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**Analysis of Impediments  
to  
Fair Housing Choice**

**2010 - 2015**

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

**March 2010**

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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 \$1.44 million annually from the following HUD programs: Community Development Block Grant (CDBG) and Home Investment Partnership (HOME). (Interview CDBG Administrator December 2009)

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 November and December 2009. The hearings were advertised in local newspapers, The Great Falls Tribune and Consumer Press (a free publication). Notices of the public hearings were also e-mailed to numerous organizations throughout the City and by personal contacts. The resulting 12 participants represented a very diverse group from Habitat for Humanity, Consumer Credit Counseling Services of Montana, Opportunities, Inc., NeighborWorks, Easter Seals Medicaid Waiver, 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 300 individuals (actual numbers are unknown because of the various networks that were used) 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 approximate 300 surveys, 75 were filled out via the internet or hand delivered, the 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 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 2000 (American Fact Finder 2008 and Data Sets 2006-2008))
- Montana Census and Economic Information Center
- 2006-2008 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 2009
- *Great Falls Tribune*
- Habitat for Humanity
- NeighborWorks
- Great Falls Housing Authority
- Opportunities, Inc.
- Other anecdotal data

The final draft was submitted for public review as an appendix to the 2010 -2015 Consolidated Plan.

## **Executive Summary**

In November and December 2009 public hearings (held in a listening format facilitated by the City of Great Falls Fair Housing Specialist) were held to gather information from the general population of Great Falls. Attendees were from the housing industry, financial organizations, mental health organizations, tenants and landlords. The purpose of the public hearings were 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 public hearings, a Housing Survey was distributed to an estimated 300 community members of which 75 surveys were returned. Results from the public hearings, surveys, and personal contacts resulted in seven impediments to fair housing choice selected for action. The AI was made available for public comment with the City of Great Falls Consolidated Plan, March 18 through April 16, 2010.

### 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 2010-2015 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 (to 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)**
6. Lack of communications and education between organization that provide housing and agencies seeking housing for their cliental: safe housing for young parents, housing for veterans, foreclosure prevention, accessible housing. **(Restricts housing choices or availability of housing choices)**

# 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 59,251 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 2005 versus 2008 Census

2005– 58,257

2008 – 59,251

Increase: 994

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 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). The 2006 – 2008 American Community Survey 3-Year Estimates show an estimate 6,623 minority races of which 1,829 are Hispanic or Latino (of any race). This is an increase of 1,307 minority residents in a eight year period.

## Poverty

In 2006-2008, 14 percent of the people were in poverty. Twenty-one percent of related children under 18 were below the poverty level, compared with 9 percent of people 65 years old and over. Eleven percent of all families and 42 percent of families with a female householder and no husband present had incomes below the poverty level. (2006-2008 American Community Survey 3-Year Estimate)

## Housing units, 1990 – 2007

City of GF	1990*	Percent	2000*	Percent	2007*	Percent	Actual**	Percent
Single-Family Units	14,923	61.8	16,450	65.1	16,821	65.4	17,623	65.1
Multi-Family Units	7,530	31.2	7,771	29.5	7,384	28.7	8,045	29.7
Mobile Homes***	1,699	7.0	1,342	5.3	1,310	5.9	1,393	5.2
Total Housing Units	24,157		25,253		25,715		27,061	

Source:\* U.S. Census, \*\*2000 U.S. Census data plus actual number of permits issued by City of Great Falls Community Development Department 2000 through 2007, \*\*\* 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

<b><u>Great Falls 2007 Racial and Ethnic Distribution</u></b>			
	<u>2005 - 2007</u>	<u>2000 Census</u>	<u>1990 Census</u>
White	52,571	50,996	51,301
Black or African American	722	540	531
American Indian and Alaska Native	2,962	2,888	2,549
Asian	477	485	458
Native Hawaiian and Other Pacific Islander	0	49	Not Identified
Some other race	<u>267</u>	<u>341</u>	<u>258</u>
Total Population**	58,397	56,690	55,097
Hispanic or Latino(of any race)	1,901	1,354	926

\*\*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 , 2005-2007 American Community Survey 3-year estimates

Minority Concentration

The 2000 census revealed that there are several concentrations of minority races in Great Falls: American Indian’s are located in all census tracts with the highest concentrations in tracts seven (7), nine (9), and 16; Hispanic or Latino are also in all census tracts with the highest concentration in tracts three (3), 12 and 16. Note that Malmstrom Air Force Base is located in Tract 12.

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 the American Chamber of Commerce Researchers Association’s “Inter-City Cost of Living Index” resulted in an overall rating of 98.2 based on a scale of 100. Housing was rated at 83.3. The housing index utilizes monthly apartment rent (2-bedroom, unfurnished, excluding all utilities except water, approximately 950 square feet), the purchase price of a new 1,800 sq.ft. urban home and monthly payment of principal and interest on a 30-year fixed-rate mortgage. (Falls & Surrounding Area, Relocation Guide 2009-2010)

## Labor Force Characteristics and Unemployment

The 1990 and 2000 and American Community Survey for 2006-2008 censuses provides the following data:

<u>year estimate</u>	<u>Labor Force Status</u>		
	<u>1990</u>	<u>2000</u>	<u>2006-2008 3</u>
Persons 16 or over	42,035	43,951	46,601
In labor force	26,501	28,015	29,013
Civilian Labor Force	24,926	26,757	27,696
Employed	23,273	24,909	26,262
Unemployed	1,653	1,848	1,434
Armed Forces	1,575	1,258	1,317
Females 16 or over	22,363	22,882	24,350
Females in the labor force	12,422	13,299	14,349

Source: 1990 and 2000 Census, 2006-2008 American Community Survey 3-year estimates

The labor force in Great Falls continues to expand at a moderate rate. According to the Job Service Workforce Center December 2009 saw an unemployment rate of 5.9%.

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 2006-2008 American Community Survey it is estimated that 16,384 individuals are over the age of 55 while the 2000 Census showed that 14,218 individuals were over age 55, an increase of elderly population by 2,166.

### Employment Characteristics

The largest employers in Great Falls are portrayed below:

<b><u>Top 10 Private Employers in Great Falls</u></b>			
<u>Private Sector</u>			
<u>Rank</u>	<u>Employer</u>	<u>Business Type</u>	<u>Employees</u>
1.	Benefis Healthcare	Hospital	2,400
2.	Great Falls Clinic	Healthcare Facility	780
3.	N.E.W. Customer Service	Warranty/Service Plans	676
4.	Wal-Mart	Retailer	501
5.	United Materials	Construction	305
6.	Albertsons	Grocery Store	261
7.	Easter Seals-Goodwill	Services for Disabilities	249
8.	Davidson Companies	Financial Services/Travel	246
9.	Missouri River Manor	Nursing and Rehabilitation	246
10.	McDonald's	Restaurant	241

Source: "09 The Great Falls Chamber of Commerce Community Guide"

## Malmstrom Air Force Base

Malmstrom AFB, home of the 341<sup>st</sup> Space Wing, is one of the largest employers in Great Falls as well as a large contributor to the local economy. Malmstrom AFB saw a decline in their over all mission when 50 Minuteman Missiles were deactivated. The Base accounts for nearly 45 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 base also supports approximately 1,400 retired military people who live in the area. Source: "09 The Great Falls Chamber of Commerce Community Guide"

### **Top 6 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	Military	4,004
2.	Great Falls Public Schools	Public School System	1,613
3.	Montana Air National Guard	Military	1,033
4.	City of Great Falls	City government	528
5.	Cascade County	County government	500
6.	MSU-GF College of Technology	University	172

Source: "09 The Great Falls Chamber of Commerce Community Guide"

## **Household, Income and Poverty**

### Family Size and Household Composition

The American Community Survey 3-year estimate (2006-2008) shows an estimated 24,015 households, up 181 households from the 2000 Census which showed 23,834 households. The survey estimates that the average family size is 2.98 while in 2000 the average family size was 2.92 persons. Of the total households 62.9%, up from 62.3% in 2000, were family households and 37.1% compared to 37.7% in 2000, were non-family households. (2006-2008 American Community Survey 3-year estimates)

### Income and Poverty

The median household income for all households in Great Falls was \$41,598 compared to \$32,436 in 2000, and the family median income was \$53,902 compared to \$40,107 in 2000. (Source: 2000 Census and 2006-2008 American Community Survey). In 2006-2008, 16 % of the people were in poverty. Twenty-five percent of related children under 18 were below the poverty level, compared with 8 percent of the people 65 years old or over. Thirteen percent of all families and 45 percent of families with a female householder and no husband present had income below the poverty level. (2006-2008 American Community Survey 3-year estimates)

The 2009 HUD income guidelines are presented below:

HUD Income Guidelines for 2009 – Great Falls								
Family size	1	2	3	4	5	6	7	8
Extremely Low Income*	\$11,450	13,100	14,700	16,350	17,650	18,950	20,250	21,600
Very Low Income**	\$19,100	21,800	24,550	27,250	29,450	31,600	33,800	35,950
Low Income***	\$30,500	34,900	39,250	43,600	47,100	50,600	54,050	57,550

\* 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

### Poverty

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

Poverty Thresholds 2008	
Size of Family	Weighted average thresholds
One person	\$10,991
Two persons	\$14,051
Three persons	\$17,163
Four Persons	\$22,025
Five persons	\$26,049
Six persons	\$29,456
Seven persons	\$33,529
Eight persons	\$37,220
Nine persons or more	\$44,346

Source: U.S. Census Bureau, Poverty Thresholds for 2008

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). Although this data is some what dated, 2000 Census, its reflection of poverty in Great Falls is still accurate.

### **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 2005 seven test were performed which resulted in case filings, 2006 eight cases were based on testing, 2007 no cases were based on testing, 2008 there was no testing, 2009 saw 21 tests completed with four conciliated cases based on the testing.

#### 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, martial status and creed.

Great Falls Fair Housing complaints filed from January 2005 to December 2009 with HUD Office in Denver.

<u>Protected Class</u>	<u>2005</u>	<u>2006</u>	<u>2007</u>	<u>2008</u>	<u>2009</u>
Race	3	2	3	0	0
Color	0	0	0	0	0
Religion	0	0	0	0	0
Sex/gender	0	2	0	0	0
Disability	3	13	1	0	2
Familial Status	2	5	2	3	0
National Origin	0	0	0	0	0
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 2009, January, 2010

Both complaints in 2009 were withdrawn after resolution.

Great Falls Fair Housing complaints filed from January 2005 to December 2009 with Montana Human Rights Bureau.

<u>Protected Class</u>	<u>2005</u>	<u>2006</u>	<u>2007</u>	<u>2008</u>	<u>2009</u>
Race	0	0	0	0	1
Color	0	0	0	0	0
Religion	0	0	0	0	0
Sex/gender	0	0	0	0	1
Disability	0	7	0	0	3
Familial Status	0	0	0	0	1
National Origin	0	0	0	0	0
Martial Status	0	0	0	0	0
Age	0	0	0	0	0
Creed	0	0	0	0	0

Source: Montana Human Rights Bureau submission January, 2010

During 2009 the Montana Human Rights Bureau settled three cases; two for disability and one for familial status.

Great Falls Fair Housing Complaints Filed from January 2005 to December 2009 with Montana Fair Housing.

<u>Protected Class</u>	<u>2005</u>	<u>2006</u>	<u>2007</u>	<u>2008</u>	<u>2009</u>
Race	2	1	0	0	2
Color	0	0	0	0	0
Religion	0	0	0	0	0
Sex/gender	2	1	0	0	0
Disability	14	20	0	0	4
Familial Status	3	6	0	0	1
National Origin	0	3	0	0	0
Martial Status	0	0	0	0	0
Age	0	3	0	0	0

Creed	0	0	0	0	0
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Source: Great Falls Annual AI Updates for 2001, 2002, 2003, 2004 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 2005 to December 2009 with City of Great Falls Fair Housing Specialist					
<u>Protected Class</u>	<u>2005</u>	<u>2006</u>	<u>2007</u>	<u>2008</u>	<u>2009</u>
Race	1	7	5	3	4
Color	0	0	0	0	0
Religion	0	1	1	1	0
Sex/gender	3	4	0	1	2
Disability	6	3	14	22	8
Familial Status	2	2	2	2	3
National Origin	0	0	0	0	0
Martial Status	1	0	0	1	1
Age	1	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 2001, 2002, 2003, 2004

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.

### Community Survey

Approximately 300 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 communities general level of understanding and experience with fair housing issues (See Appendix B). This was not a scientific survey but with 75 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. 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:

- During the last five years the fair housing situation is better (50.7%), an increase of 2.8% from 2005.
- 85.9% of the surveys returned stated they had not experienced discrimination in housing. (Results in 2005 was 76.2%)
- 69% did not know of anyone experiencing discrimination in housing. (2005 showed 70.7%)
- For those who had experienced discrimination in question 2, familial status (53.8%), race, martial status, age and disability were chosen by 46.2% of those surveyed as the main forms of housing discrimination.
- For those who knew someone who had been discriminated against, race and familial status were the main forms of housing discrimination. This was the same in 2005.

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.
- Quality of rental properties and housing stock is substandard
- There is no centralized listing of rental property

### 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, 14.1% of those surveyed stated they had experienced discrimination in housing during the last five years and 31% stated they knew of someone being discriminated against in housing during the past five years. (See appendix B)

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

### 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

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 authorization for 1372 housing units. Currently, only 924 units are being occupied due to construction projects either planned or underway. Malmstrom AFB currently has 1106 housing units in the inventory with 175 inactive units. There are 266 housing units under construction. Waiting list for airman is minimal, as of January 2010: 75 individuals are waiting for two bedrooms; 10 waiting for three bedrooms and six waiting for four bedrooms and 1406 housing units include 111 renovated units and 278 newly constructed units. 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 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. 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 will be ready for occupancy during December 2004.

The Great Falls Housing Authority administers 220 Housing Choice Vouchers serving a population of approximately 220 families. As of January 2010, 275 families are currently on the waiting list, of which 194 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 nine of the last 10 years. 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.

The Sandhills site is a new moderate income housing project under construction. The first 4-plex, of four 4-plexes, will be completed during 2010. The other three 4-plexes will be built as funds are available.

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 January 2010, Opportunities, Inc. in Great Falls, is overseeing 146 Mod-Rehab units and 562 Housing Choice Vouchers. They have 1833 applicants on their waiting list, as of December 2009. 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 January 2010).

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. Due to fair market rents being lower than local rents approximately 60 housing units opted out of the HUD program. Of these the Great Falls Housing Authority increased their voucher program by 20. See impediment 1.

### Subsidized Housing

A survey of subsidized housing was accomplished during the month of January 2010 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 2010			
<u>Units (Occupied)</u>	<u>Occupancy Rate</u>	<u>Accessible Units</u>	<u>Disabled Occupied</u>
1,551 (1,456)	94%	290	109
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”*. In March 2007 it was noted that 68 units were opted out but 12 of those units were allowed to use Housing Choice Vouchers

## **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 is from the four major lending institutions meeting HMDA reporting requirements: Stockman Bank, Prairie Mountain Bank, U.S. Bank and Wells Fargo Fin’l Montana, Inc.

Disposition of Applications for FHA, FSA/RHS, and VA Home Purchase Loans, 1 to 4 Family Homes by Race,  
Gender and Income of Applicant, 2008

Race, Gender & Income	Apps. Received	Loans Originated	Apps. Approved But Not Accepted	Apps. Denied	Apps. Withdrawn	Files Closed as Incomplete
American Ind/ Alaskan Native (Total)	1	1	0	0	0	0
Male	0	0	0	0	0	0
Female	0	0	0	0	0	0
Joint (Male/Female)	1	1	0	0	0	0
Asian/Pacific Islander (Total)	2	2	0	0	0	0
Male	1	1	0	0	0	0
Female	0	0	0	0	0	0
Joint (Male/Female)	1	1	0	0	0	0

Race, Gender & Income	Apps. Received	Loans Originated	Apps. Approved But Not Accepted	Apps. Denied	Apps. Withdrawn	Files Closed as Incomplete
Black (Total)	1	1	0	0	0	0
Male	0	0	0	0	0	0
Female	0	0	0	0	0	0
Joint (Male/Female)	1	1	0	0	0	0
Hispanic (Total)	8	8	0	0	0	0
Male	7	7	0	0	0	0
Female	1	1	0	0	0	0
Joint (Male/Female)	0	0	0	0	0	0
White (Total)	310	271	11	13	14	1
Male	99	77	3	2	7	0
Female	71	66	1	4	5	1
Joint (Male/Female)	140	124	7	7	2	0
Joint (White/Minority) Total	10	10	0	0	0	0
Male	0	0	0	0	0	0
Female	0	0	0	0	0	0
Joint (Male/Female)	10	10	0	0	0	0

**Income of Applicants**

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	22	14	1	4	3	0
50-79% of MSA Median	84	73	3	0	7	0
80-99% of MSA Median	66	59	1	4	1	0
100-119% of MSA	57	54	0	2	1	0
120% or More of MSA Median	96	88	5	3	2	0
Income Not Available	0	0	0	0	0	0

According to the data provided, 342 applications were received of which 293 loans were originated for properties in Great Falls; an overall 85% approval rate. Of those applications received 13 applicants were denied. American Indians/Alaskan Natives had a 100% approval rate for their loans; Asian/Pacific Islander and Blacks had a 100% loan approval.; Hispanics also had a 100% loan approval. Numbers seem to be low because of the economic environment.

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 63% loan origination while the other four levels were 87% or better 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.

**Disposition of Applications for Conventional Home Purchase Loans, 1 to 4 Family Homes by Race, Gender and Income of Applicant, 2008**

Race, Gender & Income	Apps. Received	Loans Originated	Apps. Approved But Not Accepted	Apps. Denied	Apps. Withdrawn	Files Closed as Incomplete
American Ind/ Alaskan Native (Total)	0					
Male	0					
Female	0					
Joint (Male/Female)	0					
Asian/Pacific Islander (Total)	0					
Male	0					
Female	0					
Joint (Male/Female)	0					
Black (Total)	0					
Male	0					
Female	0					
Joint (Male/Female)	0					
Hispanic (Total)	2	2	0	0	0	0
Male	2	2	0	0	0	0
Female	0	0	0	0	0	0
Joint (Male/Female)	0	0	0	0	0	0
White (Total)	187	142	19	5	23	0
Male	44	35	2	2	6	0
Female	34	26	5	1	2	0
Joint (Male/Female)	109	81	12	2	15	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)						
Total	1	1	0	0	0	0
Male	0	0	0	0	0	0
Female	0	0	0	0	0	0
Joint (Male/Female)	1	1	0	0	0	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	14	11	2	0	1	0
50-79% of MSA Median	30	18	3	3	5	1
80-99% of MSA Median	24	20	2	2	4	0
100-119% of MSA	13	8	3	0	3	0
120% or More of MSA						
Median	125	102	11	1	13	0
Income Not Available	4	3	0	1	0	0

The data shows that no minorities applied for conventional loans. The data also reflects the economy and that conventional loans may be harder to apply for.

### Age and Quality of Housing Stock

Year Structure Built	Estimate	Percent
Total housing units	25,708	
Built 2005 or later	477	1.9%
Built 2000 to 2004	1,092	4.2%
Built 1990 to 1999	1,840	7.2%
Built 1980 to 1989	1,587	6.2%
Built 1970 to 1979	3,685	14.3%
Built 1960 to 1969	4,023	15.6%
Built 1950 to 1959	5,122	19.9%
Built 1940 to 1949	2,504	9.7%
Built 1939 or earlier	5,378	20.9%

Selected Housing Characteristics, 2006-2008 American Community Survey 3-year Estimates

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. 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 2000 census stated that 136 units lacked complete plumbing facilities while the 2006-2008 estimates that 201 units

lack plumbing, (both hot and cold piped water, a flush toilet and a bathtub or shower) and 207 units in 2000 lacked complete kitchen facilities (installed sink with piped water, a range, convection or microwave oven; and a refrigerator) while the 2006-2008 estimates that 381 units lack kitchen facilities.

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. 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, 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, Inc. of Great Falls dba NeighborWorks Great Falls (NWGF) helps families buy homes, improve their homes and keep their homes through various educational and loan programs. Since 1980, NWGF has helped over 4,000 families into homeownership across the state, utilizing a variety of funding sources. In 2009, NWGF assisted 139 families into homeownership throughout Great Falls, making 121 loans which deployed \$1.2 million in secondary mortgage financing and leveraged \$15 million in first mortgage loans. Three hundred and thirty one participants graduated from homebuyer education, 57 families enrolled in the IDA program (29 purchased homes), 139 customers received foreclosure prevention services, with 19 foreclosures prevented (most foreclosure customers continue to receive services) and 623 volunteers contributed 7960 hours of volunteer work in 2009.

NWGF, a 501(c)(3) nonprofit organization, works in low-to-moderate income and blighted areas targeted by NWGF and the City of Great Falls for revitalization. NWGF also provides homebuyer assistance programs city-and-statewide. During its 30-year history, NWGF has accomplished the following in Great Falls:

- Over 1,500 families have become homeowners with NWGF help
- More than 4,500 participants have graduated from homebuyer education
- NWGF has been involved in 12% of Multiple Listing Service real estate sales in Great Falls
- Neighborhood revitalization in 6 Great Falls neighborhoods
- Over 226 new homes have been built by NWGF
- Over 411 dilapidated structures have been removed or repaired
- Hundreds of homeowners helped with home repair
- 1 new home built with Montana Conservation Corps
- 25 NWGF High School Houses built by students
- Over \$135 million in public and private investment in NWGF target neighborhoods
- Over \$60 million in Montana Board of Housing loans
- \$36 million in Lender Pool loans
- \$10 million in Rural Development low interest loans

- Helped 255 families avoid foreclosure through counseling, lender negotiations and loans
- 26 years of MApril neighborhood cleanup projects
- 25 years of educating residents on code enforcement
- Incorporation of new Montana Home Ownership 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 150,000 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

NWGF has been working on revitalizing the lowest income and most blighted neighborhoods in Great Falls for the past 30 years. Approximately 10 – 15 lower income homeowners each year are assisted with loans and advice on home repairs. Additionally, NWGF purchases three to five major problem properties for rehabilitation and resale to families below 80% of Cascade County median income. NWGF is involved in the construction of approximately 10 to 12 new homes per year, as funds permit. NWGF works on attacking blight and deterioration in neighborhoods by removing dilapidated structures, organizing neighborhood cleanups and targeting properties for code enforcement. Their various programs, funded by several sources, include:

- Payback capital projects and revolving loan funds
- Infill housing—a program to alleviate neighborhood vacant lot problems
- Mutual Self-help Housing where families built their own homes with NWGF supervision
- Construction of new homes affordable to families at less than 80% AMI
- Construction of new homes using high school and college of technology student labor
- 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

NeighborWorks Great Falls focuses its energy on innovative programs that draw on basic principals to help people help themselves. The mission of the agency is to rebuild historic neighborhoods by providing homeownership opportunities for lower-income families.

The City of Great Falls annually grants NWGF funding from CDBG and HOME funds. CDBG and HOME funds are used for construction of new homes and renovation of restored homes in targeted neighborhoods. HOME funds are also used to provide down payment assistance for purchase of homes anywhere in the city. The target neighborhoods of NWGF include census tracts 3, 4, 5, 6, 7, 8, 16, and 22 (block 2). Between 2005 and 2009, homes were constructed and renovations took place in tracts 5, 7, 16, and 22 (block 2).

NeighborWorks, Great Falls, outreach to minority populations included contracting with War Shield Development for barriers to Indian homeownership study, advertising in Native Montana, financial support of and booths at Round Dances, Native-taught financial fitness courses and naming the chief of staff of the Little Shell Band of Chippewa-Cree to the Board of Directors.

In fiscal year 2009, 40% of NWGF participants were below 50% Area Median Income (AMI); 32% were between 50% and 80% AMI; 11% were between 80% and 100% AMI and 16% were above 100% AMI.

**Rental Market and Affordability**

According to the 2000 Census there are 23,785 occupied housing units of which 8,751 are specified renter occupied. The 2006-2008 American Community Survey 3- year estimates 25,708 total housing units with 24,015 occupied, and 8,016 are rental units. Since the 2000 census we see an increase in occupied housing but a decrease of over 700 rental units. Below is the 2000 Census data for gross rent and the three year estimates for 2006-2008.

<u>Rent</u>	<u>Gross Rent</u>			
	<u>Number*</u>	<u>Percent*</u>	<u>Number**</u>	<u>Percent**</u>
Less than \$200	1,048	12	644	8
\$200 to \$299	1,070	12.2	526	6.6
\$300 to \$499	3,927	44.9	2,352	29.3
\$500 to \$749	1,798	20.5	2,994	37.4
\$750 to \$999	347	4	757	9.4
\$1,000 to \$1,499	109	1.2	437	5.5
\$1,500 or more	108	1.2	306	3.8
No cash rent	344	3.9	311	

Source: \*2000 Census and \*\* Selected Housing Characteristics 2006-2008, 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.
2. Outreach through education and networking continued to be the principal method of furthering fair housing. Activities undertaken during 2005 – 2010: (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 2218 individuals through workshops at numerous agencies to include workshops sponsored by the City
  - \* provide a monthly fair housing presentation to first time homebuyers and the Great Falls Association of Realtors
  - \* participated in summer orientation event at MSU-Great Falls College of Technology and distributed fair housing information

- \* participated in community-wide workshops co-sponsored by the City, NeighborWorks, 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
  - \* coordinated the annual Great Falls Housing Task Force booth at the Great Falls Home Show, where 16,000 individuals attend this three day show; staff from 15 organizations presented information and handouts as well as networked with the public
  - \* held 29 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
    - \* writing a fair housing column for the Housing Authority's newsletter about issues of concern to the public housing community.
  4. From 2005 through 2009 the City Fair Housing Specialist responded to 4507 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 February 2009 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 2009 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 \$1.06 from 2005.
  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 (to 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)**
6. Lack of communications and education between organization that provide housing and agencies seeking housing for their cliental: safe housing for young parents, housing for veterans, foreclosure prevention, accessible housing. **(Restricts housing choices or availability of housing choices)**

Strategies and Measurements

**Impediment 1 (Public Sector)**

HUD fair market rents are not competitive with local market rents (to 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 December 2010 January 2011 HUD consultation.

**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 Fair Housing Specialist will market the availability of education and outreach pertaining to the rights of all protected classes. 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. 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 2010.

### **Impediment 3 (Private Sector)**

Landlords, property managers, tenants, future tenants and support agencies lack knowledge on Federal Fair Hosing 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 provide a list of organizations contacted, number of individuals trained, copies of educational material to the housing task force on a quarterly basis starting April 2010.

### **Impediment 4 (Private Sector)**

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)**

#### **Strategy**

Great Falls Planning / 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 Cities Fair Housing Specialist. Outreach and education will be provided by building officials to act in a proactive manner. The Fair Housing Specialist will also contact Opportunities, Inc. and the Great Falls Housing Authority for statistics on Housing Quality Standards (HQS) failures.

#### **Measurement**

Number of razing permits and permits for repairs based upon complaints received. Number of passed and failed HQS inspections.

### **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.

**Impediment 6 (Private Sector)**

Lack of communications and education between organization that provide housing and agencies seeking housing for their cliental: safe housing for young parents, housing for veterans, foreclosure prevention, accessible housing. **(Restricts housing choices or availability of housing choices)**

**Strategy**

Seek an agency or organization willing to coordinated and maintain a web site for organizations and housing providers to list available housing for the specific needs of individuals listed in this impediment or any special needs housing situation.

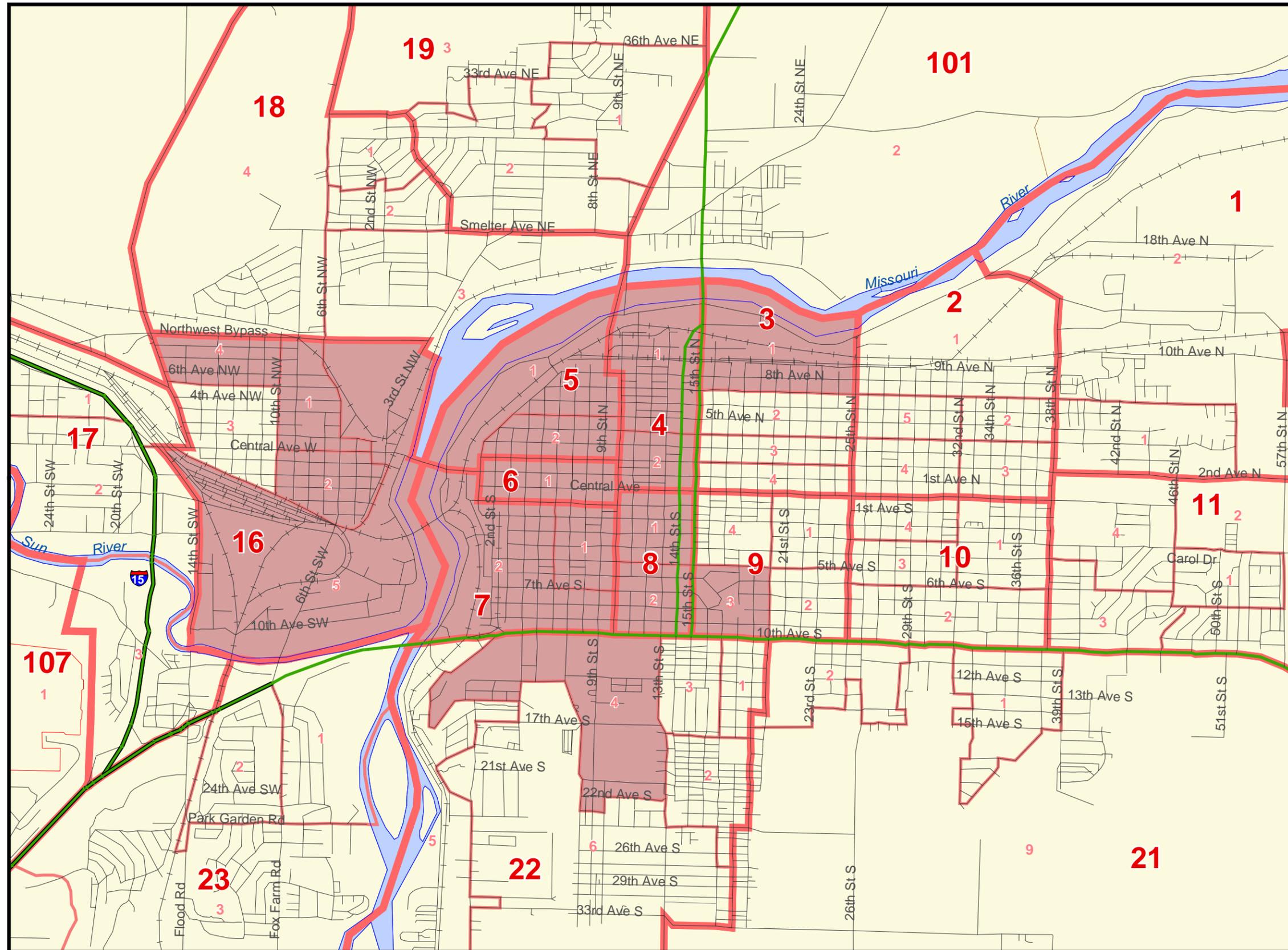
**Measurement**

Successful sponsorship and utilization of coordinator and web page.

**APPENDIX A:**

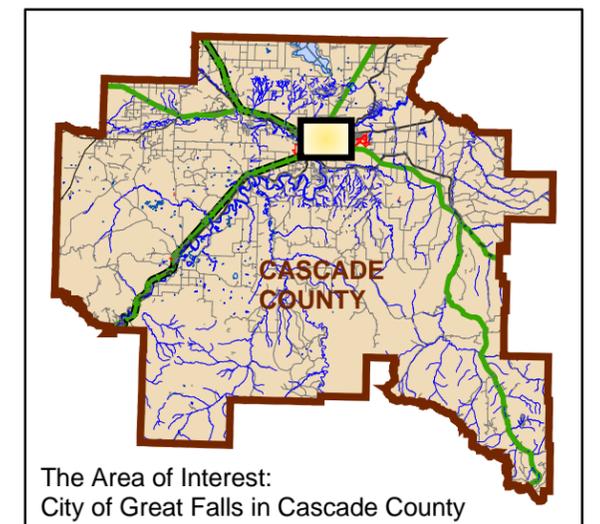
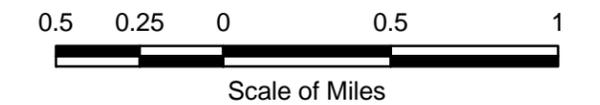
**HUD Low to Moderate Income Areas and Census  
Tract Map, City of Great Falls**

# H.U.D. Low to Moderate Income Areas, City of Great Falls, Cascade County, Montana



## Percent Low to Moderate Income by Census Block Group

- Block Group with Less than 51% Low to Moderate Income
- Block Group with 51% or More Low to Moderate Income
- Block Group Number
- Census Tract Boundary
- Census Tract Number
- Water
- Interstate Highway
- Primary Highway
- Local road or street
- Railroad
- Airport



**APPENDIX B:**

**Great Falls Housing Survey Form  
August 2009 – November 2009**

## Great Falls Housing Survey Results August – November 2009

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

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

Mean:		1.8
Standard Deviation:		0.9
Responses	Count	Percent
Better	35	50.7%
Worse	14	20.3%
No Change	20	29.0%

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

Mean:		1.9
Standard Deviation:		0.4
Responses	Count	Percent
Yes	10	14.1%
No	61	85.9%

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

Mean:		1.7
Standard Deviation:		0.5
Responses	Count	Percent
Yes	22	31.0%
No	49	69.0%

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	6	46.2%
Religion	0	0.0%
Marital Status	6	46.2%
Age	6	46.2%
Color	1	7.7%
National Origin	0	0.0%
Disability	6	46.2%
Familial Status	7	53.8%
Creed (Belief)	0	0.0%
Sex	1	7.7%

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	11	50.0%
Religion	0	0.0%
Marital Status	6	27.3%
Age	9	40.9%
Color	2	9.1%
National Origin	1	4.5%
Disability	8	36.4%
Familial Status	10	45.5%
Creed (Belief)	0	0.0%
Sex	1	4.5%

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.	13	48.1%
Housing provider falsely stated there was no housing available.	8	29.6%
Observed discriminatory advertising.	2	7.4%
Sellers/buyers/renters treated differently in terms or conditions of sale or rental of property.	12	44.4%
Home mortgage denied because of discrimination.	1	3.7%
Realty agents/brokers/lenders steer individuals to specific neighborhoods.	11	40.7%
Housing provider refused to make reasonable accommodations for disabled tenant.	8	29.6%
Specify other negative experiences. (Please specify and attache your comments)	3	11.1%

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

Mean:		1.9
Standard Deviation:		0.3
Responses	Count	Percent
Yes	5	7.2%
No	64	92.8%

Q8. If yes, please list:

Need more wheelchair accessible homes and apartments. Also the rent has gone up but not peoples paychecks.

No place in the city limits anymore to enable people to own their own lot to get out from under poorly miss managed trailer courts in town

Almost universally, rental property is not adiquitely maintained so that safety is questionable and general rental and neighborhood environments deteriorate over time. People have been denied housing because of guide dogs or general service dogs.

I can't truly say I know first hand, but I have heard many stories and it shocks me.

One of our local appraisers deducted \$9000 from a house in an area he did not like, although the buyers had lived in the house for 11 years and did like the area.

Licensed Realtor Landlord stating they would let someone out of a lease only if they would purchase a home with the Realtor Landlord as their representative.

Q9. What agency would you report housing discrimination to?:

Responses	Count	Percent
Montana Human Rights Bureau	12	17.6%
City of Great Falls Fair Housing Specialist	40	58.8%
Department of Housing and Urban Development Fair Housing and Equal Opportunity	26	38.2%
Montana Fair Housing	23	33.8%
Cascade County Law Clinic	1	1.5%
Montana Legal Services	6	8.8%
Other	0	0.0%

Q10. What actions should be undertaken in Great Falls to address discrimination in housing?

Let HUD know

Build more affordable wheelchair accessible homes and apts to rent. And put a cap on raising rents. Because peoples paychecks do not go up like the rent does.

unknown

Stop trying to turn our town into the haves and have nots.

Renters should be given a paper when they rent explaining what is discrimination and what their rights are. By the same token, landlords could be protected by this also. This should be made available to all renters, not just big enterprises.

There are good efforts to educate us "newcomers" as to landlord/tenant laws and regulations. Racial discrimination is still alive and well in Montana, but I hope it's getting better. I'm bothered that people with limited finances have so few options for nice, clean housing.

UNDER COVER INVESTIGATION OF THE OFFENDER SHOULD BE UNDER TAKEN.

Closer Monitoring of equal treatment amongst tenants and applicants at Buchanan Enterprises

Education for all involved. I Strict and continuous nforcement of fair housing requirements. Continuous inspection of fair housing compliance and of property maintenance.

They need to treat people the same whether they are rich or poor. They put poor people in a bad part of the neighborhood and if you have enough money you get to go the nicer neighborhoods.

Criminal action against the offender. Training and education for realtors, brokers, landlords...

continue with education

If I know I should report it to a Fair Housing Specialist.

Address the issue asap

I am not to sure what actions to take. I feel bad for the landlords because they probably feel obligated to rent to someone just to protect themselves from a lawsuit. At the same time the people I know are very good people but have been discriminated against, just because the landlord had a bad experience with a different renter.

Laws should be changed to address discrimination against disabilities and minorities.

N/A

more education to the public in general

education which is what is being done.

there is none to my knowledge

It shouldn't even be an issue.

Some discrimination takes place by pricing.

I believe our community has improved in this area with the Fair Housing Specialist, Neighbor Works and the real estate related professionals. The real barrier seems to be that tenants by law have to be made aware of lead based paint. I'm not sure the tenants are aware of their rights/responsibilities in regard to fair housing. Economic barriers continue to be a struggle in Cascade County. On a separate issue, is there a minimum standard for what a landlord is allowed to rent? A significant area of difficulty is the unlicensed landlord and the sellers out there who are uneducated as to what constitutes a fair housing violation.

Q11. Who should be responsible for taking actions as identified in question 8?

Its everybody's problem

unknown

The city should make available zoning to allow persons owning mobil homes in good repair to own lots.

Because renters are so unaware what can/should be done that someone needs to be their advocate. Landlords should have to

present all options in writing to the renter of what can happen. If in writing, both the renter and the landlord are aware of what can happen--makes them both accountable.

All of us.

Montana Fair Housing

I do not know

City of Great Falls. Rental ordinances need development and/or enforcement. General condition of rental property in Great Falls is very sub-standard and little attention seems devoted to this situation. The resulting degradation effects the entire community.

H.U.D Great Falls Housing

landlords themselves

The only way I can see anything being improved is through the "People's Voices". A nice happy medium would be for landlords and tenants to be able to sit down and try to get a good idea on both sides of it all.

Don't know.

montana fair housing

dept of housing and urban development fair housing and equal opportunity

The city housing department

The person who was violated and the observer in cooperation.

Anyone who is aware

Q12. Income levels of minority and female headed households.

Mean:			2.8
Standard Deviation:			1.1
Responses	Count	Percent	
Not a barrier	10	15.2%	
A minor barrier	14	21.2%	
A moderate barrier	19	28.8%	
A serious barrier	23	34.8%	

Q13. Concentration of minority households in certain neighborhoods.

Mean:			2.5
Standard Deviation:			1.2
Responses	Count	Percent	
Not a barrier	18	28.6%	
A minor barrier	15	23.8%	
A moderate barrier	13	20.6%	
A serious barrier	17	27.0%	

Q14. Lack of adequate zoning for manufactured homes.

Mean:			2.5
Standard Deviation:			1.2
Responses	Count	Percent	
Not a barrier	20	31.7%	
A minor barrier	10	15.9%	
A moderate barrier	16	25.4%	
A serious barrier	17	27.0%	

Q15. Lack of local organization devoted to fair housing investigation and testing.

Mean:	2.1	
Standard Deviation:	1.1	
Responses	Count	Percent
Not a barrier	23	39.0%
A minor barrier	17	28.8%
A moderate barrier	8	13.6%
A serious barrier	11	18.6%

Q16. Residents are not familiar with their fair housing rights.

Mean:	2.7	
Standard Deviation:	1.2	
Responses	Count	Percent
Not a barrier	15	22.7%
A minor barrier	12	18.2%
A moderate barrier	17	25.8%
A serious barrier	22	33.3%

Q17. Landlords, property managers are not familiar with fair housing rights.

Mean:	2.5	
Standard Deviation:	1.1	
Responses	Count	Percent
Not a barrier	17	25.4%
A minor barrier	16	23.9%
A moderate barrier	20	29.9%
A serious barrier	14	20.9%

Q18. Lack of knowledge among Realtors regarding fair housing.

Mean:	1.9	
Standard Deviation:	0.9	
Responses	Count	Percent
Not a barrier	26	40.0%
A minor barrier	24	36.9%
A moderate barrier	10	15.4%
A serious barrier	5	7.7%

Q19. Lack of knowledge among bankers/lenders regarding fair housing.

Mean:	1.8	
Standard Deviation:	0.9	
Responses	Count	Percent
Not a barrier	30	47.6%
A minor barrier	18	28.6%
A moderate barrier	12	19.0%
A serious barrier	3	4.8%

Q20. Lack of knowledge among insurance industry representatives regarding fair housing.

Mean:	1.9	
Standard Deviation:	1.0	
Responses	Count	Percent
Not a barrier	27	42.9%
A minor barrier	21	33.3%
A moderate barrier	10	15.9%
A serious barrier	5	7.9%

Q21. Lack of mobile home courts that allow mobile homes over five years old.

Mean:	2.7	
Standard Deviation:	1.1	
Responses	Count	Percent
Not a barrier	11	18.6%
A minor barrier	11	18.6%
A moderate barrier	21	35.6%
A serious barrier	16	27.1%

Q22. There is no centralized listing of rental property.

Mean:	2.8	
Standard Deviation:	1.1	
Responses	Count	Percent
Not a barrier	11	17.7%
A minor barrier	11	17.7%
A moderate barrier	18	29.0%
A serious barrier	22	35.5%

Q23. Quality of rental properties and housing stock is substandard.

Mean:	2.9	
Standard Deviation:	1.1	
Responses	Count	Percent
Not a barrier	9	13.8%
A minor barrier	15	23.1%
A moderate barrier	15	23.1%
A serious barrier	26	40.0%

Q24. Other barriers (please list and rate as above)

Mean:	2.7	
Standard Deviation:	1.3	
Responses	Count	Percent
Not a barrier	2	20.0%
A minor barrier	3	30.0%
A moderate barrier	1	10.0%
A serious barrier	4	40.0%

Q25. Other Barriers

Barriers of Landlords: Having an employee of DPHHS sitting down with a tenant talking to a landlord asking to please rent to someone who they know has had problems but does not disclose fully. They tell you this is how they are going to pay and they will be good tenants. I would like to be contacted about this because I think it is wrong and the employee knows it is wrong and admitted it later. How many landlords have gotten taken by believing a "supposedly" good source and is this what our system does to "help" a problem situation?

Being charged more for rent than other tenants for a same square footage unit because you moved in last and all other units are paying the same. There are years separating their move in dates. Is this fair? I mean there is literally no major difference between these apartments.

I want to own my own lot for my well maintained mobile home and there is no where I can do that. I feel trapped around renters and low life and there is nothing I can do about it.

It's hard to find rentals that will allow pets and children. Also their is limited choices for those with physical disabilities. It would be nice if all homes built from now on were "visitable".

Absent or over-burdened landlords don't maintain their property or know what's going on there. (slumlords)

Painting all tenants with the same brush. One bad apple spoils the barrel

Expense of physically acceptable rental property as opposed to virtual slum housing. Rental standards really need improvement city wide and continuous inspection to be sure standards are upheld. Rental costs need to be reasonable according to size specifications and not inflated according to location, property condition or attempts to exclude tenants.

i am having a hard time finding room mates and places to live that are affordable for me as a college student and a place that allows pets

I have found it is almost impossible to find housing or be approved of housing after having negative credit issues or filing bankruptcy. People with financial difficulties have just as much need as the next person for a roof over their heads and the heads of their children!

Housing is hard to find especially in a price range affordable to low to middle income with need of more than two bedrooms. Just lack of rentals!

Archetctural barriers

Since NHS has began building in what was earlier known as undesirable areas, in my opinion there really are no areas in which I would hesitate to live and, therefore, sell.

**APPENDIX C:**

**Great Falls Subsidized Housing Statistics as of January 14, 2010**

**Appendix C:** Subsidized Housing statistics as of January 14, 2010. The survey includes public 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. Accessibility was 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. Only units that are subsidized (under contract) are counted.

**Subsidized Housing Statistics as of January 14, 2010**

<u>Name</u>	<u>#Units (Occupied)</u>	<u>Occupancy Rate</u>	<u>Accessible Units / #filled by Mobility Impaired</u>		
Autumn Run**	120 (115)	96%	52	/	2
Sandstone**	48 (41)	85%	16	/	2
Townsite Apts.**	20 (18)	90%	10	/	0
Holland Court **	16 (16)	100%	8	/	3
Yeoman	30 (28)	93%	2	/	2
Russell	20 (0) 20 in rehab	0%	0	/	0
Sunrise	50 (49)	98%	3	/	3
Austin Hall	34 (33)	97%	5	/	5 *5
Area 22 (GFPHA)	200 (186)	93%	14	/	13 *14
Area 25 (GFPHA)	156 (148)	95%	0	/	0
Vista Villa	96 (92)	96%	0	/	0
Grandview	96 (89)	93%	0	/	0
Elmore Roberts	60 (57)	95%	3	/	2 *1
Park Manor	103 (96)	93%	0	/	0
Aspen Village	60 (60)	100%	8	/	2 *1
Elmwood	18 (18)	100%	2	/	1
Parkview	83 (83)	100%	0	/	0
Southwinds	23 (22)	96%	23	/	23 *23
Portage	47(44)	94%	47	/	8 *47
Meadow Lark	17 (17)	100%	17	/	17 *17
Eagles Manor	66(44)	67%	66	/	18
Broadview Manor	20(20)	100%	1	/	1
Centennial Village	48(44)	92%	0	/	0
Holiday West	12(12)	100%	0	/	0
Rainbow House	40(37)	93%	0	/	0
Sunshine Village	72(71)	99%	7	/	7 *7
Franklin School Apt.	38(28) 10 in rehab	100%	6	/	0
<b>TOTALS:</b>	<b>1551(1456) (30 in rehab)</b>	<b>94%</b>	<b>290</b>		<b>109 *115</b>

\*Denotes units with roll in showers. (Note: Rehab units were subtracted from totals to use only livable units in calculations.)

\*\*Affordable housing (Restricted rents for income eligible individuals; Section 8 Housing Choice vouchers are allowed.

**Section Eight Housing Choice Vouchers:** 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.*	465	465	100%
Great Falls Housing authority	220	194	88%
<hr/>			
TOTALS:	685	659	96%

\*The State suspended 50 vouchers in September 2009.

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

<u>#Units (Occupied)</u>	<u>Occupancy Rate</u>
146(146)	100%

