
**Analysis of Impediments
to
Fair Housing Choice**

2015 - 2019

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

April 2015

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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

Great Falls 2013 Racial and Ethnic Distribution

	<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	<u>582</u>	<u>365</u>	<u>341</u>
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 in 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 341st 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 120th 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:

HUD Income Guidelines for 2015 – Great Falls								
Family size	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

Poverty

The poverty level is defined by the federal government on an annual basis and varies with household size.

Poverty Thresholds 2015	
Size of Family	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

Areas of Poverty Concentration by U. S. Census Tract for Great Falls			
Census Tract	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.

<u>Protected Class</u>	<u>2010</u>	<u>2011</u>	<u>2012</u>	<u>2013</u>	<u>2014</u>
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
Martial 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.

<u>Protected Class</u>	<u>2010</u>	<u>2011</u>	<u>2012</u>	<u>2013</u>	<u>2014</u>
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
Martial 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.

<u>Protected Class</u>	<u>2010</u>	<u>2011</u>	<u>2012</u>	<u>2013</u>	<u>2014</u>
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
Martial 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

<u>Protected Class</u>	<u>2010</u>	<u>2011</u>	<u>2012</u>	<u>2013</u>	<u>2014</u>
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
Martial 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 3rd 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

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.

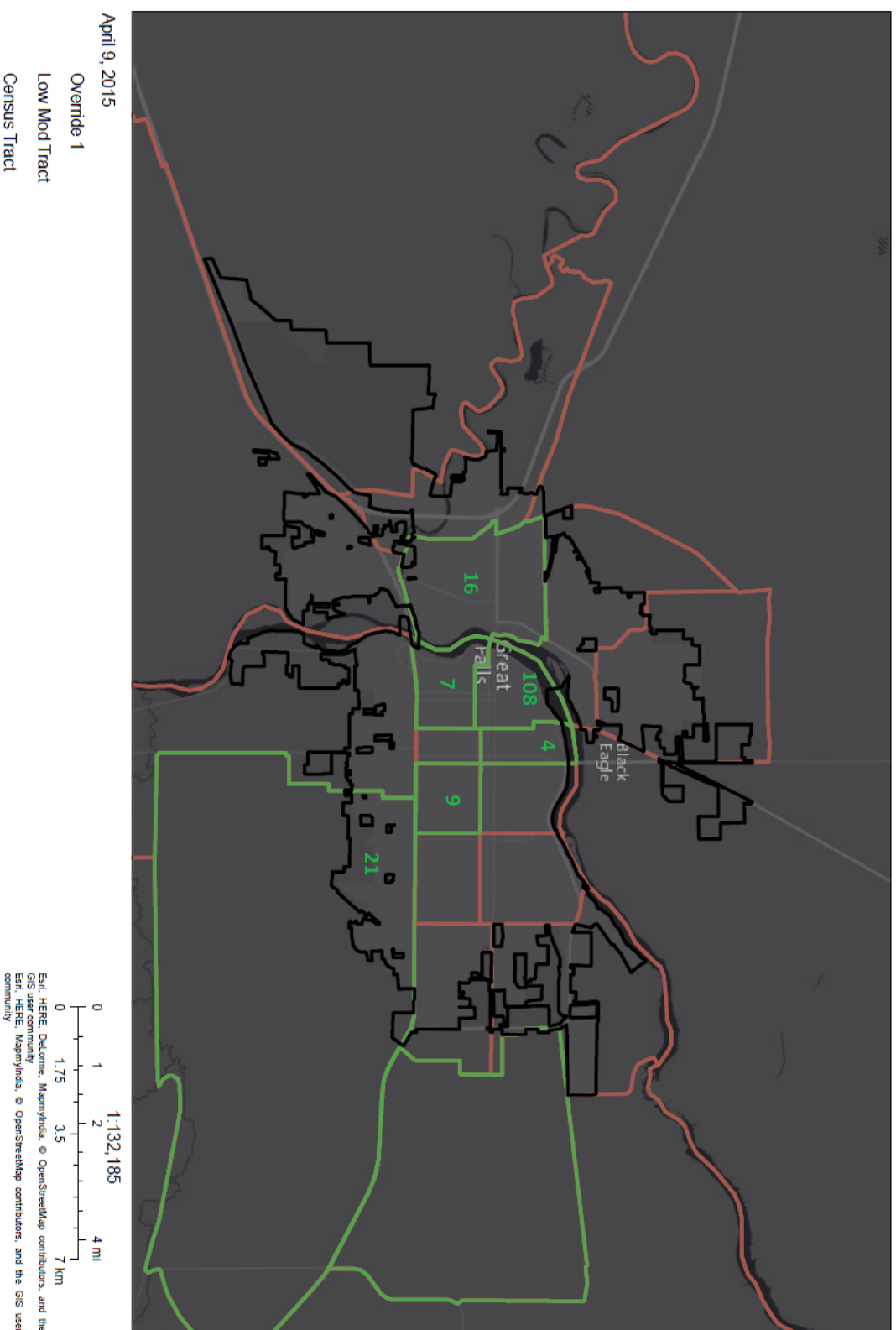
Update:

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



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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. 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

<u>Name</u>	<u>#Units (Occupied)</u>	<u>Occupancy Rate</u>	<u>Accessible Units / #filled by Mobility Impaired</u>			
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	*5
Area 22 (GFPHA)	200 (179)	90%	14	/	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	*1
Elmwood	18 (18)	100%	2	/	1	
Parkview	83 (83)	100%	0	/	0	
Southwinds	23 (23)	100%	23	/	23	*23
Portage	47 (45)	96%	47	/	8	*47
Meadow Lark	17 (17)	100%	17	/	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	*6
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%

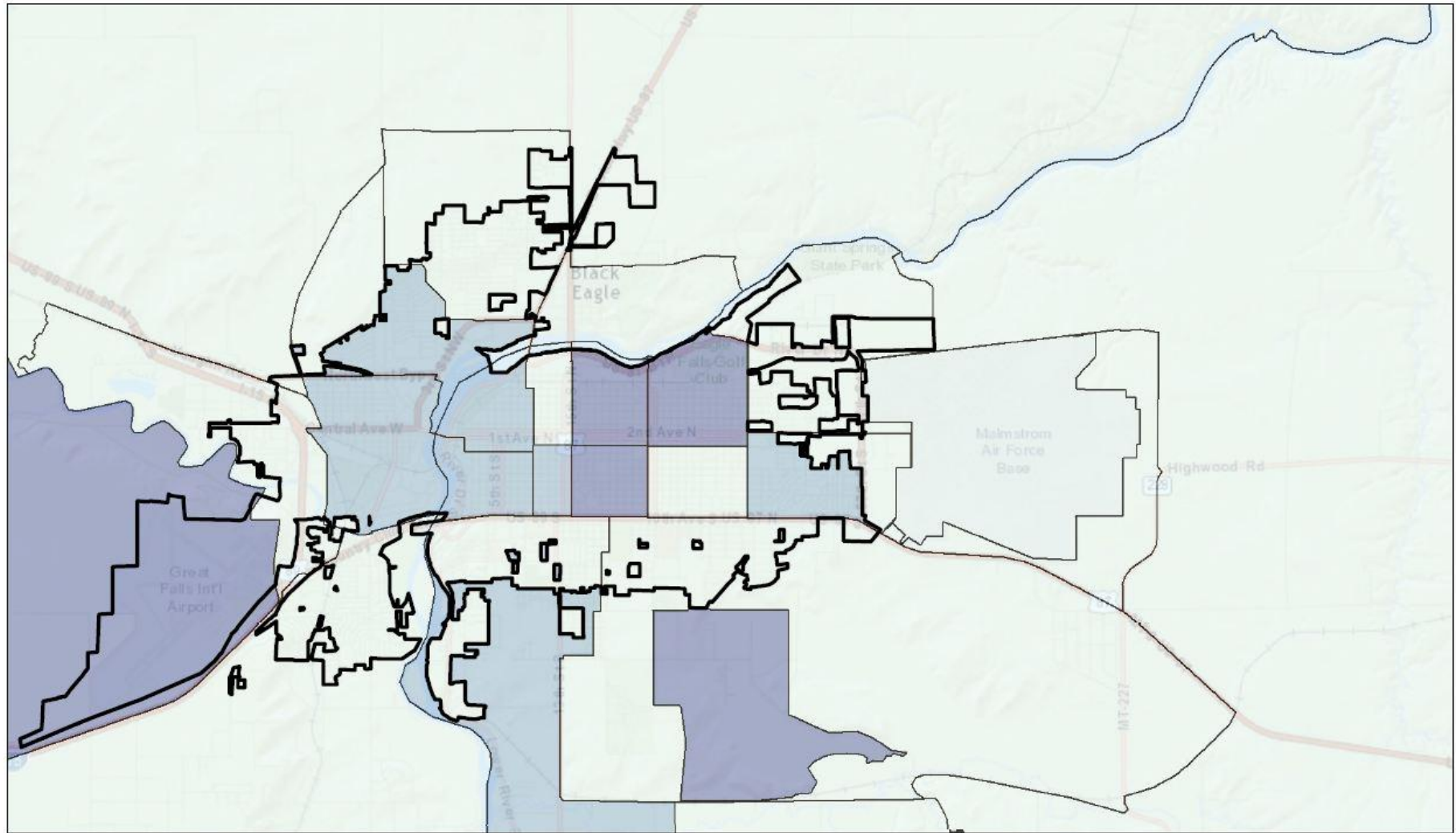
Project Based (Mod Rehab): This program is managed by Opportunities, Inc.

<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



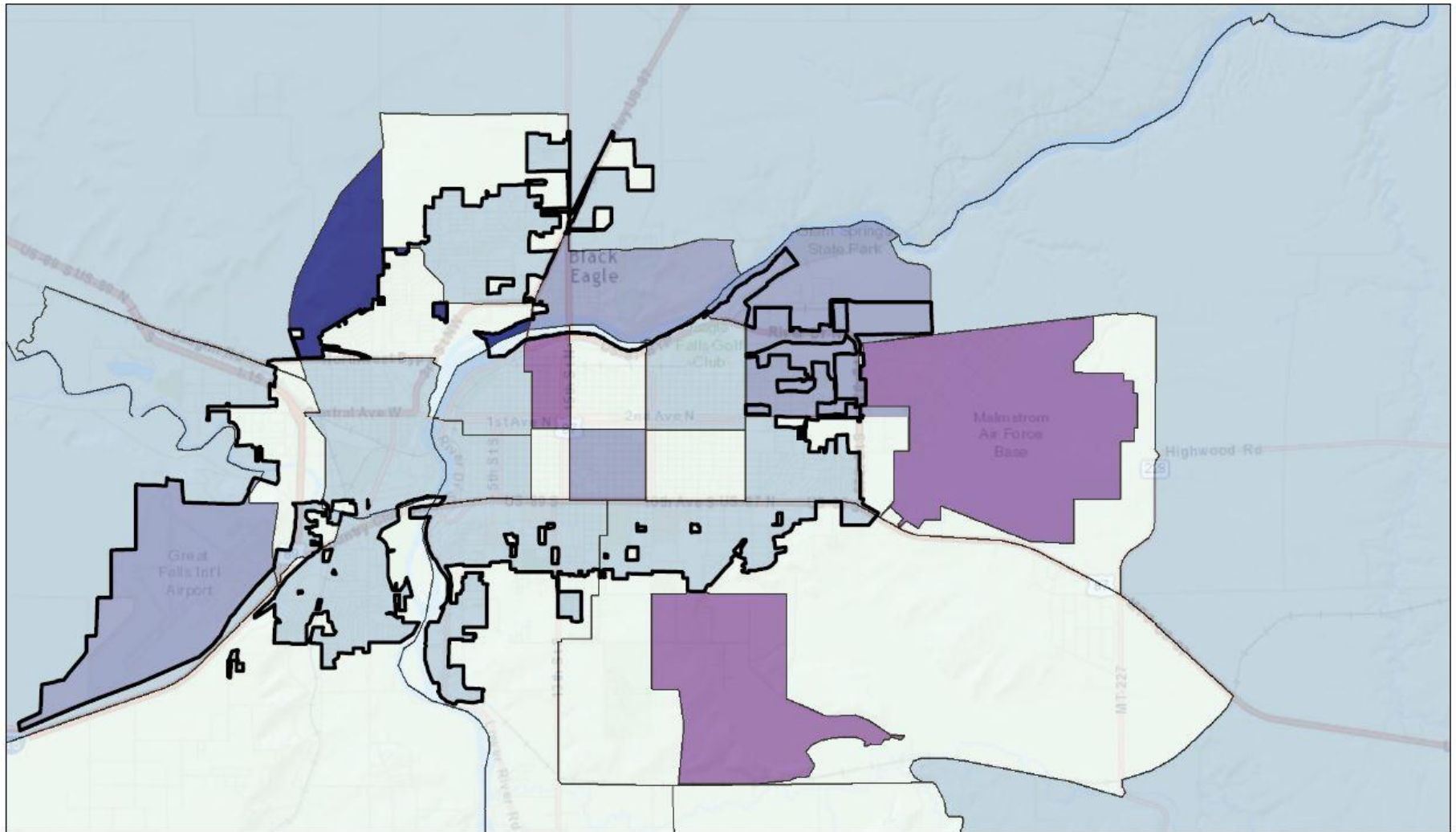
April 13, 2015

Override 1 AmericanIndianAlaskaNativeAlone
B03002EST5_PCT
 <2.90%
 2.90-8.52%
 8.52-22.62%

1:132,185
 0 1 2 4 mi
 0 1.75 3.5 7 km

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

CPD Maps Hispanic Origin - Consolidated Plan and Continuum of Care 4/13/2015



April 13, 2015

Override 1 **HispanicOrigin**

B03002EST12_PCT

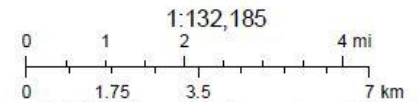
<1.35%

1.35-4.72%

4.72-9.47%

9.47-18.57%

>18.57%



Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community