percent Graduate Degree	13.2	6.7	Children in Household		
Income			Percent with Child under Age 18	26.5	28.9
Median Family Income	\$45,000	\$39,949	Percent Female Householder With Children	12.7	6.8
Not in Labor Force			Household Composition		
Percent not in Labor Force (i.e., retired, disabled, and unemployed)	29	35	Percent White	96.0	90.7
Residential Area			Percent Native American	1.6	4.2
Percent City of Great Falls	78.3	70.5	Percent Other	2.4	5.1

Appendix C displays the survey instrument with the summative statistics for each question and sub-question. For nominal and ordinal measured questions, the counts and percentages, in parentheses, are displayed. Questions with continuously measured variables are summarized with medians and means as indicated.

## Data Analysis

### Housing

Eighty-four percent of the respondents own their homes with 75.1% residing in single family residences. Most households contain 3 or more bedrooms (70.2%). Nearly 55% state that they spend less than 30% of their household income with 39% stating that between 30-50% is spent on housing. Over 76% state that the amount spent on housing is affordable. Although most state that their housing is affordable, 69.5% would apply for low-interest loans or grants to improve their home. Eighty-five percent state that their homes are not accessible to those with disabilities and furthermore over 50% believe more accessible housing is needed in the community. With regard to housing problems, air leaks around windows and doors (41.8%), sticking doors and windows (29%), inadequate insulation (25.2%), and cracked foundations (20.8%) are the top four housing problems. Twenty-two and 25% do not know if asbestos or lead-based paint, respectively, are problems in their homes and 31% don't know if they have radon in their homes. Cascade County residents (62.3%) believe that more affordable rentals are needed. Nearly 60% believe that better quality rental homes are needed while 54.8% believe that more affordable apartments are needed. Regarding the perspective on the condition of housing in their neighborhoods, 88.8% believe that housing is average or above average in their neighborhoods. Twenty-one percent of the respondents feel that unsafe or unsanitary apartment complexes exist in their neighborhood and that these complexes have a negative impact (64.2%) on the neighborhood. Nearly 50% of the residents believe that the community needs additional housing for teen parents, homeless and victims of violence in the community. Regarding homes for purchase, 71.3% believe more homes costing less than \$100,000 are needed and 53% noted that more homes between \$100,000 and \$120,000 were needed.. In addition, 68.6% believe more Habitat for Humanity homes are needed. Overwhelmingly, respondents believe the more elderly housing units are needed. Most respondents do not know if additional group homes are needed (i.e., ranging from 54.3% to 59.7%), but around a third said more group homes of various types were needed. Nearly 83% of the residents believe that vacant building, houses, and trailers need to be demolished in the city and county. Just under 50% of respondents felt that existing subdivisions should be zoned for manufactured housing and that some outlying areas should be annexed into the city. Concerning the use of tax revenues to support housing, 42% said the city and county should use local tax dollars to support affordable housing. Over 60% of the residents believe that: 1) grants and low-interest loans should support first-time homebuyers (61.3%); 2) state and federal funds should be used for affordable housing (69.5%); and 3) local funds and resources should be used to expand affordable housing (65.3%). Finally, over 87% do not have a problem making their monthly mortgage payments in the past year, leaving 13% who did have a problem.

In response to an open-ended question of "What do you feel is the areas' biggest housing problem?", the highest mentions were for poor quality housing (242 responses), lack of affordable housing (226), lack of low income housing (99), new homes too expensive (75) and rent too high (60).

#### Renter-Occupied Housing

The rental occupied population would be described as primarily residing in apartments (34.2%) and houses (32.9%) typically with 2 bedrooms. Over 57% of the renters spend 30-50% of their income on housing. Over 77% do not receive any rental assistance. Over 63% believe that their housing costs are affordable. (Of the renters 70.1% would like to participate in home buyer assistance. Whereas, 80% of the renters homes are not accessible, 58% believe there is a need for such housing. The most prominent housing problem for renters is air leaks around doors and windows (54.2%). Sticking doors and windows is next with 38.5% seeing this as problematic in their rental unit. Cracked foundations; and walls or ceilings with holes, falling plaster, peeling paint, stains, and mold and mildew are perceived problems both with 26.9% of the renters stating such. Renters demand more affordable rental houses (85.8%), better quality rentals (80.4%), more affordable apartments (77.3%), more rental houses (73.3%), and more rental houses that allow pets (69.9%). Over 84% of the renters believe that the housing in their neighborhood is average or above. Over 60% of the renters believe that additional housing is needed for the homeless/transitional, teen parents, and victims of violence. Overwhelmingly, renters believe that more homes costing less than \$100,000 should be available (81.6%) in addition to Habitat for Humanity homes (75.4%). Like all residents, renters feel that dilapidated structures should be demolished (80.6%). Well over 70% of the renters feel there is a need for first-time home buyer's funds, and the local, state, and federal funds should be used to expand and improve affordable housing.

Statistically significant differences between owners and renters ( $\chi^2$ ;  $p < 0.05$ ) are due to the disproportionate distribution between occupancy.

#### Public Facilities

Seventy-eight percent of the housing units use city sewer with over 90% experiencing no problems with this service and 84.7% not needing repair or replacement. Over eighty-two percent of the housing units use city water with 68% not experiencing problems. Over 88% of the city water users do not need repair or replacement. Nearly 60% of the residents find both city and county roads in need of repairs. Over 50% feel that the street and roads are in need of traffic flow improvements. There are no perceived problems (65.6%) with the railroad crossings in the Great Falls area. Where 51.8% of the residents state there problems with traffic speeding in their neighborhood, 46.3% do not see a problem. Over 65% of the residents do not have a noise problem in their neighborhood, but 56% of those with a noise problem said it was caused by vehicles. 60% state that the curbs/gutters, sidewalks, and accessible curb cuts are fair to good in the neighborhood. Approximately 50% of the residents feel that plane and train transportations are inadequate within the state and out of the state. There is a fairly even distribution across the adequacy of the bus service in Great Falls (i.e., adequate [31.8%], not adequate [29.1%], and do not know [39.1%]). For those not feeling bus service is adequate, weekend operations are the desired implementation. Most respondents (97%) were not aware of the Northern Region transportation option. With regard to community satisfaction and public services and facilities, a need for more youth recreation tops the list at 41.2% with recycling and weed control following (36.9% and 37.1%, respectively). A need for information on public services is demanded

(33.6%). In addition to a desire to stay informed, over 60% feel that non-cable television access should be provided for public meetings.

#### Education

Over 67% of the Great Falls and Cascade County residents feel that the city and county districts are comparable to similar districts in Montana. In addition, 64.1% are satisfied with the safety of the schools in their community. With the exception of summer school opportunities, the proportion of residents who are satisfied with educational programs (i.e., vocational training, general education, college preparation, evening workshops, music, athletics, and adult basic education) exceeds those with no opinion on such programs. The proportion of those dissatisfied is far less (i.e., less than 14%). Significantly, over 92% of the residents believe that anti-drug education programs should be offered in the schools.

#### Health Care

Overwhelmingly, over 82% of the residents in the city and county feel that a walk-in medical care facility is needed in the community. Regarding the need for additional medical specialists in the community, 44% believe there is a need while nearly 40% have no opinion on the matter. Examining the level of satisfaction with the various aspects of health care in the community, generally evinces a somewhat satisfied to very satisfied level across most health care services. Again, the most dissatisfaction is with an immediate walk-in care clinic (i.e., 20.2% are somewhat to very dissatisfied). For several health care services in the community a majority of residents do not have an opinion of the service. Such services are the Indian Family Health Clinic, mental health counseling, alcoholism treatment, drug addiction treatment, obstetrical care, nutrition counseling, women-infant-children programs, and home-based health care services. Looking at Native Americans only (n=23), over 65% of the Native American respondents are somewhat to very satisfied with the Indian Family Health Clinic while approximately 30% are unaware of the clinic. Seventy-eight percent of the residents believe an Ask a Nurse program would be a good addition to the community. Regarding health and dental services for low income residents in the community, respondents feel that there are not adequate services (i.e., 45.9% and 49.3%, respectively). A majority of respondents rate themselves as healthier (45%) or similar (44.6%) as those of the same age. Over 75% do not have any physical, mental, or emotional problems and nearly 90% do not require the use of special, medical equipment (e.g., wheelchair, cane, bed, telephone, etc.). Medical specialists needed by respondents most often were cardiovascular, ear-nose-throat, dermatology and general practice-primary care physicians. Medicare, Medicaid and private insurance were carried by 21%, 2% and 65% of respondents, respectively; while 12% had no insurance. The number of hours of volunteer work varied from zero to 64 hours per month, with a mean of 13.64 and median of 8 hours per month.

#### Recreation and Social Opportunities

Significantly, over 83% of the residents responding to the survey in the city and county find that their churches meet their needs. Of households with school age children, 64% eat dinner together at least 4 times in an average week. It appears as though city/county residents do not know of the recreational opportunities for various age

groups. Just over 32% feel that there are not adequate recreational opportunities for young adults. Yet over 45% feel that there adequate recreational opportunities for elementary age groups. Regarding recreational facilities, over 53% think that more or better quality public restrooms are needed. Generally, residents are quite satisfied with the community's recreational facilities. Respondents have no opinion or are unaware of some the community's recreational opportunities such as ice skating, basketball, equestrian trails, and folf. Residents are generally satisfied with the community's art galleries, museums, historic centers, and symphony but do not have an opinion of dance and chorale opportunities. Over 20% of the residents think that additional opportunities are needed in movie and live theatre, community concerts, and cultural events, however, they are quite satisfied with the existing opportunities. Just under 35% of respondents felt there was not adequate recreational opportunities for persons with very low incomes; while 25% said there were not enough for persons with mental and physical disabilities or handicaps.

#### Economic Development

Significantly, over 83% of those responding to the survey in the city and the county make more than 75% of their purchases in the Great Falls area. A vast majority of those residents feel that community should make more efforts to attract new large and small businesses (i.e., 80.2% and 87%, respectively). In addition, residents feel that efforts should be made to expand existing large and small businesses (i.e., 72.2% and 86%, respectively). Sixty-six percent of the respondents are employed or self-employed, with 79% of households with one or more employed member. The largest occupation category is 'other' for primary and secondary income earners. Only 19.6% of those employed are under-employed (20% professionals) with only 5.5% of those employed being employed outside of Cascade County. The top five employment sectors, which respondents would like developed or expanded are: 1) retail businesses (70%); 2) recreation industry (69%); 3) small home businesses (66.1%); 4) light manufacturing (65.4%); and 5) research/laboratories (64.3%). The top five financial services that respondents would like to see more available in the community are: 1) first-time home buyer opportunities (72%); 2) home improvement loans (71.1%); 3) student loans (65.9%); 4) down payment assistance (64.5%); and 5) affordable home subsidies (62.9%). Interestingly, four of the five of these financial service demands are housing related. Over 78% of the respondents are in favor of seeking state, and/or federal funds to develop and expand businesses and 72% are in favor of using local and county funds for the same purpose of creating job opportunities.

#### Demographic Differences

It is not logical to examine differences between the various demographic variables and each of the questions in housing, public services, education, healthcare, recreation and social opportunities, and economic development. This is due to the statistically significant differences within the demographic variables. That is, a bivariate, inferential statistic (e.g., Chi-square) examining the distribution between race and, for example, the percentage of household income spent on housing, which would reveal significance could not be interpreted as contingency between the two variables because the significant difference in proportions within the racial categories. The same could be

argued with housing occupancy, income (i.e., categorical), and the other demographic variables. In sum, the sample and the county population tends to be homogeneous.

### Conclusions

The primary substantive conclusion from the survey and analysis may be that the residents of the City of Great Falls and Cascade County are generally content with their housing, public services, education, healthcare, recreation and social opportunities, and their jobs. The public feels that there is a need for additional, affordable housing. In particular, those residents who rent believe that there needs to be additional rental housing and housing, which is accessible for home ownership. In addition, they believe public funding (local, state and federal) should be allocated for affordable housing. They also believe that there is a housing need for those in the community that may be disadvantaged (e.g., homeless, teen parents, and victims of violence) or elderly.

Generally, residents are pleased with public services with the exception that particular attention should be given to streets and roads, and that some means be considered to augment air and train transportation. Regarding education the public is satisfied with the quality and safety of their schools. Overall the residents of the city and county are satisfied with the health care in their community. A large proportion of the general population is unaware of or not familiar with several health care programs (drug and alcohol treatment, mental health counseling, etc.). Many residents believe there is a need for additional programs such as a walk-in clinic, Ask-a-Nurse, and programs for those with low incomes and/or a lack of health insurance. Whereas some of the city/county residents believe that additional or better quality recreational and social opportunities are needed such as bike paths, indoor swimming, natural area, and public restrooms, most are satisfied. Many express the need for enhancement in the community's movie theatre(s), live theatre, community concerts, and cultural events. By and large, residents believe that concerted efforts should be taken to attract and support businesses, which will ultimately create more jobs in the community. Finally, community residents state that financial services targeting home ownership should be more available from local sources.

► See the survey instrument and tally of the Great Falls/ Cascade County Community Opinion survey under [Appendix C](#).



## GREAT FALLS AREA HOUSING NEEDS ASSESSMENT

In September, 2008, a one-page housing survey was sent to 1,400 low-income families living in public housing, receiving Section 8 Housing Choice Vouchers or receiving funds through the Low Income Energy Assistance Program (LIEAP). Also surveys were distributed through a number of social service agencies that serve lower income persons. The survey was distributed as a back up to the Opinion Survey in case lower income families were not adequately reached with the Opinion Survey. While this survey is not statistically valid it is informative. A total of 612 lower income citizens responded to the survey.

This survey targeted to lower income residents indicated that the majority of respondents found their housing to be adequate except for having problems common with older homes and apartment buildings such as poor insulation and leaky windows. Access to medical and financial services was reported to be needed. Over 80% of the respondents said that they have adequate transportation means. The survey found that the respondents live primarily in 2-4 bedroom rental apartments, with a lower number owning their home (24.3%). Examining the income scale, this discretionary income-level explains the high proportion of rental occupancy. The family size for the respondents is between one and two children. It may then be argued that there is a need for more 2-4 bedroom housing units, and the need for additional services to these families within the lower income brackets.

While over 62% of the respondents utilize a personal vehicle for transportation, the remaining 37% rely on other modes of transportation. For the most part, respondents feel that transportation is needed to access medical and financial services and child care in the community. Over 96% earn a monthly income, yet over 60% are not employed. 58.8% of the respondents earn between \$501 and \$1,200 per month.

As would be expected of this particular population, 62% rent their home. Over 43% reside in an apartment, with 16.1% in a mobile home and 34.4% in a single-family dwelling. Nearly 30% have been residing in their current homes for the last 1 to 3 years with over 67% not receiving any rental assistance (note: home owners responded, no assistance). Of those receiving rental assistance, over 50% receive Section 8 assistance. Over 92% feel that there should be more opportunities for home-ownership with approximately 71% expressing an interest in such opportunities. Over one-quarter of the respondents spend less than \$39/month on heat and electricity for their homes with a majority (67.2%) having gas as their heating source. Fifty-eight percent do not receive LIEAP assistance. The top four housing problems (i.e., exceeding 30%), for the respondents, are: 1) a lack of insulation; 2) air leaks; 3) sticking door and windows; 4) and wall and ceiling problems. Sixty-eight percent believe their housing condition is fair to good. Sixty percent find the amount of living space to be adequate to roomy.

► See the Great Falls Area Housing Needs Assessment survey form and tally under Appendix D.

### HOMELESS SURVEY

The most recent point in time count of the homeless population in Great Falls was conducted in January 2010. Data from the 2009 survey is included in this study because the 2010 analysis of the data is not yet available. The survey has been conducted since 1999 and is undertaken to obtain an encompassing view of the homeless population in Montana. It is difficult to compare survey findings between years as the format of the survey has changed over the years. If the definition of homeless used includes people who are "doubled up" the number of homeless people in Great Falls for 2009 was 193, a number slightly down from previous years. Fourteen organizations were involved in conducting the survey.

There were 113 homeless surveys completed. Of these, 47 were completed by case managers on behalf of clients, 46 were completed by interviewers, and 20 were filled out by the homeless person. Twenty-nine percent of those surveyed were with children or other family members. Of those responding to the survey 77 were males and 36 were females. Forty-six were staying with family or a friend and 48 were staying at the Rescue Mission. Twenty-five percent of respondents had a part or full time job, 21% were receiving Social Security, and 42% had no income at all. Thirty percent of those surveyed were receiving food stamps. Twenty-five percent of these homeless persons have lived in the Great Falls area for 20 or more years, 38% have lived here for more than 10 years, and 56% have lived in the area more than 5 years. Twenty-seven percent of these homeless respondents have been hospitalized for a mental health condition.

► See the Great Falls Area Homeless Survey form and tally under Appendix E.

### FOCUS GROUPS FINDINGS

Having accumulated a wealth of statistical data and citizen input regarding Community Development Needs from the surveys, the Housing plan sub-group decided it was necessary to put a face on the data. From October 16, 2008 – April 2, 2009 small focus groups were held weekly. Participants included: shelter care agencies, senior housing providers, realtors, lenders, housing agencies serving persons with disabilities, organizations operating subsidized housing, agencies working with teens, public schools and higher education, City of Great Falls code enforcement officials, economic development professionals, landlords and representatives of church groups and social service agencies. Town meetings were held in Belt on May 14, 2009 and in Cascade on June 25, 2009. Summarized notes from each group are show below

#### Shelter Care: Great Falls Receiving Home, Great Falls Rescue Mission and Mercy Home

Discussion: The Great Falls Receiving Home has 14 shelter beds for children removed from their homes. The children are transitioned into foster care. The Mercy Home provides 8 rooms for abused spouses and children. The Rescue Mission has room for 80 homeless people with



50% being men and 50% being women and children who stay at the Haven of Hope across the street from the Mission.

A major concern was housing affordability, in view of low paying jobs and high housing prices and rents. Low-income rentals have long waiting lists, which results in longer stays in shelter care. Poor credit histories and past debts to low-income rental housing agencies make it difficult to qualify for housing. Especially in abusive situations, this problem can be compounded by abuse victim still being married to debtor. Housing plans for moving out of shelter care increase the success rate of independent housing four times over. More education is needed on loan programs available and how to buy house. People are sometimes too slow to come to the mission, moving from friend to friend to car; go into debt, then end up at the mission.

Needs: 1) 8 – 12 individual apartments for transitional housing from 6 months to 1 -2 years, to get families stabilized and pay off their debts and warrants, preferably close to the Rescue Mission and Haven of Hope, 2) transitional housing for battered spouses that is safe and longer term than shelter care at the Mercy Home, 3) first month's rent and utility deposit, 4) a housing ombudsman for debt and damage claims to appeal unreasonable damage claims from prior rental units and arrest warrants for things as minor which eliminate eligibility for subsidized housing, 5) more single family and multi-family homes which can be rented with a Section 8 housing voucher, 6) health inspections for questionable rentals, 7) more quality low income housing options in general, 8) specialized supportive housing for those with mental illness and other disabilities.

#### Senior Housing: Aging Services, Eagle's Manor

Discussion: There are 80 Medicaid Waiver slots administered by the Area VIII Agency on Aging. An additional 180 Medicaid Waivers are administered by Easter Seals for this area. There is an overabundance of pricier assisted living and memory care units with 26 providers.

Needs: 1) more assisted living homes that are affordable for persons with Medicaid waivers; 2) a combination facility where home services can be provided to seniors; 3) more Medicaid waivers to keep seniors in assisted living instead of skilled care facilities; 4) a tax credit project with rents affordable for 50% area median income earners; 5) more HUD 202 rental projects that generally serve extremely low income seniors by providing extended project based rental assistance, 6) one-bedroom homes in safe neighborhoods for seniors who wish to sell their homes, 7) lobby Congress to change law or HUD to change policy to allow Section 8 Housing Choice Vouchers to be used in senior rental housing where meals are provided like Eagles Manor.

#### Lenders: First Interstate; Mountain West; Wells Fargo; Stockman

Discussion: Property appreciation is outstripping wage growth, such that even a \$40,000 deferred mortgage subsidy is not enough, customers can afford \$60 -- \$65,000 mortgage, but can't find a home in their price range. The mortgage market has vastly changed, with lower loan to value and higher down payments required, 30% down for investment rental properties, maximum of 4 loans per person to spread risk, pressure on rental market due to foreclosures, prices are softening and homes are selling slower. Borrowers with construction loans need good credit, good income and cash reserves to cover overages. Market changes have added fees for lower credit scores, loans are harder to get, mortgage insurance is more expensive.

Needs: 1) Townhomes or condos (condos have financing struggles), 2) higher deferred mortgages subsidies, 3) higher down payment assistance programs for families between 80 – 120% of area median income, 4) home improvement financing for seniors, 5) loan programs for hard-to-finance loans, 6) proactive lead paint remediation program to make homes easier to sell

Realtors: Northwest Realty Group

Discussion: Good rentals are in short supply, as are homes for sale in the \$125,000 -- \$130,000 bracket. Market has lots of people who want to buy, including widows and widowers on fixed incomes; families who need 3+ bedrooms, small families and singles who need 1- 2 bedrooms, and persons with disabilities who need accessible features. Families are stretched – they work their entire lives but cannot buy a house. RD loans help people get into homes outside the city, but have an interest recapture feature that takes away equity. Land is scarce in the city limits; much of Great Falls is built on Bentonite clay which expands and shrinks ruining foundations and causing cracking – homebuyers need to beware; Sun Prairie has water problems, outside the city, the lots are bigger and more expensive. Foreclosures listing prices are set by owner, usually held for 3 months, then reduced, but some companies won't deal on prices. No particular neighborhood has a lot of foreclosures.

Needs: 1) offer more Individual Development Accounts, 2) maintain NeighborWorks ability to help with the 3.5% down payment required by FHA, 3) produce more housing priced in the \$125,000 to \$130,000 bracket.

Subsidized rentals: Great Falls Housing Authority, Opportunity, Inc. Independent Living Services:

Discussion: The Great Falls Housing Authority has 490 public housing units and 16 HOME grant units. There are also 152 Mod rehab units in Great Falls. They are HUD subsidized and must be affordable to those at or below 80% AMI. HUD fair market rents are too low. Section 8 waiting list is 600 plus; but vouchers cannot be used in many cases because decent rentals cannot be found. Vouchers are double issued to two families at the same time. Waiting list for public housing is 6 months for 1 -2 bed units; 3-4 months for 3 and 4 bed units and a year or more for 1 bedroom units. Public Housing vacancy rate is 3%, they receive 100 applications per month; but only 15-20 units turn over. Some owners would like to improve rental property, but subject to City regulations must bring everything up to code once they start renovations. Sixty homeless high school students have been identified recently. They are not eligible for the Housing Authority or Section 8 if under 18 and not emancipated.

Needs: 1) Senior housing with elevator access; 2) more 1 bedroom and 4 bedroom homes, 3) Reassessment of HUD fair market rates to be based on quality average rents, for homes that can pass the Housing Quality Standards

Teens and teen parents: Kairos Youth Services and Young Parents Education Center

Discussion: Kairos Youth Services operates three group homes for youth - one with 8 beds for short and long term housing for boys, one with 8 beds for short and long term housing for girls,

and one with six beds providing therapeutic services for youth. Kairos used to have 32 beds. They now have 22 beds total. Foster care can be used as an alternative for group homes. Youth services are state budget driven. There is a lack of foster homes due to low rates. Youth have to be under the custodial care of DPHHS to have housing and food provided.

Public housing and many private parties will no longer rent to teen parents because of the vagueness in Montana law concerning disaffirming contracts by persons under 18. Some landlords will rent to teen under 18 with special circumstances, but these are not subsidized, so teens pay full rent, which can cause school problems because of their work hours. Services are a big part of the picture, so even with facilities; it would be hard to get staffing costs covered.

There are currently 9 chronically homeless students (by HUD definition) attending the Alternative High School, 5 chronically homeless students at Great Falls High School and 2 chronically homeless students at CMR. An estimated 10-15% of the alternative high school population is probably floating from home to home.

Needs: 1) funds for deposits, 2) teen crisis stabilization facility, 3) supportive housing for teens graduating from foster care, 4) supportive housing for teens parents, 5) more use of CDBG to improve current specialized housing, 6) items 2 through 5 need funding to provide services as well funding to construct or purchase and rehab appropriate facilities.

#### Housing for individuals with disabilities; AWARE, Center for Mental Health, Quality Life Concepts

Discussion: There are a variety of populations with disabilities. Quality Life Concepts operates 15 group homes for individuals with developmentally disabled persons. The group homes need to be occupied at capacity housing six clients to cash flow. Currently less than half of the Quality Life Concepts group homes meet accessibility requirements. Homes on one level in a safe neighborhood are needed. There is an ongoing effort to make the existing homes accessible, but funds are need.

The Center for Mental Health operates four group homes in Great Falls with each serving eight mentally disabled clients. Only one of these four group homes is laid out on one level and accessible to physically disabled clients. Some clients must go to nursing homes when they "age out" of the group homes.

AWARE operates two adolescent group homes and a rehabilitation group home for adult mental health clients. Accessible rentals are very difficult to find. Families with a member having disabilities need accessible housing.

Needs: 1) immediate need for 5 or 6 group homes on one level in safe neighborhoods, adaptable to specific needs, 2) all new homes and rentals built to minimum visit ability standards 3) supportive housing with services for severely disabled mentally ill, developmentally disabled and those with brain trauma, 4) current group homes need to be adapted to meet needs of aging clients 5) funding needs to be restored for mental health outreach manager position so clients may receive help in finding rental housing 6) housing for mentally ill homeless persons who are not allowed to stay at the Rescue Mission, 7) more flexibility in use of emergency funds

including creation of a flexible to stand as a guarantee for first and last month's rent which can be paid down by client, 8) City should continue accessible curb cut program to enable elderly to stay in neighborhoods as they become more fragile or disabled, 9) identify various levels of accessible housing in the city and establish electronic network to report vacancy to clients and providers looking for accessible housing.

#### Schools: Longfellow, Head Start

Discussion: One in eight (14%) of the students attending Longfellow Elementary School are part of a homeless family. Some of these families have lost housing due to violating rules of Public Housing and they cannot get back in. Native families are evicted for moving family member in to their housing. Longfellow is the school attended by the homeless children living at Haven of Hope. Although OPI normally would not provide busing for these students, the neighborhood they would have to walk through is unsafe, so a bus is provided.

Longfellow attendance is 320 students, up 100 students in the past seven years. Native Americans make up 60% of the population. The families are mobile; 52% of students are new this year. 90-95% of the students receive free/reduced lunch. Longfellow has morning 7 AM drop off program and after school program until 6:30 PM. Food and snacks are provided. Children do not have to spend as much time being unsupervised.

Most Head Start families are renters. Many of these families live with relatives or friends or in shelters. Homeless families and children in foster care are moved to top of the Head Start waiting list. Only families with poverty level incomes are eligible for Head Start with a 10% income exception. Head Start undertakes home visits as part of its program. Teachers often see bad (sub-standard) housing conditions during these visits. There is a huge interest in acquiring safe and sanitary housing that is affordable. Teen moms often have a very hard time finding affordable housing.

Needs: 1) raise City rental standards, 2) provide a facility with a structured living environment for teen moms, 3) provide advocacy for low income families to get housing.

#### Code Enforcement, City Building Code, City Code Enforcement, Fair Housing

Discussion: The City Building Inspector's Office is responsible for enforcing the International Building Code, overseeing regulation of abatements, condemnations and asbestos inspections. At times state codes override International Building Code. The codes are in place to protect the safety of citizens. Building inspections are mostly permit driven. The inspector must be invited into property by owner, owner's agent or a tenant. When invited in to a property, all that the inspector sees is legally documented. There are some items of work that can be done to rehabilitate property that do not require a permit, such as finish work like painting, tiling, carpeting, cabinets, and counter tops, or fencing not over 6 feet high, or water tanks not over 5,000 gallons. A license is required to do plumbing and electrical work on a property. In years past prior to construction boom in 2007, staff had more time to be able to inspect sub-standard properties, to vacate them and condemn them.

The City Code Enforcement Officer is responsible for enforcing regulations regarding private property issues including: abandoned vehicles, dilapidated fences & houses, garbage, junk vehicles, rubbish, trash, overgrown vegetation, etc. The enforcement process is driven by citizen complaints. The complaint may be made anonymously. A letter is written to property owner detailing items out of compliance with city regulations. Most owners respond to the process. A few do not respond or are repeatedly out of compliance. Repeat offenders are legally prosecuted, but it often takes a long time to get to court because of limited legal and court staffing. Cases are often dismissed.

The Fair Housing Specialist provides outreach and education in Federal Fair Housing Law and Montana State landlord and tenant law, as well as human right law. The specialist presents one on one education seminars to landlords, property managers, realtors, tenants of the Housing Authority, and non-profit organization clients. Landlord and tenant complaints are directed to the Fair Housing Specialist who provides mediation and conflict resolution for the situations. We have some outstanding landlords in area. Quality properties are 100% filled. We can get rid of the bad rental properties by offering more affordable quality rentals. We need a commitment to eliminate sub-standard properties. There are numerous new landlords who have acquired one house. We need to educate those landlords regarding the Fair Housing and Tenant and Landlord laws.

Needs: 1) Additional part time city judge, 2) firmer enforcement of city private property regulations by court, 3) more city staff emphasis on inspecting sub-standard housing (quality of housing), 4) increase recycling of construction waste, 5) citizen education regarding licensing requirements for construction work, 6) keep city commissioners informed regarding ongoing need to vacate and condemn some properties 7) encourage energy efficient and LEED certified building, 8) continue process of educating landlord and tenants regarding Fair Housing Law.

#### Large Employers, NEW, Benefis Health System

Discussion: A list of available rentals is faxed to Benefis every week. It is a real challenge to find rentals that will accept pets. It is difficult to find temporary housing for visiting physicians. Benefis owns some properties near the hospital to provide temporary housing. The hospital has troubles filling professional positions because our housing market is higher cost than markets from which they tend to draw professionals. Lower paid positions at hospital already live here so they have housing.

NEW has employees who live in town and out of town. Landlords have taken advantage of some of those who rent. Some of those who rent need to be educated about how to be a good responsible tenant. Some employees have a hard time getting to work because the buses do not run at night or on the weekends. Good affordable housing in the downtown area would benefit these employees. Affordable rental properties for larger families are hard to find. NEW has hosted First-time Homebuyer classes for employees. Considerable interest was shown by employees. NEW has set up an IDA for employees with a 5 to 1 match for a housing purchase down payment.

Needs: 1) a renter responsibility and rights course, 2) rental properties for larger families, 3) rental properties with outside common areas for gardening or recreating, 4) City bus services on weekends and at night, 5) good quality, affordable down town housing.

#### Military, Malmstrom Air Force Base

Discussion: There currently are 1178 housing units on Malmstrom Air Force Base, with 922 being occupied. The rest are held vacant to be replaced with new units. Base housing staff detailed their efforts to find affordable housing for military families, especially those displaced with the construction of replacement homes at MAFB. It is difficult to find rentals that allow pets and that are in the better sections of town. Some sections of town, such as the lower south and north side, are not considered safe for military personnel.

The lowest ranking military members receive a \$733 stipend monthly to cover housing, with higher ranking officers receiving up to \$1400 per month. Great Falls landlords are very astute about the military rental subsidies and raise the rents of "better" rental properties to coincide with the stipend. The military presence affects the Great Falls rental market often determining the going rate for decent properties and forcing lower income renters into the many rentals having unattractive to substandard conditions. Still according to the base housing staff, "good quality housing is lacking out in the Great Falls community even for the level of affordability lower ranking military have". The personnel prefer to live on base. It is generally 98% occupied. Base housing would probably rent for \$2,000/month in the city market.

The Base also has dormitory style housing for younger single personnel. The dorms are said to be some of the best in the air force. This base has the youngest population in the agency. As a rule, they are not interested in buying a house. The Air Force keeps a list of open rental properties in the community. Currently, there are 105 properties on the list; half of them have been found to be basically not livable. The policy is not to steer personnel away from housing. The housing staff is constantly getting complaints about what is available to rent.

Needs: 1) better quality rental housing that is affordable for lower ranking military members; 2) completion of the base housing replacement projects; 3) rental housing that allow pets; and 4) better education concerning the improvements in the neighborhoods that may not be considered safe by the military.

#### Higher Education

Discussion: Locating affordable housing for students is more difficult because tax credit projects cannot be built for student renters. Some students cannot come to school in Great Falls because of a lack of affordable housing, especially students at the College of Technology (COT). The University of Great Falls (UGF) is building new student housing because College Villa is completely full. A four-plex with three bedrooms in each apartment is planned. UGF stated they need modern dorms, with separate living areas from the kitchen that would be attractive to students. The College of Technology Construction Trades Program is interested in building a NeighborWorks home if construction financing and a lot are available.



Needs: 1) Decent, affordable rental apartments in the higher education area near COT and UGF. 2) Construction financing and lots for construction of a student-built home using COT students. 3) A day care facility is needed on the COT campus in general, but especially for single parent families 4) A plea was made to keep access to the river open as development occurs.

#### Landlord Associations and Property Management

Discussion: Landlords need continual education on fair housing and assistance in improving the quality of their rentals. NeighborWorks Great Falls (NWGF) should be careful not to build in areas where there are high density rentals, as it increases the complaints that landlords get from the residents of the new homes. However, it does improve the neighborhoods when NWGF builds new homes. Some less expensive rentals will always be necessary for low income people who cannot qualify for rental assistance or who choose not to apply for rental assistance. Some people cannot qualify for assistance or public housing because of a prior repair bill or some other past transgression. Trailer parks often fill a need for low income unsubsidized housing, but the homeowners are very vulnerable to bad conditions and park closure due to redevelopment. Renters often pay a great deal for utilities, up to 50% of their rent. High utility costs result from lack of energy conservation measures in the rental properties. Replacing boilers, windows, insulating doors, etc are expensive and landlords need to share that cost with the renters or get some assistance in raising the capital. The City Rental Improvement Fund has been a good source of capital providing 0% CDBG loans to landlords to make improvements to rental properties in return for keeping rents affordable for lower income tenants.

Needs: 1) Amnesty program to allow families to overcome the offense that eliminated future application for publicly subsidized housing 2) Continuation of education to landlords and property managers regarding fair housing regulations 3) Support NWGF work in assisting the homeowners in manufactured housing communities to purchase and operate the park as a limited equity cooperative 4) Need capital funds to allow landlords to complete energy saving upgrades to their properties without having to raise the rent substantially.

#### Economic Development

Discussion: Great Falls has reasonable housing prices compared to the rest of Montana and the nation, but it also suffers from low incomes, so there is an affordability gap. If half of the economic development projects on the drawing board take off, prices could increase more rapidly than wages, increasing the affordability gap and causing Great Falls to lose its status as an attractive expansion or relocation area due to the reasonable housing prices. Great Falls needs to have continual development of affordable homes; right now a lot of the reasonably priced homes are older stock and need a lot of work. It is hard to find safe and decent rental housing if your income is too high for subsidized rentals and too low to afford good rental property. Great Falls needs to diversify its economy, attract capital to create an industrial base which will create higher wage jobs for residents.

Needs: 1) An affordable housing ordinance that allows smaller lots sizes and other density incentives to reduce the cost of construction; which are only available if the home is to be affordable to a family or individual at or below 120% of area median income 2) Create an

industrial park to attract businesses that will fully utilize the work force skill available in Great Falls and provide higher paying jobs.

#### Ministerial Association

Discussion: Many churches are helping with foreclosure prevention and rental assistance. Primarily, the people asking for help from the churches want rental assistance. Most churches have a board that deliberates on requests for help. Churches buy gift cards for food for people in need. Help is needed with medicine. The Churches try to work cooperatively with each other and with Opportunities Incorporated in order to make sure that families are not gaming the system of assistance. The churches always have more requests than they can fulfill. They have seen an increase since the economy started to nosedive.

Needs: 1) Continuation of the cooperation between the churches and the social services agencies to stretch the limited emergency funding as far as possible.

#### Belt Horizons Project participants

Discussion: Lack of land outside of the flood plain limits new building. The Rocky Mountain elevator area could provide land if the elevator was torn down. The school owns some land they may consider for housing. Foreclosures are not a problem, the homes have been purchased and renovated. A number of lower-income families have moved to Belt because rents are lower. About half of the school staff commutes from Great Falls.

Needs: 1) Single family quality rentals are needed, 2) rent to own program for families with credit problems, 3) Homes affordable for purchase by young families,

#### City of Cascade Cascade Planning Board members:

Discussion: Retired seniors on fixed incomes cannot afford labor for home repairs. An abandoned elevator located on BNSF right-of-way needs to be removed, as it is a safety hazard. Houses are available to rent or buy – the overpriced ones sit on the market for a while. School enrollment is stable. Outfitters are buying homes in Cascade for summer fishing – they only occupy them a few months a year. Cascade has passed a nuisance ordinance and instituted a cleanup program in Cascade. The planning board is newly formed.

Needs: 1) Home improvement program for retired seniors on fixed incomes.



#### Past Housing Efforts:

Past community development efforts specific to housing issues completed with the community include:

Great Falls Growth Policy Housing Element adopted in 2005 which recommended the following goals for the community housing supply.

1. To provide a diverse supply of safe and affordable housing for residents of all ages, needs, and income levels, including single-family homes, apartments, mobile/manufactured homes, assisted living facilities, group homes, emergency shelters, and other types of housing.
2. To encourage more affordable housing by making it easier and/or less expensive to build new housing through the use of innovative land use regulations, development standards, and building code requirements.
3. To maintain the area's existing housing stock in a safe and sanitary condition.
4. To encourage and support homeownership.
5. To conserve and enhance the character, quality, and livability of the community by preserving and improving distinctive neighborhoods that offer diverse housing opportunities.

The Community Development Department Consolidated Plan adopted in 2005 and 2010 with Annual Action Plans adopted yearly.

The Analysis of Impediments to Fair Housing adopted in 2010 and updated annually

NeighborWorks Great Falls, formerly Neighborhood Housing Services of Great Falls, approaching its 25<sup>th</sup> anniversary with 260 homes for LMI First-time Homebuyers rehabilitated or newly constructed.

NeighborWorks has constructed 46 Mutual Self-Help homes and has 10 under construction and 10 planned for 2010-11.

Great Falls Land Development Code and Zoning Regulations, updated in 2007

Two Accessible Space, Inc. (ASI) HUD 811 projects, One ASI HUD 202 project constructed

City CDBG Deferred Payment Revolving Loan Program to bring homes of LMI owners up to code including energy efficiencies. (181 during the past decade.)

City Rental Improvement Revolving Loan Program to bring homes of LMI renters up to code including energy efficiencies. (138 units during the past decade)

Great Falls Housing Authority's continuing substantial renovation of HA properties including: 200 of the units at Parkdale, all 50 units of the Sunrise development, all 30 units of Yeoman Tynes development, and all twenty units of the Russell project.

Opportunities, Inc 14 unit complex of affordable Housing at Kennedy Apartments

Habitat for Humanity homes 22 houses completed to date with more being planned

Eagles Manor 123 units of affordable senior housing upgraded and held affordable until 2015.

Montana Institute of Family Living, project based rental assistance housing for the elderly and disabled with 103 units, has undertaken upgrades to locks, common spaces and tenant rooms.

Quality Life Concepts group homes for developmentally disabled persons have been upgraded to meet the needs of clients aging in place, including tract lifting systems with corresponding bathtubs.

Cascade County has worked with NeighborWorks Great Falls using State of Montana HOME funds to provide home improvement loans, remove blight and construct 4 new homes in Black Eagle. The Cascade County Commission is working with the Department of Environmental Quality and the Environmental Protection Agency to select the area around the former Anaconda smelter as a designated clean-up site. Cascade County has been instrumental in the construction of 56 owner-built homes under the NeighborWorks Mutual Self-Help Program funded in part by USDA Rural Development.

**Most Pressing Housing Community Development Needs gathered from surveys and focus groups:**

- 1) Fair Market Rent too low: The Great Falls Housing Authority and Opportunities, Inc, both reported that Section 8 participants are having difficulties finding homes or apartments that would accept the Section 8 vouchers. The primary problem was that Section 8 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 was that the landlord would have to hold the rental open until the Housing Quality Standards inspection was completed and compliance with HQS requirements achieved, meaning that rental income was lost during the transition. This waiting, coupled with lower than market rent, makes landlords reluctant to accept Section 8 rentals.
- 2) Transition apartments for individuals and families ready to leave shelter care are lacking. Homeless families are now primarily housed in the Haven of Hope or the Mercy Home, while single males are housed at the Rescue Mission. These organizations have identified a need for transition apartments, where families can live independently, but with support services until they are ready to move to fully independent status.
- 3) Supervised affordable housing for young parents is needed. Public housing and many private parties will no longer rent to teen parents because of the vagueness in Montana law concerning disaffirming contracts by persons under 18. Young parents are often unable to go to school, hold down a job to earn a living and care for a child.
- 4) Decent, safe one and two bedroom apartments are needed near the medical center, College of Technology and University of Great Falls. Students and persons needing or providing medical services have a very hard time finding affordable housing in those areas. Vacancies are immediately filled. Housing with less than a one year lease is needed for summer students and transitioning medical professionals.
- 5) More units of affordable accessible rental housing for seniors are needed in Great Falls. During the past decade a significant number of project based affordable housing units in Great Falls have come out of contractual agreement with HUD to remain affordable. This fact coupled with an ever increasing number of seniors, many of whom have low incomes is creating an increased demand for one and two bedroom affordable senior rental units.
- 6) Funds for rent and utility deposits, as well as other barriers, keep individuals and families in shelter housing longer than necessary. A deposit fund is needed to allow faster transition to independent living. This fund would also be helpful in integrating former offenders into the community after their release.

- 7) Decent, affordable homes for first-time homebuyers continue to be needed in the Great Falls Community. The average cost of safe and sanitary single family residences continues to be beyond the means of low to moderate families.
- 8) Land donations are needed to permanently create housing that is affordable in the form of Land Trusts.
- 9) Downtown redevelopment hinges on the need for middle income housing stock in the heart of the Great falls Downtown area.
- 10) An expedited zoning process or special zoning ordinance is needed to encourage affordable housing.
- 11) The Great Falls area needs local non-profit developers to utilize the Low Income Housing Tax Credit program to augment affordable rental housing stock in the Community especially units affordable to households or individuals at 50% AMI.
- 12) The need for deferred loans for single family home improvement by lower income homeowners continues.
- 13) Additional Medicaid waivers are needed for the growing number of disabled and elderly living in our community. More housing providing assisted living units that will accept the waivers is needed.
- 14) Facilities are needed that combine affordable senior housing and the use of in-home services. This is a lower cost alternative than assisted living or a nursing home, and is similar to allowing seniors to stay in their single family homes while receiving in-home care.
- 15) A housing ombudsman is needed to help renters to negotiate rental application rejections.
- 16) A better quality of rental housing stock available to those receiving Housing Choice vouchers is needed.
- 17) Preservation and upgrading of existing manufactured housing communities is needed to preserve housing for lower income families.

STRATEGIES TO MEET GREAT FALLS/CASCADE COUNTY HOUSING NEEDS  
2010 – 2020

- 1) a Conduct a Fair Market Rent Survey for Cascade County taking into account the sub-standard housing that often serves lower income households and brings rental cost averages down. Such housing should not be included in the Market Rent survey.
- 1) b Network to reduce the time necessary to provide HQS inspections and compliance.
- 2) Construct or rehabilitate existing buildings to create transition housing with support services for individuals and families. Homeless families are now primarily housed in the Haven of Hope or the Mercy Home, while single males are housed at the Rescue Mission. These organizations have identified a need for transition apartments, where families or individuals can live independently, but with support services until they are ready to move to a fully independent status.
- 3) Form a partnership between the School District, Young Parents Education Center, Kairos and other interested organizations to apply for grants to build or rehabilitate existing space to create a supervised transitional living center for young parents and homeless youth.
- 4) a To address the need for affordable rental housing near the hospital and medical services, the Great Falls Housing Authority will build four two-bedroom four-plexes having a total of 16 new housing units. The Great Falls Housing Authority has been awarded HOME funds from the City of Great Falls and from the State of Montana to construct two of accessible four-plexes in the Sand Hills area of the Medical District. The target market for the four-plexes is senior couples who need two bedrooms due to medical conditions. Future plans call for construction of an additional two four-plexes as funding becomes available.
- 4) b The University of Great Falls has constructed new housing for 32 students and is seeking funding for housing for an additional 36 student on campus in the form of apartment complexes.
- 4) c Undertake creative leasing options for existing housing such as the University of Great Falls or Benefis Hospital leasing an entire apartment building for students or medical personnel to sub-lease.
- 5) Accessible Space Incorporated has applied for HUD 202 funds and HOME funds to build a new 30 unit affordable rental project for seniors. The development will have project based rent subsidies to help very low

income seniors pay their rent. The building will be design to be accessible for seniors.

- 6) Community organization networking is necessary to apply for grant funds to establish and operate a fund providing rent and utility deposits or to address other barriers to accessing affordable housing. Lack of funds for rent and utility deposits, as well as other barriers, are keeping individuals and families in shelter housing longer than necessary contributing to the shelters being overfull.
- 7) a To address the continued need for decent, affordable homes for first-time homebuyers in the Great Falls Community construction or renovation of 8 – 10 homes per year in transition neighborhoods with appraised values of \$135,000 and below will be undertaken by NeighborWorks. These homes will be sold to families or individuals below 80% of area median income. The City of Great Falls will provided HOME and CDBG funding for the homes. HOME funds are also used for deferred down payment mortgages to bridge the affordability gap between the first mortgage amount for which the borrower qualifies and the price of the home. The homes are usually built in target neighborhoods and have the added benefit of improving the property values in the neighborhood and the ripple effect of improvements to other homes.
- 7) b Higher deferred mortgage subsidies using the Self-Help Opportunity Program and HOME funds will make owning decent, affordable homes a possibility for lower income first-time income homebuyers. Using a program called Self-Help Light, NeighborWorks can provide deferred mortgage funding in addition to the HOME funding from the City of Great Falls. This allows the homes to be purchased by lower-income families between 50 and 70% AMI. The deferred mortgages are at zero interest with no payments until the homes are sold or the first mortgage is repaid. A share of the equity from the sale is recaptured and used to replenish the deferred mortgage pool.
- 7) c Ten new homes per year will be constructed by LMI households under the Mutual Self-Help (MSH) model. The Mutual Self-Help model requires owner sweat equity of 1200 – 1300 hours, about 65% of the labor in construction a home. The sweat equity becomes owner equity when the loan on the home is closed, with past MSH builders gaining equity of \$15,000 to \$25,000. NeighborWorks is working with the Moose Club in Black Eagle on the purchase of 10 acres for development of additional Mutual Self-Help lots.
- 7) d Great Falls and Cascade County have an opportunity to use special stimulus funding, the Neighborhood Stabilization Program, to purchase and renovate foreclosed homes. At least 25% of the homes must be sold to households having incomes at or below 50% AMI. The remaining

homes will be sold to households having incomes up to 120% AMI. The funding is time-constrained, so speed is essential to maximizing the funds coming to Great Falls and Cascade County. Program income resulting from will remain in the community to help low income first-time homebuyer in the future.

- 7) e Create a rent-to-own program for credit-impaired, but worthy, borrowers as an important tool for homeownership. Poverty creates a situation where a small event can create future credit problems, because available income allows for no unexpected events. For example, a bill for a car repair required to continue working can cause missed utility bills or rent payments, causing shutoffs or eviction. Many families, that would like to own a home, have past credit problems (often in the distant past), which prevent them from qualifying for a mortgage loan. These families, with credit counseling and Individual Development Account opportunities, can clean up their credit and move into homeownership, if they are able to participate in a rent-to-own program where they are stable and contribute a part of their rent each month toward a down payment on the home.
- 7) f Continue to develop a workable Section 8 to Homeownership program.
- 7) g Creation of resident limited equity cooperatives (Resident Owned Communities) to purchase and operate manufactured housing communities. Once the cooperative owns and operates the manufactured housing community, the homeowners are safe from displacement, dramatic rent increases, and deferred maintenance and have an incentive to improve their homes and the community. Additionally, they are able to get long term leases which qualify their homes for real estate financing.
- 8) Solicit donations of city or county-owned land for creation of land trusts or other legal configurations to create permanently affordable homes. A law passed in the 2009 Montana legislature clarified the ability of city and counties to donate land for housing that is permanently affordable. The donation of land near city services would save approximately \$7,500 per lot in land costs.
- 9) a Creation of middle income condominiums or townhomes in the downtown area will be supported. Housing is a key to downtown redevelopment. Twenty-four condominium units are now under construction at sale prices from \$133,000 to \$299,000. Considerations that would make downtown housing development more feasible would be special long-term rates at the parking garages and tax incentives for buyers which provide a tax break for the first several years. Historic preservation of buildings renovated should be supported.
- 9) b Use of Neighborhood Stabilization Program Income funds to provide downtown housing.



- 10) Work toward the adoption of affordable housing zoning ordinances and the enforcement of upgraded building codes for energy conservation and accessibility by the City of Great Falls and Cascade County. Currently, in order to build homes on small lots, a special process of zoning variance has to be undertaken which is often a four month process. This process needs to be expedited. An affordable housing ordinance would allow for quick approval of the proposed lot replat, in exchange for homes that are affordable to families or individuals under 80% of AMI. Additionally, universal accessibility and Energy Star certifications need to be encouraged.
- 11) Local non-profit developers from the Great Falls area will be encouraged to utilize the Low Income Housing Tax Credit program to augment affordable rental housing stock in the community especially units affordable to households or individuals with incomes at 50% AMI or lower. The Franklin School renovation project is the first tax credit project awarded in Cascade County for more than a decade. Cascade County suffers from an incorrect conclusion by the Board of Housing that since for-profit tax credit projects targeted for households at 60%AMI in Great Falls have vacancies, there is no need for more tax credit projects here. However, the population that really needs the subsidy provided by the Low Income Housing Tax Credit Program (LIHTC) consists of those having a household income at or below 50% AMI. This population could use Housing Choice Vouchers in conjunction with Tax credit subsidized properties developed by a non-profit General Partner to be affordable to those at 50% of AMI. These households are unable to afford rents at LIHTC properties renting at 60% of AMI which therefore remain vacant.
- 12) Expansion of homeowner improvement programs to reach more people. Both the City of Great Falls and NeighborWorks have home improvement loan programs for seniors and other homeowners. Expansion of these programs to serve more homeowners will result in improved living conditions and better looking neighborhoods and communities.
- 13) Work to acquire an increased number of Medicaid waiver slots for the Great Falls area and find more assisted living facilities that will accept the waivers. Most of the assisted living homes in Great Falls, due to financial considerations, limit the number of occupants on Medicaid waivers.
- 14) Coordinate with rental property owners and service providers to allow the provision of in-home services to senior renters. Aging services has pointed out a need for housing and services in the same facility. This concept emulates the concept of in-home services, with seniors staying in their single family homes.
- 15) Find funding for a housing ombudsman to appeal rejected applications.



Housing counseling is now available in the form of homeownership and foreclosure counseling, but there is a need for rental counseling, especially a housing ombudsman to negotiate rental application rejections, similar to the way a foreclosure counselor negotiates with a lender for better terms.

- 16) a Upgrade rental housing stock available to those receiving Housing Choice vouchers and other low to moderate income renters. Build or rehabilitate more single family and multi-family housing that will accept Section 8 vouchers including Section 8 to Homeownership program. Section 8 vouchers are double-issued today, meaning that two families are issued the voucher at the same time due to the scarcity of safe and sanitary homes available to use the vouchers. Through a combination of construction and landlord education, Cascade County can have more Section 8 homes available.
- 16) b The City will continue to upgrade rental property using its CDBG Rental Improvement Fund zero interest loans. The units are made available and affordable to LMI tenants some of whom have Section 8 Housing Choice Vouchers.
- 17) Preservation and upgrading of existing manufactured housing communities possibly utilizing the Resident Owned Community (ROC) model.

THE CITY OF GREAT FALLS AND CASCADE COUNTY  
HOUSING PLAN 2010-2020

From the data gathered over a period of almost 2 ½ years, the housing plan sub-group produced a summary of strategies to meet the greatest needs identified. The summary was presented to the full Great Falls/Cascade County Housing Planning Group on February 25, 2010. (See the minutes of the meeting in Appendix A.) The full planning group adopted key strategies to meet housing needs. The Group emphasized that there are current housing activities identified in the study as needs and strategies that are already being handled well, these strategies need to be a part of the continuing effort to address the need for safe, affordable housing in our community during the upcoming years. The strategies denoted below were adopted for inclusion in the Great Falls/Cascade County Housing Plan 2010-2020 as priorities to meet unmet needs in our community:

- Construct or rehabilitate buildings to create transitional housing with support services, for individuals and families that are homeless, teenagers, young parents, ex-felons and those suffering from mental illness.
- Address the need for affordable student/health worker rental housing in the medical-education district near university, college of technology, and hospital such as the newly constructed student housing at UGF or pursue creative leasing options for existing housing.
- Create middle income condominiums or townhomes in the downtown area as a key to downtown redevelopment. Utilize incentives to make renovation possible. Support historic building renovation.
- Adopt ordinances that make the development of affordable housing more feasible and that increase the blight removal authority of the City of Great Falls and Cascade County. Adopt codes that include universal accessibility and energy efficiency features. Expedite zoning approval in return for providing housing affordable for lower income households
- Safe, accessible, affordable senior housing, including more Medicaid waivers for nursing home care and in-home care options for renters as well as owners
- Improve the quality of rental housing stock available to lower income renters including those receiving Housing Choice vouchers. Build or rehabilitate more rental housing stock to meet HQS standards and to be more energy efficient. Focus available funding sources to upgrade current rental housing and preserve affordable rental housing.
- Preservation and upgrading of existing manufactured housing communities possibly utilizing a rent to own program.

## FUNDING SOURCES

This list of funding sources is by no means all inclusive. Each program listed is followed by a brief summary. Program policies may change annually, including application deadlines, matching fund requirements, and maximum funding limits.

### Community Development Block Grant Program (CDBG)

The CDBG Program is a federally funded program designed to help communities with their greatest community development needs. All projects must benefit low and moderate income households. The CDBG Program was established by the federal Housing and Community Development Act of 1974. The program is divided into two categories at the federal level. The "Entitlement Program" provides funds to communities with 50,000 or larger populations. The City of Great Falls receives CDBG funding through the Entitlement Program. The City CDBG Program funds housing, public facilities, public service and economic development projects. The "State Program" in Montana is administered by the Montana Department of Commerce. The program also provides funding for housing, public facilities, public service and economic development projects.

The grant competitions for housing are conducted in the winter for the State and the City of Great Falls Eligible activities under the CDBG housing program are housing rehabilitation and new construction of permanent residential units, site improvements on public or non-profit owned land to be used for new housing, and conversion of existing structures.

State CDBG Program  
301 S. Park Ave.  
Helena, MT 59620-0523  
841-2791

City CDBG Program  
2 Park Drive S.  
Great Falls, MT  
455-8407

### HOME Investment Partnership Program (HOME)

This federally funded program was established under the National Affordable Housing Act of 1990. It provides funding to states, local governments, and Community Housing Development Organizations (CHDOs) for the purpose of developing affordable housing for persons of low and very low incomes. The program is divided into two categories at the federal level. The "Entitlement Program" provides funds to communities with 50,000 or larger populations. The City of Great Falls receives HOME funding through the Entitlement Program. The Montana "State Program" is administered by the Montana Department of Commerce. Funds are awarded to incorporated cities, towns, counties, and Montana-certified CHDOs.

The HOME program provides funding for a wide variety of housing related activities. Eligible HOME activities include: rehabilitation; conversion; new construction; tenant-based rental assistance; acquisition of property (first-time home buyers, rental housing or transitional housing); selective eligible activities (such as acquisition of land, site improvements and demolition); relocated assistance; and other activities related to the development and maintenance of non-luxury housing.

State HOME Program  
P.O. Box 200545  
Helena, MT 59620-0545  
841-2820

City HOME Program  
P.O. Box 5021  
Great Falls, MT 59403-5021  
455-8407

#### Federal Home Loan Bank of Seattle

The Federal Home Loan Bank of Seattle supports affordable housing and economic development initiatives in Alaska, Hawaii, Idaho, Montana, Oregon, Utah, Washington, Wyoming, American Samoa, Guam, and the Northern Mariana Islands through the following bank-sponsored programs.

The AFFORDABLE HOUSING PROGRAM (AHP) provides subsidy to help member financial institutions support affordable housing, both rental and homeownership, for families and individuals earning up to 80 percent of area median income.

HOMESTART PROGRAM grants are used by member financial institutions to match the funds of first-time homebuyers earning up to 80 percent of area median income. HOMESTART PLUS is open to first-time homebuyers receiving public housing assistance, including tribally designated housing authorities.

The COMMUNITY INVESTMENT PROGRAM (CIP) provides member financial institutions with reduced-rate, long-term advances to fund affordable housing for households earning up to 115 percent of area median income, or economic development initiatives that benefit households with annual incomes of up to 100 percent of area median income in urban areas and 115 percent of area median income in rural areas.

CIP PLUS offers reduced-rate advances for the purpose of refinancing adjustable rate mortgages, originated between January 1, 2003, and December 31, 2007, into fixed-rate mortgages. Mortgages must support a household's primary residence, and members must hold the mortgage in portfolio.

The ECONOMIC DEVELOPMENT FUND (EDF) is a companion program to the CIP and provides financial institutions with reduced-rate, long-term advances to fund loans that support commercial, industrial, manufacturing, social service, public facility, or public infrastructure projects.

Jennifer Ernst  
Vice President / Community Investment Officer  
[jernst@fhlbsea.com](mailto:jernst@fhlbsea.com)  
phone: 206.340.8737

AHP Applications  
Steve Johnson  
Community Investment Program  
[sjohns@fhlbsea.com](mailto:sjohns@fhlbsea.com)  
phone: 206.340.8738

USDA Rural Development (USDA RD) Housing Preservation Grant (HPG)  
The objective of the HPG program is to provide decent, safe, and sanitary housing to low and very low income households in rural areas. Rural areas are defined as places with populations under 10,000 persons. Some communities with populations between

10,000 and 20,000 may qualify if located outside Metropolitan Standard Areas, depending on local mortgage credit conditions.

This program provides grant funds to public body to repair and rehabilitate rental and owner-occupied housing. Eligible activities also include interest reduction payments to eligible homeowners. Communities may compete for these funds. The maximum grant amount is \$90,000, with no more than 20% allowed for administrative activities. The application deadline is published annually, and is usually in March - May. Grant awards are generally made in July. For further information, contact USDA Rural Development, 727-7580

#### USDA RD 504 Rural Housing Loans and Grants

These funds are awarded to rural homeowners who are without sufficient income to make repairs or improvements to their dwellings in order to make it safe and sanitary. The owner of the units must apply directly to the district RECDs office. Grants of not more than \$5,000 may be made to elderly low income homeowners who show no repayment capacity. Non-elderly applicants are only eligible for loans. The limit for loans is \$15,000, with a maximum term of repayment of 20 years at a 1% interest rate. For further information, contact USDA Rural Development, 727-7580.

#### USDA RD 515 Rural Rental Housing Loans

This program finances the construction or purchase of apartments, duplexes and multi-unit dwellings to provide housing for low to moderate income persons. Congregate and group housing loans are also available through this program. Loans can be made to individuals, public agencies, cooperatives, profit and non-profit organizations. Except for public agencies, applicants must be unable to provide moderate-cost rental units with other financing. Loans are repayable in up to 50 years with interest reductions in some cases. Contact USDA Rural Development, 727-7580 for further information.

#### USDA RD 502 Home ownerships Loans

This program provides financing for low and moderate income individuals to purchase, build, improve, repair or rehabilitate existing homes or to construct a new home. The applicant's home must be in a rural area. Individuals must be unable to obtain a loan from other sources on terms and conditions that they can reasonably be expected to pay. The applicant must have sufficient income to pay house payments and other housing-related costs. The repayment period is 33 years. The house must be modest in size, design, and costs. For further information, contact USDA Rural Development, 727-7580

#### US Department of Housing and Urban Development

HUD provides direct funding for construction of affordable housing seniors and persons with disabilities. Applications are competitive. For more information, visit HUD.gov

#### The Montana Board of Housing (MBOH)

The MBOH is the administrative agency of the Low Income Housing Tax Credit Program in the state of Montana. The Low Income Housing Tax Credit was established

by Congress in the Tax Reform Act of 1986. It is intended to provided for the retention, rehabilitation and construction of rental housing for low income individuals and families.

Additionally, MBOH provides policy direction to the agency staff, authorizes bond issues, approves development financing and evaluates Board Housing Programs including: the Single Family Program, Recycled Single Family Program, Multifamily Loan Programs, Low Income Housing Tax Credit Program and the Reverse Annuity Mortgage (RAM) Program.

MBOH  
P.O. Box 200528  
Helena, MT 59620-0528  
841-2840

#### Opportunities, Inc

Opportunities, Inc, the community action agency serving Cascade County, offers many programs for low income persons. In particular, they offer a weatherization program that helps to improve heating efficiency of homes. Eligibility is based on income. Weatherization items include installation of storm windows and insulation of homes. Owners must apply to this program directly.

Opportunities, Inc  
905 1<sup>st</sup> Avenue North  
Great Falls, MT 59401  
761-0310

#### NeighborWorks Great Falls

NeighborWorks Great Falls provides down payment loans, home improvement loans and foreclosure prevention loans. Eligibility is based on income. For home improvement and foreclosure prevention loans, owners apply directly at NeighborWorks. For down payment loans, apply for a first mortgage at a local lender and inquire of the lender about NeighborWorks down payment loans.

NeighborWorks Great Falls  
509 1<sup>st</sup> Avenue South  
Great Falls, MT 59401  
761-5861

#### NeighborWorks Montana

NeighborWorks Montana provides acquisition, development and acquisition financing to non-profit developers of affordable rental housing. Non-profit developers should request information from NeighborWorks directly.

NeighborWorks Montana  
509 1<sup>st</sup> Avenue South  
Great Falls, MT 59401  
458-8704

## APPENDIX A

### GREAT FALLS COMPREHENSIVE HOUSING PLAN MEETING

Civic Center – Gibson Room  
September 28, 2007

To start out the day, Sheila Rice, Brett Doney, Chris Imhoff and Maria Valandra detailed the need for a comprehensive housing plan to meet the needs of all Great Falls residents. The plan should be inclusive: rental, ownership, special needs, seniors, and others should be included. Great Falls has a economic development advantage with the relative low costs of housing; we want to improve wages but not lose our housing cost advantage, so we need to plan how to provide housing at affordable prices for all groups.

Notes from the brainstorming sections are at the bottom. The Moving Forward task groups shown below will be meeting between now and the next meeting to determine their part in the plan.

#### MOVING FORWARD – TRADE SCHOOLS GROUP 13 VOTES

Members: Joe Boyle [jboyle@crossroadsolutions.org](mailto:jboyle@crossroadsolutions.org); Al Ekblad [afciogfls@unions-america.com](mailto:afciogfls@unions-america.com); tom\_kotynski@gfps.k12.mt.us; Shannon McDonald [realestate@mtrealty.com](mailto:realestate@mtrealty.com); Bridget Schermele [bridget@prairiemountainbank.com](mailto:bridget@prairiemountainbank.com); Ellen Sievert [esievert@ci.great-falls.mt.us](mailto:esievert@ci.great-falls.mt.us); Amy Vansickle [avansickle@gfdevelopment.org](mailto:avansickle@gfdevelopment.org)  
Chair – Al Ekblad

Develop workforce to provide trade skills long term  
Expand HS and VoTech training programs to meet labor needs  
Use COT students in construction to build houses  
Require training as a component for all public construction projects  
Trade schools – builds houses – higher wages – growth – brings people back  
Trade schools  
Higher workers comp – more worker training creates a better qualified workforce and lower work comp rates than higher wages  
Get school district, COT, unions, business and industry to set a unified agenda for workforce development  
Increase opportunities for better paying jobs  
Train/education construction and rehab workers  
Provide grant funds for land for trade schools and houses  
Use foreclosed/run down properties as training areas for trades

#### MOVING FORWARD – CREATE INCENTIVES AND FIND FUNDING GROUP 13 VOTES

Members: Spencer Woith [spencerwoith@woithengineering.com](mailto:spencerwoith@woithengineering.com); Joe O'Leary [joe@ridgeline-mt.com](mailto:joe@ridgeline-mt.com); Julie Topel-Evans [Julie@ready2migrat.com](mailto:Julie@ready2migrat.com); Lyle Konkol



[lyle.j.konkol@hud.gov](mailto:lyle.j.konkol@hud.gov); Terry Youngworth, [tyoungworth@ci.great-falls.mt.us](mailto:tyoungworth@ci.great-falls.mt.us); Susie David [Suzanne.david@mt.usda.gov](mailto:Suzanne.david@mt.usda.gov)  
Chair – Lyle Konkol

Have City provide tax incentive or development incentive for affordable housing development  
City to waive fees if affordable housing criteria is met, including # of units, cost of units and density criteria  
Ways to provide safe decent housing: put inmates to work, alternative – modular and manufactured housing, panelized homes.  
More and more section 8s going away will impact other housing  
Pass the Housing Montana Legislation  
Some type of tax break or reduction of infrastructure fees to build homes that are considered affordable, density bonus, subsidize worker wages  
Get funding from commissioners, legislatures, and casinos or lottery  
Increase or change housing voucher rate – useless because renters have had places destroyed or not enough money paid  
Create incentives to stimulate downtown upper story housing development  
Provide grant funds for land for trade schools and houses  
Include affordable housing as use of TIF money  
Make sure HUD certificates are fully funded  
Increase availability and amount of down payment assistance programs  
Incentive program for both builder and buyer to utilize existing buildings downtown  
Good budgeting – use funds wisely  
Create partnership with non-profit groups and government

#### MOVING FORWARD – REHAB DOWNTOWN GROUP 6 VOTES

Members: Karen Nebel [knebel@nhsgf.org](mailto:knebel@nhsgf.org); [Michael.mccleary@usbank.com](mailto:Michael.mccleary@usbank.com); [donastebbins@bresnan.net](mailto:donastebbins@bresnan.net); Marianne Sepich [msepich@fib.com](mailto:msepich@fib.com); Margo Minster [mminster@fib.com](mailto:mminster@fib.com)  
Chair Karen Nebel

Provide grants and subsidized/guaranteed loans for downtown development  
Develop downtown with planned land use around city  
Revitalize downtown – so much space to develop into housing, becoming a cool community will help our image problem and recruit more workforce and retain the workforce we have  
Rehab downtown – either renovate or rebuild  
Get a plan for developing GF downtown – upper story buildings for moderate income households

#### MOVING FORWARD – CREATE A HOUSING PLAN GROUP 4 VOTES

Members: Adam Gill [agill@cccsmt.org](mailto:agill@cccsmt.org); Sheila Rice [srice@nhsgf.org](mailto:srice@nhsgf.org); Pastor Phil Caldwell [1king4life@sofast.net](mailto:1king4life@sofast.net); Michael O'Neil [oneil\\_michael@msn.com](mailto:oneil_michael@msn.com); Chris Imhoff [cimhoff@ci.greatfalls.mt.us](mailto:cimhoff@ci.greatfalls.mt.us)  
Chair – Sheila Rice



Fix infrastructure to include offering opportunities to stop brain drain. Have to bring technical higher paying jobs  
 Good wages = better housing = better opportunities  
 Form a plan – research successful plans that other communities have used and work from there  
 Survey to identify precise needs  
 Get a plan and followthrough  
 Create resident-owned manufactured housing communities  
 Planning urgent – density, traffic, where to grow  
 Followup city wide panel with small groups to create 5 year plan  
 Involve churches  
 Large number of agencies and programs represented here and I have no understanding of them. Gaining a clear perspective would be very impactful  
 Lack of being informed  
 Finding ways to inform the community  
 Inform the youth community – April – National Teach Children to Save; October, National Credit Day; Pulse Great Falls Group  
 Get over the image problem  
 Create a welcoming community where everyone has a home  
 Build energy efficiency into every home  
 Build universal accessibility into every new unit

#### MOVING FORWARD – LAND GROUP 7 VOTES

Members: Karen Nebel [knebel@nhsgf.org](mailto:knebel@nhsgf.org); Shannon McDonald [realestate@mtrealty.com](mailto:realestate@mtrealty.com); Al Henry [ahenry@nhsgf.org](mailto:ahenry@nhsgf.org)  
 Chair – Al Henry

Facilitate infill process and advantages  
 Purchase land for future development – short term  
 Initiate a land trust program  
 Identify state, city and county land that could be used for development  
 Community land trusts – city or county donates or leases land or lots for development of single family homes to ensure permanent affordability  
 Secure affordable land site now – land trusts  
 Purchase land now for future use

#### CAN'T COMMIT BUT KEEP IN THE LOOP

Alberta [knapstad@usw.salvationarmy.org](mailto:knapstad@usw.salvationarmy.org)  
 Barbara Murfield [parkmanorbarbara@imt.net](mailto:parkmanorbarbara@imt.net)  
 Bill [admin@eaglesmanorret.com](mailto:admin@eaglesmanorret.com)  
 Becky Fisher or Gary Owens United Way of Cascade County  
[becky@uwccmt.org](mailto:becky@uwccmt.org)

#### WHAT'S BEEN DONE

2 bedroom total housing costs \$600 under HUD  
 NeighborWorks in 2007 – 24 affordable units; 18 new and 6 renovations  
 City building permits:

Jan to Aug 2007: 152 single families permits; \$24.3 million; average price \$230,000  
 2006: 192 single family permits, \$28 million  
 Infill project on 7<sup>th</sup> Ave N 24 -28 units in \$160,000 range  
 2007 average sales price all homes \$164,000  
 Housing authority has 500 units plus 206 section 8 vouchers  
 Opp Inc has 425 vouchers in GF areas  
 Habitat building 3 houses per year  
 State income tax deduction for mortgage interest is \$125 million per year – taxpayer  
 subsidy of higher income housing  
 1,576 total subsidized units in GF, including section 8.  
 16-20 group homes  
 Agape youth residences  
 Rescue Mission and Haven of Hope  
 Domestic violence shelter  
 Community is integrated – housing for 18 to 80 plus  
 Disabled, seniors, renters, homeowners.  
 8 – 11 housing for disabled – 2 units with 14 each

#### STRENGTHS – DIAMONDS

- ❖ NeighborWorks
- ❖ Housing stock vs population
- ❖ Outlying commute areas
- ❖ Short wait for getting into subsidized or affordable housing
- ❖ Generally affordable
- ❖ Location – airport and air quality
- ❖ Good schools, low crime rates
- ❖ Transit system
- ❖ Reverse mortgage through MBOH
- ❖ Agape house for 18 – 21 years old
- ❖ Self-help homes – USDA
- ❖ Habitat for Humanity
- ❖ Mercy Home
- ❖ MAFB housing
- ❖ Base hotel for newcomers
- ❖ Financing options – banks and credit unions

#### THREATS – SPADES

- ♠ Low wages
- ♠ Aging workforce/lack of workforce
- ♠ Low self esteem/image problem
- ♠ NIMBY problem/stop growth
- ♠ Deteriorating housing stock/poor quality
- ♠ Subprime lending
- ♠ Taxes

#### OPPORTUNITIES -- HEARTS

- ♥ Aging demographics – create new housing choices and positive community flow
- ♥ Space
- ♥ Land cost still low
- ♥ Vacant downtown buildings
- ♥ Nonprofits
- ♥ NeighborWorks – national resources, financial and technical
- ♥ Tap unutilized workforces – MSU, apprenticeships
- ♥ Agency interaction – retain and develop further
- ♥ The bubble – to our advantage
- ♥ Interest rates are good
- ♥ Tribal Federal \$\$ -- opening other housing and economic development
- ♥ Trades education in GF to add to workforce before it becomes a crisis
- ♥ GF history of trades industry inherited
- ♥ Utilize the energy of the youth – high school house
- ♥ Wages of trades good
- ♥ Educate public about being “Bozemanized”
- ♥ Talent within agencies

#### WEAKNESSES – CLUBS

- ♣ Funding – no federal, state, city or county funding for housing
- ♣ Lower wages – trained
- ♣ No housing plan
- ♣ High work compensation rates for construction
- ♣ Informing young community
- ♣ Lack of county involvement
- ♣ Lack of incentives
- ♣ Lack of permanent affordability
- ♣ Risk
- ♣ High poverty area
- ♣ No middle ground – very high incomes and very low incomes.

The next full group meeting will be on Friday, November 30 at a site to be announced. Moving Forward Group chairs – please have a meeting in the next two weeks to start your section of the comprehensive housing plan.

## GREAT FALLS COMPREHENSIVE HOUSING PLAN MEETING

Civic Center – Gibson Room

November 30, 2007

Present:	Adam Gill	Al Henry	Bill Holliday
	Chris Imhoff	Tom Kotynski	Barbara Murfield
	Shelia Rice	Marianne Sepich	Dona Stebbins
	Les Stevenson	Spencer Woith	Terry Youngworth
	Jerome Patton	Maria Valandra	

### Task Groups Reports:

- Trade School Group – Tom Kotynski reported on the Trade School Group - See attachment  
Al Ekblad is to contact people in the group to let them know where this group is going and what their options are.
- Create Incentive and Funding Group – Lyle Konkol reported that they will look at the Missoula model that used the concept to work with various partners to reduce costs to build affordable housing.
- Rehab Downtown Group – Karen Nebel was not present so Jerome Patton gave a report on the Imagine Downtown group and their progress
  - The Johnson Hotel Building – the commercial tenants do not want the top space to be turned into residential because of the noise levels during business hours.
  - Focus of the group is to create resources and BID's that could help people get a successful project going.
  - Property west of Perkins – moving on developing into small apartments
  - The Great Falls Business Improvement District has new website that identifies properties downtown that are available and lists grants available.
- Create a Housing Plan Group – Adam Gill reported that the group is working on three surveys
  - Agency Survey – This survey will go to various organizations including realtors, lenders, non-profit agencies, etc. It will go out by e-mail using survey monkey and is expected to be released in the middle of January
  - Community Survey - This survey will be developed based on the responses of the Agency Survey. We plan on mailing out 9000 survey's to random addresses by late February.
  - Gap Survey – This survey will be handed out by organizations to their clients ie Opportunity Inc. would give the survey to clients that come into their office.

6

- The results of these surveys will be to compile a Comprehensive Housing affordability strategy which would formulate a housing plan. We will have hard and electronic copies. All the groups will have input into housing plan.
- Land Group – Al Henry reported they have not met as a group but have done some research on community land trusts – see attachment. He also reported that Neighborworks has had positive conversation with county commissioners on community land trusts. They are working in Sun Prairie to acquire property and decommission substandard trailers and they are working with Rural Development for direct loan on new mobile homes (\$2,000 per trailer to get rid of the old trailers)
  - Land for future development – there is land available but it's the development costs that keep people from developing affordable housing.

#### Group Thoughts:

- What are the rental issues in Great Falls? –
  - All tax credit projects in Great Falls are private and are at 60% which doesn't allow HUD certificates to be used
  - They are seeing issues with out of state property managers not paying attention to their property and so there are properties that are not rented out.
  - Great Falls does not have experienced property managers.
  - 8,000 rental units in low income areas – 1/3 are substandard
  - Should we add a rental committee to this group? The group felt we should and Terry Youngworth has agreed to head up this group. Sheila will send out an email inviting people to join this group.
- Who Is Missing from our group?
  - County Commissioners – Al Henry will Contact
  - Planning Board – Al Henry will contact
  - Realtors – Sheila Rice will contact
  - City Planning – Dona Stebbins will contact

Sheila reported that 1 year ago MEDA formed a Housing Work Group

- People couldn't grow business
- No houses to be purchased or rentals available
- They came up with an option list
  - Create State Housing Funds
  - Look at subdivision and zoning laws to see if they encourage good land use
  - Manufacturing housing

Governor went to Department of Commerce and said he wants a solution to promote economic development and housing. A Housing Coordinating Team was formed to look into this issue.

The Housing Montana Fund Group during the last legislative session tried to get money put into a fund. This didn't pas but they are still working on a strategy and have decided to make housing a campaign issue.

Next Steps:

- Maria will contact the Trades Group chair to ask him to let his group know the decision of dismantling and give them their options to join other groups. – Tom will stay on as liaison and report to us what the newly formed Workforce Group is doing.
- Sheila will contact the Rehab Group and Jerome has agreed to be apart of this group.
- Terry has volunteered to head up the Rental Group
- There was discussion about defining our Vision – The Comprehensive Plan group will take the lead to put a draft together for the entire group to review and give feedback.
- Adam Gill has agreed to work on putting our information on various websites

Next Meeting:

- January 25, 2008  
8:30am – 10:30 am  
Civic Center – Gibson Room (Chris Imhoff- will you please reserve the room for next month)

## GREAT FALLS COMPREHENSIVE HOUSING PLAN MEETING

NeighborWorks Great Falls

February 25, 2010

8

Present were: Lee Houle, Great Falls Public Schools; Chris Christiaens, Opening Doors; Terry Youngworth, City of Great Falls and Great Falls Housing Authority; Gary Owen, United Way; Brian Rogers; Sheila Rice, NeighborWorks; Chris Imhoff, City of Great Falls; John Rosenbaum, Rosenbaum Builders and NeighborWorks; Jim Weber, Great Falls Housing Authority and NeighborWorks; Suzie David, USDA Rural Development; Rita Beck, Young Parents Center; Sharon Virgin, Great Falls Association of Realtors; Bobbie Gilstrap, Teacher's Federal Credit Union; Maria Valandra, First Interstate Bank; and Katie Riley, Cascade County Health Department.

Maria Valandra reviewed the community needs assessment process of the Comprehensive Housing Affordability Strategy, including the orchestration of four different surveys, 15 focus groups and numerous meetings with the Task Force. Sheila Rice explained the proposed strategies to address housing related needs gleaned from the study process. Chris Imhoff detailed unmet needs and strategies that had risen to the top as candidates for inclusion in the Great Falls/Cascade County Housing Plan 2010-2020. It was emphasized that there are current housing activities identified in the study as needs and strategies that are already being handled well, these strategies need to be a part of the continuing effort to address the need for safe, affordable housing in our community during the upcoming years.

The unmet needs and strategies proposed for inclusion in the City of Great Falls and Cascade County Housing Plan for 2010-2020 follow:

- Transition Housing with supervision and services as appropriate, serving homeless teens, teen parents, ex-felons, foster children aging out of the system and homeless men and families among others.
- Student/Health worker rental housing in the medical-education district
- Downtown housing for a variety of income levels, emphasis on historic building renovation
- Ordinances that make the development of affordable housing more feasible and that increase the blight removal authority of the City of Great Falls and Cascade County.
- Safe, accessible, affordable senior housing, including more Medicaid waivers for nursing home care and in-home care options for renters as well as owners
- Quality affordable rental housing, focus available funding sources to upgrade current rental housing and preserve affordable rental housing
- Preservation and upgrading of existing manufactured housing communities

Those present at the meeting voted to support the inclusion of the above stated unmet needs and strategies as priorities in the Housing Plan and added the following comments and suggestions:

Legislative changes may be needed to address some of the strategies  
Great Falls needs to access the continuum of care for homeless individuals and families

Continue the First-time homeownership program to allow families to build assets and gain wealth

Don't forget low-hanging fruit such as creating more rapid inspection and repair of homes that are available to Section 8 rental assistance

Revise community profile to reflect information from MAFB income levels

Determine a housing vision for Great Falls

5 years maybe ambitious, depending on the start date

Is there "one" thing that has the largest impact?

#### Next Steps

The committee will meet on March 25<sup>th</sup> at 8:30 am. Discussion will include a list of what's been done so far. Sheila will take the responsibility of reporting on this meeting and developing talking points for the group and an executive summary of the report.

Notes from this meeting will be mailed to all participants. The document will be available on-line for everyone. Once the report is finalized, meetings will be held with the City of Great Falls staff and Commission and the County staff and commissions to ask their approval of the plan. The Vision Expo will be invited us to create a poster board for the Expo in April.



## APPENDIX B

### Respondents to Great Falls and Cascade County Agency and Organization Surveys

#### Housing agencies:

- Accessible Space, Inc.
- Neighbor Housing Services, Inc. aka NeighborWorks Great Falls (2)
- Eagles Manor Retirement Community (2)
- Great Falls Housing Authority
- Malmstrom Air Force Base Housing Office

#### Housing businesses:

- 909 Apartments
- American Realty Group (2)
- Big Sky Realty of Montana (2)
- Century 21 McDonald Realty
- Coldwell Banker/The Falls Real Estate
- Dahlquist Realtors
- ERA American Horizon Realtors
- Faith Realty
- First American Title Company
- First Interstate BancSystem
- Great Falls Realty (2)
- Heritage Property Brokerage
- McDonald Realty
- Montana Realty
- Re/Max of Great Falls
- Russell Country Realty
- Stockman Bank (2)
- Wells Fargo Bank

#### Government agencies:

- Cascade County Office of Public Assistance
- Adult Protective Services
- Cascade County Area VIII Agency on Aging
- Cascade County Foster Grandparent Program
- Cascade County Commission
- City of Great Falls City Manager
- City of Great Falls Community Development Department (2)
- City of Great Falls Planning Department
- Great Falls Job Service Workforce Center
- Great Falls Public School District-Paris Gibson Learning Center
- Neighborhood Council
- Whittier Elementary School

#### Non-profit agencies:

Benefis Healthcare-Behavior Health Services  
Big Brothers Big Sisters of Great Falls  
Camp Fire USA North Central Montana Council  
Center for Mental Health (4)  
Easter Seals-Goodwill Industries  
Get Fit Great Falls  
Great Falls Children's Receiving Home  
Great Falls Rescue Mission  
Hands, Inc.  
Kairos Youth Services, Inc.  
Life Way Pregnancy Services  
Mental Health Association of Great Falls  
North Central Montana RSVP  
Opportunities, Inc.  
Paris Gibson Square  
Quality Life Concepts  
Rural Dynamics, Inc./Consumer Credit Counseling Service of Montana (2)  
Salvation Army  
St. Martin de Porres Mission-St. Jude Conference  
Voices of Hope  
Young Parents Education Center  
YWCA Mercy Home

Miscellaneous:

National Electronics Warranty  
Eklund Enterprises

► A complete compilation of all responses is available at the City Community Development Office.

APPENDIX D

**GREAT FALLS AREA HOUSING NEEDS ASSESSMENT**  
Conducted by the Great Falls Area Housing Plan Work Group  
September 2008

Please help us to identify housing needs in our community by taking a few minutes to complete this survey. The survey results will give us direction in setting goals and developing strategies to address the area's greatest housing needs. If you received this survey by mail, please return the completed survey in the postage paid envelope provided, to NeighborWorks Great Falls by October 6. If you are filling this survey out at a service agency, just leave it there with staff and we will pick it up. Thank you very much for your effort and time.

1. Have you filled out this survey before? a. Yes 0 (0%) b. No 612 (100%)
2. Do you live in Cascade County? a. Yes 588 (96.1%) b. No 7 (1.1%)
3. Do you live inside the Great Falls city limits? a. Yes 516 (87.8%) b. No 72 (12.2%)
4. What is your primary source of transportation? a. Car 380 (62.8%) b. Bus 36 (6.0%) c. Taxi 6 (1.0%) d. Bike 17 (2.8%) e. Walk 41 (6.8%) f. Friend 32 (5.3%) g. Case manager 10 (1.6%) h. Multi-modal 83 (13.7%)
5. Do you: a. Own your home 147 (24.3%) b. Rent your home 375 (61.9%) c. Stay with friends/family 45 (7.3%) d. Other: unspecified 34 (5.6%)  
Other: Mercy Home 3 (0.5%) Other: Pre-release 1 (0.2%) Other: YWCA 1 (0.2%)
6. How long have you lived in your present home? a. 0-6 months 85 (13.9%) b. 6 months-1 year 79 (13.0%) c. 1-3 years 179 (29.3%) d. 4-7 years 111 (18.2%) e. 8-15 years 66 (10.8%) f. Longer than 15 years 90 (14.8%)
7. How much is your monthly rent or house payment?



MO RENT	RESPONSES	MO RENT	RESPONSES	MO RENT	RESPONSES	MO RENT	RESPONSES	MO RENT	RESPONSES
0		61	173	1	280	2	365	2	570
3		1	175	3	282	1	368	1	575
9		2	178	1	292	1	370	1	585
12		1	180	3	299	1	373	1	591
20		1	181	6	300	20	375	4	595
25		2	182	1	301	1	378	1	600
25		1	183	2	307	1	387	2	604
27		1	185	1	310	2	390	1	612
30		1	186	1	315	2	395	1	625
37		1	187	3	317	1	396	1	631
40		12	189	1	245	1	397	1	635
45		1	193	1	248	1	399	1	640
54		1	194	3	250	12	400	18	650
55		1	195	2	251	1	410	4	664
60		1	196	1	253	1	417	1	666
62		1	200	7	255	1	420	2	675
73		1	201	1	255	1	425	11	700
84		1	210	1	256	1	427	1	704
87		1	211	5	260	4	430	3	720
89		1	215	6	265	3	438	1	750
91		1	219	1	266	1	440	1	755
96		1	220	2	267	1	440	1	776
98		1	221	1	270	1	442	1	781
100		3	223	1	275	3	447	1	786
101		1	224	2	276	2	449	1	800
109		1	225	10	279	1	450	18	801
120		2	226	1	280	2	450	1	805
125		2	228	1	282	1	452	1	820
127		2	229	1	292	1	455	4	835
128		1	230	2	299	1	459	1	840
129		1	235	1	300	20	460	1	850
130		1	239	1	301	1	463	1	854
140		1	240	3	307	1	465	1	868
141		1	242	1	310	2	475	8	900
143		1	245	1	315	2	479	1	950
145		1	248	1	317	1	480	2	975
146		2	250	12	320	3	485	1	980
147		1	251	1	325	9	490	1	987
148		1	253	1	327	1	495	1	1000
149		2	255	1	330	2	500	11	1043
150		3	255	1	335	2	520	1	1084
155		1	256	1	337	1	525	9	1188
158		1	260	4	345	1	528	1	1300
159		1	265	3	346	2	529	1	homeless
160		2	266	1	347	2	530	1	no answer
161		1	267	1	350	22	540	2	variable
163		2	270	2	355	1	545	2	
165		1	275	3	360	2	549	1	
166		1	276	2	362	1	550	13	
170		2	279	1	364	3	555	1	

8. Do you currently have rental assistance? a. Yes 196 (32.6%) b. No 406 (67.4%)
9. If answer to #8 is yes, what kind of rental assistance do you have?  
a. Section 8 113 (53.6%) b. Public Housing Assistance 83 (39.3%)  
c. Shelter + Care 1 (0.5%) d. Other: unspecified 12 (5.7%)  
Other: Pre-release 2 (0.9%)
10. How much do you currently pay for heat and electricity in your highest cost month?  
a. \$0-39 142 (27.0%) b. \$40-60 41 (7.3%) c. \$61-90 48 (8.5%)  
d. \$91-120 83 (14.7%) e. \$121-160 85 (15.1%) f. \$161-200 54 (9.6%)  
g. \$201-250 55 (9.8%) h. \$251-300 27 (4.8%) i. More than \$300 19 (3.4%)
11. Please identify the main heating source for your home: a. Electric 134 (23.1%)  
b. Gas 389 (67.2%) c. Oil 3 (0.5%) d. Coal 0 e. Wood 2 (0.3%)  
f. Propane 10 (1.7%) Multi-heating sources 41 (7.2%)
12. What is your household's current monthly income? a. Less than \$100 43 (7.3%)  
b. \$100-200 11(1.9%) c. \$201-350 25 (4.2%) d. \$351-500 45 (7.6%)  
e. \$501- 650 107 (18.1%) f. \$651-800 71 (12.0%) g. \$801-1000 93 (15.8%)  
h. \$1001-1200 76 (12.9%) i. \$1201- 1400 38 (6.4%) j. \$1401- 1650 23 (3.9%)  
k. \$1651- 1850 14 (2.4%) l. \$1851- 2150 18 (3.1%) m. \$2151-2350 7 (1.2%)  
n. \$2351-2600 8 (1.4%) o. \$2601-3000 4 (0.7%) p. More than \$3000 per month 7 (1.2%)
13. Do you use LIEAP? a. Yes 249 (42.0%) b. No 344 (58.0%)
14. Are you currently employed? a. Yes 235 (39.8%) b. No 356 (60.2%)
15. How many persons in your household are 19 years old or older? a. 1 335 (57.7%)  
b. 2 197 (33.9%) c. 3 23 (4.0%) d. 4 9 (1.5%) e. 5 13 (2.2%)  
f. More than 5 4 (6.9%)
16. How many persons in your household are children (0-18 yrs.)?  
a. 1 120 (41.5%) b. 2 84 (29.1%) c. 3 49 (16.9%) d. 4 24 (8.3%)  
e. 5 8 (2.8%) f. More than 5 4 (1.4%)
17. How old are you? a. 18-23 54 (8.9%) b. 24-30 76 (12.6%) c. 31-44 151 (25.0%)  
d. 45-60 190 (31.4%) e. 61-72 78 (12.9%) f. 73-85 47 (7.8%)  
g. over 85 9 (1.5%)

18. Please identify the type of housing you live in: a. Apartment 261 (43.4%)  
b. Single family house 207 (34.4%) c. Mobile home 97 (16.1%)  
d. Hotel/Motel 3 (0.5%) e. Shelter 8 (1.3%) f. Rented room 15 (2.5%)  
h. No permanent residence 10 (1.8%)

19. Does your home have any of the following housing problems?

MARK YOUR ANSWERS WITH AN (X).

	a. Yes	b. No	c. don't know		a. Yes	b. No	c. don't know
A. Inadequate plumbing/leaking pipes	111 20.1%	381 69.1%	59 10.7%	I. Lead based paint	30 5.5%	349 63.9%	167 30.6%
B. Asbestos	26 4.8%	359 66.7%	153 28.4%	J. Unsafe wiring or electrical outlets	104 18.9%	358 65.1%	88 16.0%
C. Inadequate insulation	165 30.1%	299 54.5%	85 15.4%	K. Air leaks around windows & doors	312 55.2%	224 39.6%	29 5.2%
D. Need furnace repair/replacement	68 12.5%	407 75.1%	67 12.4%	L. Cracked foundations	137 24.9%	321 58.3%	92 16.8%
E. Roof leaks, sags, missing shingles	107 19.6%	393 72.0%	46 8.4%	M. Sticking doors and windows	210 38.0%	313 56.6%	30 5.4%
F. Soot, smoke from heater, fireplace, or kitchen stove	34 6.3%	462 85.9%	42 7.8%	N. Walls or ceilings with holes, falling plaster, peeling paint, stains, mildew, mold	172 31.2%	352 63.8%	28 5.0%
G. Fumes from furnace/ water heater	22 4.1%	471 87.7%	44 8.2%	O. Broken or missing window panes	99 18.0%	432 78.5%	19 3.5%
H. Radon	7 1.3%	346 64.9%	180 33.8%	P. Cracked siding	80 14.7%	406 74.6%	58 10.7%

20. Please rate the physical condition of your housing: a. Terrible 16 (2.7%)  
b. Poor 74 (12.5%) c. Fair 178 (30.1%) d. Good 225 (38.0%)  
e. Very Good 99 (16.7%)

21. How many bedrooms does your home have: a. 0 0 b. 1 20 (3.4%)  
c. 2 132 (22.1%) d. 3 237 (39.7%) e. 4 139 (23.3%)  
f. 5 or more 69 (11.5%)

22. Please rate the adequacy of space in your home:  
a. Cramped 58 (9.8%) b. Tight but livable 179 (30.2%)  
c. Adequate 252 (42.6%) d. Roomy 103 (17.4%)

23. Please describe access to services from your home.

MARK YOUR ANSWERS WITH AN (X).

	a. Services are nearby	b. It is a reasonable walk to services	c. Transportation is necessary to reach services
A. Grocery store	203 (34.9%)	93 (16.0%)	286 (49.1%)
B. Laundromat	197 (38.7%)	79 (15.5%)	233 (45.8%)
C. Medical care	107 (18.7%)	50 (8.8%)	414 (72.5%)
D. Schools	170 (35.4%)	106 (22.1%)	204 (42.5%)
E. Child care	111 (27.9%)	61 (15.3%)	226 (56.8%)
F. Bus route	294 (55.6%)	133 (25.1%)	102 (19.3%)
G. Financial services	98 (18.8%)	85 (16.3%)	337 (64.9%)

24. Which kind or kinds of new rental low-income housing are most needed in our area:

Studio apartments	6	1.1%	Single family homes	111	20.4%
1-bedroom apartments	52	9.6%	Handicap accessible rentals	21	10.3%
2-bedroom apartments	49	9.0%	Apartments for seniors	31	5.7%
3-4 bedroom apartments	56	10.3%	Both 3-4 bed apartments and single family homes	38	7.0%
Assisted living facilities	9	1.7%	Both handicap accessible rentals and apartments for seniors	9	1.7%
Transitional living facilities	0	0	Multiple responses all other	161	29.7%



25. Are more opportunities needed to help low-income families become home owners? a. Yes 533 (92.1%) b. No 46 (7.9%)
26. Would you be interested in such an opportunity? a. Yes 412 (70.8%) b. No 170 (29.2%)
27. Do you have adequate transportation to services and schools? a. Yes 483 (82.6%) b. No 102 (17.4%)
28. Do you feel housing for persons with special needs is lacking in our area? a. Yes 410 (73.3%) b. No 149 (26.7%)
29. Have you experienced foreclosure in the past two years? a. Yes 19 (3.2%) b. No 576 (96.8%)

## APPENDIX E

### Montana Homeless Survey, January 29, 2009 Results for District 5 – Great Falls

129	survey forms completed
16	determined to be not homeless (did not include in tally)
80	Alone
18	Single parent with children
5	With spouse or partner and children
2	With spouse or partner but no children
8	With other
80	Family members
193	Total homeless people based on local findings

The following information is summarized from the 113 survey forms which were completed by/for homeless people. Demographics are available for only the 113 people who responded to the questionnaire, not for all people who are with the homeless person who was interviewed.

Percentages on the following tally will not always equal 100%. Some of the 113 respondents did not answer all questions. Some questions allow for multiple responses. Additionally, allowing for rounding influences % total.

1. This form is being filled out by:

Responses:	Count	Percent
Self	20	18
Interviewer	46	41
Case manager on behalf of a client	47	41

2. Have you filled out a similar survey in the past week?

Responses:	Count	Percent
Yes	0	0
No	113	100

3. Location (list of 12 districts): All Great Falls (5)

4. Where are you sleeping or where did you sleep on the night of Thursday, January 29?

Responses:	Count	Percent
Outside	4	3
Emergency shelter	28	25
Name of facility		
GF Rescue Mission - 21		
GF Rescue Mission Haven of Hope - 7		
Domestic violence shelter (Mercy Home) - 0		
Transitional housing for homeless persons	20	18
Name of facility		
GF Rescue Mission - 20		
Gateway Grace Home - 0		
Gateway Blue Thunder Lodge- 0		
Psychiatric facility	0	0
Substance abuse treatment facility	1	1
Hospital	0	0

Prison/jail	2	2
Domestic violence shelter	0	0
With relative or friend	46	41
Rental housing, own apartment or house	0	0
Motel/hotel	8	7
Youth foster care home	0	0
Other: church, Set Free, 2 left blank	4	3

5. Where have you stayed in the last 30 days?

Responses:	Count	Percent
Outside	7	6
Emergency shelter	24	21
Transitional housing for homeless persons	16	14
Psychiatric facility	1	1
Substance abuse treatment facility	1	1
Hospital	0	0
Prison/jail	3	3
Domestic violence shelter	0	0
With relative or friend	52	46
Rental housing, own apartment or house	6	5
Motel/hotel	10	9
Youth foster care home	0	0
Other: church, left blank	2	2

6. Gender:

Responses:	Count	Percent
Male	77	68
Female	36	32

7. Ethnicity/Race

Responses:	Count	Percent
White	89	79
Hispanic or Latino	2	2
American Indian/Alaskan Native	14	12
Black/African American	4	3
Asian	2	2
Other: Polynesian, left blank	2	2

8. Have you serve in the military?

Responses:	Count	Percent
Yes	14	12
No	93	82

9. What was the last grade in school that you completed?

Responses:	Count	Percent
Less than 9th grade	11	10
9—12th, no diploma	25	22
High school graduate or GED	36	32
Some college, no degree	24	21
Associates degree	2	2
Bachelors degree	3	3
Graduate or professional degree	1	1

10. Are you alone or with family?

Responses:	Count	Percent
Single parent with children	18	16
With spouse or partner AND children	5	4
Alone	80	71
With spouse or partner but NO children	2	2
Other: mother (2), family (3), sister & niece, ex-spouse with children, left blank	8	7

11. Are you or anyone else with you pregnant?

Responses:	Count	Percent
Yes	1	1
No	112	99

12. Your age: age 16-79 reported

16 - 1	31 - 2	46 - 24	61 - 2
17 - 1	32 - 4	47 - 2	62 - 2
18 - 2	33 - 2	48 - 1	63 - 1
19 - 4	34 - 3	49 - 1	64 - 1
20 - 0	35 - 3	50 - 2	65 - 1
21 - 3	36 - 1	51 - 3	68 - 2
22 - 1	37 - 1	52 - 3	71 - 1
23 - 2	38 - 1	53 - 7	79 - 1
24 - 3	39 - 2	54 - 2	
25 - 2	40 - 1	55 - 1	
26 - 1	41 - 0	56 - 2	
27 - 6	42 - 2	57 - 1	
28 - 3	43 - 1	58 - 1	
29 - 4	44 - 4	59 - 3	
30 - 1	45 - 4	60 - 2	

13. If with family member, please provide their ages (do not enter your age again)  
Ages <1-82 reported.

< 1 yr - 2			
1 - 4	11 - 3	21 - 1	38 - 2
2 - 3	12 - 2	22 - 0	42 - 2
3 - 6	13 - 3	23 - 0	48 - 2
4 - 11	14 - 0	24 - 1	49 - 1
5 - 7	15 - 1	25 - 4	50 - 1
6 - 2	16 - 2	26 - 2	53 - 1
7 - 3	17 - 2	27 - 1	57 - 1
8 - 1	18 - 0	28 - 1	82 - 1
9 - 0	19 - 2	32 - 1	
10 - 2	20 - 0	34 - 1	

14. If any of the above are school aged children, are they in school now?

Responses:	Count	Percent
Yes	15	13
No	6	5

15. How long has it been since you had a place you considered home or a permanent place to live?

Responses	Count	Percent
1 week or less	3	3
More than 1 week	6	5
More than 1 month	18	16
More than 3 months	19	17
More than 6 months	12	11
More than 1 year	21	18
More than 2 years	34	30

16. Why did you leave your last place of residence? (check all that apply)

Responses:	Count	Percent
Rent problems	16	14
Evicted but for other than rent problems	15	13
Conflict with family or friends	26	23
Overcrowding	2	2
Domestic violence	4	3
Lost job or no job	20	18
Went to prison or jail	4	3
Went into the hospital	5	4
Aged out of foster care	0	0
Housing condemned	1	1
Fire	0	0
Other:	29	26
Other: wanted apartment, separated from wife, traveling (2), never had 1, moved to be with children & grandchildren, lost children, living with parents, get closer to parents in nursing home, on probation, treatment, moved (6), quit job, hurt in car wreck, divorce, had no place to begin with, friend died, stayed with friend, looking for spiritual help, career pursuit, housework, death in family, left blank (2)		

17. Have you been without a permanent place to live before?

Responses:	Count	Percent
No	55	49
Yes, if yes, how many times in last 3 years?	59	52
Once	12	
Twice	14	
3 times	7	
4 or more times	22	

18. Where was your last residence?

Great Falls – 68  
 Other Montana cities - (Lewistown (2), Fairfield, Conrad, Havre, Billings (2), Ulm, Ronan, Helena, Scobey, Manhattan, Browning, Townsend, Kalispell, MT (2); CA; WA; IL; WY; FL; AZ; Auburn WA; Seattle WA; Tacoma WA; Spokane WA; Priest ID; Phoenix AZ; Lincoln NB; El Paso TX; Rockaway Beach NY;

19. How long have you been in this community?

Responses:	Count	Percent
Less than 1 week	1	1
1 week to 1 month	2	2
More than 1 month	6	5
More than 4 months	18	16
More than 1 year	6	5
More than 2 years	15	13
More than 5 years	20	18
More than 10 years	15	13
More than 20 years	28	25

20. Do you have any income (check all that apply)?

Responses:	Count	Percent
None	47	42
Part-time job	14	12
Full-time job	15	13
TANF cash assistance	4	3
Unemployment	0	0
Supplemental Security, SSI, SSDI	24	21
Disability	4	3
Veterans benefits	2	2
Child Support	2	2
Other: roll-over IRA acct; spot jobs; left blank	3	3

21. Do you receive SNAPs (food stamps)?

Responses:	Count	Percent
Yes	35	31
No	74	66

22. Have you been hospitalized for a mental health issue?

Responses:	Count	Percent
Yes	30	27
No	81	72

23. Have you ever been in a hospital, detox or rehab center for a substance abuse issue?

Responses:	Count	Percent
Yes	21	19
No	89	79

24. Do you feel you need help with a substance abuse issue now?

Responses:	Count	Percent
Yes	17	15
No	91	81

25. Are you receiving substance abuse services now?

Responses:	Count	Percent
Yes	13	12
No	96	85

26. Do you feel you have a health condition that limits your ability to work, get around, care for yourself or otherwise take care of your needs?

Responses:	Count	Percent
Yes	40	35
No	70	62

27. Have you ever been told that you have HIV or AIDS?

Responses:	Count	Percent
No	110	97
Yes	2	2

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# Analysis of Impediments to Fair Housing Choice

2015 - 2019

City of Great Falls  
Community Development  
City of Great Falls, Montana

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April 2015



## Table of Contents

Introduction: HUD Fair Housing Requirements.....	3
Executive Summary.....	4
Great Falls Background Data: Demographics, Income Data and Employment.....	6
Household, Income and Poverty.....	9
Great Falls Current Fair Housing Legal Status.....	11
Community Survey.....	13
Public Sector Impediments.....	14
Private Sector Impediments.....	17
Current Great Falls Fair Housing Activities.....	21
Strategies to Address Impediments to Fair Housing Choice.....	22
Appendix A: HUD Low to Moderate Income Areas and Census Tract.....	26
Appendix B: Great Falls Housing Survey.....	28
Appendix C: Great Falls Subsidized Housing Statistics as of February 2005.....	31

### Introduction: HUD Fair Housing Requirements

The U.S. Department of Housing and Urban Development (HUD) requires communities that administer Community Planning and Development (CPD) programs to implement procedures to affirmatively further fair housing. Great Falls receives approximately \$914,000 (2014) annually from the following HUD programs: Community Development Block Grant (CDBG) and Home Investment Partnership (HOME). (Office of Community Planning and Development CPD Cross Program Funding Matrix, 2015)

The CDBG program contains a regulatory requirement to affirmatively further fair housing and a second requirement that grantees certify that they will affirmatively further fair housing. This holds true for the HOME program, also.

As part of the jurisdiction's obligation to affirmatively further fair housing, Great Falls as an entitlement community, must undertake the completion of an Analysis of Impediments to Fair Housing Choice.

Funding for this plan was accomplished using HUD entitlement funds for administration activities in Great Falls.

### What is an impediment to Fair Housing Choice?

According to HUD's Fair Housing Planning Guide, impediments to fair housing choice are defined as:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin that restrict housing choices or the availability of housing choice.
- Any actions, omissions, or decisions that have this effect.
- Violations, or potential violations, of the Fair Housing Act.
- Actions counter-productive to fair housing choices, such as community resistance when minorities, persons with disabilities and/or low-income persons first move into white and/or moderate to high income areas, or resistance to the siting of housing facilities for persons with disabilities because of the person who will be occupy the housing.
- Actions that have the effect of restricting housing opportunities on the basis of race, color, religion, sex, disability, familial status, or national origin.

### Methodology

In order to complete a comprehensive Analysis of Impediments to Fair Housing Choice, hereafter AI, two public hearings were held during December 2014 and March 2015. The initial hearing was advertised in local newspapers, The Great Falls Tribune and Consumer Press (a free publication). Notices of both public hearings were also e-mailed to numerous organizations throughout the City and by personal contacts. The resulting 12 survey responses and 25 agency participants (March event) represented a very diverse group from Habitat for Humanity, Consumer Credit Counseling Services of Montana, Opportunities, Inc., NeighborWorks, Quality Life Concepts, landlords, tenants, public housing, City of Great Falls Fair Housing Specialist, and interested citizens, to name a few. The public hearings were a forum to define impediments as seen by the attendees, establish strategies, measurements and responsibilities.

A survey was sent to approximately 210 individuals (based upon mailing labels used in sending the letters) throughout the city by the City of Great Falls' CDBG/HOME Administrator. Of the approximate 210 surveys, 15 were filled out via email or hand delivered and does not include their comments recorded in the second input meeting, which referenced the survey questions during the participatory portion during the event. This data is used in the writing of this AI. (See Appendix B)

In completing the AI the following sources were reviewed or contacted:

- City of Great Falls Growth Policy Update 2013
- Great Falls City-County Growth Policy
- Great Falls zoning laws
- Complaints filed with:
  - The HUD Fair Housing office
  - The Montana State Human Rights Bureau
  - Montana Fair Housing
  - City of Great Falls Fair Housing Specialist
  - Montana Legal Services
- Home Mortgage Disclosure Act (HMDA)
- U.S. Decennial Census 2010
- Montana Census and Economic Information Center
- 2011-2013 American Community Survey (U.S. Census Bureau)
- Great Falls Area Housing Needs Assessment (conducted by the Great Falls Area Housing Plan Work Group)
- Interview of public hearing attendees
- 2010 housing survey of subsidized housing
- Internet
- HUD income guidelines and fair market rents for 2015
- Great Falls Tribune
- Habitat for Humanity
- NeighborWorks Great Falls
- Great Falls Housing Authority
- Opportunities, Inc.
- Other anecdotal data

The final draft was submitted for public review as an appendix to the 2015-2019 Consolidated Plan.

### Executive Summary

In December 2014 and March 2015 public hearings (held in an open discussion format facilitated by the City of Great Falls Planning and Community Development staff) were held to gather information from the general population of Great Falls. Attendees were from the housing industry, financial organizations, mental health organizations, nonprofit service providers and residents. The purpose of the public hearings were to determine the housing needs and confirm goals and objectives for the upcoming 2015-2019 Consolidated Plan as well as identify barriers to fair housing choice. This feedback would be used to develop strategies that could be undertaken in partnership with local organizations to address those barriers and further the opportunity for fair housing choice.

The City Fair Housing Specialist and city Planning and Community Development staff worked with a variety of public and private stakeholders to identify impediments to fair housing choice. This included a review of public sectors: Great Falls zoning, building codes, permits and fees, public housing and Section 8 policies. Elements reviewed in the private sector included lending practices, affordability of housing in both the rental and homeownership arena.

Besides the public hearings, an Organizational Survey Questionnaire was distributed to an estimated 210 community members of which 15 surveys were mailed back. Results from the public hearings, surveys, and personal contacts resulted in retaining six impediments to fair housing choice selected for action. The AI was made available for public comment with the City of Great Falls Consolidated Plan, May 2 through May 31, 2015.

#### Strategies to Address Barriers

For each of the impediments and strategies discussed for the City of Great Falls, the designated lead staff person or organization will record all progress toward eliminating the stated impediment. A summary of the progress will be included as an appendix in the "Consolidated Plan for Great Falls" and will go through the appropriate public review and comment period. Final review will be accomplished by City staff, certified by the City Manager and approved by the Mayor and City Commissioners. This plan will be included in the 2015-2019 Consolidated Plan and the summary of progress will be included with the Consolidate Annual Performance Evaluation Report.

The listed impediments were those selected through the public hearing process, surveys and interviews, and listed as priorities within the community. Priority was determined based on impact upon the community, the community housing survey, and discussion among participants. Priorities and strategies are discussed in the final section of this plan.

Great Falls has been and will continue to actively pursue its commitment to furthering fair housing choice within the community. In addition to the impediments and strategies noted in this five year plan, Great Falls will continue the numerous activities and partnerships previously established to increase fair housing awareness in the public and private sector. This plan will be reviewed on an annual basis.

#### Impediments to Fair Housing Choice

##### **Public:**

1. HUD fair market rents are not competitive with local market rents (too low) resulting in opting out from HUD programs and fewer housing units for subsidized rents. **(Restricts housing choices or availability of housing choices)**

##### **Private:**

2. Discriminatory practices in violation of the Fair Housing Act are present in Great Falls. **(Restricts housing based on protected classes)**
3. Landlords, property managers, tenants, future tenants and support agencies lack knowledge on Federal Fair Housing Laws, State landlord tenant laws and discrimination laws. **( Counter-productive to fair housing choice)**
4. Lack of quality housing for low income with Housing Choice Vouchers results in a lack of housing and mobility for those that are using this program. **( Counter-productive to fair housing choice)**
5. Lack of subsidized housing for elderly and disabled that is fully accessible / usable. **(Restricts housing based on protected classes)**

## Great Falls Background Data: Demographics, Income Data and Employment

### General Overview

Great Falls, Montana is located along the banks of the Missouri River in Cascade County. Geographically located in the central region of the state the geography is typical of the Northern Plains with grasslands and mesas. The city is bordered on the east by the Highwood and Little Belt mountains while to the west the Rockies dominate the skyline.

The City of Great Falls has a population of 59,091 persons. The local economy is based on agriculture, retail, healthcare and defense.

Generally, the economy in Great Falls is fairly stable with neither dramatic growth nor decline. This is also true of the population.

#### Population Comparison 2010 Census versus 2013 ACS

2010– 58,505

2013 – 59,051

Increase: 586

Source: Montana Census and Economic Information Center, July 2008.

During the first half of the 1990's a shift to a service and retail economy started and has continued with limited growth in the industrial arena.

In 2010 the U.S. Census showed 6,740 minority residents of which 1,978 were of Hispanic (of any race) origin. Whereas the 2000 census shows 5,316 of which 1,354 are of Hispanic or Latino (of any race). The 2011 - 2013 American Community Survey 3-Year Estimates show an estimate 7,360 minority races of which 2,554 are Hispanic or Latino (of any race). This is an increase of 2,044 minority residents in a thirteen year period.

### Poverty

In 2011-2013, 19.5 percent of the people were in poverty. Thirty-three (33) percent of related children under 18 were below the poverty level, compared with seven (7) percent of people 65 years old and over. Fourteen (14) percent of all families and Forty-one (41) percent of families with a female householder and no husband present had incomes below the poverty level. (2011-2013 American Community Survey 3-Year Estimate)

#### Housing units, 2000 – 2013

City of GF	2000*	Percent	2013*	Percent
Single-Family Units	16,450	65.1	17,898	66.8
Multi-Family Units	7,771	29.5	7,472	27.9
Mobile Homes**	1,342	5.3	1,410	5.3
Total Housing Units	25,253		26,780	

Source:\* U.S. Census, ACS \*\*2013 ACS data plus actual number of permits issued by City of Great Falls Community Development Department 2013 through 2015, \*\*\* includes modular and manufactured homes.

Single family units comprise the largest percentage of the housing units in Great Falls. These units are traditionally the least affordable, due in part to higher land cost and construction cost. The table shows a decline in multi-family housing resulting in a hardship for individuals seeking rental units.

#### Ethnic and Racial Population of Great Falls

<u>Great Falls 2013 Racial and Ethnic Distribution</u>			
	<u>2011 - 2013</u>	<u>2010 Census</u>	<u>2000 Census</u>
White	51,731	51,765	50,996
Black or African American	507	617	540
American Indian and Alaska Native	3,176	2,942	2,888
Asian	601	510	485
Native Hawaiian and Other Pacific Islander	0	76	49
Some other race	582	365	341
Total Population**	59,091	58,505	56,690
Hispanic or Latino(of any race)	2,554	1,978	1,354

\*\*The racial and ethnic distribution numbers may add to more than the total population because individuals may report more than one race.

Source: 2000 and 2010 U.S. Census , 2011-2013 American Community Survey 3-year estimates

#### Minority Concentration

A review of the CPD Maps provided by HUD reveals that there are several concentrations of minority races in Great Falls: American Indians are located in all census tracts with the highest concentrations in tracts 2 3, 9, and 107; persons of Hispanic Origin in all census tracts with the highest concentration in tracts 4, 9, 12, 106 and 107. Note that tract 107 consists primarily of county land: only the Great Falls International Airport is located within city limits. Please note that Malmstrom Air Force Base is located in Tract 12 resulting in a high concentration of all races (See Attachment D).

#### Economic Trends

The "base economy" of Great Falls includes agriculture and livestock, military, state and federal government, light manufacturing, healthcare, and service industries. Using cost of living comparisons provided by commercial sites such as AreaVibes, resulted in an A+ rating of 92 based on a scale of 100. The cost of living in Great Falls is 5.4% less than the Montana average and 8.4% less than the national average. Housing was rated less favorably (C+) on this same scale due to lower percentage of ownership and lower median home price.

The Bureau of Labor Statistics Economy at a Glance shows a positive 12-month percentage change in the Education and Health Services field, while employment is nearly all other sectors declined.

### Labor Force Characteristics and Unemployment

The 2000 and American Community Survey for 2011-2013 censuses provides the following data:

Labor Force Status		
	<u>2000</u>	<u>2011-2013 3-year estimates</u>
Persons 16 or over	42,035	46,601
In labor force	26,501	29,013
Civilian Labor Force	24,926	27,696
Employed	23,273	26,262
Unemployed	1,653	1,434
Armed Forces	1,575	1,317
Females 16 or over	22,363	24,350
Females in the labor force	12,422	14,349

Source: 2000 Census, 2011-2013 American Community Survey 3-year estimates

The labor force in Great Falls continues to expand at a moderate rate. According to the Bureau of Labor Statistics January 2015 saw an unemployment rate of 5.1%.

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 2011-2013 American Community Survey it is estimated that 17,165 individuals are over the age of 55 while the 2010 Census showed that 16,741 individuals were over age 55, a small increase of elderly population by 424.

### Employment Characteristics

The largest employers in Great Falls are portrayed below:

<u>Top 10 Private Employers in Great Falls</u>			
Private Sector			
<u>Rank</u>	<u>Employer</u>	<u>Business Type</u>	<u>Employees</u>
1.	Benefis Healthcare	Hospital	2,732
2.	Asurion	Warranty/Service Plans	552
3.	Walmart Stores	Retailer	475
4.	Great Falls Clinic	Services for Disabilities	407
5.	Easter Seals-Goodwill	Construction	305
6.	Centene	Insurance	319
7.	Albertsons	Grocery Store	280
8.	University of Great Falls	University	229
9.	Missouri River Care	Nursing and Rehabilitation	225
10.	Davidson Companies	Financial Services/Travel	224

Source: "2014 The Great Falls Chamber of Commerce Community Guide"

### Malmstrom Air Force Base

Malmstrom AFB, home of the 341<sup>st</sup> Space Wing, is one of the largest employers in Great Falls as well as a large contributor to the local economy. Malmstrom AFB saw a decline in their overall mission when 50 Minuteman Missiles were deactivated. The Base accounts for over 40 percent of the City's economic base. As part of the community its military members are active in contributing and sharing in numerous volunteer activities. The 120<sup>th</sup> Airlift Wing of the Montana Air National Guard is transitioning to C-130 cargo-carrying aircraft from previous fighter jet operations, including a \$22 million hanger under construction. It is anticipated for 2016.

Source: "2015 The Great Falls Chamber of Commerce Community Guide"

### Top 5 Public Employers in Great Falls

#### Public Sector

<u>Rank</u>	<u>Employer</u>	<u>Business Type</u>	<u>Employees</u>
1.	Malmstrom Air Force Base (outside city limits)	Military	4,693
2.	Great Falls Public Schools	Public School System	2,035
3.	Montana Air National Guard	Military	1,229
4.	City of Great Falls	City government	541
5.	Cascade County	County government	500

Source: "2014 The Great Falls Chamber of Commerce Community Guide"

### Household, Income and Poverty

#### Family Size and Household Composition

The American Community Survey 3-year estimate (2011-2013) shows an estimated 24,629 households, down 672 households from the 2010 Census which showed 25,301 households. The survey estimates that the average family size is 2.98 while in 2010 the average family size was 2.88 persons. Of the total households 60.5% (up from 59.8% in 2010) were family households and 39.5% (compared to 40.2% in 2010) were non-family households. (2011-2013 American Community Survey 3-year estimates)

#### Income and Poverty

The median household income for all households in Great Falls was \$42,487 compared to \$32,436 in 2000, and the family median income was \$56,049 compared to \$40,107 in 2000. (Source: 2000 Census and 2011-2013 American Community Survey). In 2011-2013, 19.5 % of the people were in poverty. Twenty-seven (27) percent of related children under 18 were below the poverty level, compared with 7 percent of the people 65 years old or over. Fourteen percent of all families and 41 percent of families with a female householder and no husband present had income below the poverty level. (2011-2013 American Community Survey 3-year estimates)



The 2015 HUD income guidelines are presented below:

Family size	HUD Income Guidelines for 2015 – Great Falls							
	1	2	3	4	5	6	7	8
Extremely Low Income*	\$12,950	15,930	20,090	24,250	28,410	32,570	36,720	40,600
Very Low Income**	\$21,550	24,600	27,700	30,750	32,250	35,700	38,150	40,600
Low Income***	\$34,440	39,400	44,300	49,200	53,150	57,100	61,050	64,950

\* Extremely low income at or below 30% of median family income  
 \*\* Very low income at or below 50% of median family income  
 \*\*\* Low income 51-80% of median family income

Source: [http://www.huduser.org/portal/datasets/il/il15/Section8\\_IncomeLimits\\_Rev.pdf](http://www.huduser.org/portal/datasets/il/il15/Section8_IncomeLimits_Rev.pdf)

### Poverty

The poverty level is defined by the federal government on an annual basis and varies with household size.

Size of Family	Poverty Thresholds 2015	
	Weighted average thresholds	
One person	\$11,770	
Two persons	\$15,930	
Three persons	\$20,090	
Four Persons	\$24,250	
Five persons	\$28,410	
Six persons	\$32,570	
Seven persons	\$36,730	
Eight persons	\$40,890	
Nine persons or more	\$44,346	

Source: Office of The Assistant Secretary for Planning and Evaluation , Poverty Thresholds for 2015

Census Tract	Areas of Poverty Concentration by U. S. Census Tract for Great Falls		
	2013 Population	Persons in Poverty	Percent Poverty
1	2,628	556	21%
2	4,124	155	4%
3	3,001	635	21%
4	1,983	516	26%
108	3,918	481	11%
7	1,938	600	30%
8	1,763	177	10%
9	3,041	636	21%
10	2,998	256	9%
11	4,414	1,111	25%

16	4,809	1807	38%
17	2,262	139	6%
18	3,597	320	9%
19	5,581	87	2%
21	4,037	674	17%
22	6,230	683	11%
23	7,244	282	4%

Note: Tracts 17, 21, 22, 23 are partial tracts that include City of Great Falls and County of Cascade numbers. Percent poverty is for that census tract only.

Source: 2009-2013 American Community Survey 5-year estimates

According to the data most individuals rated as being in poverty are located in the central residential and downtown area of Great Falls, census tracts 4, 7, 9, and 16. In contrast tracts 4, 7, 9, 16, 21, and 108 are classified as Low to Moderate Income areas. Tract 21 contains largely county lands (CPD Maps, Appendix A). Note: this data differs slightly from other sources of information in the Analysis of Impediments due to the census tract level analysis of poverty; the most recent data at this level was 5-year, rather than 3-year estimates.

#### Great Falls Current Fair Housing Legal Status

##### Fair Housing Testing, Complaints and Legal Findings

Discrimination complaints, lawsuits and settlements can provide a snapshot of fair housing problems within a jurisdiction. Complaints, lawsuits and settlements can also be used to measure the severity of discrimination in housing, hence an impediment to furthering fair housing. The four organizations normally contacted with fair housing complaints from Great Falls are the City of Great Falls Fair Housing Specialist, Montana Fair Housing (a non-profit organization located in Butte, Montana), Montana Human Rights Bureau, and the Denver HUD Office. The City of Great Falls Fair Housing Specialist is a clearing house for referrals and information but does not perform any compliance/enforcement activity.

##### Fair Housing Testing and Complaints

E-mails requesting information on discrimination complaints were sent to Montana Fair Housing, Montana Human Rights Bureau and the Denver HUD office. Numbers submitted by the Great Falls Fair Housing Specialist were referred to the, afore mentioned agencies.

Montana Fair Housing is the main agency referred to by City staff. Montana Fair Housing receives complaints, completes basic intake information, logs the data in its data base, investigates complaints, conducts testing, and provides mediation and negotiation services.

##### Testing:

Montana Fair Housing has and will continue to perform testing in Great Falls. In 2014 six tests were performed with 5 showing a difference in treatment. Montana Fair Housing received 93 calls in 2014.

##### Complaints:

The following tables show complaints received by the various agencies for Great Falls. It should be noted that the tables include not only federal protected classes but additionally the three protected classes recognized by the state of Montana: age, marital status and creed.

Great Falls Fair Housing complaints filed from January 2010 to December 2014 with HUD Office in Denver.

Protected Class	2010	2011	2012	2013	2014
Race	2	1	2	0	0
Color	0	0	0	0	0
Religion	0	0	0	0	0
Sex/gender	3	0	0	0	0
Disability	0	0	5	2	0
Familial Status	3	0	0	0	0
National Origin	0	0	0	0	2
Marital Status	0	0	0	0	0
Age	0	0	0	0	0
Creed	0	0	0	0	0

Source: Freedom of Information Request with HUD for 2014, March 2015 Fair Housing Specialist

Both complaints in 2014 found no cause determination.

Great Falls Fair Housing complaints filed from January 2010 to December 2014 with Montana Human Rights Bureau.

Protected Class	2010	2011	2012	2013	2014
Race	1	0	0	0	1
Color	0	0	0	0	0
Religion	1	0	1	1	0
Sex/gender	1	0	1	0	3
Disability	4	0	3	1	1
Familial Status	0	0	0	0	1
National Origin	1	0	0	0	0
Marital Status	0	0	1	0	0
Age	1	0	0	0	0
Creed	0	0	0	0	0

Source: Montana Human Rights Bureau submission March, 2015

During 2014 the Montana Human Rights Bureau addressed one case for disability (under "cause" as of 3/25).

Great Falls Fair Housing Complaints Filed from January 2010 to December 2014 with Montana Fair Housing.

Protected Class	2010	2011	2012	2013	2014
Race	0	0	5	0	2
Color	0	0	0	0	0
Religion	0	0	0	0	0
Sex/gender	0	8	0	0	3
Disability	9	15	7	1	1
Familial Status	0	4	5	1	2
National Origin	0	7	0	0	2
Marital Status	0	2	3	0	0
Age	0	1	0	0	0

Creed	0	0	0	0	0
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Source: Great Falls Annual AI Updates for 2011, 2012, 2013, and MT Fair Housing

During 2009 Montana Fair Housing settled three cases in disabilities and one familial status by conciliation.

Great Falls Fair Housing complaints filed from January 2010 to December 2014 with City of Great Falls Fair Housing Specialist					
Protected Class	2010	2011	2012	2013	2014
Race	5	2	0	0	1
Color	0	0	0	0	0
Religion	0	0	1	1	0
Sex/gender	2	7	1	0	4
Disability	5	4	3	1	1
Familial Status	3	1	0	0	0
National Origin	0	0	0	0	0
Marital Status	0	0	1	0	0
Age	0	0	0	0	0
Creed	0	0	0	0	0

Note: All complaints were referred to Montana Fair Housing.

Source: City of Great Falls Annual AI Updates for 2013, 2012, 2011

All complaints were referred to Montana Fair Housing, Montana Human Rights Bureau or HUD. The numbers show that most complaints are based on disability and the majority of these complaints dealt with assistive, therapy or service animals.

#### Organizational Survey Questionnaire

Approximately 210 surveys were distributed through numerous health services organizations, Great Falls Housing Authority, Retired Senior Volunteer Program and Opportunities, Inc., plus others. The exact number is unknown because many organizations e-mailed the survey to clients and other organizations. Surveys were also given to the Great Falls Housing Task Force, landlord associations and to members of the public hearing. The survey was designed to assess the community's general level of understanding and experience with not only fair housing issues but the housing needs of the community for the next five years under the Consolidated Plan. Questions 11-20 deal largely in housing discrimination (See Appendix B). This was not a scientific survey but with 15 official email/letter responses and its inclusion in a March 3<sup>rd</sup> 2015 input meeting, it did provide a picture of possible discrimination in the community as well as information indicating the need for greater education in fair housing. See appendix B for survey and comments by those taking the survey.

A review of the survey shows the following perceptions by those that took the survey:

- All but one of the written respondents (14/15) chose the option b.) "report it to an agency that would act" in regards to question 16. If you were aware of a housing discrimination act, what would you do?
- 5/15 (33%) of respondents indicated that they or someone they know had been a victim of housing discrimination
- Common terms included
  - "affordable"
  - "slumlords"

- “working poor”
- “decent housing”

Questions 11 through 20 showed the following as serious barriers to fair housing in Great Falls as seen by those surveyed:

- Need for more ADA accessible units and unit modification for protected groups such as elderly
- Residents are not familiar with their fair housing rights.
- Quality of rental properties and housing stock is substandard
- There is testimony of ethnic discrimination of minorities (Native American) for Question 13. See Appendix B

#### Summary of Fair Housing Profile in Great Falls

- The results of the Community survey and complaints received suggest that the Great Falls community members do experience discrimination in housing. In addition to the formal complaints and referrals, One-third of nonprofit or faith-based respondents indicated that they or someone they know had been a victim of housing discrimination. Agencies indicated discrimination most often occurs due to disability or race. While complaints to the city Fair Housing Specialist has decreased from 2010, this may be due to decreasing work hours to ten hours per week in 2013.

It is notable that no complaints surrounding real estate and financial transactions were noted.

#### Public Sector Impediments and Additional Programs

In August 2013 the Great Falls City Commission adopted “The City of Great Falls Growth Policy Update”. Generally, a Growth Policy, formerly known as a Comprehensive Plan, is an official document adopted by a local government as a broad body of public policy to guide decisions about the physical, social, and economic development of a community. The essential characteristics of a Growth Policy are general, comprehensive, and long range: It is general in that it analyzes and summarizes community-wide issues and trends in order to recommend broad goals, objectives, and policies. It is comprehensive because it focuses on the entire community and all functional aspects of development as a single unit, with all components working together, not apart. The Growth Policy is long-range because it looks beyond pressing current issues to the potential problems and opportunities five or ten years or more into the future. The following discussions on zoning and subdivisions, codes, infrastructure, permits and fees and processing are from the “Growth Policy” document (Source: “The City of Great Falls Growth Policy Update” 2013).

#### Zoning and Subdivision Regulations

Areas of the City are zoned for medium density multi-family residential use (“R-5 Multi-Family Medium Density”) and for high density multi-family use (“R-6 Multi-Family High Density”). The “R-6” zoning district is intended to accommodate multi-family units of the highest density on parcels that have sufficient area to accommodate required parking and landscaping. Multi-family residential development projects proposed for properties zoned “R-5” and “R-6” are subject to design review criteria through an open meeting process. As long as design and site requirements are met, development of multi-family residential housing in an “R-5” or an “R-6” zoning district is not restricted.

#### Building Codes and Enforcement

The enforcement of building codes in the City is not considered to be a constraint to residential development since most lenders and buyers demand that houses must meet the Montana State Adopted Codes or similar

regulation. However, the enforcement of building codes in existing housing units is an issue, especially in the City's older neighborhoods where property owners may not have the funds to repair problems and bring the units up to code.

#### Cost and Availability of Infrastructure

The condition and capacity of the streets, utilities, and other public facilities in the Great Falls area are generally sufficient to accommodate growth into the future.

#### Permits and Fees

The City collects fees that affect the cost of developing housing in Great Falls area. For example, building/zoning permit fees can contribute to the cost of building or remodeling housing. The largest impact on housing cost is the infrastructure such as sewers, water mains, etc. During the review for the AI this was observed as being necessary for the future of quality development.

#### Timely Processing of Permits for Development Projects

The City has relatively streamlined procedures for reviewing and approving development projects. Most proposals that conform to existing zoning, subdivisions, and building codes can obtain building permits within a few weeks or less. Request for new subdivisions, zoning changes, or conditional use permits are usually resolved within a few months. As a policy, the City of Great Falls attempts to keep the development review process as quick and efficient as possible. This does not seem to be a significant housing issue.

#### Malmstrom Air Force Base Housing

Malmstrom AFB currently has 1,116 housing units in the inventory. There are zero housing units under construction at this time. The waiting list for airman varies significantly depending on the season. On average, two bedrooms are the highest in demand at 100+ on the waiting list at any given time. 0-50 individuals are waiting for three bedrooms and 0-20 waiting for four bedroom units. This number includes the newest 111 renovated units and 278 newly constructed units. (Source: Malmstrom AFB Housing Office telephone inquiry April 27, 2015).

#### Public Housing, Section 8 and Subsidized Housing

##### Great Falls Public Housing Authority

The Great Falls Housing Authority owns and manages 490 public housing units located at five geographically separated sites. These sites are discussed below:

The Great Falls Housing Authority main site is located at 1500 Sixth Avenue South and consists of 356 units; 156 units were constructed in the early 1940's and 40 of these units were substantially rehabilitated in 1982. In 1986 a major rehabilitation began on the additional 116 units. In 1998 a program designed to modify 200 additional units was started and completed in 2001. The Housing Authority will continue the 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; electrical, plumbing and heating systems. Exterior sewer, water and electrical services will also be replaced. The overall project will take 10 to 15 years to complete

15

In 1973, 50 units were constructed at Sunrise Court located at 5115 Third Avenue South. These units have gone through complete interior and exterior rehabilitation. This phase was completed in 2004 and the second phase was completed in 2006. Rehabilitation included asbestos abatement, new doors, windows, siding, kitchen cabinets, bathrooms, flooring and section 504 requirements.

In 1980, 20 units were constructed at 3313 Eleventh Avenue South known as the Russell site. This project is in good condition. The Great Falls Housing Authority partnered with the Air Force Red Horse organization located at Malmstrom Air Force Base and completed a major landscaping project in 2001. 2009 and 2010 saw a complete renovation of the Russell site to include asbestos abatement, new doors, windows, siding, kitchen cabinets, bathrooms, flooring and section 504 requirements.

Also in 1980, 30 units were constructed at 2700 Sixteenth Avenue South known as Yeoman-Tynes. This site was completely modernized and completed in December 2008.

In 1982, 34 units were constructed at 1622 Third Avenue North, known as Austin Hall which serves elderly and disabled residents. Nine units and the community room are completing total rehabilitation and were ready for occupancy during December 2004.

The Great Falls Housing Authority administers 250 Housing Choice Vouchers serving a population of approximately 250 families. As of January 2014, 119 families are currently on the waiting list for public housing and 100 families for Housing Choice Vouchers. The waiting time for Housing Choice Vouchers is approximately two to five years depending upon bedrooms and availability of vouchers.

Lead based paint abatement and removal requirements when first implemented were a major concern resulting in landlords not participating in the Housing Choice Voucher program. After discussing this with housing authority staff, participation in the voucher program has not become a problem, in part due to working closely with landlords on abatement and removal requirements.

The Great Falls Housing Authority has been rated as a "High Performer" by HUD nine of ten years from 2000-2010. The quality of housing and customer service provided for residence is outstanding (Source: Great Falls Housing Authority Interview).

The Great Falls Housing Authority Five Year Plan includes substantial remodel at the main site to include underground utilities. It is estimated that the project will take approximately five years to complete and is currently under construction in 2015.

The Sandhills site is a new moderate income housing project under construction. The first 4-plex, of four 4-plexes, was completed in 2010. In 2013, the Great Falls Housing Authority completed the second phase of its Sand Hills project which included two four-plexes that are accessible, resulting in a total of 16 affordable housing units.

The Housing Authority will have 719 units of public housing when including vouchers; however, four units will be unavailable at the main site (previously known as Parkdale) because of renovation. The Housing Authority will provide 32 units of affordable housing (16 units at Holland Court and 16 units at Sand Hills. Eight of the 16 units at Holland Court, two of the units at Sand Hills and 22 of the 490 units of public housing are handicap accessible units (including five units at Austin Hall, a 34 unit elderly housing project where the entire building is accessible).

As of February 2014 the Housing Authority was administering 265 Housing Choice vouchers and anticipates administering the same number in the upcoming year. As of February 2014 the waiting list for public housing



was 101 families. The average wait for public housing is four to six months. The waiting list for Housing Choice vouchers was 223 families and the average wait time is one year to one and one-half years.

#### Opportunities, Inc.

"Opportunities, Inc. is dedicated to the principal that all people have the right to be self sufficient in providing for their own needs without discrimination; that they have equal opportunity for education training, employment and career advancement; and , that they have just access to the necessities for physical, psychological and spiritual well being." (Source: Opportunities, Inc. mission statement) The purpose of the HUD Housing program is to "enable low and moderate income families to live in decent, safe, sanitary, and affordable housing." They provide a direct rental subsidy and administer the voucher program as an HRDC receiving federal funds through the Montana Department of Commerce.

As of March 2014 Opportunities, Inc., was administering 475 Housing Choice vouchers and 141 mod rehab units and anticipates maintaining a similar level of administration in the coming year. As of March 2014 there were 3,365 families on the waiting list for Housing Choice vouchers, with an average wait time of three and one-half years. It is of note the people on Opportunities, Inc. waiting list could be duplicated on the Housing Authority Housing Choice waiting list.

Opportunities, Inc., will provide rental assistance and have a security deposit revolving account to assist low income households who are renting. The agency will also own and maintain a 16 unit apartment building (Kennedy Apartments) where rent levels are kept as low as possible for low income renters.

#### Acceptance of Tenant Based Section 8

According to the Great Falls Housing Authority staff, there have been minimal complaints received regarding the rejection of Section 8 eligible individuals and families by landlords and property managers. Of the few complaints received by the City of Great Falls Fair Housing Specialist the reasons stated were paperwork required, lack of payment for damages, and problems that have happened in the past with Section 8 renters. The Housing Authority raised their payments to 110% to be competitive with the rental market thus insuring a reasonable pool of Section 8 accepting landlords and property managers. Fair market rents (FMR) have dropped in the Great Falls MSA for the past several years, including FY 2015. Due to fair market rents being lower than local rents housing units continue opting out of the HUD program. See impediment 1.

#### Subsidized Housing

A survey of subsidized housing was accomplished during the month of January 2014 to ascertain availability of subsidized housing. The survey includes public housing operated by the Great Falls Housing Authority. Other properties are privately owned subsidized housing where the federal government, either through state channels or directly, provides subsidies to the owner who then applies the subsidies to the rent charged to low income tenants. There are privately owned subsidized housing units for seniors and people with disabilities, families and individuals. Accessibility is based on units available for individuals who are mobility impaired. A request by several human services agencies to ascertain the number of roll-in showers available in subsidized housing resulted in 116 units with roll-in showers being reported.

Summary of Subsidized Housing Statistics – January 2014			
<u>Units (Occupied)</u>	<u>Occupancy Rate</u>	<u>Accessible Units</u>	<u>Disabled Occupied</u>
1,350 (1,273)	94%	272	91
See Appendix C for complete survey.			



Numerous landlords stated that they advertise the availability of accessible units throughout the City but very few apply, hence the discrepancy between accessible units and disabled occupied. This has been the trend for several years.

#### Summary of Impediments in the Public Sector

There is only one impediment in the public sector: "HUD fair market rents are not competitive with local market rents (they are low) resulting in the opting out from HUD programs and fewer housing units for *subsidized rents*".

#### Age and Quality of Housing Stock

Year Structure Built	Estimate	Percent
Total housing units	25,708	
Built 2005 or later	182	0.7%
Built 2000 to 2004	2,118	7.9%
Built 1990 to 1999	1,628	6.1%
Built 1980 to 1989	1,397	5.2%
Built 1970 to 1979	3,824	14.3%
Built 1960 to 1969	5,388	20.1%
Built 1950 to 1959	4,570	17.1%
Built 1940 to 1949	2,870	10.7%
Built 1939 or earlier	4,803	17.9%

Selected Housing Characteristics, 2011-2013 American Community Survey 3-year Estimates

The large percentage of housing stock in Great Falls is 35 years or older (80%). Nearly half (45.7%) of all housing units in Great Falls were built before 1960. This is considerably older housing stock than the State of Montana. 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 deterioration of neighborhoods. (American Community Survey 3-year Estimates)

The quality of housing has always been at the forefront of discussion with low income tenants. The 2011-2013 ACS estimates that 27 units lack plumbing, (both hot and cold piped water, a flush toilet and a bathtub or shower), down from 201 in 2000, while 2011-2013 estimates show 210 units lacked complete kitchen facilities (installed sink with piped water, a range, convection or microwave oven; and a refrigerator) down from 381 in 2000.

#### Disproportionately Greater Needs

The City of Great Falls is over 87.5% White according to the 2011-2013 ACS. Other races account for around 5% or less for nonwhite races, with American Indian or Alaska Native amounting to the second largest percentage at 5.4%. Asian is 1% and Black or African American is less than 1%. Hispanic or Latino of any race amounts for 4.3%

Based upon the tables below, calculation has found that disproportionately greater needs to exist 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:

- 76.7% of extremely low income residents has one or more of the four housing problems provided, but all ten (100%) of Asian residents suffer from one or more housing problems.

For 30%-50% AMI:

- 60.2% of low income residents has one or more of the four housing problems provided, but 75% of Native American and nearly 93% of Hispanic residents suffer from one or more housing problems.

For 50%-80% AMI:

- 51.5% of moderate income residents has one or more of the four housing problems provided, but 71.4% of Hispanic residents suffer from one or more housing problems

For 80%-100% AMI:

- 22.1% of residents has one or more of the four housing problems provided, but 41.1% of Hispanic residents suffer from one or more housing problems

#### 30%-50% of Area Median Income

Housing Problems	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	1,720	1,135	0
White	1,495	1,020	0
Black / African American	0	55	0
Asian	0	0	0
American Indian, Alaska Native	135	45	0
Pacific Islander	0	0	0
Hispanic	50	4	0

• Table 1 - Disproportionally Greater Need 30 - 50% AMI

Data Source: 2007-2011 CHAS

- \*The four housing problems are:
- 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

The City Community Development Department enforces various codes to ensure that housing units meet minimum safety requirements for the residents. The City supports the maintenance and rehabilitation of housing and residential neighborhoods through its code enforcement program.

#### Homeownership and Affordability

Housing affordability is affected by two independent factors: housing cost and household income. Housing costs have continued to grow steadily over the past decade, while income levels have not kept pace.

(Source Great Falls Growth Policy Update 2013)

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, such as NeighborWorks and Habitat for Humanity. Despite their success, the ability of low and moderate income families to purchase housing has been adversely affected during the past decade as a result of costs rising faster than income levels.

#### NeighborWorks

Neighborhood Housing Services (NHS), aka NeighborWorks Great Falls will be allocated approximately \$22,7800 in CDBG funds for 2015/2016 for a revolving loan fund to provide down payment and closing cost assistance, new construction, purchase and rehabilitation of six housing units and other activities addressing neighborhood revitalization. NHS will also use prior year HOME funds through the Owners in Partnership Program to provide down payment and closing cost assistance to low to moderate income first-time homebuyers.

NHS is a 501(c)(3) non-profit organization whose overall goal is to provide safe, affordable housing for low income families. NHS is the primary affordable housing developer in Great Falls and is also the only Community Housing Development Organization (CHDO) and Community Based Development Organization (CBDO) in Great Falls. When an agency is designated as a CHDO and/or CBDO by HUD, it means the agency is eligible to apply for specific federal grant funds and undertake specific activities to address affordable housing within a community. These activities would include a CBDO using CDBG funds for new construction.

NHS's primary services include providing low interest loans and construction assistance to neighborhood low income homeowners for rehabilitation of their homes; purchasing and rehabilitating houses to be sold to low and moderate income households; constructing single family homes that are affordable for low to moderate income households; down payment and closing cost assistance; homebuyer education; foreclosure prevention loans; neighborhood wide clean-up and revitalization activities and special assistance to residents of targeted neighborhoods.

NHS will use Neighborhood Stabilization Program's program income funds to purchase lots with substandard buildings and demolish these structures. CDBG and HOME funds will be used to build new homes on these lots which will be available for sale to low income first-time homebuyers. The City will administer these funds through NHS.

NHS will administer a Section 8 Housing Choice Voucher Homeownership Program in partnership with the Housing Authority. This program involves Housing Authority current Housing Choice Voucher holders who are eligible being able to switch their rental vouchers to mortgage payments and pay 30% of their income toward a house payment rather than monthly rent. All eligible voucher holders will be required to participate in NHS's first-time homebuyer program and receive individual financial counseling. As of March 2013 no families were enrolled in the program but NHS and the Housing Authority anticipate serving two families in the upcoming year.

#### Rental Market and Affordability

According to the 2010 Census there are 25,301 occupied housing units of which 9,302 are specified renter occupied. The 2011-2013 American Community Survey 3- year estimates 26,780 total housing units with 24,619 occupied, and 9,461 are rental units. Since the 2010 census we see an increase in occupied housing and an increase of over 100 rentals. Below is the 2011-2013 ACS data for gross rent and the three year estimates for 2011-2013.

Gross Rent		
<u>Rent</u>	<u>Number</u>	<u>Percent</u>
Less than \$200	460	5.0
\$200 to \$299	572	6.2
\$300 to \$499	2,186	23.7
\$500 to \$749	3,255	35.2
\$750 to \$999	1,577	17.1

\$1,000 to \$1,499	809	8.8
\$1,500 or more	383	4.1
No cash rent	219	

Source: 2011-2013, American Community Survey 3-year Estimates

## Current Great Falls Fair Housing activities

### **Affirmatively Furthering Fair Housing**

The City aggressively pursued diverse avenues in expanding its philosophies and community involvement to affirmatively further fair housing through the following activities.

1. Annual updates to the Analysis of Impediments to Fair Housing Choice through 2014.
2. Outreach through education and networking continued to be the principal method of furthering fair housing. Activities undertaken during 2010 – 2015: (these activities will continue)
  - \* distributed pamphlets community-wide free of charge (information involved fair housing, landlord and tenant law, advertising guidance, and accessibility guidelines)
  - \* provided current information about fair housing on the City's Internet site
  - \* presented discrimination and fair housing educational programs to approximately 283 individuals in 2014 through workshops at numerous agencies to include workshops sponsored by the City
  - \* provide a monthly fair housing presentation to first time homebuyers and quarterly to the Great Falls Association of Realtors (Terry's Tidbits)
  - \* participated in summer orientation event at Great Falls College-MSU and distributed fair housing information
  - Landlords Association,
    - \* participated in community-wide workshops co-sponsored by the City, Opportunities, Inc., Neighborhood Councils and provided information about fair housing, landlord and tenant law, and housing regulations related to disabled people
    - \* wrote articles about fair housing for newsletters for NeighborWorks and the Great Falls Housing Authority
    - \* held 6 one-on-one landlord/property manager training sessions (8 hours total)
      - \* actively participated as member of the Housing Task Force, Community Advisory Council, and the Local Individuals Network for Customized Services Landlords Association,
3. The partnership between the City and the Housing Authority continued through the joint position of the City's Fair Housing Specialist. Fair housing activities included:
  - \* conducted investigations of tenant complaints, sexual harassment complaints, and assistive animal rules and regulations at the Housing Authority
  - \* reviewed Housing Authority leasing requirements and provided guidance on fraud, fair housing, service animals, and pet policies
  - \* writing a fair housing column for the Housing Authority's newsletter about issues of concern to the public housing community.
4. From 2011 through 2015 the City Fair Housing Specialist responded to 3,140 housing complaints and information inquiries from landlords and tenants, a majority dealt with state landlord and tenant laws.
5. Provided conflict resolution services involving fair housing issues and formal mediations related to landlord-tenant law to all individuals, as requested.

6. The rental housing market, especially subsidized housing was monitored on an ongoing basis. As of January 2014 the vacancy rate of subsidized housing was approximately 6%, this rate has been fairly constant (5% - 6%) throughout the years. The National Low Income Housing Coalition released a report showing that in 2015 a Great Falls worker would need to earn \$11.38 an hour to afford a two bedroom apartment at fair market rate; this is up \$0.87 from 2009.
7. All enacted city ordinances were reviewed to ensure compliance with fair housing laws.
8. In recognition of Fair Housing Month, the Mayor of Great Falls, during the Commission Meeting, proclaims April as Fair Housing Month, at which time statistics from the previous year are mentioned.

#### Strategies to Address Impediments to Fair Housing Choice

The impediments and strategies listed below were developed through a consensus effort during a public listening meeting and e-mail review.

#### Impediments

##### **Public:**

1. HUD fair market rents are not competitive with local market rents (too low) resulting in opting out from HUD programs and fewer housing units for subsidized rents. **(Restricts housing choices or availability of housing choices)**

##### **Private:**

2. Discriminatory practices in violation of the Fair Housing Act are present in Great Falls. **(Restricts housing based on protected classes)**
3. Landlords, property managers, tenants, future tenants and support agencies lack knowledge on Federal Fair Housing Laws, State landlord tenant laws and discrimination laws. **( Counter-productive to fair housing choice)**
4. Lack of quality housing for low income with Housing Choice Vouchers results in a lack of housing and mobility for low income tenants. This impediment was revised to be broader in 2012. **( Counter-productive to fair housing choice)**
5. Lack of subsidized housing for elderly and disabled that is fully accessible / usable. **(Restricts housing based on protected classes)**

#### Strategies and Measurements

##### **Impediment 1 (Public Sector)**

HUD fair market rents are not competitive with local market rents (too low) resulting in opting out from HUD programs and fewer housing units for subsidized rents. **(Restricts housing choices or availability of housing choices)**

##### Strategy

Discuss this impediment during the annual HUD consultation and see what is being done, if anything.

##### Measurement

Pending 2015 HUD consultation, HUD webinar sessions with CDBG/HOME administrator.

Will be monitored and compared with the next FY 2015 Fair Market Rent for all bedroom sizes.

Update:

Upon receipt of the "Final FY 2015 Fair Market Rents" (FMR) it has been noted that the market rents have slightly increased from 2014; efficiency units went from \$476 to \$485; one bedroom FMR increased from \$497 to \$505; two bedroom rents have increased from \$637 to \$648; three bedroom units went from \$922 to \$937; and four bedroom units increased from \$939 to \$955 in 2015. This impediment continues as stated above. The increase in fair market rents is below market rents being requested by owners at this time. Note: market rents decreased from FY 2013 to FY 2014.

**Impediment 2 (Private Sector)**

Discriminatory practices in violation of the Fair Housing Act are present in Great Falls. **(Restricts housing based on protected classes)**

Strategy

1. The City will market the availability of education and outreach pertaining to the rights of all protected classes. The City will be responsible for contacting various agencies to offer training in the rights and responsibilities of people in the housing market to include human services agencies.
2. A strategy will be developed to increase a community wide awareness of the existence of discrimination and resources available to those who have been discriminated against.

Measurement and Responsibility

The current Fair Housing Specialist or a member of the Great Falls Planning and Community Development department will continue to update the Great Falls Housing Task Force committee on a monthly basis as to the number of discrimination complaints received, the number of individuals receiving training and organizations contacted.

Update:

The Great Falls Housing Task Force has been and will continue to be briefed on monthly discrimination complaints received. During 2012 there were six (6) alleged discrimination complaints received by the Fair Housing Specialist, following two (2) alleged complaints received in 2013. See "Fair Housing Complaints" attachment to this document.

**Impediment 3 (Private Sector)**

Landlords, property managers, tenants, future tenants and support agencies lack knowledge on Federal Fair Housing Laws, State landlord tenant laws and discrimination laws. **( Counter-productive to fair housing choice)**

Strategy

1. An ongoing assessment of specific education needs through current course evaluations and a survey process of housing stakeholders will be performed by the City Fair Housing Specialist.
2. Partner with local agencies to provide education and encouragement for successful landlords and tenants and others in the housing market.
3. The Fair Housing Specialist will update and develop training materials and partner with housing agencies (landlord organizations, financial institutions, insurance and realty organizations) to procure and author educational handouts within each area of expertise.

#### Measurement and Responsibility

The Fair Housing Specialist will update the current list of organizations contacted, number of individuals trained, copies of educational material to the housing task force on a quarterly basis

Update: Ongoing. For example, during calendar year 2013, 409 individuals received education in fair housing during 18.5 contact hours.

#### Impediment 4 (Private Sector)

Lack of quality housing for low income with Housing Choice Vouchers results in a lack of housing and mobility for low income tenants. **( Counter-productive to fair housing choice)**

#### Strategy

1. Great Falls Planning and Community Development Department through its building inspectors, is establishing a more aggressive program to evaluate the habitability/quality of mobile homes, manufactured homes, rental properties (single and multi-family) especially for low income using Housing Choice Vouchers. This will include a tenant complaint system with involvement of the City's Fair Housing Specialist. The City also employs a Code Enforcement Technician with partial funding from the CDBG program who addresses complaints or refers appropriate fair housing cases to the Fair Housing Specialist.
2. Outreach and education will be provided by building officials to act in a proactive manner.
3. Community Development Block Grant (CDBG) funds will be used to improve housing stock and provide new housing for low income based upon submissions and approval of City Commission.

#### Measurement

Number of razing permits and permits for repairs based upon complaints received. Number of projects funded by Community Development Block Grant (CDBG) funds and money expended.

Update: Community Development Block Grant funds were used to improve the quality of housing through the following projects during calendar year 2015: \$68,000 to fund the housing rehabilitation specialist (up from \$65,500 in 2013) who provides rehab counseling, loan processing, inspections, and construction monitoring for all CDBG-funded City revolving loan programs for low income individuals; \$31,031 for the City Planning and Community Development Code Enforcement Technician; \$68,341 for the rental improvement loan program (down from \$94,324 from 2013); \$22,780 to NeighborWorks Great Falls for down-payment assistance, purchase and rehabilitation of houses and revitalization activities in their Community Based Development Organization (CBDO)-designated neighborhoods.

#### Impediment 5 (Private Sector)

Lack of subsidized housing for elderly and disabled that is fully accessible / usable. **(Restricts housing based on protected classes)**

#### Strategy

Market need for fully accessible and usable housing and available programs that would help future rehabilitation of existing housing to become fully accessible / usable to households requiring special needs. Attract elderly / accessible housing providers to construct new units in the Great Falls community.



Measurement

Track increase in request for program information and annual survey of agencies that request accessible / usable living for their clients. This will include tracking the number of newly constructed accessible units for elderly and occupancy rates.

Update:

In 2013, the Great Falls Housing Authority completed the second phase of its Sand Hills project which included two four-plexes that are accessible, resulting in a total of 16 affordable housing units. In 2014 Accessible Space Inc. began construction of a 38 unit project for residents 55 years or older. This will be fully accessible.



APPENDIX A:

HUD Low to Moderate Income Areas and Census  
Tract Map, City of Great Falls

CPD Maps - Low-Moderate Income Tracts 2015 - Consolidated Plan & Continuum of Care Planning Tool



## APPENDIX B:

### 2015-2019 CDBG Consolidated Plan Organizational Survey Questionnaire February 2015 – March 2015



#### 2015-2019 CDBG Consolidated Plan - Organizational Survey Questionnaire

Please find the following list of question to help the City better assess the needs of the community through the use of Community Development Block Grant and HOME Improvement Partnership funds. Your responses may be submitted to the Planning and Community Development office at the Civic Center located at 2 Park Drive S., Room 112 or mailed to the address above. Responses can also be submitted via email to Jolene Wetterau at [jwetterau@greatfallsmt.net](mailto:jwetterau@greatfallsmt.net). Please submit your responses no later than March 20, 2015.

1. What is the name of your organization/office?
2. List the strengths and weaknesses of the housing sector in your area as they impact your customers and your organization. Please consider such factors as: housing affordability and accessibility, housing conditions, housing availability, convenience of location, transportation to services, non-profit capacity, public sector capacity, private sector capacity, financial resources, military housing, homeless housing, supportive housing, public housing, and housing infrastructure such as sewer, water, power, phone, garbage etc. services.  
Think about who is and who is not well served, and why people are not well served.
3. What current housing needs in your area does your organization run up against most frequently? and for what groups?
4. What resources are available in the public or private sectors of the community to meet these housing needs? (Please consider the following and others: low and moderate-income renters/owners, military families, college students, young families, single parent households, work force households, as well persons who are: elderly; cognitively, sensory, physically, psychiatrically, and/or developmentally disabled; domestic-abuse victims; runaway or at-risk youth; homeless or individuals/families at risk of being homeless; living with significant chronic health conditions including HIV/AIDS, or substance abuse/chemically dependent.)
5. In your professional opinion, exactly what are the housing needs of the clients you serve? What are their other community service needs (i.e. jobs, transportation, health care, etc.)?
6. Please describe the gaps between current housing needs and resources in your area.
7. How have the housing needs in your area changed in the last five to ten years?
8. How do you expect your area's housing needs to change in the next five years to ten years?

9. Please describe the regulatory barriers or other barriers you perceive to affordable housing. Do they increase the costs of housing or act as a disincentive to the development of low-income housing affordable to residents with very low incomes?
10. Explain whether the cost of housing or the incentives to develop, maintain, or improve affordable housing for moderate income and middle income households are affected by: public policies including tax policies, land use controls, zoning ordinances, building codes, fees and charges, growth limits, or policies that affect the return on residential investment.
11. Have you or someone you know been a victim of housing discrimination? Yes or No
12. Does Great Falls have individuals practicing housing discrimination? Yes or No
13. Of the following protected classes (race, color, national origin, religion, sex, familial status (discrimination against children), disability, marital status, creed, age) which happens the most in Great Falls? Select only one.
  - a. Race b. color c. national origin d. religion e. sex
  - f. familial status g. disability h. marital status i. age j. creed
14. Where is the best place to learn to recognize and/or prevent housing discrimination?
  - a. On the Internet b. workshops c. friends d. read a book
  - e. Other \_\_\_\_\_
15. How important is housing discrimination to you?
  - a. Not so much b. a little c. somewhat d. a lot
16. If you were aware of a housing discrimination act, what would you do?
  - a. nothing
  - b. report it to an agency that would act (Dept. of Housing and Urban Development, Montana Fair Housing, Human Rights Bureau, Great Falls Fair Housing Specialist)
  - c. try to educate the parties involved
  - d. would not want to be involved even if I knew it was wrong
17. Other comments on housing discrimination in Great Falls.
18. Other comments about housing issues in your area.
19. Other comments about needs of the low-income persons in your area.
20. How does your organization define affordable housing?

## APPENDIX C:

### Great Falls Subsidized Housing Statistics as of January 2, 2014

Appendix C: Subsidized Housing statistics as of January 2, 2014. The survey includes public housing and affordable housing operated by the Great Falls Housing Authority. Other properties are privately owned subsidized housing where the government provides subsidies directly to the owner who then applies the subsidies to the rent charged to low income tenants. This does not apply to affordable housing. Accessibility is based on units available for individuals who are mobility impaired. Various agencies have asked for an inventory of roll in showers. This survey did not focus on other supportive services.

Subsidized Housing Statistics as of January 2, 2014					
Name	#Units (Occupied)	Occupancy Rate	Accessible Units / #filled by Mobility Impaired		
Autumn Run** (***)	120		52	/	
Cascade Ridge**	40 (40)	100%	40	/	*4
Mountain View**	48 (44)	92%	16	/	4
Town site Apts. **	20 (18)	90%	10	/	0
Sand Hills **	16 (16)	100%	16	/	1
Holland Court **	16 (16)	100%	8	/	4
Yeoman	30 (29)	97%	2	/	1
Russell	20 (18)	90%	0	/	0
Sunrise	49 (48)	98%	3	/	3
Austin Hall	34 (34)	100%	5	/	5
Area 22 (GFPHA)	200 (179)	90%	14	/	14
Area 25 (GFPHA)	152 (134)( 4 rehab)	88%	0	/	0
Vista Villa	96 (90)	94%	0	/	0
Elmore Roberts	60 (50)	83%	3	/	0
Park Manor	101 (99)	98%	0	/	0
Aspen Village	60 (60)	100%	8	/	2
Elmwood	18 (18)	100%	2	/	1
Parkview	83 (83)	100%	0	/	0
Southwinds	23 (23)	100%	23	/	23
Portage	47 (45)	96%	47	/	8
Meadow Lark	17 (17)	100%	17	/	17
Broadview Manor	20 (19)	95%	1	/	1
Centennial Village	48 (48)	100%	0	/	0
Rainbow House	40 (40)	100%	0	/	0
Sunshine Village	72 (70)	97%	7	/	7
Franklin School Apt.	40 (35)	88%	6	/	0
TOTALS:	1350 (1273) (4 in rehab)	94%	272	91	*117

\*Denotes units with roll in showers. (Note: Rehab units were subtracted from totals to use only livable units in calculations.)

\*\* Affordable Housing

\*\*\*Manager stated that "it was company policy not to give out occupancy rates" hence add 120 units to total units available (1470 units)

Section Eight Housing Choice Vouchers as of January 2, 2014: Housing Choice Vouchers are managed by Opportunities, Inc. and the Great Falls Housing Authority. Project Based (Mod Rehab) are managed by Opportunities, Inc.. Opportunities, Inc. is funded through the Montana Department of Commerce who in turn contracts with the Department of Housing and Urban Development. The Great Falls Housing Authority is funded directly with Department of Housing and Urban Development.

	<u>Number Vouchers Contracted</u>	<u>Number Vouchers in Use</u>	<u>Percentage in Use</u>
Opportunities, Inc.	475	425	89%
Great Falls Housing Authority	265	188	71%
TOTALS:	740	613	83%

Project Based (Mod Rehab): This program is managed by Opportunities, Inc.

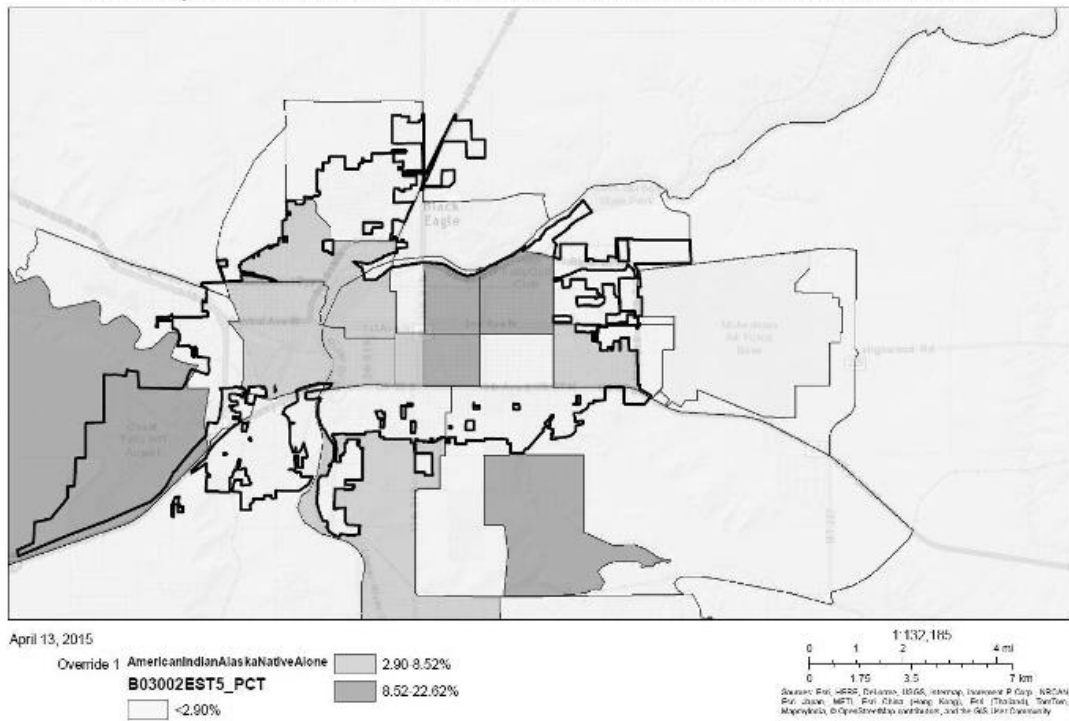
<u>#Units (Occupied)</u>	<u>Occupancy Rate</u>
141(141)	100%



APPENDIX D:

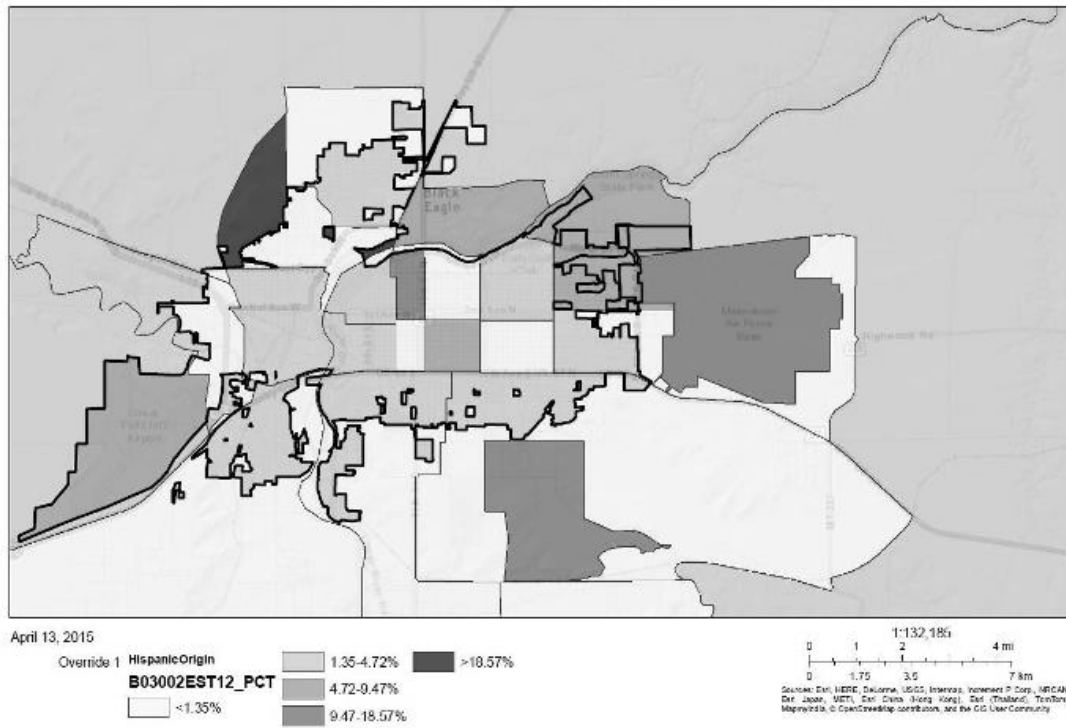
Great Falls Racial Concentration: CPD Maps

CPD Maps American Indian - Consolidated Plan and Continuum of Care 4/13/2015



1

CPD Maps Hispanic Origin - Consolidated Plan and Continuum of Care 4/13/2015



2

## Appendix G

### 2015-2019 PROGRAM INCOME/RECAPTURE POLICY BETWEEN THE CITY OF GREAT FALLS AND NEIGHBORWORKS GREAT FALLS

#### INTRODUCTION:

NeighborWorks Great Falls has been the recipient of HOME funding from the City of Great Falls fiscal year 2010. 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 and wherever property is available.

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. Both types of deferred mortgage have equity share provisions.

Program income will be generated from the repayment of the HOME loans and the 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 principle resident of the home. Additionally NeighborWorks is certified as a City of Great Falls Community 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 and will be documented to the City of Great Falls Planning and Community Development Department.

NeighborWorks Great Falls will use CHDO proceeds for new construction or rehabilitation of affordable single family housing through 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 CHDP proceeds activities.

NeighborWorks Great Falls will comply with the Recapture Provisions established in §92.253(a)(5)(ii) and highlighted in the HUD Notice CPD 12-003. 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 downpayment, 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.

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.

#### Acceptable Recapture Models

Of the four basic recapture options are described in the HOME rule and discussed in CPD 12-003, NeighborWorks Great Falls uses "4. **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, are 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. Detailed written agreements, including an Occupancy Agreement, HOME rider to the Deed of Trust, and Deed Restriction Agreement ensures 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 at §92.504(c)(5) of the HOME rule.

#### Noncompliance

Failure to comply with the resale or recapture requirements means that 1) the original HOME-assisted homebuyer no longer occupies the unit as his or her principal residence (i.e., unit is rented or vacant), or 2) the home was sold during the period of affordability and the applicable resale or recapture provisions were not enforced. If this noncompliance occurs, NeighborWorks Great Falls must repay to the City of Great Falls, with non-Federal funds, any outstanding HOME funds invested in the housing. The amount subject to repayment is the total amount of HOME funds invested in the housing (i.e., any HOME development subsidy plus any HOME downpayment or other assistance (e.g., closing costs) provided to the homebuyer) minus any HOME funds already repaid (i.e., payment of principal on a HOME loan). Any interest paid on the loan is considered program income and cannot be counted against the outstanding HOME investment amount. Note that noncompliance with principal residency requirements by a homebuyer under a recapture provision is not a transfer. Consequently, the amount NeighborWorks Great Falls must repay is not subject to prorated or other reductions included in its recapture provisions. NeighborWorks Great Falls must repay the HOME whether or not it is able to recover any portion of the HOME investment from the noncompliant homebuyer. Therefore, it is crucial for NeighborWorks Great Falls to have enforcement mechanisms in its written agreements with homebuyers to protect its investment and minimize its risk.

#### 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.

NeighborWorks Great Falls activities are congruent with the Housing Goals of the City of Great Falls, as shown below:

#### CITY OF GREAT FALLS 2015-2019 CONSOLIDATED PLAN

##### Five Year Priorities

Priority: Provide direct first-time homebuyer assistance for low to moderate income families.

Priority: Provide construction and rehabilitation assistance for very low to moderate income homeowners or property owners with very low to moderate income renters to upgrade the city housing stock to provide and sustain safe, affordable housing

Priority: Provide decent affordable housing opportunities for very low and low income renters, particularly the elderly and/or disabled.

##### Five Year Goals

Provide direct first-time homebuyer assistance to low to moderate income families. Partner agencies have included NeighborWorks Great Falls and Habitat for Humanity using HOME and non-HOME funding.

Provide construction and rehabilitation assistance for very low to moderate income homeowners or property owners with very low to moderate income renters to upgrade the city housing stock to meet standard building codes to provide and sustain safe, affordable housing. The City of Great Falls will provide loans to low income homeowners through the Deferred Payment Loan program. The City of Great Falls will provide loans to property owners to rehabilitate rental units that will be rented to low income people through the Rental Improvement program.

The five year strategic plan was developed to coordinate the needs of the community and available resources to meet the following basic goals central to performance measurement requirements and set forth in the statutes of the CDBG and HOME grant programs:

- ♣ provide decent housing for low and moderate income people
- ♣ provide a suitable living environment for low and moderate income people
- ♣ form partnerships with other governments and organizations to make better use of public resources in providing services

##### Activities

In support of the HOME project goals and in keeping with the City of Great Falls Consolidated Housing Plan goals, 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-to-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. This account will also function as the Revolving Loan Fund (RLF) account, providing the vehicle for handling income derived from loans made with the program income. Separate accounting for CHDO proceeds, as a type of HOME program income having greater flexibility for eligible uses, will be maintained. The Finance Director will 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.

#### Ongoing Monitoring

For HOME-assisted homebuyer projects under recapture agreements, NeighborWorks Great Falls will perform ongoing monitoring of the principal residency requirement during the period of affordability. It will be NeighborWorks Great Falls' responsibility to ensure that the HOME-assisted housing qualifies as affordable housing under §92.254 during the period of affordability. Confirmation that the buyer is using the property as his or her principal residence can often be accomplished by verifying that the buyer's name appears on utility company records or insurance company records for the home. In addition, postcard or letters mailed with "do not forward" instructions can demonstrate whether the buyer is receiving mail at the home.

**City of Great Falls, Montana  
Citizen Participation Plan for the  
Consolidated Plan and  
Consolidated Annual Performance Evaluation Report  
February 2019**

**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 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.

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.

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

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.

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.

**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.

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.

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.

**City of Great Falls  
Community Development Block Grant  
City Commission Policies  
March 15, 2019**

1. The Planning & Community Development Department will conduct an annual community needs assessment to gain community insight into annual funding priorities, including:
  - a. The distribution of a Community Survey
  - b. Outreach to the Council of Councils and Neighborhood Councils
  - c. Public Needs Hearing
2. Community data will be compiled and presented to the City Commission with a recommendation for annual community goals.
3. The City Commission will provide three opportunities to obtain citizens opinions: 1) a work session presentation by staff, 2) Public Needs Hearing, and 3) public comments on the Annual Action Plan. The public will be able to address:
  - a. Grant Policies
  - b. Housing and community development needs
  - c. Development of proposed activities
  - d. Review of proposed uses for funding
  - e. Review of program performance
4. The City Commission will vote on priorities/annual goals to be included in the Annual Action Plan and will allocate funding percentages to priority goals.
5. City Staff will review and score applications year-round, based on available funds. Applications will only be accepted that address the community goals identified in the Annual Action Plan. The minimum grant request and award shall be \$10,000.
6. If a grant applicant disagrees with a staff decision relative to program or funding eligibility unrelated to discrimination, the applicant may submit a written appeal to the Planning and Community Development Director. The appeal must be received within sixty days of the applicant being notified of staff's decision. If the Planning and Community Development Director upholds the staff decision, the applicant has the option to have the appeal reviewed by the City of Great Falls Board of



Adjustment/Appeals, which has the authority under Resolution 10283 to hear and decide appeals on CDBG allocations.

7. In addition to staff review, all loan applications that are not emergency in nature will be reviewed by a 3<sup>rd</sup> party board that has the expertise to determine loan viability.  
Example: Great Falls Housing Authority: Loan Review Board
  - a. All applicants that have any "employee, agent, consultant, officer, or elected official or appointed official of the recipient, or of any designated public agencies" (24 CFR 570.611) "either for themselves or those with whom they have business or immediate family ties, during their tenure or for one year thereafter" that may participate in the decision-making grant and/or loan process must notify the City, in writing, at least 30-days in advance. Therefore, HUD can be notified and, if necessary, a request of an exception submitted.
8. The City will implement all Public Facility projects and not accept external Public Facility applications.
9. The City will only fund Public Service Grants that are providing new or expanding services.
10. The City will retain all Program Income, to be revolved back into the Community Grant Program.
11. Private non-profit agencies will not be funded for staff salaries, benefits, office consumables, and rent payments for agency office space or utility costs.
12. The City will fund activities to further fair housing through supportive funding for a Fair Housing Specialist.
13. The City will fund the administration to manage the Community Development Block Grant and HOME Investment Partnership Grant
  - a. The City will fund the staffing necessary to implement the Revolving Loan Fund

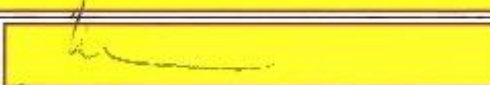


## Grantee SF-424's and Certification(s)

OMB Number: 1545-0047  
Expiration Date: 12/31/2019

Application for Federal Assistance SF-424		
<div> <div> <b>* 1. Type of Submission:</b>  <input type="checkbox"/> Preapplication  <input checked="" type="checkbox"/> Application  <input type="checkbox"/> Changed/Corrected Application                 </div> <div> <b>* 2. Type of Application:</b>  <input checked="" type="checkbox"/> New  <input type="checkbox"/> Continuation  <input type="checkbox"/> Revision                 </div> <div> <b>* 3. Revision select appropriate event(s):</b>  <input type="checkbox"/> Other (Specify):  <input type="text"/> </div> </div>		
<b>* 3. Date Received:</b> 05/29/2019		<b>4. Applicant Identifier:</b> <input type="text"/>
<b>6a. Federal Entity Identifier:</b> 1 1 NC 30 6000		<b>6b. Federal Award Identifier:</b> 1 20 NC 30 0000
<b>State Use Only:</b>		
<b>6. Date Received by State:</b> <input type="text"/>		<b>7. State Application Identifier:</b> <input type="text"/>
<b>8. APPLICANT INFORMATION:</b>		
<b>* a. Legal Name:</b> City of Great Falls		
<b>* b. Employer/ Taxpayer Identification Number (EIN/TIN):</b> 91-8001289		<b>* c. Organizational DUNS:</b> 080287093000
<b>d. Address:</b>		
<b>* Street:</b> 2 Park Drive S.		
<b>* Street2:</b> PO Box 5021		
<b>* City:</b> Great Falls		
<b>* County/Parish:</b> Cascade		
<b>* State:</b> MT: Montana		
<b>* Province:</b>		
<b>* Country:</b> United States of America		
<b>* Zip / Postal Code:</b> 59405-5021		
<b>e. Organizational Unit:</b>		
<b>Department Name:</b> Planning and Community Dev.		<b>Division Name:</b> CDBG/HOME
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>		
<b>Prefix:</b> Mr		<b>* First Name:</b> Craig
<b>Middle Name:</b>		
<b>* Last Name:</b> Raymond		
<b>Suffix:</b>		
<b>Title:</b> Director		
<b>Organizational Affiliation:</b>		
<b>* Telephone Number:</b> 406-455-8590		<b>Fax Number:</b> 406-455-3181
<b>* Email:</b> cgraymond@greatfallsmt.net		

Application for Federal Assistance SF-424	
* 9. Type of Applicant 1: Select Applicant Type: <input type="text" value="C: City or Township Government"/>	
Type of Applicant 2: Select Applicant Type <input type="text"/>	
Type of Applicant 3: Select Applicant Type <input type="text"/>	
* Other (specify): <input type="text"/>	
* 10. Name of Federal Agency: <input type="text" value="U.S. Department of Housing and Urban Development"/>	
11. Catalog of Federal Domestic Assistance Number: <input type="text"/>	
CDDA Title: <input type="text"/>	
* 12. Funding Opportunity Number: <input type="text" value="14-216"/>	
* Title: <input type="text" value="Community Development Block Grant"/>	
13. Competition Identification Number: <input type="text"/>	
Title: <input type="text"/>	
14. Areas Affected by Project (Cities, Counties, States, etc.): <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
* 15. Descriptive Title of Applicant's Project: <input type="text" value="City of Great Falls FY18 Annual Action Plan, including certification for a participating jurisdiction"/>	
Attach supporting documents as specified in agency instructions. <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/>	

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant: 33	* b. Program/Project: 39
Attach an additional list of Program/Project Congressional Districts if needed.	
<input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
17. Proposed Project:	
* a. Start Date: 07/11/2014	* b. End Date: 06/30/2020
18. Estimated Funding (\$):	
* a. Federal	1,270,181
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	
* g. TOTAL	1,270,181
* 18. Is Application Subject to Review By State Under Executive Order 12372 Process?	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/> .	
<input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review.	
<input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes", provide explanation and attach	
<input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="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 28, Section 1001)	
<input checked="" type="checkbox"/> ** I AGREE	
* The list of certifications and assurances, or an identical site where you may obtain this list, is available in the announcement or agency specification below.	
Authorized Representative:	
Prefix: Mr.	* First Name: Gregory
Middle Name: <input type="text"/>	
* Last Name: Dwyer	
Suffix: <input type="text"/>	
* Title: City Manager	
* Telephone Number: 208-455-8540	* Fax Number: 208-455-3131
* Email: gdwyer@grantsatiml.net	
* Signature of Authorized Representative: 	* Date Signed: 6/11/20

**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. §§4901 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. §§290dd-3 and 290ee-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.

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Standard Form 424D (Rev. 7-97)  
Prescribed by OMB Circular A-102

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 existing 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. 93-623), 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. §473), 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 City Manager	
APPLICANT ORGANIZATION City of Great Falls		DATE SUBMITTED 6.4.20	

SF-424D (Rev. 7-97) Back



Application for Federal Assistance SF-424			
<b>* 1. Type of Submission:</b> <input type="checkbox"/> Pre-application <input checked="" type="checkbox"/> Application <input type="checkbox"/> Change/Corrected Application		<b>* 2. Type of Application:</b> <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	
		<b>* If Revision, select appropriate letter(s):</b> <input type="text"/>	
<b>* 3. Date Received:</b> 03/20/2018		<b>1. Applicant Identifier:</b> <input type="text"/>	
<b>5a. Federal Entity Identifier:</b> <input type="text"/>		<b>5b. Federal Award Identifier:</b> M-18-MC-30-3218	
<b>State Use Only:</b>			
<b>6. Date Received by State:</b> <input type="text"/>		<b>7. State Application Identifier:</b> <input type="text"/>	
<b>8. APPLICANT INFORMATION:</b>			
<b>* a. Legal Name:</b> City of Great Falls			
<b>* b. Employer/Taxpayer Identification Number (EIN/TIN):</b> 81-8001255		<b>* c. Organization's CLNS:</b> 0812878850030	
<b>d. Address:</b>			
<b>* Street:</b> 2 Park Drive S.		<input type="text"/>	
<b>* Street 2:</b> PO Box 5021		<input type="text"/>	
<b>* City:</b> Great Falls		<input type="text"/>	
<b>* County/Parish:</b> Cascade		<input type="text"/>	
<b>* State:</b> MT: Montana		<input type="text"/>	
<b>* Province:</b>		<input type="text"/>	
<b>* Country:</b> USA: UNITED STATES		<input type="text"/>	
<b>* Zip / Postal Code:</b> 59403-5021		<input type="text"/>	
<b>e. Organizational Unit:</b>			
<b>Department Name:</b> Planning and Community Dev.		<b>Division Name:</b> CDSQ/HOME	
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>			
<b>Prefix:</b> Mr.		<b>* First Name:</b> Craig	
<b>Middle Name:</b>		<input type="text"/>	
<b>* Last Name:</b> Raymond		<input type="text"/>	
<b>Suffix:</b>		<input type="text"/>	
<b>Title:</b> Director			
<b>Organization's Address:</b>			
<input type="text"/>			
<b>* Telephone Number:</b> 408-455-8530		<b>Fax Number:</b> 408-455-3181	
<b>* Email:</b> cgraymond@greatfallsmt.net			

<b>Application for Federal Assistance SF-424</b>		
* 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:		
14-238		
* 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 FY18 Annual Action Plan, including certification for a participating jurisdiction		
Attach supporting documents specified in agency instructions.		
Add Attachments	Delete Attachments	View Attachments

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant: 39	* b. Program/Project: 39
Attach an additional list of Programs/Project Congressional Districts if needed.	
<input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
17. Proposed Project:	
* a. Start Date: 07/01/2018	* b. End Date: 06/30/2020
18. Estimated Funding (\$):	
* a. Federal	273088
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program income	
* g. TOTAL	273,088
<b>* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?</b> <input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/> <input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review. <input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
<b>* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes," provide explanation and attach <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="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 28, Section 1001) <input checked="" type="checkbox"/> <b>I AGREE</b> <small>** The list of certifications and assurances on an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.</small>	
Authorized Representative:	
Prefix: Mr.	* First Name: Gregory
Middle Name:	
* Last Name: Doyon	
Suffix:	
* Title: City Manager	
* Telephone Number: 408-255-9540	* Fax Number: 408-464-8131
* Email: gdoyon@sonoma.net	
* Signature of Authorized Representative:	* Date Signed: 6/11/18



**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. §§1726-1753) 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. §§4901 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residential 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) §§623 and 627 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.

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Standard Form 424D (Rev. 7-87)  
Prescribed by OMB Circular A-102

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. 91-648) 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. §§1601-1608 and 7324-7328) which limit the political activities of employee 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 48 U.S.C. §474), 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. 93-206).
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 City Manager
APPLICANT ORGANIZATION City of Great Falls	DATE SUBMITTED 6.11.20

SF-424D (Rev. 7-97) Back

## 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 subcontractors, 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

6.11.20  
\_\_\_\_\_  
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) 2019 [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

6.11.20

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 §70.208(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

6.11.20  
\_\_\_\_\_  
Date

City Manager  
\_\_\_\_\_  
Title



**Specific HOME Certifications**

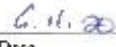
The HOME participating jurisdiction certifies that:

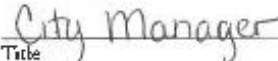
**Tenant Based Rental Assistance** - If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

**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 §92.211.

**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

  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
Title

## Emergency Solutions Grants Certifications

The Emergency Solutions Grants Program recipient certifies that:

**Major rehabilitation/conversion/renovation** -- If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

**Essential Services and Operating Costs** -- In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the recipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the recipient serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

**Renovation** -- Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

**Supportive Services** -- The recipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal, State, local, and private assistance available for these individuals.

**Matching Funds** -- The recipient will obtain matching amounts required under 24 CFR 576.201.

**Confidentiality** -- The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

**Homeless Persons Involvement** -- To the maximum extent practicable, the recipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

**Consolidated Plan** -- All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.



**Discharge Policy** – The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for those persons.

\_\_\_\_\_  
Signature of Authorized Official

\_\_\_\_\_  
Date

\_\_\_\_\_  
Title

**Housing Opportunities for Persons With AIDS Certifications**

The HOPWA grantee certifies that:

**Activities** -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

**Building** -- Any building or structure assisted under that program shall be operated for the purpose specified in the consolidated plan:

1. For a period of not less than 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility,
2. For a period of not less than 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

\_\_\_\_\_  
Signature of Authorized Official

\_\_\_\_\_  
Date

\_\_\_\_\_  
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.

Application for Federal Assistance SF-424			
<b>* 1. Type of Submission:</b> <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		<b>* 2. Type of Application:</b> <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	
<b>* 3. Date Received:</b> 05/29/2019		<b>4. Applicant Identifier:</b> [Redacted]	
<b>5a. Federal Entity Identifier:</b> [Redacted]		<b>5b. Federal Award Identifier:</b> B-19-MC-30-0002	
<b>State Use Only:</b>			
<b>6. Date Received by State:</b> [Redacted]		<b>7. State Application Identifier:</b> [Redacted]	
<b>II. APPLICANT INFORMATION:</b>			
<b>* a. Legal Name:</b> City of Great Falls			
<b>* b. Employer/Taxpayer Identification Number (EIN/TIN):</b> 81-6001289		<b>* c. Organizational DUNS:</b> 0602870630000	
<b>d. Address:</b>			
<b>* Street1:</b> 2 Park Drive S.			
<b>* Street2:</b> PO Box 3021			
<b>* City:</b> Great Falls			
<b>County/Parish:</b> Cascade			
<b>* State:</b> MT: Montana			
<b>Province:</b> [Redacted]			
<b>* Country:</b> USA: UNITED STATES			
<b>* Zip / Postal Code:</b> 59403-0021			
<b>e. Organizational Unit:</b>			
<b>Department Name:</b> Planning and Community Dev.		<b>Division Name:</b> COBQ/HOME	
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>			
<b>Prefix:</b> Mr.		<b>* First Name:</b> Craig	
<b>Middle Name:</b> [Redacted]		<b>* Last Name:</b> Raymond	
<b>Suffix:</b> [Redacted]		<b>Title:</b> Director	
<b>Organizational Affiliation:</b> [Redacted]			
<b>* Telephone Number:</b> 408-455-6520		<b>Facsimile Number:</b> 408-455-3181	
<b>* Email:</b> cgraymond@greatfallsmt.net			

Application for Federal Assistance SF-424		
* 9. Type of Applicant 1: Select Applicant Type: <input type="text" value="C: City or Township Government"/>		
Type of Applicant 2: Select Applicant Type: <input type="text"/>		
Type of Applicant 3: Select Applicant Type: <input type="text"/>		
* Other (specify): <input type="text"/>		
* 10. Name of Federal Agency: <input type="text" value="U.S. Department of Housing and Urban Development"/>		
11. Catalog of Federal Domestic Assistance Number: <input type="text"/>		
CFDA Title: <input type="text"/>		
* 12. Funding Opportunity Number: <input type="text" value="14-216"/>		
* Title: <input type="text" value="Community Development Block Grant"/>		
13. Competition Identification Number: <input type="text"/>		
Title: <input type="text"/>		
14. Areas Affected by Project (Cities, Counties, States, etc.): <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>		
* 15. Descriptive Title of Applicant's Project: <input type="text" value="City of Great Falls FY19 Annual Action Plan, including certification for a participating jurisdiction"/>		
Attach supporting documents as specified in agency instructions. <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/>		

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant: <input type="text" value="33"/>	* b. Program/Project: <input type="text" value="38"/>
Attach an additional list of Program/Project Congressional Districts if needed.	
<input type="text"/>	<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>
17. Proposed Projects:	
* a. Start Date: <input type="text" value="10/30/2019"/>	* b. End Date: <input type="text" value="06/30/2020"/>
18. Estimated Funding (\$):	
* a. Federal:	<input type="text" value="794000"/>
* 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="794,000"/>
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/>	
<input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review.	
<input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes," provide explanation and attach <input type="text"/>	
<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="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 28, Section 1001)	
<input checked="" type="checkbox"/> 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: Mr.	* First Name: <input type="text" value="Gregory"/>
Middle Name: <input type="text"/>	
* Last Name: <input type="text" value="Doyon"/>	
Suffix: <input type="text"/>	
* Title: <input type="text" value="City Manager"/>	
* Telephone Number: <input type="text" value="408-455-8543"/>	* Fax Number: <input type="text" value="408-454-3131"/>
* Email: <input type="text" value="gdoyon@greentriehunt.net"/>	
* Signature of Authorized Representative: <input type="text"/>	* Date Signed: <input type="text" value="10/30/2019"/>

# ASSURANCES - CONSTRUCTION PROGRAMS

GMB Number: 4040-0008  
Expiration Date: 02/28/2022

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 project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, 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 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 progressive 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. §§4728-4783) relating to prescribed standards of 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 handicap; (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. 92-263), 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. 91-516), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 627 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 VI 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.

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Prescribed by GMB Circular A-102



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. §§1601-1606 and 7324-7326) 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. 93-623); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-203).


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 1998 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.

20. Will comply with the requirements of Section 108(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from: (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect; (2) Procuring a commercial sex act during the period of time that the award is in effect; or (3) Using forced labor in the performance of the award or subawards under the award.


SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	City Manager
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Great Falls	5/22/17

SF-424D (Rev. 7-97) Back



Application for Federal Assistance SF-424		
<p><b>* 1. Type of Submission:</b></p> <p><input type="checkbox"/> Preapplication  <input checked="" type="checkbox"/> Application  <input type="checkbox"/> Changed/Corrected Application</p>		
<p><b>* 2. Type of Application:</b></p> <p><input checked="" type="checkbox"/> New  <input type="checkbox"/> Continuation  <input type="checkbox"/> Revision</p>		
<p><b>* If Recipient, select appropriate letter(s):</b></p> <p><b>* Other (Specify):</b></p>		
<p><b>* 3. Date Received:</b></p> <p>05/20/2019</p>		<p><b>4. Applicant Identifier:</b></p>
<p><b>5a. Federal Entity Identifier:</b></p>		<p><b>5b. Federal Award Identifier:</b></p> <p>M-78-MC-30-0218</p>
<p><b>State Use Only:</b></p>		
<p><b>6. Date Received by State:</b></p>		<p><b>7. State Application Identifier:</b></p>
<p><b>8. APPLICANT INFORMATION:</b></p>		
<p><b>* a. Legal Name:</b> City of Great Falls</p>		
<p><b>* b. Employer/Transporter Identification Number (EIN/TIN):</b></p> <p>81-6001259</p>		<p><b>* c. Organization's DUNS:</b></p> <p>0002670830000</p>
<p><b>d. Address:</b></p>		
<p><b>* Street1:</b> 2 Park Drive S.</p>		
<p><b>* Street2:</b> PO Box 5021</p>		
<p><b>* City:</b> Great Falls</p>		
<p><b>County/Parish:</b> Cascade</p>		
<p><b>* State:</b> MT: Montana</p>		
<p><b>Province:</b></p>		
<p><b>* Country:</b> USA: UNITED STATES</p>		
<p><b>* Zip / Postal Code:</b> 09903-8021</p>		
<p><b>e. Organization of Unit:</b></p>		
<p><b>Department Name:</b></p> <p>Planning and Community Dev.</p>		<p><b>Division Name:</b></p> <p>CDBGHOME</p>
<p><b>f. Name and contact information of person to be contacted on matters involving this application:</b></p>		
<p><b>Prefix:</b> Mr. <b>* First Name:</b> Craig</p>		
<p><b>Middle Name:</b></p>		
<p><b>* Last Name:</b> Raymond</p>		
<p><b>Suffix:</b></p>		
<p><b>Title:</b> Director</p>		
<p><b>Organizational Affiliation:</b></p>		
<p><b>* Telephone Number:</b> 408-446-8530</p>		<p><b>Fax Number:</b> 406-454-3181</p>
<p><b>* Email:</b> cgraymond@cityofgreatfalls.net</p>		

Application for Federal Assistance SF-424	
* 8. Type of Applicant 1: Select Applicant Type: <input checked="" type="radio"/> City or Township Government	
Type of Applicant 2: Select Applicant Type: <input type="text"/>	
Type of Applicant 3: Select Applicant Type: <input type="text"/>	
* Other (specify): <input type="text"/>	
* 10. Name of Federal Agency: U.S. Department of Housing and Urban Development	
11. Catalog of Federal Domestic Assistance Number: <input type="text"/>	
CDDA Title: <input type="text"/>	
* 12. Funding Opportunity Number: * 4-229	
* Title: HOME Investment Partnership Program	
13. Competition Identification Number: <input type="text"/>	
Title: <input type="text"/>	
14. Areas Affected by Project (Cities, Counties, States, etc.): <input type="text"/> <div> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachments"/> </div>	
* 15. Descriptive Title of Applicant's Project: City of Great Falls FY19 Annual Action Plan, including certification for a participating jurisdiction	
Attach supporting documents as specified in agency instructions. <div> <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/> </div>	

Application for Federal Assistance SF-424	
16. Congressional Districts (C):	
* a. Applicant: <input type="text" value="39"/>	* b. Program/Project: <input type="text" value="3E"/>
Attach an additional list of Program/Project Congressional Districts if needed.	
<input type="text"/>	<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>
17. Proposed Project:	
* a. Start Date: <input type="text" value="07/01/2019"/>	* b. End Date: <input type="text" value="06/30/2020"/>
18. Estimated Funding (\$):	
* a. Federal	<input type="text" value="273088"/>
* 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="273,088"/>
19. Is Application Subject to Review By State Under Executive Order 12872 Process?	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12872 Process for review on <input type="text"/>	
<input type="checkbox"/> b. Program is subject to E.O. 12872 but has not been selected by the State for review.	
<input checked="" type="checkbox"/> c. Program is not covered by E.O. 12872.	
20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes," provide explanation and attach <input type="text"/>	
<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="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 28, Section 1001)	
<input checked="" type="checkbox"/> I AGREE	
** The list of certifications and assurances, or an intrinsic site where you may obtain this list, is contained in the announcement or agency specific instructions.	
Authorized Representative:	
Prefix: <input type="text" value="Mr."/>	* First Name: <input type="text" value="Gregory"/>
Middle Name: <input type="text"/>	
* Last Name: <input type="text" value="Dayan"/>	
Suffix: <input type="text"/>	
* Title: <input type="text" value="City Manager"/>	
* Telephone Number: <input type="text" value="408-488-6640"/>	Fax Number: <input type="text" value="408-454-3131"/>
* Email: <input type="text" value="gdayan@grapplellmt.net"/>	
* Signature of Authorized Representative: 	* Date Signed: <input type="text" value="8/22/19"/>

# ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4010-0008  
Expiration Date: 02/23/2022

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 project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, 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 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 progressive 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. §§4726-4763) relating to prescribed standards of 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. §§4901 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. 86-352) 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 1686-1688), 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. 92-285), 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. §§260 dd-3 and 260 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.

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Prescribed by GSA Circular A-102

11. Will comply, or has already complied, with the requirements of Titles II and IV 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. §§1501-1506 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 \$50,000 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 175(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. 93-203).
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 river system.
17. Will assist the awarding agency in assuring compliance with Section 108 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11693 (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 1998 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.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subaward under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	City Manager
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Great Falls	8.22.19

SF-424D (Rev. 7-97) Back



## 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

5.22.19  
Date

  
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) 2019 [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

5.22.19  
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

5.22.19  
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 that is necessary to provide affordable housing.

  
Signature of Authorized Official

5-22-19  
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.

**Housing Opportunities for Persons With AIDS Certifications**

The HOPWA grantee certifies that:

**Activities** -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

**Building** -- Any building or structure assisted under that program shall be operated for the purpose specified in the consolidated plan:

1. For a period of not less than 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility,
2. For a period of not less than 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

\_\_\_\_\_  
Signature of Authorized Official

\_\_\_\_\_  
Date

\_\_\_\_\_  
Title

### **Emergency Solutions Grants Certifications**

The Emergency Solutions Grants Program recipient certifies that:

**Major rehabilitation/conversion/renovation** – If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

**Essential Services and Operating Costs** – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the recipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the recipient serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

**Renovation** – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

**Supportive Services** – The recipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal, State, local, and private assistance available for these individuals.

**Matching Funds** – The recipient will obtain matching amounts required under 24 CFR 576.201.

**Confidentiality** – The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

**Homeless Persons Involvement** – To the maximum extent practicable, the recipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

**Consolidated Plan** – All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.

**Discharge Policy** – The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

\_\_\_\_\_  
Signature of Authorized Official

\_\_\_\_\_  
Date

\_\_\_\_\_  
Title