

---

---

**Analysis of Impediments  
to  
Fair Housing Choice**

**2005 - 2010**

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

---

---

# **Table of Contents**

|  |    |
|--|----|
| Introduction: HUD Fair Housing Requirements.....                               | 1  |
| Executive Summary.....   | 3  |
| Great Falls Background Data: Demographics, Income Data and Employment.....     | 4  |
| Great Falls Current Fair Housing Legal Status.....                             | 10 |
| Public Sector Impediments.....   | 17 |
| Private Sector Impediments.....  | 21 |
| Current Great Falls Fair Housing Activities.....                               | 27 |
| Strategies to Address Impediments to Fair Housing Choice.....                  | 29 |
| Appendix A: HUD Low to Moderate Income Areas and Census Tract.....             | 33 |
| Appendix B: Great Falls Housing Survey.....                                    | 34 |
| Appendix C: Great Falls Subsidized Housing Statistics as of February 2005..... | 35 |

## **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 \$1.15 million annually from the following HUD programs: Community Development Block Grant (CDBG) and Home Investment Partnership (HOME).

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, a Great Falls Fair Housing Working Group, hereafter known as the Working Group, was established. During September 2004 approximately 75 invitations were sent via e-mail, letter and by personal contact, as well as request for volunteers in two articles of the *Great Falls Tribune*. The resulting 18 participants represented a very diverse

group from the financial community, neighborhood councils, landlords, tenants, public housing, City of Great Falls Fair Housing Specialist, and interested citizens, to name a few. The Working Group met twice to determine impediments and a third time to establish strategies and measurements, and a fourth to review the draft.

A survey was sent to approximately 500 individuals throughout the city by the Great Falls Housing Authority, Local Individuals Network for Customized Services (LINC – a conglomeration of human service organizations), Retired Senior Volunteer Program (RSVP) Aging Services and Opportunities, Inc. (an agency that provides community action programs, assist low income residents in housing, housing referrals and subsidized housing). Of the 500 surveys, 121 were filled out, returned and used by the working group in their deliberations.

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

- City of Great Falls Consolidated Plan
- 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)
- Census 1990
- Census 2000
- Interview of group members
- 2004 housing survey of subsidized housing
- Internet
- HUD income guidelines and fair market rents for 2004
- *Great Falls Tribune*
- Other anecdotal data

A review of the draft was made by the working group and changes were incorporated.

The final draft was submitted for public review with the Consolidated Plan.

## **Executive Summary**

In October 2004 the Working Group was established comprised of representatives from diverse population groups, the housing industry, financial organizations, neighborhood councils, tenants and landlords. The Working Group met once in October twice in November, and once in December. The purpose of the group was to identify barriers to fair housing choice and 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 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 Working Group and public and private sector reviews, a Housing Survey was distributed to over 500 community members of which 121 surveys returned. Results from the survey were brought to the attention of the working group for their review. All of the reviews, the housing survey and the efforts of the working group resulted in seven impediments to fair housing choice selected for action.

### **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 2005-2010 Consolidated Plan and the summary of progress will be included with the Consolidate Annual Performance Evaluation Report.

The listed impediments were those selected by the Working Group, as priorities within the community. Priority was determined based on impact upon the community, the community housing survey, and discussion among the Working Group members. 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 new 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.

## **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 56,690 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.

| <b><u>Population Comparison 1990 versus 2000 Census</u></b> |               |                 |
|---|---------------|-----------------|
| 1990 – 55,097   | 2000 – 56,690 | Increase: 1,593 |

Source: 1990 and 2000 Census

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 1990 the U.S. Census showed 4,722 minority residents of which 926 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). This is an increase of 594 minority residents in a 10 year period.

The 1990 census stated that 7,952 individuals were below the poverty level whereas in the 2000 census 7,989 individuals were below the poverty level, an increase of 37 individuals below the poverty level. In 1989 there were 1,684 families below the poverty level and in 1999 there were 1658 families below the poverty level, a decrease of 26 families in poverty.

According to the 2000 census there are 23,811 households with a median household income of \$32,436 of which approximately 12,296 households are below the median income.

There are 25,250 housing units in Great Falls with 23,834 occupied as noted in the 2000 census. Of the total occupied, 8,815 are renter occupied with 3,198 households using 30% or more of income towards rent.

Ethnic and Racial Population of Great Falls

| <b><u>Great Falls 2000 Racial and Ethnic Distribution</u></b> |               |                |                    |
|---|---------------|----------------|--------------------|
|   | <u>Number</u> | <u>Percent</u> | <u>1990 Census</u> |
| White   | 50,996        | 92.2           | 51,301             |
| Black or African American                                     | 540           | 1.0            | 531                |
| American Indian and Alaska Native                             | 2,888*        | 5.1            | 2,549              |
| Asian   | 485           | 0.9            | 458                |
| Native Hawaiian and Other Pacific Islander                    | 49            | 0.1            | Not Identified     |
| Some other race   | <u>341</u>    | <u>0.6</u>     | <u>258</u>         |
| Total Population**  | 56,690        |                | 55,097             |
| Hispanic or Latino(of any race)                               | 1,354         | 2.4            | 926                |

\*The Native American community believes this is an under representation.  
 \*\*The racial and ethnic distribution numbers may add to more than the total population because individuals may report more than one race.

Source: 1990 and 2000 U.S. Census

Economic Trends

The City of Great Falls is the third largest city in the state. The *Great Falls Tribune* in their “Great Falls Outlook 2004” dated February 22, 2004, summed up the Great Falls economic trend “Statewide polls show that economy is the top issue on the people’s minds...Here in Great Falls and north central Montana, the issue is especially acute. Unlike other parts of this broad state, we haven’t seen the population and economic growth that other cities and regions have experienced.”

Brownfield Program

The City is actively pursuing a hotel and restaurant site that could employ approximately 200 employees. Present efforts are through the Brownfield sites program and appropriate grants. Employment would be largely low to middle income.

Labor Force Characteristics and Unemployment

The 1990 and 2000 census provides the following data:

| <u>Labor Force Status</u> |             |             |
|---------------------------|-------------|-------------|
|                           | <u>1990</u> | <u>2000</u> |
| Persons 16 or over        | 42,035      | 43,951      |
| In labor force            | 26,501      | 28,015      |

|                            |        |        |
|----------------------------|--------|--------|
| Civilian Labor Force       | 24,926 | 26,757 |
| Employed                   | 23,273 | 24,909 |
| Unemployed                 | 1,653  | 1,848  |
| Armed Forces               | 1,575  | 1,258  |
| Females 16 or over         | 22,363 | 22,882 |
| Females in the labor force | 12,422 | 13,299 |

Source: 1990 and 2000 Census

The labor force in Great Falls continues to expand at a moderate rate. According to the U.S. Department of Labor, Bureau of Labor Statistics the unemployment rate for October 2004 was 4.5 percent versus 4.6 in October 2000. A high unemployment rate of 7.3 percent was seen in February 1995 and a low of 3.4 in August 2002.

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 2000 Census there are 14,218 individuals at age 55 and older in Great Falls an increase of 1,145 over the 1990 census.

### Employment Characteristics

In 2000 the Great Falls economy provided 7,778 management, professional and related occupations, 7,596 occupations in sales and office while service occupations were the third highest with 4,660. Occupations in construction were 2,189 while production, transportation and material-moving saw 2,559 occupations. There were 127 occupations in farming, fishing, and forestry.

The largest employers in Great Falls are portrayed below:

| <b><u>Top 10 Employers in Great Falls</u></b> |                           |                            |                  |
|---|---------------------------|----------------------------|------------------|
| Private Sector                                |                           |                            |                  |
| <u>Rank</u>                                   | <u>Employer</u>           | <u>Business Type</u>       | <u>Employees</u> |
| 1.  | Benefis Healthcare        | Hospital                   | 2,029            |
| 2.  | Great Falls Clinic        | Healthcare Facility        | 750              |
| 3.  | N.E.W. Customer Service   | Warranty/Service Plans     | 650              |
| 4.  | Wal-Mart                  | Retailer                   | 553              |
| 5.  | University of Great Falls | University                 | 300              |
| 6.  | Albertsons                | Grocery Store              | 280              |
| 7.  | Missouri River Manor      | Nursing and Rehabilitation | 225              |
| 8.  | Davidson Companies        | Financial Services/Travel  | 234              |
| 9.  | Burlington Northern       | Railroad                   | 200              |
| 10.   | Quality Life Concepts     | Services                   | 185              |

Source: "Great Falls Outlook 2004" by the *Great Falls Tribune*, February 22, 2004

## 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. Of major concern is the 2005 Base Realignment and Closure Commission, or BRAC. Economically at stake is Malmstrom's \$225 million a year in payroll and direct spending. The Base has nearly 12,000 military personnel and dependents, plus another 2,000 civilians who work at the Base, including private contractors. (Source: "Great Falls Outlook 2004" by the *Great Falls Tribune*, February 22, 2004)

### **Top 7 Employers in Great Falls**

#### Public Sector

| <u>Rank</u> | <u>Employer</u>              | <u>Business Type</u> | <u>Employees</u> |
|-------------|------------------------------|----------------------|------------------|
| 1.          | Malmstrom Air Force Base     | Military             | 4,307            |
| 2.          | Great Falls Public Schools   | Public School System | 1,998            |
| 3.          | Montana Air National Guard   | Military             | 1,000            |
| 4.          | City of Great Falls          | City government      | 458              |
| 5.          | Cascade County               | County government    | 450              |
| 6.          | MSU-GF College of Technology | University           | 228              |
| 7.          | U.S. Postal Service          | Postal service       | 224              |

Source: "Great Falls Outlook 2004" by the *Great Falls Tribune*, February 22, 2004 and Great Falls Public Schools

## **Household, Income and Poverty**

### Family Size and Household Composition

The 2000 Census reports there are 23,834 households averaging 2.31 persons per household. The average family size is 2.92 persons. Of the total households 62.3% were family households and 37.7% were non-family households. Family households with children under eighteen comprise 30.1% of all households. Single females with children present under 18 years are 7.1% of total households. A total of 12.4% of the householders are 65 years and older. And 32.1 of the households have individuals under 18 years.

### Income and Poverty

The median household income for all households in Great Falls was \$32,436 and the family median income was \$40,107 (Source: 2000 Census). The 1990 Census shows that median household income was \$23,113 while the median family income was \$28,731. Data from the 2000 Census shows 39% of total households (23,811) earn less than

\$25,000. The census also shows that 17.7% of families (14,956) earn less than \$25,000 per year. Incomes between \$25,000 and \$75,000 account for 49.6% of household income and 57.8 % of family income.

The 2004 HUD income guidelines are presented below:

| HUD Income Guidelines for 2004 – Great Falls                   |          |          |          |          |
|--|----------|----------|----------|----------|
| Family size  | 1        | 2        | 4        | 6        |
| Extremely Low Income*  | \$9,650  | \$11,000 | \$13,750 | \$15,950 |
| Very Low Income**  | \$16,050 | \$18,350 | \$22,950 | \$26,600 |
| Low Income***  | \$25,700 | \$29,400 | \$36,700 | \$42,600 |
| * 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: Great Falls Housing Authority

The 2000 census shows that approximately 40% of households would fall below the \$36,700 level the Great Falls Housing Authority uses for income cut off, while 42% of families would qualify for subsidized housing.

For 2004, HUD established that the median income for Great Falls was \$45,300. HUD uses state-wide figures to determine Great Falls income guide lines.

Poverty

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

| Poverty Thresholds 2003 |                             |
|-------------------------|-----------------------------|
| Size of Family          | Weighted average thresholds |
| One person              | \$9,393                     |
| Two persons             | \$12,015                    |
| Three persons           | \$14,680                    |
| Four Persons            | \$18,810                    |
| Five persons            | \$22,245                    |
| Six persons             | \$25,122                    |
| Seven persons           | \$28,544                    |
| Eight persons           | \$31,589                    |
| Nine persons or more    | \$37,656                    |

Source: U.S. Census Bureau, Current Population Survey 2004 Annual Social and Economic Supplement

The 1999 Census data shows that 1,658 families were in poverty or 11.1% while 7,989 individuals were in poverty status or 14.5%. Female headed households (no husband present) with related children under 18, experienced the highest rates of poverty in Great Falls. Out of 973 identified families with female head of households in poverty, 887 have children under 18 years of age.

The state of Montana has a poverty rate of 14.6% while the United States has a rate of 2.2% (Source: Montana 2004 AI). Great Falls has a poverty rate of 14%. This number was achieved by dividing individuals in poverty (7,989) by total population (56,690) (Source: 2000 Census).

| Areas of Poverty Concentration by U. S. Census Tract for Great Falls |                 |                    |                 |
|--|-----------------|--------------------|-----------------|
| Census Tract   | 1999 Population | Persons in Poverty | Percent Poverty |
| 1  | 2,414           | 162                | 7%              |
| 2  | 3,910           | 409                | 10%             |
| 3  | 3,525           | 656                | 19%             |
| 4  | 1,949           | 331                | 17%             |
| 5  | 2,407           | 755                | 31%             |
| 6  | 686             | 326                | 48%             |
| 7  | 2,113           | 781                | 36%             |
| 8  | 2,061           | 579                | 28%             |
| 9  | 3,208           | 698                | 22%             |
| 10   | 3,296           | 267                | 8%              |
| 11   | 4,446           | 415                | 9%              |
| 16   | 4,346           | 863                | 20%             |
| 17   | 2,289           | 214                | 9%              |
| 18   | 3,637           | 339                | 9%              |
| 19   | 4,291           | 183                | 4%              |
| 21   | 3,799           | 693                | 18%             |
| 22   | 6,017           | 659                | 10%             |
| 23   | 6,274           | 165                | 2%              |

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: 2000 Census

According to the data most individual rated as being in poverty are located in the central residential and downtown area of Great Falls, census tracts 3, 4, 5, 6, 7, 8, 9 and 16 (See U.S. Census Tracts Map, Appendix-A).

## **Great Falls Current Fair Housing Legal Status**

---

### **Fair Housing 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 Missoula, Montana), Montana Human Rights Bureau, and the Denver HUD Office, Fair Housing Hub. 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 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. A review of available documentation and information from the agencies mentioned shows no discrimination lawsuits filed in Great Falls during the last three years. This is not to say that some cases have not been settled out of court through the efforts of Montana Fair Housing. Several cases dealing with discriminations based on handicap (disability) were settled for undisclosed amounts over the past five years. Contacting Montana Legal Services also indicated they were not aware of any ongoing discrimination complaints.

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.

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, martial status and creed.

Great Falls Fair Housing complaints filed from January 2001 to October 2004 with HUD Office in Denver.

| <u>Protected Class</u> | <u>2001</u> | <u>2002</u> | <u>2003</u> | <u>2004</u> |
|------------------------|-------------|-------------|-------------|-------------|
| Race                   | 3           | 2           | 0           | 1           |
| Color                  | 0           | 0           | 0           | 0           |
| Religion               | 0           | 0           | 0           | 0           |
| Sex/gender             | 3           | 2           | 0           | 0           |
| Disability             | 3           | 6           | 1           | 1           |
| Familial Status        | 0           | 2           | 1           | 1           |
| National Origin        | 0           | 0           | 0           | 0           |
| Martial Status         | 0           | 0           | 0           | 0           |
| Age                    | 0           | 0           | 0           | 0           |
| Creed                  | 0           | 0           | 0           | 0           |

Note: Out of the 26 filed cases: No cause was found in 11 cases, 5 individuals failed to cooperate, 3 had settlements. In the year 2004, 2 cases were found no cause and the disability case is open.

Source: Freedom of Information Request with HUD, December 29, 2004

Great Falls Fair Housing complaints filed from January 2001 to October 2004 with Montana Human Rights Bureau.

| <u>Protected Class</u> | <u>2001</u> | <u>2002</u> | <u>2003</u> | <u>2004</u> |
|------------------------|-------------|-------------|-------------|-------------|
| Race                   | 12          | 0           | 2           | 0           |
| Color                  | 0           | 0           | 0           | 0           |
| Religion               | 0           | 0           | 0           | 0           |
| Sex/gender             | 1           | 16          | 0           | 0           |
| Disability             | 0           | 12          | 0           | 0           |
| Familial Status        | 0           | 0           | 0           | 0           |
| National Origin        | 0           | 0           | 0           | 0           |
| Martial Status         | 0           | 0           | 0           | 0           |
| Age                    | 0           | 0           | 0           | 0           |
| Creed                  | 0           | 0           | 0           | 0           |

Source: Montana Human Rights Bureau submission November, 23, 2004

Great Falls Fair Housing Complaints Filed from January 2001 to October 2004 with  
Montana Fair Housing.

| <u>Protected Class</u> | <u>2001</u> | <u>2002</u> | <u>2003</u> | <u>2004</u> |
|------------------------|-------------|-------------|-------------|-------------|
| Race                   | 1           | 4           | 3           | 2           |
| Color                  | 0           | 0           | 0           | 0           |
| Religion               | 1           | 1           | 0           | 0           |
| Sex/gender             | 6           | 3           | 3           | 1           |
| Disability             | 18          | 23          | 12          | 4           |
| Familial Status        | 2           | 1           | 2           | 1           |
| National Origin        | 5           | 6           | 6           | 7           |
| Martial Status         | 0           | 0           | 0           | 0           |
| Age                    | 1           | 1           | 0           | 0           |
| Creed                  | 0           | 0           | 0           | 0           |

Source: Great Falls Annual AI Updates for 2001, 2002, 2003, 2004 and MT Fair Housing

Great Falls Fair Housing complaints filed from January 2001 to October 2004 with City  
of Great Falls Fair Housing Specialist

| <u>Protected Class</u> | <u>2001</u> | <u>2002</u> | <u>2003</u> | <u>2004</u> |
|------------------------|-------------|-------------|-------------|-------------|
| Race                   | 13          | 4           | 5           | 2           |
| Color                  | 0           | 0           | 0           | 0           |
| Religion               | 0           | 0           | 0           | 0           |
| Sex/gender             | 0           | 3           | 2           | 4           |
| Disability             | 14          | 17          | 3           | 1           |
| Familial Status        | 5           | 2           | 3           | 1           |
| National Origin        | 0           | 4           | 0           | 0           |
| Martial Status         | 0           | 0           | 0           | 1           |
| Age                    | 0           | 0           | 0           | 0           |
| Creed                  | 0           | 0           | 0           | 0           |

Note: All complaints were referred to Montana Fair Housing.

Source: City of Great Falls Annual AI Updates for 2001, 2002, 2003, 2004

According to the statistics, race and disabilities are the discriminations reported with the most frequency to the various agencies.

## Community Survey

Approximately 500 surveys were distributed through numerous health services organizations, Great Falls Housing Authority, Retired Senior Volunteer Program and Opportunities, Inc. The exact number is unknown because many organizations photocopied the survey and the surveys were randomly distributed to clients. Surveys were also given to the Great Falls Housing Task Force, landlord associations and to members of the AI Working Group. The survey was designed to assess the community general level of understanding and experience with fair housing issues (See Appendix B). This was not a scientific survey but with 121 responses it did provide a picture of possible discrimination in the community as well as information indicating the need for greater education in fair housing. Survey questions and summaries are below.

### Great Falls Housing Survey Results October –November 2004

Note: Survey numbers may add up to more/or less than 100% because respondents answered or failed to answer specific questions.

#### Questions

Q1. During the last five years the fair housing situation in Great Falls has become:

| Responses | Count | Percent |
|-----------|-------|---------|
| Better    | 58    | 47.9%   |
| Worse     | 24    | 19.8%   |
| No Change | 39    | 32.2%   |

Q2. During the last five years have you experienced discrimination in housing?

| Responses | Count | Percent |
|-----------|-------|---------|
| Yes       | 29    | 23.8%   |
| No        | 93    | 76.2%   |

Q3. Are you aware of anyone experiencing discrimination in obtaining housing in Great Falls during the past five years?

| Responses | Count | Percent |
|-----------|-------|---------|
| Yes       | 36    | 29.3%   |
| No        | 87    | 70.7%   |

Q4. If you answered "Yes" to Question 2, which of the following was the reason for the discrimination (check all that apply)?

| Responses       | Count | Percent |
|-----------------|-------|---------|
| Race            | 16    | 55.2%   |
| Religion        | 5     | 17.2%   |
| Marital Status  | 6     | 20.7%   |
| Age             | 8     | 27.6%   |
| Color           | 7     | 24.1%   |
| National Origin | 6     | 20.7%   |
| Disability      | 4     | 13.8%   |
| Familial Status | 13    | 44.8%   |
| Creed (Belief)  | 2     | 6.9%    |
| Sex             | 0     | 0.0%    |

Q5. If you answered "Yes" to Question 3, which of the following was the reason for the discrimination (check all that apply)?

| Responses       | Count | Percent |
|-----------------|-------|---------|
| Race            | 19    | 57.6%   |
| Religion        | 5     | 15.2%   |
| Marital Status  | 9     | 27.3%   |
| Age             | 8     | 24.2%   |
| Color           | 6     | 18.2%   |
| National Origin | 3     | 9.1%    |
| Disability      | 5     | 15.2%   |
| Familial Status | 17    | 51.5%   |
| Creed (Belief)  | 2     | 6.1%    |
| Sex             | 1     | 3.0%    |

Q6. Are you aware of anyone experiencing the following in Great Falls during the past five years (Check all that apply)?

| Responses   | Count | Percent |
|---|-------|---------|
| Housing Provider, lender or insurance agency refused to rent, sell or negotiate with persons interested in housing. | 30    | 68.2%   |
| Housing provider falsely stated there was no housing available.   | 8     | 18.2%   |
| Observed discriminatory advertising.  | 6     | 13.6%   |
| Sellers/buyers/renters treated differently in terms or conditions of sale or rental of property.                    | 19    | 43.2%   |
| Home mortgage denied because of discrimination.   | 8     | 18.2%   |
| Realty agents/brokers/lenders steer individuals to specific neighborhoods.  | 10    | 22.7%   |
| Housing provider refused to make reasonable accommodations for disabled tenant.                                     | 9     | 20.5%   |
| Specify other negative experiences. (Please specify and attach your comments)                                       | 1     | 2.3%    |

Q7. Are you aware of other actual/potential fair housing violations in Great Falls?

| Responses | Count | Percent |
|-----------|-------|---------|
| Yes       | 13    | 11.3%   |
| No        | 102   | 88.7%   |

Q8. What agency would you report housing discrimination to?

| Responses  | Count | Percent |
|--|-------|---------|
| Montana Human Rights Bureau  | 18    | 17.5%   |
| City of Great Falls Fair Housing Specialist                                    | 53    | 51.5%   |
| Department of Housing and Urban Development Fair Housing and Equal Opportunity | 51    | 49.5%   |
| Montana Fair Housing   | 50    | 48.5%   |
| Cascade County Law Clinic  | 5     | 4.9%    |
| Montana Legal Services   | 12    | 11.7%   |
| Other  | 0     | 0.0%    |

**Note: The following questions were asked to ascertain the community view about what is an impediment to furthering fair housing discrimination.**

Q9. Income levels of minority and female headed households.

| Responses          | Count | Percent |
|--------------------|-------|---------|
| Not a barrier      | 18    | 18.6%   |
| A minor barrier    | 20    | 20.6%   |
| A moderate barrier | 22    | 22.7%   |
| A serious barrier  | 37    | 38.1%   |

Q10. Concentration of minority households in certain neighborhoods.

| Responses          | Count | Percent |
|--------------------|-------|---------|
| Not a barrier      | 18    | 19.4%   |
| A minor barrier    | 16    | 17.2%   |
| A moderate barrier | 37    | 39.8%   |
| A serious barrier  | 22    | 23.7%   |

Q11. Lack of adequate zoning for manufactured homes.

| Responses          | Count | Percent |
|--------------------|-------|---------|
| Not a barrier      | 32    | 36.8%   |
| A minor barrier    | 24    | 27.6%   |
| A moderate barrier | 15    | 17.2%   |
| A serious barrier  | 16    | 18.4%   |

Q12. Lack of local organization devoted to fair housing investigation and testing.

| Responses          | Count | Percent |
|--------------------|-------|---------|
| Not a barrier      | 30    | 32.3%   |
| A minor barrier    | 14    | 15.1%   |
| A moderate barrier | 28    | 30.1%   |
| A serious barrier  | 21    | 22.6%   |

Q13. Residents are not familiar with their fair housing rights.

| Responses          | Count | Percent |
|--------------------|-------|---------|
| Not a barrier      | 15    | 16.3%   |
| A minor barrier    | 10    | 10.9%   |
| A moderate barrier | 20    | 21.7%   |
| A serious barrier  | 47    | 51.1%   |

Q14. Landlords, property managers are not familiar with fair housing rights.

| Responses          | Count | Percent |
|--------------------|-------|---------|
| Not a barrier      | 17    | 19.5%   |
| A minor barrier    | 18    | 20.7%   |
| A moderate barrier | 20    | 23.0%   |
| A serious barrier  | 32    | 36.8%   |

Q15. Lack of knowledge among Realtors regarding fair housing.

| Responses          | Count | Percent |
|--------------------|-------|---------|
| Not a barrier      | 21    | 23.6%   |
| A minor barrier    | 19    | 21.3%   |
| A moderate barrier | 27    | 30.3%   |
| A serious barrier  | 22    | 24.7%   |

Q16. Lack of knowledge among bankers/lenders regarding fair housing.

| Responses          | Count | Percent |
|--------------------|-------|---------|
| Not a barrier      | 22    | 24.4%   |
| A minor barrier    | 25    | 27.8%   |
| A moderate barrier | 27    | 30.0%   |
| A serious barrier  | 16    | 17.8%   |

Q17. Lack of knowledge among insurance industry representatives regarding fair housing.

| Responses          | Count | Percent |
|--------------------|-------|---------|
| Not a barrier      | 19    | 22.1%   |
| A minor barrier    | 20    | 23.3%   |
| A moderate barrier | 30    | 34.9%   |
| A serious barrier  | 17    | 19.8%   |

Q18. Lack of mobile home courts that allow mobile homes over five years old.

| Responses          | Count | Percent |
|--------------------|-------|---------|
| Not a barrier      | 25    | 31.3%   |
| A minor barrier    | 19    | 23.8%   |
| A moderate barrier | 15    | 18.8%   |
| A serious barrier  | 21    | 26.3%   |

Q19. There is no centralized listing of rental property.

| Responses          | Count | Percent |
|--------------------|-------|---------|
| Not a barrier      | 25    | 28.7%   |
| A minor barrier    | 25    | 28.7%   |
| A moderate barrier | 23    | 26.4%   |
| A serious barrier  | 14    | 16.1%   |

Q20. Quality of rental properties and housing stock is substandard.

| Responses          | Count | Percent |
|--------------------|-------|---------|
| Not a barrier      | 13    | 14.9%   |
| A minor barrier    | 20    | 23.0%   |
| A moderate barrier | 32    | 36.8%   |
| A serious barrier  | 22    | 25.3%   |

A review of the survey shows the following perceptions by those that took the survey:

- During the last five years the fair housing situation is better (47.9%)
- 76.2% of the surveys returned stated they had not experienced discrimination in housing.
- 70.7% did not know of anyone experiencing discrimination in housing.
- For those who had experienced discrimination in question 2, race and familial status were the main forms of housing discrimination followed by disabilities..
- For those who knew someone who had been discriminated against, race and familial status were the main forms of housing discrimination.

Questions 9 through 20 showed the following as serious barriers to fair housing in Great Falls as seen by those surveyed:

- Income levels of minority and female heads of household.
- Residents are not familiar with their fair housing rights.
- Landlords, property managers are not familiar with fair housing rights.

## Summary of Fair Housing Profile in Great Falls

The results of the above survey and complaints received suggest that the Great Falls community members do experience discrimination in housing. In addition to the formal complaints and referrals, 76.2% of the survey respondents stated they had not experienced discrimination in housing and 70.7% stated they did not know of anyone being discriminated against. The remaining approximately 24% and 30% have been or know someone who has been impeded in their search for housing due to discrimination.

It is notable that no complaints surrounding real estate and financial transactions were noted.

Responses to the survey and the Working Group suggest that outreach and information about individuals rights in procuring housing would be beneficial.

***General impediments: See Strategies to Address Impediments to Furthering Fair Housing for greater detail.***

### ***Impediment 1 of 6***

***Discriminatory practices in violation of the Fair Housing Act are present in Great Falls, especially impacting Native Americans and physically/mentally handicapped.***

## **Public Sector Impediments and Additional Programs**

In May, 2003 the Great Falls City Commission adopted “The Great Falls City-County Growth Policy.” 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 Great Falls City-County Growth Policy”).

### Zoning and Subdivision Regulations

The City’s multi-family zoning district, “C” Residential allows very high densities on parcels with sufficient area to accommodate required parking and landscaping. Multi-family residential projects proposed for property already zoned “C” Residential are subject to design review, but no open public hearing process. To date, although there has

been some discussion in the community, there has been no restriction to multi-family housing construction.

### 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 Uniform Code 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. As of this writing the City has taken an aggressive posture to eliminate sub-standard housing that does not meet code. Many of these sites have been utilized by different agencies, such as Neighborhood Housing Services, Inc., that construct low income housing.

### Maintenance of Property

There is a perception that a high percentage of rental properties are in need of property maintenance. Although this is not an impediment, it is an area the Working Group chose to explore. They wish to partner with the City and define "maintenance of property" which will be presented to the Great Falls Housing Task Force to determine if future action is necessary.

The City in conjunction with the "Weed and Seed" grant will survey specific neighborhoods to ascertain the maintenance of property. This initial survey will be completed by December 2005. The information provided will be used to get a better picture of the quality of housing stock within the City. Future action will be determined by the Working Group and partnering with the City.

### 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 authorization for 1406 housing units. Currently, only 1140 units are being occupied due to construction projects either planned or underway. The 1406 housing units include 111 renovated units and 278 newly constructed units. The remainder of the units will be replaced by new construction, with the final project to be funded in 2007. Impact on the local community will be minimal (Source: Malmstrom AFB Housing Office).

### 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, formerly known as Parkdale, 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.

In 1973, 50 units were constructed at Sunrise Court located at 5115 Third Avenue South. Half of these units have gone through asbestos removal and complete interior and exterior rehabilitation. This phase was completed in 2004 and the second phase is estimated to be complete in 2006.

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.

Also in 1980, 30 units were constructed at 2700 Sixteenth Avenue South known as Yeoman-Tynes. This site is in good condition.

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 will be ready for occupancy during December 2004.

The Great Falls Housing Authority administers 200 Housing Choice Vouchers serving a population of approximately 197 families. 300 families are currently on the waiting list, of which 200 are currently in some form of subsidized housing. 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 four of the last five years. The quality of housing and customer service provided for residence is outstanding (Source: Great Falls Housing Authority Interview).

#### 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 December 2004, Opportunities, Inc. in Great Falls, is overseeing 176 Mod-Rehab units and 719 Housing Choice Vouchers. They have 1634 applicants on their waiting list. The waiting list for Mod-Rehab units is approximately one month to one year, depending upon the bedroom size needed. The waiting list for Housing Choice Vouchers is approximately two years (Source: Opportunities, Inc documentation and interview December 2004).

#### 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.

## Subsidized Housing

A survey of subsidized housing is accomplished during the month of February 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 104 units with roll-in showers being reported.

### Summary of Subsidized Housing Statistics – February 2005

| <u>Units (Occupied)</u>             | <u>Occupancy Rate</u> | <u>Accessible Units</u> | <u>Disabled Occupied</u> |
|-------------------------------------|-----------------------|-------------------------|--------------------------|
| 1,587 (1,458)                       | 95%                   | 276                     | 82                       |
| 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

Although no specific impediments were found in the public sector there are areas of possible future concerns. Zoning, codes, and permit fees will be monitored to ensure that there is not a negative impact to further fair housing.

## **Private Sector Impediments and Additional Programs**

### Home Mortgage Disclosure Act (HMDA): Application and Denials

The Home Mortgage Disclosure Act (HMDA), enacted by Congress in 1975 and implemented by the Federal Reserve Board's Regulation C, requires lending institutions to report public loan data. In order to ascertain trends in Great Falls lending practices the Home Mortgage Disclosure Act (HMDA) was reviewed. The data came from the Great Falls statistical area (MSA:3040 – Great Falls 2003).

**Disposition of Applications for FHA, FSA/RHS, and VA Home Purchase Loans, 1 to 4  
Family Homes by Race, Gender and Income of Applicant, 2003**

| Race, Gender & Income                      | Apps.<br>Received | Loans<br>Originated | Apps. Approved<br>But Not Accepted | Apps.<br>Denied | Apps.<br>Withdrawn | Files<br>Closed as<br>Incomplete |
|--|-------------------|---------------------|------------------------------------|-----------------|--------------------|----------------------------------|
| American Ind/<br>Alaskan Native<br>(Total) | 8                 | 4                   | 1                                  | 1               | 2                  | 0                                |
| Male                                       | 2                 | 1                   | 0                                  | 1               | 0                  | 0                                |
| Female                                     | 5                 | 2                   | 1                                  | 0               | 2                  | 0                                |
| Joint (Male/Female)                        | 1                 | 1                   | 0                                  | 0               | 0                  | 0                                |
| Asian/Pacific Islander<br>(Total)          | 7                 | 7                   | 0                                  | 0               | 0                  | 0                                |
| Male                                       | 4                 | 4                   | 0                                  | 0               | 0                  | 0                                |
| Female                                     | 1                 | 1                   | 0                                  | 0               | 0                  | 0                                |
| Joint (Male/Female)                        | 2                 | 2                   | 0                                  | 0               | 0                  | 0                                |
| Race, Gender & Income                      | Apps.<br>Received | Loans<br>Originated | Apps. Approved<br>But Not Accepted | Apps.<br>Denied | Apps.<br>Withdrawn | Files<br>Closed as<br>Incomplete |
| Black (Total)                              | 5                 | 5                   | 0                                  | 0               | 0                  | 0                                |
| Male                                       | 2                 | 2                   | 0                                  | 0               | 0                  | 0                                |
| Female                                     | 1                 | 1                   | 0                                  | 0               | 0                  | 0                                |
| Joint (Male/Female)                        | 2                 | 2                   | 0                                  | 0               | 0                  | 0                                |
| Hispanic (Total)                           | 8                 | 5                   | 1                                  | 1               | 1                  | 0                                |
| Male                                       | 5                 | 3                   | 1                                  | 1               | 0                  | 0                                |
| Female                                     | 0                 | 0                   | 0                                  | 0               | 0                  | 0                                |
| Joint (Male/Female)                        | 3                 | 2                   | 0                                  | 0               | 1                  | 0                                |
| White (Total)                              | 614               | 517                 | 26                                 | 34              | 34                 | 3                                |
| Male                                       | 186               | 155                 | 11                                 | 9               | 10                 | 1                                |
| Female                                     | 150               | 126                 | 5                                  | 10              | 7                  | 2                                |
| Joint (Male/Female)                        | 278               | 236                 | 10                                 | 15              | 17                 | 0                                |
| Other (Total)                              | 0                 | 0                   | 0                                  | 0               | 0                  | 0                                |
| Male                                       | 0                 | 0                   | 0                                  | 0               | 0                  | 0                                |
| Female                                     | 0                 | 0                   | 0                                  | 0               | 0                  | 0                                |
| Joint (Male/Female)                        | 0                 | 0                   | 0                                  | 0               | 0                  | 0                                |
| Joint (White/Minority)<br>Total            | 33                | 22                  | 5                                  | 5               | 1                  | 0                                |
| Male                                       | 1                 | 1                   | 0                                  | 0               | 0                  | 0                                |
| Female                                     | 0                 | 0                   | 0                                  | 0               | 0                  | 0                                |
| Joint (Male/Female)                        | 32                | 21                  | 5                                  | 5               | 1                  | 0                                |
| Race Not Available<br>(Total)              | 16                | 11                  | 0                                  | 1               | 4                  | 0                                |
| Male                                       | 0                 | 0                   | 0                                  | 0               | 0                  | 0                                |
| Female                                     | 0                 | 0                   | 0                                  | 0               | 0                  | 0                                |

|                             |                |                  |                                 |              |                 |                            |
|-----------------------------|----------------|------------------|---------------------------------|--------------|-----------------|----------------------------|
| Joint (Male/Female)         | 3              | 1                | 0                               | 0            | 2               | 0                          |
| <b>Income of Applicants</b> |                |                  |                                 |              |                 |                            |
| Race, Gender & Income       | Apps. Received | Loans Originated | Apps. Approved But Not Accepted | Apps. Denied | Apps. Withdrawn | Files Closed as Incomplete |
| Less Than 50% of MSA Median | 73             | 51               | 4                               | 9            | 7               | 2                          |
| 50-79% of MSA Media         | 192            | 159              | 9                               | 14           | 10              | 0                          |
| 80-99% of MSA Median        | 127            | 109              | 1                               | 6            | 10              | 1                          |
| 100-119% of MSA             | 119            | 104              | 7                               | 6            | 2               | 0                          |
| 120% or More of MSA Median  | 174            | 146              | 11                              | 5            | 12              | 0                          |
| Income Not Available        | 6              | 2                | 1                               | 2            | 1               | 0                          |

According to the data provided, 658 applications were received of which 549 loans were originated for properties in Great Falls; an overall 83% approval rate. Of those applications received 37 applicants were denied, an overall 5% denial rate. American Indians/Alaskan Natives had a 50% approval rate for their loans; Asian/Pacific Islander and Blacks had a 100% loan approval.; Hispanics 62% loan approval; Whites were approved 83% of the time. Whites received 98% of the total loans approved while the four remaining groups received 1% of the loans each. Percentages add up to more than 100% due to rounding of the figures.

Most loans were denied because of poor credit history and debt to income ratio.

Denials based upon income were somewhat surprising. Those less than 50% of MSA median income had a 69% loan origination while the other four levels were better than 80% loan origination (See Disposition of Applications table).

Due to the small numbers of minorities reported it is hard to determine the actual impact of loan origination.

This area will be continually monitored for adverse trends.

## Age and Quality of Housing Stock

| Year Structure Built |               |                |
|----------------------|---------------|----------------|
| <u>Years</u>         | <u>Number</u> | <u>Percent</u> |
| 1999 – March 2000    | 309           | 1.2            |
| 1995 to 1998         | 989           | 3.9            |
| 1990 to 1994         | 572           | 2.3            |
| 1980 to 1989         | 1,661         | 6.6            |
| 1970 to 1979         | 4,187         | 16.6           |
| 1960 to 1969         | 4,984         | 19.7           |
| 1940 to 1959         | 7,501         | 29.7           |
| 1939 or earlier      | 5,050         | 20.0           |

Source: 2000 Census

The majority of housing stock in Great Falls is 35 years or older. Over 49% of the stock is 45 years or older. Almost half of all housing units in Great Falls were built before 1960. This is considerably older housing stock than the State of Montana, which has about 36% of housing units built before 1960. 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 (Source Great Falls City-County Growth Policy 2003).

The quality of housing has always been at the forefront of discussion with low income tenants. The 2000 census stated that 136 units lacked complete plumbing facilities (both hot and cold piped water, a flush toilet and a bathtub or shower) and 207 units lacked complete kitchen facilities (installed sink with piped water, a range, convection or microwave oven; and a refrigerator).

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.

| City of Great Falls Condemnation of Housing Structures |                             |                         |
|--|-----------------------------|-------------------------|
| <u>Year</u>  | <u>Structures Condemned</u> | <u>Structures Razed</u> |
| 2004   | 14                          | 8                       |
| 2003   | 21                          | 15                      |
| 2002   | 4                           | 4                       |

Source: Great Falls Community Development Department

In an effort to improve neighborhoods and the quality of housing the City has been very active in enforcing building codes. During the past three years 39 structures have been condemned and 27 have been razed. Property owners are given the option to repair the property or bring it back to current code and have a habitable unit. It was noted by the

Working Group that little information is available to determine the quality of housing stock which could be an impediment to housing.

### 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. The result has been a nationwide housing affordability crisis. (Source Great Falls City-County Growth Plan)

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. 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. Great Falls home values have risen from \$88,500 in 1999 to \$109,950 in 2003. It is fair to say that most of the Great Falls affordable housing is found within the existing stock of owner occupied housing. (Source Great Falls City-County Growth Plan and Great Falls Association of Realtors)

### Neighborhood Housing Services

Neighborhood Housing Services, Inc. of Great Falls (NHS) helps families become homeowners through various educational and funding programs. Since 1980, NHS has helped over 2,800 families into homeownership utilizing a variety of funding sources. In 2004, NHS assisted 302 families into homeownership throughout Great Falls and Montana in the amount of \$1,789,630.

Neighborhood Housing Services, a 501(c)(3) nonprofit organization, works in low-to-moderate income and blighted areas targeted by NHS and the City of Great Falls for revitalization. NHS also provides homebuyer assistance programs city-and-statewide. During its 24-year history, NHS has accomplished the following:

- Over 2,800 families have become homeowners with NHS help
- Over 6,700 families have received homebuyer education
- NHS has been involved in 12% of Multiple Listing Service real estate sales in Great Falls
- Established the Montana HomeOwnership Center serving 55 Montana counties
- Neighborhood revitalization in 6 Great Falls neighborhoods
- Over 148 new homes have been built by NHS
- Over 411 dilapidated structures have been removed or repaired
- Hundreds of homeowners helped with home repair
- 1 new home built with Montana Conservation Corps
- 15 NHS High School Houses built by students

- Over \$135 million in public and private investment in NHS target neighborhoods
- Over \$56 million in Montana Board of Housing loans
- \$34 million in Lender Pool loans
- \$10 million in Rural Development low interest loans
- 22 years of MApril neighborhood cleanup projects
- 21 years of educating residents on code enforcement
- Incorporation of new Montana HomeOwnership Network affiliate serving 55 Montana counties for delivery of statewide homeownership education and financial assistance
- Established the Neighborhood Committee to deal with both deteriorating rentals and escalating crime in Great Falls' north side neighborhoods
- Assisted neighborhood residents in laying over 100,000 square feet of sod
- Participation in Great Falls improvement committees including Weed and Seed, Neighborhood Watch, Great Falls Housing Task Force, and the Regional Growth Alliance
- Annual "Meth is Scary" public awareness event
- Community organizing and involvement activities

NHS has been working on revitalizing the lowest income and most blighted neighborhoods in Great Falls for the past 24 years. It characteristically assists more than 10 lower income homeowners each year with loans for home repairs. Additionally, NHS purchases three to five major problem properties for rehabilitation and resale to families below 80% of Cascade County median income. NHS is involved in the construction of approximately 10 to 12 new homes per year, as funds permit. NHS works on attacking blight and deterioration in neighborhoods by removing dilapidated structures, organizing neighborhood cleanups and targeting properties for code enforcement. Their various programs are funded by several sources and include:

- Payback capital projects and revolving loan funds
- Infill housing—a program to alleviate neighborhood vacant lot problems
- Mixed income, mixed use construction
- Multi-family construction
- Purchase, rehabilitation and sale of previously substandard units
- Home ownership promotion through education and loan programs
- HomeOwnership Center for full cycle lending
- Exterior improvement lending in targeted neighborhoods
- Emergency repair lending
- Foreclosure prevention education and lending
- Home maintenance education
- Predatory lending education
- Community leadership training and development
- Community outreach and education
- Neighborhood cleanup

Neighborhood Housing Services focuses its energy on innovative programs that draw on basic principals to help people help themselves. (Source: Neighborhood Housing Services December 2004)

Rental Market and Affordability

According to the 2000 Census there are 23,785 occupied housing units of which 8,751 are specified renter occupied. Below is the 2000 Census data for gross rent.

| <u>Rent</u>        | <u>Gross Rent Number</u> | <u>Percent</u> |
|--------------------|--------------------------|----------------|
| Less than \$200    | 1,048                    | 12             |
| \$200 to \$299     | 1,070                    | 12.2           |
| \$300 to \$499     | 3,927                    | 44.9           |
| \$500 to \$749     | 1,798                    | 20.5           |
| \$750 to \$999     | 347                      | 4              |
| \$1,000 to \$1,499 | 109                      | 1.2            |
| \$1,500 or more    | 108                      | 1.2            |
| No cash rent       | 344                      | 3.9            |

Source: 2000 Census

***Summary of Private Sector Impediments: See Strategies to Address Impediments to Furthering Fair Housing for greater detail.***

***Impediment 2 of 6***

***Landlords, property managers, tenants, future tenants and support agencies lack knowledge on Federal Fair Housing laws, state landlord and tenant laws, state discrimination law.***

***Impediment 3 of 6***

***The inability to pay required security deposits/rent precludes low income families and individuals from obtaining housing.***

***Impediment 4 of 6***

***There is a lack of affordable housing for low income individuals.***

***Impediment 5 of 6***

***A majority of landlords will not rent to teen parents under the age of 18.***

***Impediment 6 of 6***

***Individuals with pets encounter difficulties finding rental housing as many landlords have a “no pet policy” or charge high pet deposits or monthly fees.***

## **Current Great Falls Fair Housing activities**

---

The following has been extracted from the Great Falls Consolidated Annual Performance and Evaluation Report (CAPER) for the program year 2003 - 2004:

### **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. The annual update to the 2000 Analysis of Impediments to Fair Housing was undertaken.
2. Outreach through education and networking continued to be the principal method of furthering fair housing. Activities undertaken include:
  - \* 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 400 individuals through programs at the three local high schools and Gateway Community Services
  - \* participated in summer orientation event at MSU-Great Falls College of Technology and distributed fair housing information
  - \* presented live program on public television (Channel 7) about fair housing laws and rights of individuals
  - \* participated in two community-wide workshops co-sponsored by the City and the 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 Neighborhood Housing Services and First Horizon Mortgages
  - \* attended Native American Local Government Advisory Council meeting to describe the City's role in providing fair housing services
  - \* coordinated the annual Fair Housing Faire in April 2004; staff from 15 organizations presented information and 80 people participated; presentations involved fair housing laws, landlord and tenant laws, building codes, consumer credit, legislative bills, Section 8 programs, HUD housing programs, and local gang activity
  - \* held 10 one-on-one landlord/property manager training sessions
  - \* actively participated as member of the Housing Task Force, Community Advisory Council, and the Local Individuals Network for Customized Services
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
  - \* wrote a monthly fair housing column for the Housing Authority's newsletter about issues of concern to the public housing community
4. Responded to 879 housing complaints and information inquiries from landlords and tenants.
  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 was monitored on an ongoing basis to verify Objective #4 in the Consolidated Plan (providing housing assistance to very low and low income renters) remained valid. As of February 2004 the vacancy rate of subsidized housing was approximately 6% and this rate was fairly constant throughout the year. The National Low Income Housing Coalition released a report in October 2003 which revealed a Great Falls worker would need to earn \$10.32 an hour to afford a two bedroom apartment at fair market rate. According to the 2000 Census; the per capita income in Great Falls is \$18,059. Based on these findings, it was determined Objective #4 remained valid.
  7. All enacted city ordinances were reviewed to ensure compliance with fair housing laws.
  8. April 2004 was proclaimed Fair Housing Month by Mayor Randy Gray.

## **Strategies to Address Impediments to Fair Housing Choice**

The impediments and strategies listed below were developed through a consensus effort of the Working Group.

### **Impediment 1**

Discriminatory practices in violation of the Fair Housing Act are present in Great Falls, especially impacting Native Americans and physically/mentally handicapped.

#### **Strategy**

1. The City Fair Housing Specialist will market the availability of education and outreach pertaining to the rights of all protected classes. The focus over the next year will be Native Americans and physically (HIV/AIDS) and mentally handicapped. The Fair Housing Specialist 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. The Fair Housing Specialist will investigate the possibility of having the Justice Courts mandate training for landlords and tenants who have been cited for housing related offenses.
3. 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 Fair Housing Specialist will 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, commencing April 2005. Justice Court will be contacted no later than May 1, 2005 for the feasibility of court involvement with mandated training for offenders.

### **Impediment 2**

Landlords, property managers, tenants, future tenants and support agencies lack knowledge on Federal Fair Housing laws, state landlord and tenant laws and state discrimination law.

### **Strategy**

1. An assessment of specific education needs through a survey process of housing organizations 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 provide a list of organizations contacted, number of individuals trained, copies of educational material to the housing task force on a quarterly basis starting June 2005.

### **Impediment 3**

The inability to pay required security deposits/rent precludes low income families and individuals from obtaining housing.

### **Strategy**

1. The Fair Housing Specialist will identify present low income emergency security deposit and rent programs in Great Falls.
2. The Fair Housing Specialist and financial organizations will develop a pilot project for financial education tied to security deposit and rent assistance.
3. The Fair Housing Specialist will identify program assistance for individuals that are above low income levels.

### **Measurement and Responsibility**

The Fair Housing Specialist will identify and present to the Housing Task Force a listing of assistance programs by June 2005. A pilot project will be developed and in place by November 2005. The Fair Housing Specialist and the Housing Task Force will evaluate the programs and pilot financial program on a quarterly basis based upon number of known denials for renting based on security deposit and the number of evictions based on rent. Statistics will be provided by the Fair Housing Specialist.

### **Impediment 4**

There is a lack of affordable housing for low income individuals.

### **Strategy**

1. Documentation will be gathered to define affordable housing by the Fair Housing Specialist/Housing Task Force.
2. Gather statistics and partner with other organizations to ascertain the magnitude of this problem.

### **Measurement and Responsibility**

The Fair Housing Specialist and Housing Task Force will work closely with other organizations (to be determined) in consolidating survey results to define affordable housing. An evaluation tool will be designed by a working group committee to see if affordable housing is truly a impediment. This will be accomplished by August 2005 and addressed in the annual review of this document.

### **Impediment 5**

A majority of landlords will not rent to teen parents under the age of 18.

### **Strategy**

1. Young Parents Education Center, the Great Falls Housing Authority and the Fair Housing Specialist will contact the State and Federal Department of

Housing and Urban Development to see the feasibility of starting a “Second Chance Home.”

2. A committee will be formed to ascertain options and funding.

#### **Measurement and Responsibility**

A committee will research the requirements of the “Second Chance Program” and funding options by December 2005. Planning and feasibility studies will begin January 2005 with an estimated completion date of July 2005.

### **Impediment 6**

Individuals with pets encounter difficulties finding rental housing as many landlords have a “no pet policy” or charge high pet deposits or monthly fees. Although this is not an impediment as defined by HUD, the Working Group felt strongly that pet ownership does impede people with low/moderate incomes from obtaining rental housing.

#### **Strategy**

1. The Fair Housing Specialist will research available sources for educational material/information that describes how to design and implement programs for successful renting for people with pets, e.g., Pets for Life Program through the Humane Society of United States; Doris Day Animal League.
2. Partners will do outreach programs to raise the public’s awareness of the value of pets to people in our community.
3. Develop and present information which reveals how responsible pet owners can be a positive financial market for landlords.
4. Establish if renters insurance will protect the rental property when damage is caused by a pet.
5. Explore the feasibility of working with insurance firms to create rental insurance policies based upon certification of pet behavior.
6. Coordinate with local groups to promote responsible pet ownership.

#### **Measurement and Responsibility**

A community working group will be established to aggressively pursue this impediment. Partnerships will be established with the Humane Society of Cascade County, veterinarians, and other local animal interest groups. The working group will contact insurance companies. The working group will promote responsible pet ownership and educate those in the housing industry to the financial benefits of renting to pet owners. Progress will be monitored throughout the year and included in the annual update.