



**City Commission Meeting Agenda
2 Park Drive South, Great Falls, MT
Commission Chambers, Civic Center
June 21, 2022
7:00 PM
REVISED**

The agenda packet material is available on the City's website: <https://greatfallsmt.net/meetings>. The Public may view and listen to the meeting on government access channel City-190, cable channel 190; or online at <https://greatfallsmt.net/livestream>.

Public participation is welcome in the following ways:

- Attend in person.
- Provide public comments in writing by 12:00 PM the day of the meeting: Mail to City Clerk, PO Box 5021, Great Falls, MT 59403, or via email to: commission@greatfallsmt.net. Include the agenda item or agenda item number in the subject line, and include the name of the commenter and either an address or whether the commenter is a city resident. Written communication received by that time will be shared with the City Commission and appropriate City staff for consideration during the agenda item and before final vote on the matter; and, will be so noted in the official record of the meeting.

CALL TO ORDER

PLEDGE OF ALLEGIANCE

ROLL CALL / STAFF INTRODUCTIONS

AGENDA APPROVAL

CONFLICT DISCLOSURE / EX PARTE COMMUNICATIONS

LOCAL CRIME/CRIMINAL JUSTICE SYSTEM UPDATES

1. Update from Cascade County Sheriff's Office - Sheriff Jesse Slaughter.

PETITIONS AND COMMUNICATIONS

2. Miscellaneous reports and announcements.

(Public comment on any matter that is not on the agenda of the meeting and that is within the jurisdiction of the City Commission. Please keep your remarks to a maximum of 3 minutes. When at the podium, state your name and either your address or whether you are a city resident for the record.)

NEIGHBORHOOD COUNCILS

3. Miscellaneous reports and announcements from Neighborhood Councils.

BOARDS AND COMMISSIONS

4. Miscellaneous reports and announcements from Boards and Commissions.

CITY MANAGER

5. Miscellaneous reports and announcements from City Manager.

CONSENT AGENDA

The Consent Agenda is made up of routine day-to-day items that require Commission action. Items may be pulled from the Consent Agenda for separate discussion/vote by any Commissioner.

- [6.](#) Minutes, June 7, 2022, City Commission Meeting.
- [7.](#) Total Expenditures of \$2,748,254 for the period of May 17, 2022 through June 8, 2022, to include claims over \$25,000, in the amount of \$1,587,021.
- [8.](#) Contracts List.
- [9.](#) Grants List.
- [10.](#) Accept the low bid from Ergon Asphalt & Emulsions, Inc., of Butte and authorize the purchase of Liquid Asphalt CRS-2P in the amount of \$899 per ton, for a total of \$224,750 for Fiscal Year 2022/23.
- [11.](#) Accept the low bid from Thatcher Company of Montana, Inc. and authorize the purchase of liquid chlorine in the amount of \$2,178 per ton, up to the maximum amount of 80 tons, for a total of \$174,240, for Fiscal Year 2022/23.
- [12.](#) Accept the low bid from Thatcher Company of Montana, Inc. and authorize the purchase of liquid aluminum sulfate in the amount of \$595.72 per ton, up to the maximum amount of 800 dry tons for a total of \$476,576, for Fiscal Year 2022/23.
- [13.](#) Set the public hearing on the 2021/2022 Tourism Business Improvement District Budget Amendment for July 5, 2022.
- [14.](#) ~~Set a public hearing on the First United Methodist Church "Emergency Shelter" Conditional Use Permit located at 610, 618 & 622 2nd Ave N for July 18, 2022.~~

Action: Approve Consent Agenda as presented or remove items for separate discussion and/or vote by any Commission member.

PUBLIC HEARINGS

OLD BUSINESS

- [15.](#) CDBG & HOME Grant Annual Action Plan and Amended Consolidated Plan. *Action: Set or not set a public hearing for July 5, 2022. (Presented by Craig Raymond)*

NEW BUSINESS

- [16.](#) Professional Services Agreement with Sanderson Stewart for Civil Engineering Consulting Services. *Action: Ratify/not ratify the Agreement. (Presented by Craig Raymond)*
- [17.](#) Software House International (SHI) Incorporated Customer Resale MSA for Sophos network security services. *Action: Approve or not approve SHI's Customer Resale MSA for Sophos MTR network threat monitoring services and allocate or not allocate American Rescue Plan Act (ARPA) funds in the amount of \$140,269.60 as payment for those services. (Presented by Tom Hazen)*

ORDINANCES / RESOLUTIONS

CITY COMMISSION

18. Miscellaneous reports and announcements from the City Commission.

19. Commission Initiatives.

ADJOURNMENT

(Please exit the chambers as quickly as possible. Chamber doors will be closed 5 minutes after adjournment of the meeting.)

Assistive listening devices are available for the hard of hearing, please arrive a few minutes early for set up, or contact the City Clerk's Office in advance at 455-8451. Wi-Fi is available during the meetings for viewing of the online meeting documents.

Commission meetings are televised on cable channel 190 and streamed live at <https://greatfallsmt.net>. City Commission meetings are re-aired on cable channel 190 the following Wednesday morning at 10 am, and the following Tuesday evening at 7 pm.

JOURNAL OF COMMISSION PROCEEDINGS
June 7, 2022

Regular City Commission Meeting

Mayor Kelly presiding

CALL TO ORDER: 7:00 PM

Commission Chambers Room 206

PLEDGE OF ALLEGIANCE

ROLL CALL/STAFF INTRODUCTIONS: City Commission members present: Bob Kelly, Eric Hinebauch, Joe McKenney, Rick Tryon and Susan Wolff. Also present were City Manager Greg Doyon; Grant Administrator Tom Hazen; Public Works Director Paul Skubinna; Planning and Community Development Director Craig Raymond; Finance Director Melissa Kinzler; Park and Recreation Director Steve Herrig; City Attorney Jeff Hindoien and Deputy City Attorney David Dennis; Police Chief Jeff Newton; and, City Clerk Lisa Kunz.

AGENDA APPROVAL: There were no proposed changes to the agenda by the City Manager or City Commission. The agenda was approved as presented.

CONFLICT DISCLOSURE/EX PARTE COMMUNICATIONS: None.

PROCLAMATIONS: NeighborWorks Week [June 4-11, 2022], Homeownership Month [June 2022], and the 32nd Annual Lewis and Clark Festival [June 17-19, 2022].

MILITARY UPDATES

1. MISCELLANEOUS REPORTS AND ANNOUNCEMENTS FROM THE MONTANA AIR NATIONAL GUARD (MANG).

Lt. Col. Benjamin Royer, Vice-Wing Commander of the 120th Airlift Wing, provided the following updates:

- Aviation and Maintenance personnel were recently deployed. He expressed appreciation to the community and the employers of guardsmen for supporting them and their families.
- Ninety-five members recently completed training for wildland incidents and can now augment state and federal firefighting efforts.
- A major accident response exercise was recently completed in conjunction with the 341st missile wing and several civic and community members.
- A Military Open House is scheduled for July 23-24, 2022. Entry is free and open to the public. The headline act is the USAF Thunderbirds. For additional information about all of the events, traffic flow or parking, contact the Public Affairs Office or visit greatfallsairshow.com.

PETITIONS AND COMMUNICATIONS

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2. Based on recent emails, Mayor Kelly reminded folks that the Planning Advisory Board/Zoning Commission would first consider the First United Methodist Church's (FUMC) application for a Conditional Use Permit (CUP) at a public hearing on June 14, 2022 at 3:00 pm. in the Commission Chambers. That hearing is where their voices can be heard for or against it. The recommendation of the Planning Advisory Board/Zoning Commission will come before the Commission for consideration at a public hearing on July 19, 2022.

Cheryl Scheer, City resident, commented that allowing a campground in a City parking lot will set a very dangerous precedent, and she believes crime will escalate. She concluded that there is nothing compassionate about enabling people.

Josh Butterfly, City resident, commented that on May 10, 2021 he reported being under attack at the State Capitol by transgender lobbyists in regards to taking the Native platform back to address a Census fraud issue. He alleged the reservations were robbed of \$80 million dollars this Census cycle and, thereby, robbing Great Falls of funds that could have been used for the homeless problem.

Daniel Hartzell, City resident, discussed his personal court matters.

Anna Kelly, 415 Central Avenue, read a prepared statement pertaining to Facebook comments in response to the City's recent press release announcing a lawsuit against the FUMC. She urged the Commission to reconsider the City's actions against the church and to prioritize directing funds, particularly from the Covid relief programs, to services for the unhoused community inclusive of mental health and addiction services and an emergency shelter.

Karl Spitzmacher, 100 Central Avenue, commented that the homeless problem might end up in federal court.

Judith Mortensen, City resident, commented that the American society in general has not addressed the issue of drug addiction and mental illness that has put so many people on the street. The biggest problem is not only that these people are without housing, but are also without the ability to take care of themselves, which she believes is the duty of society in general and particularly governmental agencies. She suggested looking into the answers that Providence, Rhode Island has initiated in their treatment of trespassing, vagrancy and associated problems. She referred to an Arizona law that said it was illegal to house people in tents when it is 102 degrees, and she opined it is probably illegal to house people in tents when it is 40 degrees below zero. She urged community members to come together to see if there is a possibility of solving a problem rather than trying to enhance it.

Rev. Stephen Underwood, Pastor, Central Christian Church, read a prepared statement to address the City's declared course of action regarding the encampment of unhoused persons on the property of the FUMC. He alleged the City lied and has enabled lies about the unhoused and those who have been working to help them. He concluded that the City and its government must decide whether it prefers the comfort of a few over justice and the public good.

Barbara Friend, City resident, commented that she and her family moved to Great Falls three years ago by choice, and may choose to leave Great Falls. She had her young daughter at the

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podium with her and noted that she is standing with the most vulnerable of our community right here. She commented that there has been a decline in Great Falls. She can no longer walk downtown with her kids and feel safe. She has witnessed vagrants assaulting service workers cleaning up the parks, and human and dog excrement on the sidewalk that never is cleaned up. Because of an assault incident that occurred at the FUMC, a meeting that she regularly attended there had to be moved to another location. She urged the City to make good decisions so people feel safe in their community.

Arvid Johnson, City resident, commented that years ago he was afraid for his wife's safety when she attended meetings at FUMC. He patronized Perkins Restaurant last evening and saw the vagrants and homeless people across the street. He suggested the church was enabling these folks not to be responsible for themselves. There is help in this community for people with mental health and addiction issues. Folks in that situation need to make a decision to do what they need to do to get out of it. The FUMC is a big building. He suggested the pastor allow the homeless inside the church. People have to be responsible. He is intending to be responsible in his community and be active in this matter. He does not want his community turning into Los Angeles, San Francisco, Seattle or Portland.

Kenton Miller, City resident, commented that he takes his kids to interact with the homeless at the FUMC. The homeless people are somebody's kids, siblings, or parents. They want to be treated with respect. The situation at the FUMC is not ideal; it is a work in progress. He understands everyone's frustration with the way it is. He would like to work with the City to come up with a plan that will work for the homeless.

Kevin Westie, City resident, commented that his recommendation is to send the homeless encampment to the outskirts of town.

Written comments were received from **Marilyn Christman, Carol Robinson, Karen Czech,** and **Steve Durkin**, City residents, expressing opposition to the First United Methodist Church Homeless Encampment and application for a Conditional Use Permit (CUP).

NEIGHBORHOOD COUNCILS**3. MISCELLANEOUS REPORTS AND ANNOUNCEMENTS.**

None.

BOARDS AND COMMISSIONS**4. REAPPOINTMENT TO THE POLICE COMMISSION.**

Commissioner Tryon moved, seconded by Commissioner Wolff, that the City Commission reappoint Tim Shanks to the Police Commission for a three-year term through June 30, 2023.

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

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Mayor Kelly commented that Mr. Shanks was appointed to the Police Commission on July 1, 2019 to fill a three-year term and is eligible for a second term.

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

Motion carried 5-0.

5. APPOINTMENT TO THE MANSFIELD CENTER FOR THE PERFORMING ARTS ADVISORY BOARD.

Mayor Kelly reported that in January 2021, board member Kyler Baker resigned. The City began advertising on the website. Carl Donovan submitted an application on March 28, 2022. He previously served on the Board from January 2013, through December 2018. He is eligible to serve again as there has been several years between terms.

Commissioner Wolff moved, seconded by Commissioner Tryon, that the City Commission appoint Carl Donovan for the remainder of a three-year term through December 31, 2024.

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

Hearing none, Mayor Kelly called for the vote.

Motion carried 5-0.

6. MISCELLANEOUS REPORTS AND ANNOUNCEMENTS.

None.

CITY MANAGER

7. MISCELLANEOUS REPORTS AND ANNOUNCEMENTS.

City Manager Greg Doyon updated the Commission on the following:

- Effective June 10 the State of Montana adopted the 2021 Building Codes. By statute, the City has 90 days to adopt those same codes.
- The Water Plant is fully staffed for the first time in several years.
- Public Works Director Paul Skubinna provided his notice of resignation effective July 8, 2022.
- Great Falls Fire Rescue and City Engineering met with an architect and mechanical engineer to develop a scope of work for potential bidding costs for the Tier 1 ARPA projects.
- Great Falls Fire Rescue conducted 16 EMS patient transports in May, the highest volume to date.
- June 3-5, 2022, Great Falls Fire Rescue facilitated the first City, County, State and Federal Rural Municipal Fire Academy at the City's Training Center.

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- First United Methodist Church has filed an application for a Conditional Use Permit (CUP) to operate an emergency shelter on its property. He will no longer be giving the Commission updates on the First United Methodist Church homeless encampment as this matter is now pending litigation.
- Budget review is well underway. Unfortunately, the City is seeing the impact of not taking the inflationary factor for the last couple of years. He will not only be requesting to use fund balance, but to use some Cares and ARPA money to support some of the operational needs of the City.
- He and Deputy City Manager Chuck Anderson attended the Great Open Spaces City Management Association (GOSCMA) professional development training in South Dakota May 24-27, 2022. Topics of discussion included: housing, utilizing TIF funds as a development tool to facilitate a large-scale housing project, recruitment and retention, as well as working in difficult environments.

CONSENT AGENDA.

8. Minutes, May 17, 2022, City Commission Meeting.
9. Total Expenditures of \$4,257,642 for the period of May 1, 2022 through May 25, 2022, to include claims over \$25,000, in the amount of \$3,572,181.
10. Contracts List.
11. Approve the cancellation of Outstanding and Unpaid Payroll Checks over a year old for a total amount of \$515.23.
12. Approve the purchase and installation of Sports Court Game Tiles for Lions Park Tennis Court from Sports Court of Montana through Sourcewell, a government purchasing service cooperative, in the amount of \$55,643.20. **OF 1740.8**
13. Approve a Professional Services Agreement in the amount not to exceed \$260,586 to Morrison Maierle, for design phase services for the Wastewater Treatment Plant Westside Pump Station Improvements and Bar Screen Replacement project, and authorize the City Manager to execute the agreement documents. **OF 1633.8**
14. Set the public hearing for July 5, 2022 on Resolution 10458 for the request of a Conditional Use Permit for a “Two-Family Residence” land use upon the property addressed as 3125 8th Avenue North.

Commissioner Wolff moved, seconded by Commissioner Tryon, that the City Commission approve the Consent Agenda as presented or remove items for separate discussion and/or vote by any Commission member.

Mayor Kelly asked if there were any comments from the public.

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Jeni Dodd, City resident, referred to Item 14 and OCCGF 17.20.7.060 and commented that the garage space and the accessory garage that is proposed for the project is more than the allowable cumulative area for the lot size.

She continued that the applicant has used a parking lot of a City park to park his business equipment and vehicles. Several complaints were made before the City took action. She inquired why the applicant could ignore City Code, unlike everyone else.

Joe McMillan, City resident, commented that he is the owner of the property and applicant of Item 14. He has been working with Planning and Community Development staff in putting this project together. He believes he has the proper size structure for the garage on the oversized lot. He requested that the Commission set the public hearing.

There being no one further to address the Commission, Mayor Kelly asked if there was any discussion amongst the Commissioners.

Commissioner Tryon clarified that the Commission will have an opportunity to hear more details about Item 14 at the public hearing. What the Commission is voting on tonight is simply to go forward with setting the public hearing.

Mayor Kelly called for the vote.

Motion carried 5-0.

PUBLIC HEARINGS

15. RESOLUTION 10459, A RESOLUTION ANNEXING TRACT A OF CERTIFICATE OF SURVEY 2248 AND A PORTION OF DIVISION ROAD.

ORDINANCE 3243, AN ORDINANCE ASSIGNING C-2 ZONING TO TRACT A AND THE EASTERN HALF OF THE SUBJECT PORTION OF DIVISION ROAD, AND ASSIGNING R-6 ZONING TO THE WESTERN HALF OF THE SUBJECT PORTION OF DIVISION ROAD.

Mayor Kelly declared the joint public hearing open and asked for presentation of the staff report.

Planning and Community Development Director Craig Raymond reported that Ordinance 3243 came about as a result of a staff initiated annexation request. Some time ago, when the adjacent property to the east was annexed, a portion of the property was improperly left out of the annexation, and the rights-of-way of Division Road were not included in the annexation of property to the east of Division Road. The net result of these actions is that the property associated with this annexation and zoning request became a wholly surrounded unincorporated enclave. The developed use of properties to the east and west both currently receive city water and sewer service.

Mayor Kelly declared the joint public hearing open and asked for presentation of the staff report.

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Planning and Community Development Director Craig Raymond reported that Ordinance 3243 came about as a result of a staff initiated annexation request. Some time ago, when the adjacent property to the east was annexed, a portion of the property was improperly left out of the annexation, and the rights-of-way of Division Road were not included in the annexation of property to the east of Division Road. The net result of these actions is that the property associated with this annexation and zoning request became a wholly surrounded unincorporated enclave. The developed use of properties to the east and west both currently receive city water and sewer service.

Staff recommends that C-2 zoning be applied to the Montana Department of Transportation (MDT) owned property to the east of the centerline of Division Road. At this time, MDT has no immediate plans to change the current use of the property so no other special land use determinations or processes need to be considered as part of this annexation and zoning request. The property to the west of Division is already zoned R-6. That designation would be appropriate for those areas west of the centerline of Division Road.

On April 12, 2022, the Planning Advisory Board & Zoning Commission recommended that the City Commission approve the annexation and application of zoning as proposed in the agenda report.

Mayor Kelly asked if the Commission members had any questions of staff.

Commissioner Tryon inquired if this item was presented to the Neighborhood Council.

Director Raymond responded that staff sent the information to the Neighborhood Council, but he does not know if there was a formal presentation or vote taken.

Commissioner McKenney requested that C-2 zoning be explained and what would be permitted in that district.

Director Raymond responded that C-2 zoning is a general commercial zoning district – such as restaurants, retail establishments, car washes, mattress stores and banks.

Mayor Kelly asked if there were any comments from the public in favor of Resolution 10459 and Ordinance 3243.

Jim Wingerter, City resident, Great Falls District Administrator for the Department of Transportation (MDT), commented that MDT supports the requested actions.

Mayor Kelly asked if there were any comments from the public in opposition to Resolution 10459 and Ordinance 3243.

Hearing none, Mayor Kelly closed the joint public hearing and asked the will of the Commission.

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Commissioner Hinebauch moved, seconded by Commissioner Wolff, that the City Commission adopt Resolution 10459 to annex the subject property and adjoining right-of-way, as legally described in the staff report, and the accompanying Findings of Fact, subject to the Conditions of Approval being fulfilled by the applicant.

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

Hearing none, Mayor Kelly called for the vote.

Motion carried 5-0.

Commissioner Hinebauch moved, seconded by Commissioner Tryon, that the City Commission adopt Ordinance 3243 establishing C-2 zoning for Tract A of COS 2248 and the eastern thirty (30) feet of the subject portion of Division Road; and, R-6 zoning for the western thirty (30) feet of the subject portion of Division Road, subject to the accompanying Findings of Fact/Basis of Decision.

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

Mayor Kelly inquired how long this property was left out of the City's boundaries.

Director Raymond explained that it happened on two different occasions. The most recent being the property annexed to the west of Division Road for the apartment project. He noted that sometimes these details get lost in the legal descriptions. Staff will pay more attention to legal descriptions and be more careful in preparing documents.

Mayor Kelly called for the vote.

Motion carried 5-0.

OLD BUSINESS**16. WATER TREATMENT PLANT SOLIDS MITIGATION PROJECT (OF 1698.1).**

Public Works Director Paul Skubinna reported that this item is a request to consider awarding a contract to Sletten Construction for preconstruction General Contractor Construction Manager (GCCM) services in the amount of \$54,000. The project related to this contract is to install a new process segment at the Water Treatment Plant to enable the City to better manage its solids treatment residuals. Currently, these solids are being handled multiple times which is costly and inefficient. This is listed as old business because this is an ongoing project that the Commission has taken multiple actions on already. In September 2021 the Commission approved an agreement to bring an engineer on-board; in November 2021, the Commission was presented the alternative project delivery method at a work session; on January 4, 2022 the Commission adopted Resolution 10438 documenting detailed findings that this project met the statutory requirements to be eligible for GCCM.

During that January 4, 2022 Commission meeting, there was interest by the Commission in ensuring the process was open, objective, did not limit participation or competition, was fair and

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that the selection process would be well documented. Montana Code Annotated also requires the selection process to be well documented.

On March 28, 2022, a Request for Qualifications and Request for Proposals for GCCM services for this project was published. The alternative delivery methodology did not hamper participation in the process. Four quality proposals were submitted.

The review team consisted of three City staff members, a hired engineer representative, and one member of the City Commission. During late April and May the review team scored proposals and reviewed and scored a live presentation from three of the four respondents. The scoring criteria were rigorous and are detailed on page 78 of the agenda packet. The criteria included:

- History and experience with similar projects
- Financial health, resource availability and commitment
- Personnel and office locations
- Project approach mechanics including administration, value engineering, plan review, scheduling, estimating, subcontracting and change order avoidance
- Project costs for preconstruction phase services, GCCM fee and General Condition Expenses

Page 81 of the agenda packet is the start of the scoring summary sheets for written proposals and page 83 of the agenda packet is the scoring sheet for the in person presentations by respondents. Each one of these score sheets was completed by the review committee members with supporting notes for each respondent.

The competition was fierce and fair. Out of 150 total points, five points was the spread between the #1 proposal and #3 proposal, with Sletten Construction achieving the highest aggregate score of 131.8 points.

The selection process has met statutory requirements of state law and the guidelines laid down by the Commission at the January 4, 2022 meeting. Staff recommends awarding the preconstruction phase GCCM services contract to Sletten Construction Inc.

Commissioner Wolff moved, seconded by Commissioner Hinebauch, that the City Commission award a GCCM contract to Sletten Construction Company for Phase One Preconstruction Services in the amount of \$54,000 for the Water Treatment Plant Solids Mitigation Project, and approve the stated reasons documented in the Agenda Report for that contract award.

Mayor Kelly asked if there were any comments from the public. Hearing none, Mayor Kelly asked if there was any discussion amongst the Commissioners.

Commissioner Wolff commented it was her honor and a privilege to work with the City Engineering Department, AE2S and the contractors that presented with their teams. It was a very stringent and documented process.

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Commissioner McKenney referred to the Phase One Preconstruction Services Contract and read paragraph 2 - Term of Agreement. He inquired if there had to be cause for termination.

Director Skubinna responded that the language in paragraph 2 is standard, boilerplate language in all of the contracts.

City Attorney Jeff Hindoien explained that it is a standard termination for convenience clause in a professional services-type of agreement.

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

Motion carried 5-0.

NEW BUSINESS

17. **AMENDMENT TO THE 1975 AGREEMENT ESTABLISHING CITY-COUNTY HEALTH DEPARTMENT TO DESIGNATE HB 121 “GOVERNING BODY” ENTITY.**

City Attorney Jeff Hindoien reported that the Cascade County Board of Commissioners and the City Commission met in a joint meeting on July 28, 2021 to discuss the impacts of HB 121 on the long-standing governance structure of the Board of Health (BOH) and Cascade City-County Health Department (CCHD). The City of Great Falls and Cascade County entered into an *Agreement* in 1975 to “unite in the organization of a City-County Health Department [CCHD]” to be administered by a City-County Board of Health [BOH]. That BOH structure was set up under a framework passed by the Montana Legislature in the 1960s.

In 2021, however, the Legislature passed HB 121, which amended the statutory provisions regarding local boards of health to require the creation of a new entity to be known as the “governing body.” The role of the new “governing body” entity is limited to (1) directly employing the local public health officer upon the recommendation of the already existing BOH; (2) adopting public health regulations as recommended by the existing BOH, and (3) reviewing (and potentially amending or rescinding) public health declarations or orders issued under the auspices of an actual declared public health emergency. The statute, as enacted by the Legislature at the last session, was clear in terms of the governing body entity:

- For a BOH operated solely by a county, HB 121 designates the Board of County Commissioners as the “governing body” entity.
- For a BOH operated solely by a city, HB 121 designates “the elected governing body of the city” as the “governing body” entity.
- In the case of a joint city-county BOH structure, HB 121 provides that the “governing body” will be “the entity identified as the governing body as established in the bylaws, interlocal agreement, or memorandum of understanding creating a city-county local board of health.”

In the wake of the discussion of the July 28, 2021 joint meeting, the City and County exchanged proposals for the possible designation of the “governing body” entity. The County proposed that the Board of County Commissioners simply fill that role (with no representative from the City)

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and the City proposed an entity that included a member of the City Commission along with the County Commissioners.

The parties were unable to reach an agreement on the composition of a new permanent “governing body” entity based, at least in part, on the County’s position at that time that a member of the City Commission cannot legally serve as a member of the “governing body” entity. The parties subsequently agreed in early 2022 to enter into a temporary agreement to designate an interim entity to serve as the HB 121 “governing body” while the parties resolve whatever legal impediments remain to reaching an agreement for a permanent designation of a “governing body” entity. The City has also filed a lawsuit against the County in District Court seeking a declaration from the Court that neither HB 121 nor any other legal principle prohibits the Board of County Commissioners from agreeing to the inclusion of one or more members of the City Commission to serve on the “governing body” entity.

In the meantime, Commissioner McKenney has engaged in conversations with the individual members of the Board of County Commissioners regarding the possibility of simply reaching an agreement that would have representatives from both the City and the County serving on the “governing body” entity. Those conversations have been based on the practical reality that three other similar joint board of health structures around Montana (Missoula, Helena and Bozeman) have all agreed in principle to a “governing body” entity that includes representatives from both the City Commission and the County Commission.

City Attorney Hindoien concluded that the requested action is that the City Commission approve a formal amendment to the 1975 Agreement that would stand up this governing body entity as required by the new legislation, and then make a request of the Cascade County Board of Commissioners that they, likewise, approve that formal amendment.

Commissioner McKenney moved, seconded by Commissioner Hinebauch, that the City Commission approve the proposed Amendment to the 1975 Agreement establishing the City-County Health Department to designate a HB 121 “Governing Body” entity and request that the Board of County Commissioners take action to also formally approve the proposed Amendment.

Mayor Kelly asked if there were any comments from the public. Hearing none, Mayor Kelly asked if there was any discussion amongst the Commissioners.

Commissioner McKenney inquired if there was any relationship between the governing body entity and the City-County Health Department concerning funding.

City Attorney Hindoien responded that this new particular requirement of HB 121 does not have anything to do with a funding component. The City is operating under a 1975 agreement. A more modern interlocal agreement between the City of Great Falls and Cascade County for the operation of the BOH will need to be prepared, and the funding component as well as some other structural pieces would be a part of that new agreement.

Commissioner McKenney commented that in January he was asked to reach out to the County Commissioners to see if some headway could be made. He performed research, watched videos

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of the house hearings, read the bill, and contacted the bill's sponsor. He reiterated when it is a joint agreement the governing body entity could be City Commissioners, County Commissioners and, according to the bill's sponsor, any elected official in Cascade County. He reached out to County Commissioner Briggs to discuss the intent of the bill and what would make the most sense. Current joint agreements were also brought up. There was some discussion that all of the joint agreements should be taken care of in one fell swoop. Ultimately, they did not come to agreement to put it all together. He also met individually to update the other County Commissioners. It was indicated to him that it would be a good idea if the City Commission put something on the table, vote on it, and send it to the County Commission to discuss it and make a decision.

Mayor Kelly underscored that the directive of HB 121 to establish a governing body entity was agreed to by the City and County in an interim agreement that expires in June 2022. This action tonight gives the County an opportunity to establish that governing body entity to fulfill their obligations within the law, and the funding discussions can come after that. HB 121 did not talk about revamping financial arrangements as the new governing body was established.

Commissioner McKenney concluded that once the City and County put this governing body agreement behind them, it would be a good idea to bring up the other joint agreements to look at with fresh eyes to see what adjustments could be made.

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

Motion carried 5-0.

**18. MONTANA DEPARTMENT OF NATURAL RESOURCES AND CONSERVATION
AMERICA RESCUE PLAN ACT GRANT AGREEMENT (OF 1758.0).**

Grant Administrator Tom Hazen reported that, similar to Item 16, this item is also some new, old business. The requested action is ratification of one of the ARPA grants that the City has been awarded in the amount of \$2 million dollars. This money has been awarded to the City from the \$249 million dollars allocated by the State through HB 632 to the competitive grant program. This award came out of the first round of applications that were due in July 2021. The winning application was for the Lift Station 1 and Sewer Force Main River Crossing project that is currently under design. This project is well on its way to completion, and is why he referred to this item as new old business.

The project consists of updates to Lift Station #1, also known as the 6th Street pump station, as well as installation of another new sewer river crossing to the wastewater treatment plant. Lift Station #1 pumps about one-third, or roughly three million gallons per day, of sewage from the old downtown area to the wastewater plant. The current forcemain servicing that lift station is 43 years old and represents a point in the City's collection system that, should it fail, could result in significant ramifications including, but not limited to, the discharge of raw sewage into the river. The forcemain under the river currently in service was installed in 1979, following a failure of an installation from 1959. It appears to staff we are on about 20 years of borrowed time.

JOURNAL OF COMMISSION PROCEEDINGS

June 7, 2022

Public Works started scoping this project when it first showed up on the Capital Improvement Program (CIP) in 2017 and 2018. Since that time a feasibility study and an alternatives analysis has been completed using the unbiased paired comparison decision-making methodology, and the project is currently under design. This project is expected to be out to bid in 2023 with construction to follow. In summary, Public Works is more than confident and well positioned to meet the grant performance period of December 2026.

The original Lift Station 1 application requested \$5,587,825 and committed the City to a dollar for dollar match. The City Commission approved the submission of the original application on July 20, 2021. After ranking all Round 1 applications, the State Infrastructure Advisory Committee decided to cap awards at \$2 million in order to award a larger number of programs. Public Works had to adjust the proposed Lift Station 1 project budget to reflect this limitation and inflation amounts. The budget ultimately reflected an award of \$2 million and a match amount of \$10,387,922. This updated match amount was submitted and approved during the February 15th, 2022 City Commission meeting, Item 7A. Public Works plans to cash flow the remainder of the project without incurring any additional debt.

Finally, the “Concurrences” section of the agenda report should include Veolia who has been closely involved in the development of this project.

Commissioner Tryon moved, seconded by Commissioner Wolff, that the City Commission approve ratification of the Montana Department of Natural Resources and Conservation Grant Agreement to fund the City of Great Falls Lift Station Number 1 Facility Improvements and Supplemental Forcemain Project with \$2 Million Dollars of American Rescue Plan Act (ARPA) funding distributed by the State of Montana through House Bill 632.

Mayor Kelly asked if there were any comments from the public or discussion amongst the Commissioners. Hearing none, Mayor Kelly called for the vote.

Motion carried 5-0.

19. **SOUTHWEST SIDE STREET RECONSTRUCTION PROJECT (OF 1432.2).**

Public Works Director Paul Skubinna reported that this agenda item is consideration of an award of a construction contract to United Materials for the Southwest Side Street Reconstruction project. This item is directly linked to the water main replacement project completed last construction season.

This project is located south along 2nd Avenue SW and 3rd Avenue SW on the south side of Central West and east of 6th Street SW, and includes reconstructing four blocks of street that has deteriorated to the point it is no longer savable with other treatments, like mill and overlay. The project brings the reconstructed area into compliance with Americans with Disability Act providing pedestrian connectivity from the neighborhood to 6th Street SW, in addition to new streets.

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This action is also new, old business because the Commission has taken two other actions on this project at large, the contract for the water main replacement and the contract for the tree removal. As previously discussed, the City did everything it could to save as many of the mature elm trees as possible and staff worked closely with Neighborhood Council 2 in scoping and developing this project.

The street reconstruct could not exist without the water main project. With the current inflation staff expects the street reconstruction project to be \$275,000 - \$300,000 per block. By combining the projects, the water main work lowered the cost of reconstruction, as the bid came in at \$250,000 per block for an estimated savings between \$100,000 - \$175,000, ultimately allowing the project to go forward with available funding. The funding for this project is 95% Bridge and Road Safety and Accountability Act (BaRSAA). Without leveraging the water main project with BaRSAA funding, affording this project would be a challenge, as the City's entire BaRSAA allocation for 2022 was \$1.2 million.

Staff recommends approval of the construction contract to United Materials in the amount of \$1,028,930 and to authorize the City Manager to execute the contract documents.

Commissioner Wolff moved, seconded by Commissioner Hinebauch, that the City Commission award a contract in the amount of \$1,028,930 to United Materials, Inc., for the Southwest Side Street Reconstruction, and authorize the City Manager to execute the necessary contract documents.

Mayor Kelly asked if there were any comments from the public or discussion amongst the Commissioners. With regard to removal of the elm trees, Mayor Kelly expressed appreciation for the department's consideration and sensitivity of the neighborhood concerns.

Mayor Kelly called for the vote.

Motion carried 5-0.

20. **SOUTHWEST SIDE WATER MAIN REPLACEMENT – PHASE III (OF 1432.4).**

Public Works Director Paul Skubinna reported that this agenda item is consideration of an award of a contract to Geranios Enterprises, Inc. for construction of Phase 3 of Southwest Side Water Main Replacement project. This is a sibling project to the water main project completed last summer that is being capped by the street reconstruct as discussed in agenda item 19. Staff is working their way through this area with the annual programmed water main replacement program.

This project replaces water main originally installed in 1956, 1913 and 1892. This project has floated to the top due to the escalating frequency of watermain breaks.

As with any watermain project, residents and businesses will be placed on temporary water and there will be some disruption in traffic in the area. The City will make all attempts to minimize those impacts. It is also worth noting that the Commission and the public have also recently received some communication from the City regarding DEQ's new lead and copper service line

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rule. Lead or galvanized service lines that are encountered will be logged into their inventory. The City will replace those service lines up to the curb stop and property owners will be notified of the department's findings.

The Public Works' budget includes an annual line item for the water main replacement program. Staff has been tracking costs and the trend of costs to plan for the future.

Bids were opened on February 16, 2022 for a project that included 13 blocks of watermain. The cost of that project was \$153,186 per block. Bids were opened on May 25, 2022 for these nine blocks of watermain project. The low bid was \$182,451 per block. In that three month window, inflation caused the following :

1. pipe costs went up 32%
2. Fitting went up 270%
3. Cost for service connections went up 23%
4. Valves went up 31%
5. Gravel went up 89%
6. Asphalt went up 43%

Looking back to bids in 2019, just prior to the pandemic, 6" and 8" pipe has doubled, 12" pipe has almost tripled, and gravel and asphalt have doubled in cost. This has a significant impact on budgets. He asked the Commission to remember these stats as the Public Works' budget is transmitted and during discussions pertaining to water and sewer rates.

Staff recommends approval of the construction contract to Geranios Enterprises, Inc. in the amount of \$1,642,063.50 and to authorize the City Manager to execute the contract documents.

Commissioner Wolff moved, seconded by Commissioner Tryon, that the City Commission award a contract in the amount of \$1,642,063.50 to Geranios Enterprises Inc., for the Southwest Side Water Main Replacement – Phase III, and authorize the City Manager to execute the necessary contract documents.

Mayor Kelly asked if there were any comments from the public.

Josh Butterfly, City resident, inquired how he could obtain blue prints of the drainage system from 1101 7th Street South [Boston's Restaurant] where a chemical spill took place, and was informed to contact Public Works.

There being no one further to address the Commission, Mayor Kelly asked if there was any discussion amongst the Commissioners. Hearing none, Mayor Kelly called for the vote.

Motion carried 5-0.

ORDINANCES/RESOLUTIONS

21. **ORDINANCE 3244, TO REPEAL TITLE 2, CHAPTER 12, SECTIONS 010-050 OF THE OCCGF, DISSOLVING THE GOLF ADVISORY BOARD.**

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Park and Recreation Director Steve Herrig reported that CourseCo, Inc. d/b/a Great Falls Golf, LLC, has managed the City's golf courses since December 18, 2018. Since that time, CourseCo, Inc. has provided numerous opportunities for cost savings, generated new revenues in many areas, made several improvements to the courses, and has returned significant revenue to the City annually.

The future of the Golf Board was discussed during the board's February and March meetings and the Golf Advisory Board voted unanimously to dissolve the Golf Advisory Board. In addition, management for CourseCo supports the dissolution of the Golf Advisory Board. The Board was encouraged to continue to provide feedback to the manager of the courses.

Because the City is no longer operating and managing the municipal courses, the original intent, purpose and need for the Golf Advisory Board has been eliminated. The City Commission will still be required to adopt fees and CourseCo will provide an annual update to the Commission at a work session.

Commissioner Tryon moved, seconded by Commissioner Hinebauch, that the City Commission adopt Ordinance 3244.

Mayor Kelly asked if there were any comments from the public. Hearing none, Mayor Kelly asked if there was any discussion amongst the Commissioners.

Mayor Kelly commented that the Board did a great job over the years, had many great ideas, and were a committed group. It speaks volumes to CourseCo that there has been such an amicable dissolution of the Board.

Commissioner Tryon referred to the concurrences and that the Golf Advisory Board voted unanimously to dissolve the Golf Advisory Board.

Commissioner McKenney noted that he remembers the City Manager, many times, reporting about the negative effect the golf courses had on the budget. Previous City Commissioners have resolved this issue in a very positive manner.

Motion carried 5-0.

CITY COMMISSION**22. MISCELLANEOUS REPORTS AND ANNOUNCEMENTS.**

Commissioner Hinebauch expressed appreciation to Director Herrig for acting so quickly to repair the Chowen Springs Basketball Courts when he brought it to his attention that constituents had reached out about kids not having a place to play basketball.

23. COMMISSION INITIATIVES.

None.

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June 7, 2022

ADJOURNMENT

There being no further business to come before the Commission, **Commissioner Tryon moved, seconded by Mayor Kelly, to adjourn the regular meeting of June 7, 2022, at 8:53 p.m.**

Motion carried 5-0.

Mayor Bob Kelly

City Clerk Lisa Kunz

Minutes Approved: June 21, 2022

DRAFT



Commission Meeting Date: June 21, 2022
CITY OF GREAT FALLS
COMMISSION AGENDA REPORT

ITEM: \$25,000 Report
 Invoices and Claims in Excess of \$25,000

PRESENTED BY: Finance Director

ACTION REQUESTED: Approval with Consent Agenda

LISTING OF ALL ACCOUNTS PAYABLE CHECKS ISSUED AVAILABLE ONLINE AT
<http://greatfallsmt.net/finance/checkregister>

TOTAL CHECKS ISSUED AND WIRE TRANSFERS MADE ARE NOTED BELOW WITH AN ITEMIZED LISTING OF ALL TRANSACTIONS GREATER THAN \$25,000:

ACCOUNTS PAYABLE CHECK RUNS FROM NEW WORLD	MAY 28,2022-JUNE 8, 2022	562,896.60
ACCOUNTS PAYABLE CHECK RUNS FROM MUNIS	MAY 26, 2022 - JUNE 8, 2022	2,107,757.57
MUNICIPAL COURT ACCOUNT CHECK RUN FOR	MAY 17, 2022 - MAY 31, 2022	77,599.84
TOTAL: \$		<u><u>2,748,254.01</u></u>

GENERAL FUND

FIRE

BENEFIS HEALTH SYSTEMS TESTING	OCCUPATIONAL PHYSICALS	45,869.00
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SPECIAL REVENUE FUND

STREET DISTRICT

DEPT OF TRANSPORTATION	OF 1739.1 STUCKEY RD IMPR.(CMAQ)(MDT)	126,023.50
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ENTERPRISE FUNDS

SEWER

VEOLIA WATER NORTH AMERICA	MONTHLY WWTP OPERATION CONTRACT Apr-22	285,489.11
VEOLIA WATER NORTH AMERICA	MONTHLY WWTP OPERATION CONTRACT May-22	285,489.11

PARKING

STANDARD PARKING CORPORATION	PARKING PROGRAM CONTRACT MARCH 22	37,058.43
STANDARD PARKING CORPORATION	PARKING PROGRAM CONTRACT APRIL 22	32,008.78

INTERNAL SERVICES FUND

CENTRAL GARAGE

MOUNTAIN VIEW CO OP	DIESEL / GASOLINE	29,199.55
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TRUST AND AGENCY

COURT TRUST MUNICIPAL COURT

CITY OF GREAT FALLS	FINES & FORFEITURES COLLECTIONS	63,761.63
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PAYROLL CLEARING

STATE TREASURER	MONTANA TAXES	48,321.00
FIREFIGHTER RETIREMENT	FIREFIGHTER RETIREMENT EMPLOYEE & EMPLOYER CONTRIBUTIONS	51,072.08
STATEWIDE POLICE RESERVE FUND	POLICE RETIREMENT EMPLOYEE & EMPLOYER CONTRIBUTIONS	68,169.91
PUBLIC EMPLOYEE RETIREMENT	PUBLIC EMPLOYEE RETIREMENT EMPLOYEE & EMPLOYER CONTRIBUTIONS	134,153.12
US BANK	FEDERAL TAXES, FICA & MEDICARE	209,745.08

UTILITY BILLS

NORTHWESTERN ENERGY	05614938 CHARGES FOR MAY 2022	61,236.14
HIGH PLAINS LANDFILL	SANITATION CHARGES FOR MAY 2022	109,424.64

CLAIMS OVER \$25000 TOTAL: \$ 1,587,021.08

**CITY OF GREAT FALLS, MONTANA
COMMUNICATION TO THE CITY COMMISSION**

DATE: June 21, 2022

ITEM: CONTRACTS LIST
Itemized listing of administratively approved contracts.
(Listed contracts are available for inspection in the City Clerk’s Office.)

PRESENTED BY: Lisa Kunz, City Clerk
ACTION REQUESTED: Ratification of Contracts through the Consent Agenda
MAYOR’ S SIGNATURE: _____

CONTRACTS LIST

	DEPARTMENT	OTHER PARTY (PERSON OR ENTITY)	PERIOD	AMOUNT	PURPOSE
A	Public Works	The Highwoods Mobile Home Park	Indefinite	N/A	Ratification of a Consecutive System Agreement with new owners as required by DEQ for PSW ID # MT0004681 (021814.4A; CR020210.7)

CITY OF GREAT FALLS, MONTANA

COMMUNICATION TO THE CITY COMMISSION

DATE: June 21, 2022

ITEM: GRANTS LIST
 Itemizing grants not otherwise approved or ratified by City Commission Action
 (Listed grants are available for inspection in the City Clerk’s Office.)

PRESENTED BY: Lisa Kunz, City Clerk

ACTION REQUESTED: Ratification of Grants through the Consent Agenda

MAYOR’S SIGNATURE: _____

GRANTS

	DEPARTMENT	OTHER PARTY (PERSON OR ENTITY)	PERIOD	GRANT AMOUNT REQUESTED	MATCH	PURPOSE
A	Park and Recreation	FWP Montana Trail Stewardship	07/2022-12/2022	\$4,870	\$691 – shipping costs and in-kind labor for installation	116190 – FWP Montana Trail Stewardship Grant Application for purchasing and installation of two outdoor bike repair stations on the River’s Edge Trail at West Bank Park Trailhead and South Shore Trail.



Commission Meeting Date: June 21, 2022

**CITY OF GREAT FALLS
COMMISSION AGENDA REPORT**

Item: Liquid Asphalt CRS-2P
From: Kenny Jorgensen, Street Manager
Initiated By: Public Works Department
Presented By: Paul Skubinna, Public Works Director
Action Requested: Approve Purchase for Liquid Asphalt CRS-2P

Suggested Motion:

1. Commissioner moves:

“I move that the City Commission (accept/not accept) the low bid from Ergon Asphalt & Emulsions, Inc., of Butte and (authorize/not authorize) the purchase of Liquid Asphalt CRS-2P in the amount of \$899 per ton, for a total of \$224,750 for FY 2022/23.”

2. Mayor requests a second to the motion, public comment, Commission discussion, and calls for the vote.

Staff Recommendation: Staff recommends that the City Commission approve the purchase of 250 tons of Liquid Asphalt CRS-2P from Ergon Asphalt & Emulsions, Inc., of Butte for a total of \$224,750.

Background:

Purpose

This asphalt emulsion will be used by the Street Division in the street chip-sealing program.

Evaluation and Selection Process

The specifications were advertised two times in the Great Falls Tribune, mailed to three prospective bidders and advertised on the City of Great Falls website. The bid opening was held on June 8, 2022, with one bidder responding.

Conclusion

The bid by Ergon Asphalt & Emulsions, Inc., of Butte meets specifications for the liquid asphalt.

Fiscal Impact: The bid received in 2022 of \$899 per ton is \$117,750 higher than the bid received in 2021 of \$428 per ton. Funding for this year’s purchase of liquid asphalt is in the proposed FY 2023 Street Maintenance Budget.

Alternatives: The City Commission could vote to not approve the purchase for Liquid Asphalt CRS-2P. One of the Street Divisions goals each year is to chip-seal 100 blocks of city streets.

Attachments/Exhibits: Bid Tab, Bid List

CITY OF GREAT FALLS
PO BOX 5021
GREAT FALLS MT 59403

LIQUID ASPHALT CRS-2P

Project Number
Bids Taken at Civic Center
Date: June 8, 2022
Tabulated By: Debbie Kimball
Page 1 of 1

NAME & ADDRESS OF BIDDER	Bid Security	Affidavit of Non- Collusion	Cost Per Ton	Total 250 Tons
Ergon Asphalt & Emulsions, Inc.	Bid Bond 10%	√	\$899.00	\$224,750.00

LIQUID ASPHALT CRS-2P BID LIST

1. NORMONT
2101 9th AVE NW
GREAT FALLS, MT 59404
406-453-4344
ATTN: LUKE

2. WESTERN EMULSION PLANT
7315 MOSSMAIN LANE
BILLINGS, MT 59106
406-628-1401
ATTN: SEAN OR PHYLLIS

3. ERGON ASPHALT & EMULSIONS, INC.
119873 RICK JONES WAY
BUTTE, MT 59701
ATTN: SEAN PELLERSELS
406-876-4000



Commission Meeting Date: June 21, 2022
CITY OF GREAT FALLS
COMMISSION AGENDA REPORT

Item: Purchase of Liquid Chlorine
From: Water Treatment Plant
Initiated By: Public Works Department
Presented By: Paul Skubinna, Public Works Director
Action Requested: Approval of Bid

Suggested Motion:

1. Commissioner moves:

“I move that the City Commission (accept/not accept) the low bid from Thatcher Company of Montana, Inc. and authorize staff to purchase liquid chlorine in the amount of \$2,178.00 per ton, up to the maximum amount of 80 tons for FY 2022/23.”

2. Mayor requests a second to the motion, public comment, Commission discussion, and calls for the vote.

Staff Recommendation: Staff recommends that the City Commission accept the low bid from Thatcher Company of Montana, Inc., in the amount of \$2,178.00 per ton for liquid chlorine for FY 2022/23.

Summary: Liquid chlorine is used in the water treatment process for disinfection. Specifications and bid materials were prepared for the purchase of liquid chlorine for the Water Treatment Plant for the upcoming fiscal year. Notices were sent out to all prospective bidders and publicly advertised. The bid from Thatcher Company of Montana, Inc. was acceptable as submitted.

Bids were accepted on June 8, 2022, for FY 2022/23 Water Treatment Plant chemical needs. Thatcher Company of Montana, Inc., with headquarters in Missoula, Montana provided the lowest acceptable bid for liquid chlorine at \$2,178.00 per ton. This Commission action would award a contract for FY 2022/23.

Fiscal Impact: This price reflects a 307% Increase from the FY 2021/22 contract price. The new contract would allow for the purchase of a maximum of 80 tons for a total cost of \$174,240.00.

Attachments/Exhibits: Bid Tabulation



**BID TABULATION SUMMARY
2023 - WATER TREATMENT CHEMICALS**

Bids Taken at: Civic Center

Date: 6/8/2022

WATER PLANT

Tabulated by: DMcNeese

	Name & Address of Bidder	10% Bid Security (Yes/No)	Liquid Ammonium	PREVIOUS YEAR	Liquid Chlorine Approx. 80 tons Delivery 10 days ARO	PREVIOUS YEAR	Liquid Aluminum Sulfate Approx. 800 dry tons Delivery 7 days ARO (Max Fee)	PREVIOUS YEAR	Liquid Alum Cert of Chemical Analysis (Yes/No)	Liquid Alum Cert of Compliance w ANSI/NSF Standard 60 (Yes/No)
1	DPC (DX Industries, Inc.)	NO	<input checked="" type="checkbox"/>		\$1.50/lb	\$0.3935/lb				
	P.O. Box 509		<input checked="" type="checkbox"/>	NO	\$3,000/ton	\$787/ton		NO BID		
	Hudson CO 80642-0509		<input checked="" type="checkbox"/>		\$240,000 PO	\$62,960 PO				
2	Chemtrade Chemicals US LLC	YES	<input checked="" type="checkbox"/>				0.3475/lb	\$ 0.2675/lb	YES	YES
	90 East Haley Rd, Suite 200		<input checked="" type="checkbox"/>	NO BID		NO BID	\$695/ton	\$535/ton		
	Parsippany NJ 07054		<input checked="" type="checkbox"/>				\$556,000 PO	\$428,000 PO		
3	Hawkins, Inc.	N/A	<input checked="" type="checkbox"/>							
	3100 E. Hennepin Ave.		<input checked="" type="checkbox"/>	.29						
	Minneapolis, MN 55413-2922		<input checked="" type="checkbox"/>	\$5		NO BID		NO BID		
4	Kemira Water Solutions, Inc.	N/A	<input checked="" type="checkbox"/>					\$0.30/lb		
	4321 W 6th Street		<input checked="" type="checkbox"/>	NO BID		NO BID		\$600/ton		
	Lawrence KS 66049		<input checked="" type="checkbox"/>					\$480,000 PO		
5	Thatcher Company of Montana	YES	<input checked="" type="checkbox"/>	.28	1.089/lb	\$0.355/lb	\$0.298/lb	\$0.239/lb	YES	YES
	PO Box 27407		<input checked="" type="checkbox"/>	\$5	\$2,178/ton	\$710/ton	\$595.72/ton	\$478/ton		
	Salt Lake City, &T 84127-0407		<input checked="" type="checkbox"/>	\$5	\$174,240 PO	\$56,800 PO	\$476,576 PO	\$382,400 PO		
6										
7										
8										
					306.7% Increase		124.6% Increase			



Commission Meeting Date: June 21, 2022

**CITY OF GREAT FALLS
COMMISSION AGENDA REPORT**

Item: Purchase of Liquid Aluminum Sulfate
From: Water Treatment Plant
Initiated By: Public Works Department
Presented By: Paul Skubinna, Public Works Director
Action Requested: Approval of Bid

Suggested Motion:

1. Commissioner moves:

“I move that the City Commission (accept/not accept) the low bid from Thatcher Company of Montana, Inc. and authorize staff to purchase liquid aluminum sulfate in the amount of \$595.72 per ton, up to the maximum amount of 800 dry tons for FY 2022/23.”

2. Mayor requests a second to the motion, public comment, Commission discussion, and calls for the vote.

Staff Recommendation: Staff recommends that the City Commission accept the low bid from Thatcher Company of Montana, Inc. in the amount of \$595.72 per dry ton for liquid aluminum sulfate for FY 2022/23.

Summary: Liquid aluminum sulfate is used in the water treatment process to coagulate suspended particles in the raw water stream to allow their removal. Specifications and bid materials were prepared for the purchase of liquid aluminum sulfate for the Water Treatment Plant for the upcoming fiscal year. Notices were sent out to all prospective bidders and publicly advertised. The bid from Thatcher Company of Montana, Inc. was acceptable as submitted.

Bids were accepted on June 8, 2022, for FY 2022/23 Water Treatment Plant chemical needs. Thatcher Company of Montana, Inc., with headquarters in Missoula, Montana provided the lowest acceptable bid for liquid aluminum sulfate at \$595.72 per dry ton. This Commission action would award a contract for FY 2022/23.

Fiscal Impact: This price reflects a 25% Increase from the FY 2021/22 contract price. The new contract would allow for the purchase of a maximum of 800 dry tons for a total cost of \$476,576.00.

Attachments/Exhibits: Bid Tabulation



**BID TABULATION SUMMARY
2023 - WATER TREATMENT CHEMICALS**

Bids Taken at: Civic Center

Date: 6/8/2022

WATER PLANT

Tabulated by: DMcNeese

	Name & Address of Bidder	10% Bid Security (Yes/No)	Liquid Ammonium Nitrate	PREVIOUS YEAR	Liquid Chlorine Approx. 80 tons Delivery 10 days ARO	PREVIOUS YEAR	Liquid Aluminum Sulfate Approx. 800 dry tons Delivery 7 days ARO (Max Fee)	PREVIOUS YEAR	Liquid Alum Cert of Chemical Analysis (Yes/No)	Liquid Alum Cert of Compliance w ANSI/NSF Standard 60 (Yes/No)
1	DPC (DX Industries, Inc.)	NO	<input checked="" type="checkbox"/>		\$1.50/lb	\$0.3935/lb				
	P.O. Box 509		<input checked="" type="checkbox"/>	NO	\$3,000/ton	\$787/ton		NO BID		
	Hudson CO 80642-0509		<input checked="" type="checkbox"/>		\$240,000 PO	\$62,960 PO				
2	Chemtrade Chemicals US LLC	YES	<input checked="" type="checkbox"/>				0.3475/lb	\$ 0.2675/lb	YES	YES
	90 East Haley Rd, Suite 200		<input checked="" type="checkbox"/>	NO BID		NO BID	\$695/ton	\$535/ton		
	Parsippany NJ 07054		<input checked="" type="checkbox"/>				\$556,000 PO	\$428,000 PO		
3	Hawkins, Inc.	N/A	<input checked="" type="checkbox"/>	.29						
	3100 E. Hennepin Ave.		<input checked="" type="checkbox"/>	\$5		NO BID		NO BID		
	Minneapolis, MN 55413-2922		<input checked="" type="checkbox"/>	\$5						
4	Kemira Water Solutions, Inc.	N/A	<input checked="" type="checkbox"/>					\$0.30/lb		
	4321 W 6th Street		<input checked="" type="checkbox"/>	NO BID		NO BID		\$600/ton		
	Lawrence KS 66049		<input checked="" type="checkbox"/>					\$480,000 PO		
5	Thatcher Company of Montana	YES	<input checked="" type="checkbox"/>	.28	1.089/lb	\$0.355/lb	\$0.298/lb	\$0.239/lb	YES	YES
	PO Box 27407		<input checked="" type="checkbox"/>	\$5	\$2,178/ton	\$710/ton	\$595.72/ton	\$478/ton		
	Salt Lake City, &T 84127-0407		<input checked="" type="checkbox"/>	\$5	\$174,240 PO	\$56,800 PO	\$476,576 PO	\$382,400 PO		
6										
7										
8										
					306.7% Increase		124.6% Increase			



Commission Meeting Date: June 21, 2022
CITY OF GREAT FALLS
COMMISSION AGENDA REPORT

Item: Set Public Hearing for Tourism Business Improvement District (TBID) 2021/2022 Budget Amendment

From: Melissa Kinzler, Finance Director

Initiated By: Tourism Business Improvement District Board of Directors

Presented By: Rebecca Engum, Great Falls Tourism Director

Action Requested: City Commission set public hearing date of July 5, 2022 for the Tourism Business Improvement District (TBID) 2021/2022 Budget Amendment

Suggested Motion:

1. Commissioner moves:

“I move that the City Commission (set/not set) the public hearing for the 2021/2022 Tourism Business Improvement District Budget Amendment for July 5, 2022.”

2. Mayor requests a second to the motion, public comment, Commission discussion, and calls for the vote.

Staff Recommendation: The TBID recommends that the City Commission set the public hearing for the 2021/2022 TBID Budget Amendment for July 5, 2022.

Background: The Commission approved the 2021/2022 TBID Budget and Work Plan on July 20, 2021. The actual amount of assessments levied was larger than projected. Inflation caused pricing for the renovation of 15 Overlook Drive to be higher than anticipated. Additionally, rising costs of living prompted adjustments in staffing costs to retain our talent.

The TBID has had increases in income and changes across the board in expenses. This amendment is a combination of additional income and making strategic investment in 15 Overlook Drive, Tourism staff, and marketing.

In a previous audit of the Great Falls Tourism Business Improvement District, the auditor delivered one finding related to increased expenses over the approved budget. This finding noted that an amendment to the budget was not submitted to the City of Great Falls, even though presented, and approved by the TBID Board.

To prevent any future findings, the TBID Board approved budget amendment is presented to the City of Great Falls for approval.

Fiscal Impact: There is no fiscal impact to the City of Great Falls. The increased budget funds are coming from previously received TBID Assessment that have been placed in reserves. The budget amendment reflects a 6% increase in both revenues and expenses increasing the total budget from \$800,411 to \$852,199.

Alternatives: The City Commission could choose to not approve and TBID would receive an audit finding for their budget being over.

Concurrences: Finance staff is responsible for assessing and collecting the revenues for the TBID. TBID maintains a staff to fulfil the strategic plan as set by the Board of Directors.

Attachments/Exhibits:

Approved 2021/2022 Budget and Amended Budget

1-20-2022 Board of Directors Meeting Minutes

Legal Notice

Great Falls Montana Tourism Budget
July 1, 2021 - June 30, 2022

	Approved Budget	Ammendment	Change
Income			
1 Bed Tax	\$0	\$0	
1a Previously Undistributed Bed Tax	\$0	\$0	
2 TBID Assessment	\$511,216	\$589,004	15%
2a FY21 Reserves	\$149,195	\$149,195	0%
2b Committed Reserves	\$30,000	\$0	-100%
2c Carryover	\$110,000	\$114,000	4%
3 Membership	\$0	\$0	
4 Grant	\$0	\$0	
5 Advertising	\$0	\$0	
Total Income	\$800,411	\$852,199	6%
Expenses			
Personnel			
6 Wages	\$121,799	\$152,799	25%
7 Payroll Expense	\$29,160	\$35,605	22%
Total Personnel	\$150,959	\$188,404	25%
Administration			
8 Rent	\$10,001	\$12,501	25%
8a 15 Overlook Dr	\$110,000	\$168,848	53%
9 Utilities	\$19,680	\$19,680	0%
10 Memberships	\$2,760	\$2,760	0%
11 Subscriptions	\$16,000	\$16,000	0%
12 Maintenance	\$3,900	\$3,900	0%
13 Supplies	\$8,500	\$8,500	0%
14 Postage	\$1,000	\$1,000	0%
15 Insurance	\$3,200	\$3,200	0%
16 Professional Fees	\$19,500	\$19,500	0%
17 TAC	\$0	\$0	0%
18 Professional Development	\$2,500	\$2,500	0%
Total Admin	\$197,041	\$258,389	31%
19 Leisure Traveler Marketing			
19a Media Placement	\$118,260	\$126,255	7%
19b Management	\$14,300	\$14,300	0%
19c Planning and Reporting	\$13,200	\$13,200	0%
19d Production	\$9,900	\$34,900	253%
20 Conventions Meetings & Groups	\$40,000	\$40,000	0%
21 Destination Development	\$170,000	\$90,000	-47%
22 Opportunity	\$5,000	\$5,000	0%
23 Marketing Grants	\$51,751	\$51,751	0%
24 Photo & Video Library	\$10,000	\$10,000	0%
25 Visitor Guide	\$0	\$0	0%
26 Joint Venture	\$0	\$0	0%
27 Trade Shows	\$0	\$0	0%
28 Website	\$10,000	\$10,000	0%
29 Events	\$10,000	\$10,000	0%
30 Reserves	\$0	\$0	
Total Program	\$452,411	\$405,406	-10%
Total Expenses	\$800,411	\$852,199	6%
Net Profit	\$0	\$0	0%



**Boards of Directors Meeting Minutes
Great Falls Convention and Visitors Bureau &
Great Falls Tourism Business Improvement District**

Thursday, January 20, 2022 | 9:01 AM – 10:19 AM | 100 1st Ave N, Lower-Level Conference Room

CVB Directors: Wendy Lee, Wayne Thares, Kellie Pierce, Kerry McInerney, Susan Shannon, Christina Horton, Rustin Lippincott, Brian Thompson, John Faulkner, Lexi Jones

TBID Directors: David Buckingham, Becky Amaral-Miller, Peggy O'Hare-Becker, Laurie Price, Peter Jennings, Scott Shull

Staff: Rebecca Engum, Kali Jean Tuckerman, Marisela Hazzard

Guest: Shane Etwiler

9:01 | 1. Welcome, Introductions, Call to Order – Wayne Thares, David Buckingham

9:03 | 2. Public Comment – Wayne Thares, David Buckingham
Opportunity for public comment related to items on the agenda

No public comment.

9:04 | 3. Consent Agenda – Wayne Thares, David Buckingham
Convention and Visitors Bureau Board of Directors
a) approve 12-16-2021 Minutes
b) accept December Financials

CVB ACTION TAKEN

Motion made to approve consent agenda. Seconded. No discussion. All in favor. None opposed. The motion passed.

Tourism Business Improvement District Board of Directors
c) approve 12-16-2021 Minutes
d) accept December Financials

TBID ACTION TAKEN

Motion made to approve consent agenda. Seconded. No discussion. All in favor. None opposed. The motion passed.

9:05 | 4. Review 990 – Rebecca Engum
Convention and Visitors Bureau Board of Directors review 990.

No review of 990, awaiting receipt.

9:05 | 5. Western Art Week Show Guide Partnership – Rebecca Engum
Tourism Business Improvement District Board of Directors take action as needed.

TBID ACTION TAKEN

Grow Tourism | Develop the Destination | Advocate for Tourism

Motion made to approve Western Art Week Show Guide Partnership with Portfolio with 5,000 trifold inserts for \$4,087. Seconded. Concerns about condensed timeline with Treasure Lifestyle Magazine because of limited availability with graphic designer. Preferred smaller size of trifold insert verses full-page tear out. All in favor. None opposed. The motion passed.

9:20 | 6. Budget Amendment – Rebecca Engum

Tourism Business Improvement District Board of Directors approve FY22 Budget Amendment as presented.

TBID ACTION TAKEN

Motion made to approve FY22 Budget Amendment. Seconded. No discussion. All in favor. None opposed. The motion passed.

9:23 | 7. TBID Officer Election – David Buckingham

Chair – Becky Amaral-Miller
 Vice Chair – Sandra Johnson-Thares
 Secretary/Treasurer – David Buckingham

Tourism Business Improvement District Board of Directors elect officers after nominations from the floor taken to serve from January 21, 2022 to June 30, 2022.

TBID ACTION

Motion made to close the nominations from the floor. Seconded. No discussion. All in favor. None opposed. The motion passed.

TBID ACTION

Motion made to approve Becky Amaral-Miller as TBID Chair, Sandra Johnson-Thares as TBID Vice Chair, and David Buckingham as TBID Secretary/Treasurer. Seconded. No discussion. All in favor. None opposed. The motion passed.

9:26 | 8. Reports

1. Marketing – Marisela Hazzard

Marisela Hazzard gave report.

2. Business Development Pipeline – Kali Jean Tuckerman

Kali Jean Tuckerman gave report.

3. Executive Director – Rebecca Engum

Rebecca Engum gave report.

9:53 | 9. Roundtable – Wayne Thares, David Buckingham

Sharing of items impacting Great Falls, Montana and Tourism, such as:

- announced/unannounced events
- changes in services

- updates on key initiatives
- exciting developments
- noticeable trends
- potential issues
- new ideas
- important efforts

MAGIE to will be this weekend. Montana Pro Rodeo Circuit Finals leaving Great Falls, Montana is just a rumor. Rodeo had congressional attendance and overall, attendance was built by moving the event to a Thursday – Sunday event. Great Falls International Airport hosting meeting January 27, 2022 to discuss future of the airport and ask for monetary support.

10:18 | 10. Public Comment – Wayne Thares, David Buckingham

Opportunity for public comment related to Tourism in Great Falls, Montana.

No public comment.

10:19 | 11. Adjourn – Wayne Thares, David Buckingham

Meeting adjourned.

Attention Legal Ads

NOTICE OF PUBLIC HEARING

Notice is hereby given that the Tourism Business Improvement District (TBID) Fiscal Year 2021/2022 Budget Amendment will be brought before the Great Falls City Commission for public hearing in the Commission Chambers Room 206, Civic Center Building, 2 Park Drive South, Great Falls, Montana, on Tuesday, July 5, 2022, at 7:00 o'clock p.m. Any interested person may appear and speak for or against said TBID Budget Amendment or submit in writing any comments to the City Clerk prior to or during the Commission Meeting.

Documents pertaining to this agenda item are posted on the City's website at <https://greatfallsmt.net> under "Meetings," and are on file for public inspection during regular office hours at the City Clerk's Office, 2 Park Drive South, Room 204, Great Falls, MT, or contact us at (406) 455-8451.

/s/ Lisa Kunz
City Clerk

DO NOT PUBLISH BELOW THIS LINE:

Publication dates: June 26 and July 3, 2022



Commission Meeting Date: June 21, 2022

**CITY OF GREAT FALLS
COMMISSION AGENDA REPORT**

Item: First United Methodist Church "Emergency Shelter" Conditional Use Permit at 610, 618 & 622 2nd Ave N, Great Falls, MT.

From: Planning & Community Development Department

Initiated By: Rev. Jeff Wakeley, First United Methodist Church

Presented By: Craig Raymond, Director, Planning & Community Development

Action Requested: Set a Public Hearing for the requested Conditional Use Permit for July 18, 2022

Suggested Motion:

1. Commissioner moves:

“I move that the City Commission (set/not set) the Public Hearing for the First United Methodist Church “Emergency Shelter” Conditional Use Permit for July 18, 2022.”

2. Mayor requests a second to the motion, public comment, Commission discussion, and calls for the vote.

Staff Recommendation: Staff recommends that the City Commission sets the Public Hearing for July 18, 2022. The City of Great Falls Zoning Commission is scheduled to conduct a public hearing on June 14, 2022 and is tasked with providing a recommendation to the City Commission. Neighborhood Council #7 is scheduled to consider the matter on June 13, 2022.

Background: At some point in 2021, the First United Methodist Church (FUMC) began using their property to provide meal service and as a location for offering rest and refuge to persons in need. At some point after that, FUMC began making the property on which its church is located available to homeless individuals to use as a campground facility for them to stay and camp on the property. Throughout the early part of 2022, the City has received complaints from businesses, City residents, and Neighborhood Councils regarding the activities taking place on the property. The complaints included allegations of drug use, harassment of passers-by, assaults and other inappropriate behaviors by individuals residing on the property. City staff began investigating the nature of the property use relative to the City’s applicable land use regulations and whether there were potential grounds for violations of the City’s public nuisance ordinances.

As part of that process, the City advised FUMC that, although its use of its property as a church is a permitted land use within the zoning district where it is located, any use of its property for an “Emergency Shelter” required a Conditional Use Permit (CUP). An “Emergency Shelter” land use is defined by the City’s zoning ordinance as “a place and/or building, or portion thereof that is used to

provide temporary housing and ancillary services to primarily indigent, needy, homeless, or transient individuals.” After being advised of the CUP requirement for any “Emergency Shelter” land use on its property, FUMC has formally filed an application for a CUP to operate an Emergency Shelter on its property.

Conditional Use Permit Request: FUMC has now submitted a *Land Use Application* form seeking a CUP for what they’ve identified as a “Homeless Ministry” to be conducted at the FUMC property located at 610, 618 & 622 2nd Ave N. The specifics of the proposal, taken directly from the applicant’s statement, are as follows:

1. The Monday through Friday daily distribution of lunch bags
2. A regular Tuesday evening community meal in our Fellowship Hall from 5:00 until 6:00
3. Monday through Friday access to entering the church from 10:00 AM – 12:00 PM to get lunch, to sit or use the bathrooms, from 10:00 AM – 12:00 PM
4. Use of a Porta-Potty in the parking lot for people living on the streets to use when the church building is closed
5. Allowing persons living on the street to gather on the property to socialize with the condition that they do not drink or use drugs. People who drink are told to leave the property. Persistent offenders can and have been permanently criminally trespassed.
6. Allowing people living on the street to sleep on the property overnight including allowing people to set up tents on the property. They can sleep on the property as long as they don’t drink and are not causing a public disturbance. They are also required to clean up after themselves. We are presently directing people to sleep on the East side of the church in and near the parking lot

Our Future Plans:

1. Working with a non-profit agency to create and manage a temporary encampment for those living on the streets on the unpaved section of the church’s parking lot. The encampment would contain up to 10 tents along with space for people to set up their own tents. The encampment would be fenced off and monitored for safety. The Church is working with the Ad-hoc group that has been meeting to address the issue of homelessness since January of this year (2022) They are in the process of incorporation to become a 501 C-3
2. Creation of a Walk-In Center inside the Church for persons to gather and socialize during the day and receive help. The Walk-In Center would be similar to St. Vincent DePaul’s Angel Room which is open Sunday through Wednesday. Ours would be open Thursday and Friday. The Center would include a daily meal. The kitchen will have to be remodeled and brought up to standard health department codes.
3. Working with Law Enforcement in coming up with solutions to address the problems of those persons who habitually break our rules and the city ordinance about public drinking and creating a public disturbance on our property.

The application also contains a drawing showing the proposed location for a single porta-potty and multiple tents and tent sites (approximately 20) along the east side of the church parking lot, as well as chain-link fencing around the perimeter of the camping site. (See attached Land Use Application)

The basis for a decision for a Conditional Use Permit application is listed in OCCGF §17.16.36.040. The City Commission's decision to approve, conditionally approve, or deny an application shall be based on whether the application, staff report, public hearing process, and any additional information demonstrates that each of the criteria set forth in the basis of decision ordinance have been satisfied. A

proposed Basis of Decision/ Findings of Fact - Conditional Use document as prepared by staff is attached for the Commission's consideration.

Fiscal Impact: The land use activities presently occurring on the FUMC property have created at least some degree of strain on Police Department and Municipal Court resources which in turn creates additional burden on the city budget. Although the CUP application makes reference to working with law enforcement "in coming up with solutions" to address those problems, the application contains no specific management plans or policies for addressing this issue.

Alternatives: The City Commission may propose an alternative date for a future public hearing.

Concurrences: All City departments were solicited for comment on the proposal. P&CD staff worked closely with the Police Department, Legal Department and the City Manager's Office throughout the processing of this application.

Attachments/Exhibits:

Basis of Decision/Findings of Fact
Aerial Map
Zoning Map
Site Photos
Application

CONDITIONAL USE PERMIT - BASIS OF DECISION/FINDINGS OF FACT

The City of Great Falls has been petitioned to approve a Conditional Use Permit to allow for the establishment and construction of an “Emergency Shelter” land use upon the property addressed as 610, 618, 622 2nd Ave N. legally described as Lots 1-6, Block 306, Town of Great Falls, Sec. 12, T20N, R3E, PMM, Cascade County, Montana (subject property). In order to approve the Permit, the Official Code of the City of Great Falls Section 17.16.36.040 requires demonstration that certain stated requirements have been satisfied. Therefore, this Basis of Decision has been prepared to analyze, determine and memorialize satisfaction of the required criteria.

1. The zoning and conditional use is consistent with the City’s Growth Policy and applicable neighborhood plans, if any.

The Growth Policy recognizes that homelessness is a problem that appears to be growing and offers goals and policies that are intended to address the issue in the Social chapter of the plan.

Soc1.4.1: Work with the private sector and non-profits to increase housing opportunities in the City

Soc1.4.5: Continue to support the development of accessible housing units for those with physical and mental challenges and special needs, including members of the community with disabilities, etc.

Soc1.4.9: Continue to ensure that the City promotes equal opportunity housing and access to housing for all residents and is in compliance with Federal and State requirements aimed at preventing housing discrimination.

Soc1.4.15: Expand transitional housing with supportive services benefitting the homeless and special needs populations in the City.

The proposed conditional use (i.e., “Emergency Shelter” as an element of a homeless ministry) is consistent in a general sense with the above-outlined goals. However, this particular CUP proposal has key attributes that are not consistent with either the City’s zoning standards (i.e., the “campground” structure of the proposed use) or the above-listed Growth Policy goals (i.e., the lack of any clear management planning and/or policies to address issues that seem to be inevitable when purposefully congregating homeless individuals, some of whom suffer from addiction and mental health issues).

Soc1.1.3: Support community-wide efforts in the City to reduce crime and expand crime prevention, public safety and education efforts, including neighborhood based efforts such as Neighborhood Watch.

Soc1.1.4: Strategically improve public safety in the Downtown, as well as other city-wide “hotspots” throughout the City.

As also discussed below, the existing unauthorized “Emergency Shelter” land use has resulted in a large volume of complaints regarding the behavior of individuals congregating on the property. The Great Falls Police Department has received a significant number of complaints regarding conduct on the property and has written numerous citations and effected numerous arrests of individuals in connection with the existing unauthorized land use. The CUP proposal contains no specific plans or policies intended to adequately address these issues, and thus is not consistent with the above-referenced Growth Policy goals.

Soc1.4.13: Protect the character, livability and affordability of existing neighborhoods by ensuring that infill development is compatible with existing neighborhoods.

Soc1.6.3: Work with the Neighborhood Councils, residents, property owners and businesses to create individual neighborhood plans as way of addressing needs, and preserving and improving neighborhoods.

An “Emergency Shelter” land use is a conditionally allowed use on the property, so there are circumstances under which – with appropriate structures and conditions in place – a land use of that type could occur in a manner that would be consistent with both the zoning ordinance and the above-referenced neighborhood-related Growth Policy goals. However, this particular CUP proposal - as currently presented - does not contain any clear plan or structure to mitigate any negative impacts from the proposed land use to the surrounding community and deter neighborhood blight. In that respect, the proposal also appear to be antithetical to the goals and policies of the Downtown Master Plan and Downtown Urban Renewal Plan. Those plans are written and adopted specifically to minimize and/or eliminate blight and encourage redevelopment and regeneration of the downtown. As a result, staff finds that the applicant’s request is not consistent with the above-listed elements of the City’s Growth Policy.

2. *The establishment, maintenance or operation of the zoning and conditional use will not be detrimental to, or endanger the health, safety, morals, comfort or general welfare.*

As has already been demonstrated by the existing illegal “campground” land use, the CUP proposal (which contemplates a continuation of that illegal “campground” land use) is likely to have a significant detrimental effect on the health, safety, morals, comfort and general welfare of the surrounding community and the occupants of the shelter itself.

Since the Applicant first undertook its efforts to use its property for the provision of services and space to homeless community, City staff have observed and have received numerous complaints regarding unsanitary conditions due to persons urinating and defecating outdoors and on City rights of way and complaints that citizens are being harassed and/or intimidated by occupants of the property. Great Falls Police Dept has received approximately 95 calls for service this year to date (92 total last year) and have written 46 citations this year to date (77 total last year) and made 15 arrests this year to date (6 total last year). The CUP proposal, as presented, does not contain any management plan or structure to adequately address and mitigate/eliminate any of those problems. Rather, it seems to assume an even greater reliance on local law enforcement, emergency services, and others apart from the Applicant to manage and resolve problems on the property.

3. *The conditional use will not be injurious to the use and enjoyment of other property in the immediate vicinity for the purposes already permitted, nor substantially diminish and impair property values within the neighborhood.*

Based on the numerous complaints that have been directed to the City to date, there is no question but that the surrounding neighborhood is experiencing diminished enjoyment of property. Although the CUP proposal indicates that the “campground” land use structure would be “fenced off and monitored for safety”, the use of a fence to screen an otherwise illegal land use form is not a viable proposal. Similarly, the CUP proposal contains no specific description of management plans and/or policies that would ensure that physical and behavioral impacts

of even a permissible “emergency shelter” land use would be contained on the subject property. Staff finds that the applicant’s request has the potential to substantially diminish and impair values of nearby properties in the downtown area. Staff finds that the Applicant’s request has the potential to substantially diminish and impair values of nearby properties in the downtown neighborhood.

4. *The conditional use will not impede the normal and orderly development and improvement of the surrounding property for uses permitted in the district.*

The proposed use as submitted would have a chilling effect on the development or redevelopment of surrounding properties.

5. *Adequate utilities, access roads, drainage and/or necessary facilities have been or are being provided.*

Adequate municipal services and infrastructure are available to serve both the existing use/facility (a church) and a conditionally-permitted “emergency shelter” use that might be made of the church facility. Full sidewalks, water, sewer and paved roads already exist adjacent to the subject parcel. The CUP proposal as current presented, however, does not contemplate utilizing the church facility itself as the emergency shelter. Rather, it contemplates an illegal “campground” land use with a single “porta-potty” for use when the church building is not available for bathroom services. Porta-potties are not adequate and appropriate for any permanent use as proposed.

6. *Adequate measures have been or will be taken to provide ingress and egress so designed as to minimize traffic congestion in the public streets.*

A proposed use of the church facility itself for a conditionally-permitted emergency shelter land use would not likely generate appreciable additional traffic. Ingress and egress appears to be adequate for the existing church use and a conditionally-permitted emergency shelter land use of the church facility.

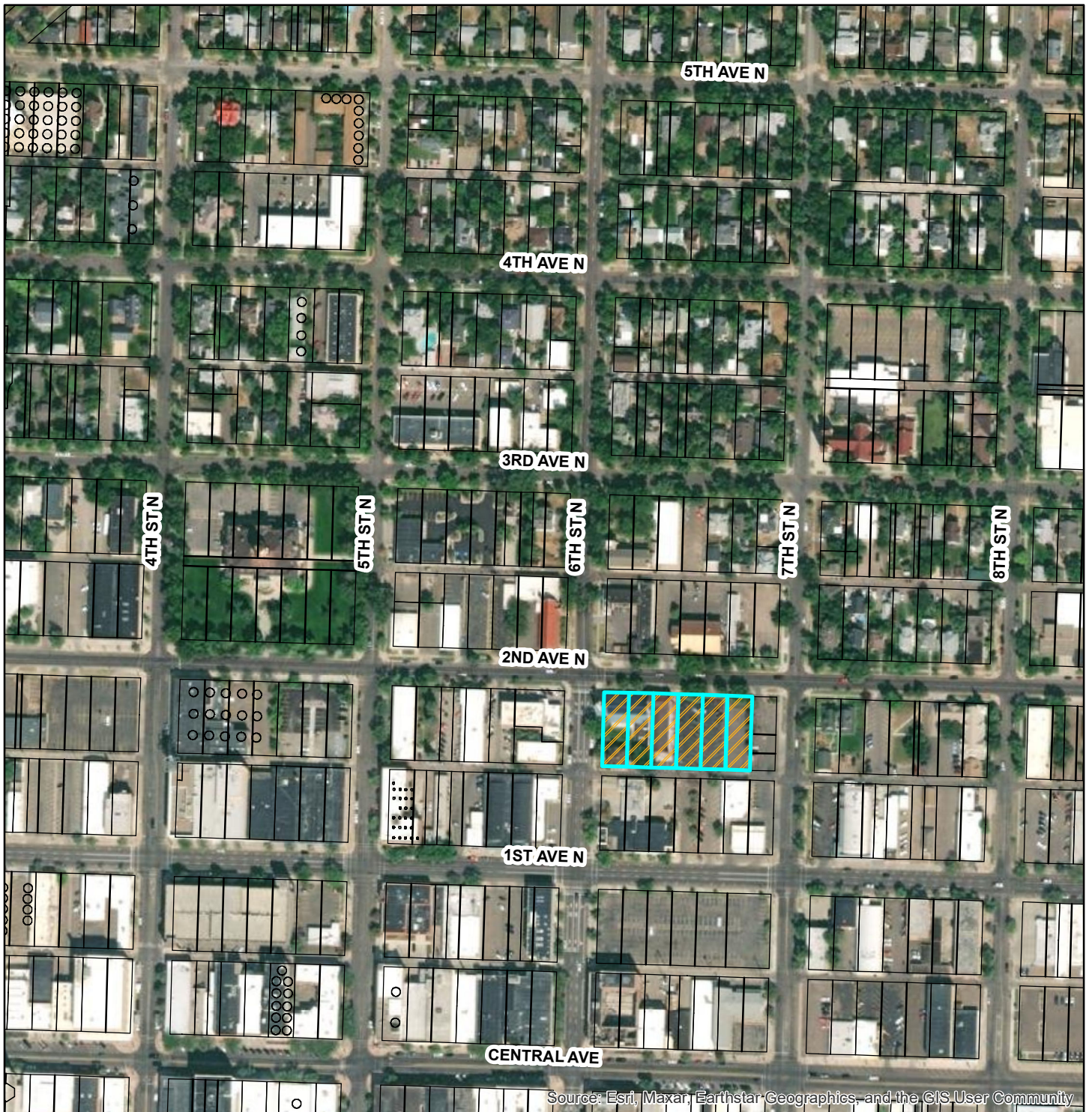
7. *The conditional use shall, in all other respects, conform to the applicable regulations of the district in which it is located, except as such regulations may, in each instance, be modified by the City Commission.*


The proposed use does not conform to existing land use regulations for the C-4 zoning district in that the proposed use takes the form of a “campground” land use. The definition of “campground” is:

"Campground" means a place and/or building, or portion thereof, that is used or is intended for public camping, where people can camp, secure tents or cabins, or park trailers, camping trailers, pickup campers, automobiles, and recreational vehicles for camping and sleeping purposes. The term includes accessory buildings such as a laundromat and retail sales for the convenience of campground guests.

A “campground” land use is not permitted either by right or even conditionally in the C-4 zoning district. As a basic principle of zoning law, the conditional use process cannot be used to authorize a land use form that is otherwise prohibited or forbidden the applicable zoning ordinance.

EXHIBIT A

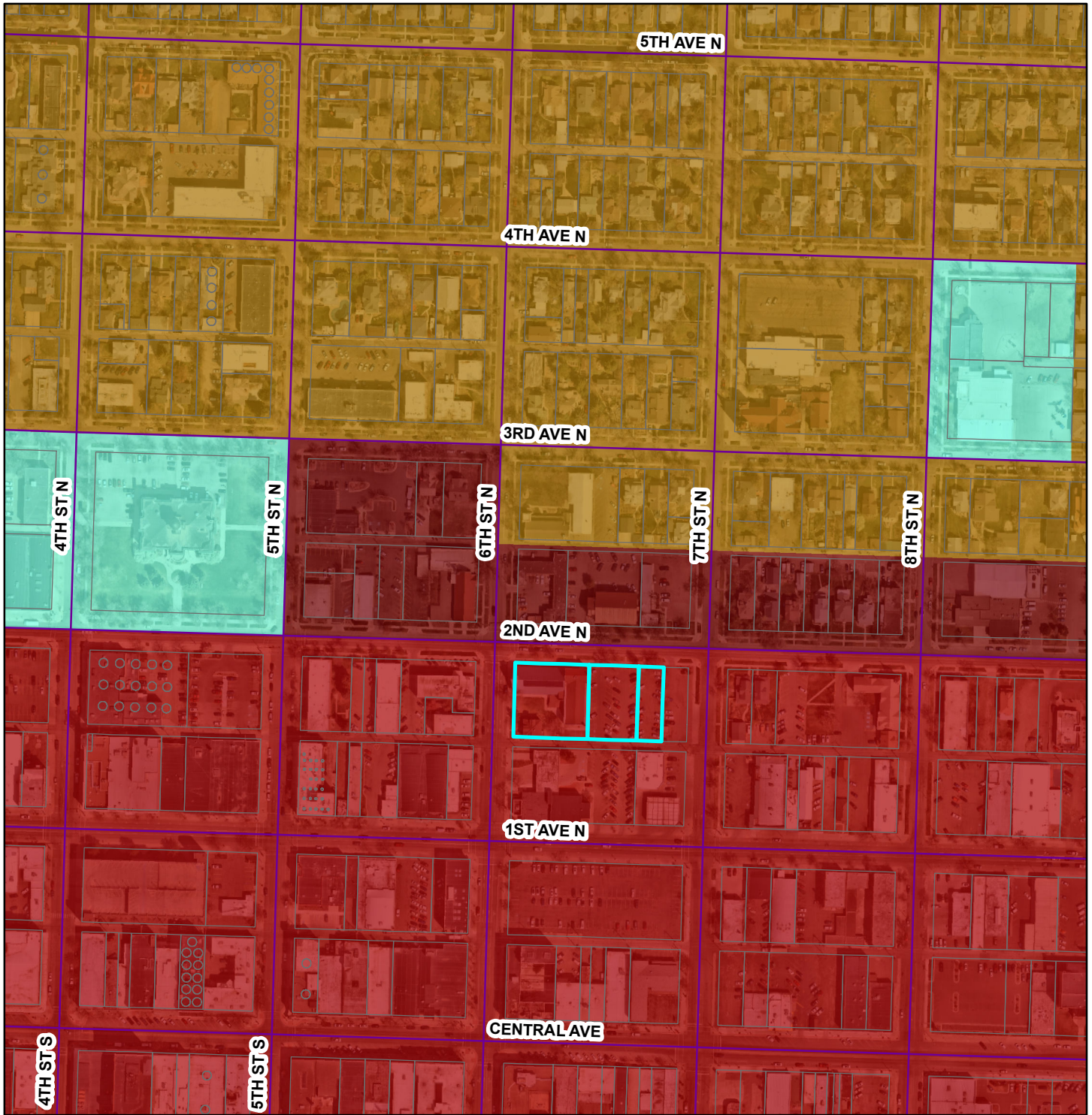


 Subject Property





 City Limits

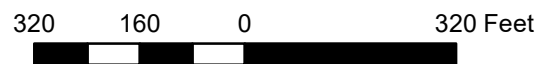


ZONING MAP



Legend

-  R-9 Mixed Residential
-  C-4 Central Business Core
-  C-5 Central Business Periphery
-  PLI Public Lands and Institutional



N



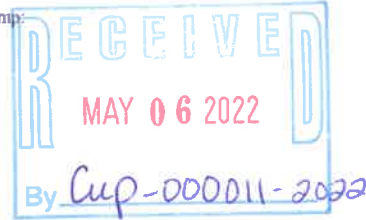






CITY OF GREAT FALLS
PLANNING & COMMUNITY DEVELOPMENT DEPT.
P.O. BOX 5021, GREAT FALLS, MT. 59403 5021
406.455.8430 • WWW.GREATFALLSMT.NET

Date Stamp:



LAND USE APPLICATION

Homeless Ministry

Name of Project (if applicable):

610 Second Avenue North, Great Falls, Montana

Project Address:

First United Methodist Church

Applicant/Owner Name:

P.O. Box 1444, Great Falls, Montana 59401

Mailing Address:

406/459-3114

Phone:

churchoffice@umcgreatfalls.org

Email:

Reverend Jeff Wakeley

Representative Name:

719-427-0269

Phone:

jeffwakeley@gmail.com

Email:

- Annexation by Petition: \$500
- Preliminary Plat, Major: \$1,500 + \$50/lot
- Final Plat, Major: \$1,500 + \$25/lot
- Minor Subdivision: \$1,250
- Zoning Map Amendment: \$2,000
- Conditional Use Permit: \$1,500
- Planned Unit Development: \$2,000
- Amended Plat, Non-administrative: \$1,000

LEGAL DESCRIPTION:

Lot/Block/Subdivision:

Section/Township/Range:

ZONING (ZONING MAP AMENDMENT ONLY):

LAND USE (CONDITIONAL USE ONLY):

Current:

Proposed:

Current:

Proposed:

I (We), the undersigned, understand that the filing fee accompanying this application is not refundable. I (We) further understand that the fee pays for the cost of processing, and the fee does not constitute a payment for approval of the application. I (We) further understand that public hearing notice requirements and associated costs for land development projects are my (our) responsibility. I (We) further understand that other fees may be applicable per City Ordinances. I (We) also attest that the above information is true and correct to the best of my (our) knowledge.

Applicant/Owner's Signature:

Reverend Jeff Wakeley

Date:

5/5/2022

Representative's Signature:

Date:

Effective Date: 5/2019

First United Methodist Church of Great Falls, MT
Outline of Present and Planned Ministry to the Homeless

The First United Methodist Church of Great Falls purpose and mission is to minister on behalf of Jesus Christ to the people living and working in the community of downtown Great Falls, regardless of their beliefs, sexual orientation, ethnicity, social and economic status. People who are houseless and living on the streets are one group who especially need our help and ministry. While some choose to live on the streets. Many live on the streets because of mental illness or economic hardship and lack of affordable housing. We recognize that in the ministering to the people living on the streets that there are those whose primary purpose for coming to the church is to drink and cause who do gather at the church for the purpose of drinking and causing a public disturbance. Much of what we are experiencing today with people living on the streets is due in part to the ongoing effects of the Pandemic.

Our present ministry to people living on the streets includes the following:

1. The Monday through Friday daily distribution of lunch bags.
2. A regular Tuesday Evening Community meal in our Fellowship Hall from 5:00 until 6.
3. Monday through Friday access to entering the church from 10 a.m.- 12 noon to get lunch, to sit or use the bathrooms, from 10:00 am - 12 noon.
4. Use of Porta-Potty in the parking lot for people living on the streets to use when the church building is closed.
5. Allowing persons living on the street to gather on the property to socialize with the condition that they do not drink or use drugs. People who drink are told to leave the property, Persistent offenders can and have been permanently criminally trespassed.
6. Allowing people living on the street to sleep on the property overnight including allowing people to set up tents on the property. They can sleep on the property as long as they don't drink and are not causing a public disturbance. They are also required to clean up after themselves. We are presently directing people to sleep on the East side of the church in and near the parking lot.

Our Future Plans:

1. Working with a non-profit agency to create and manage a temporary encampment for those living on the streets on the unpaved section of the church's parking lot. The encampment would contain up to 10 tents along with space for people to set up their own tents. The encampment would be a ministry of the church but managed by a non-profit group. The encampment would be fenced off and monitored for safety. The Church is working with the Ad-hoc group that has been meeting to address the issue of homelessness since January of this year. They are in the process of incorporation to become a 501C-3.
2. Creation of a Walk-In Center inside the Church for persons to gather and socialize during the day and receive help. The Walk-In center would be similar to St. Vincent

DePaul's Angel Room which is open Sun through Wednesday. Ours would be open Thursday and Friday. .The Center would include a daily meal. The kitchen will have to be remodeled and brought up to standard health department codes.

3. Working with Law Enforcement in coming up with solutions to address the problems of those persons who habitually break our rules and the city ordinances about public drinking and creating a public disturbance on our property.

+++ CHAIN LINK FENCE AROUND PERIMETER

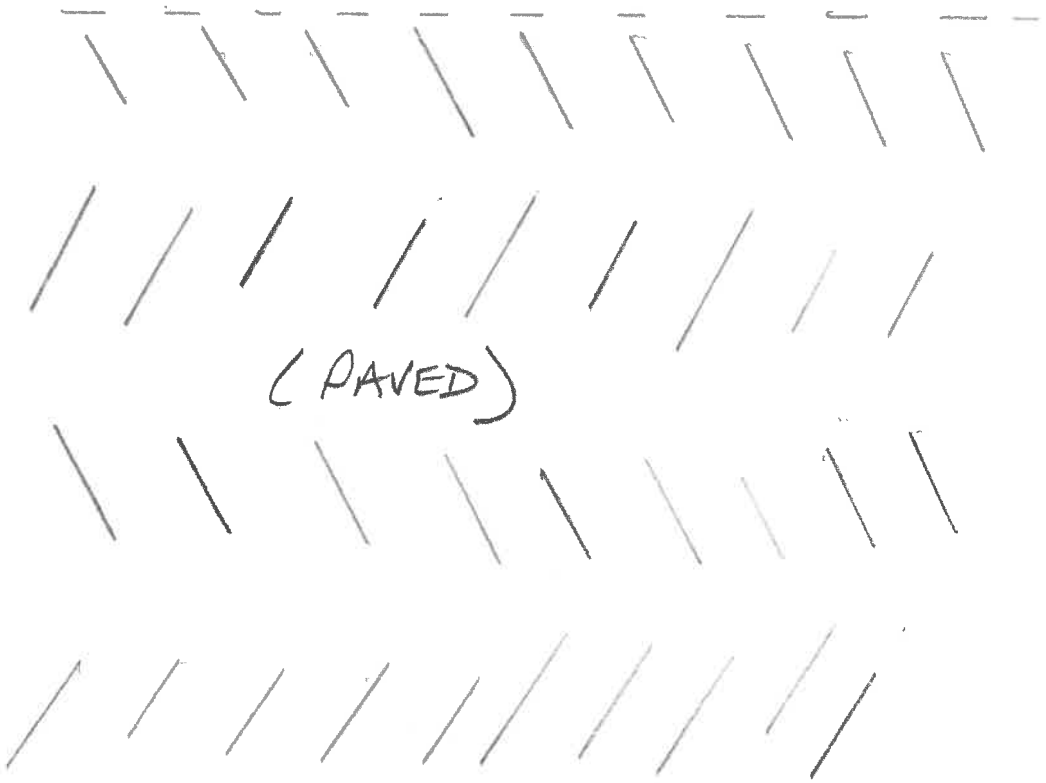
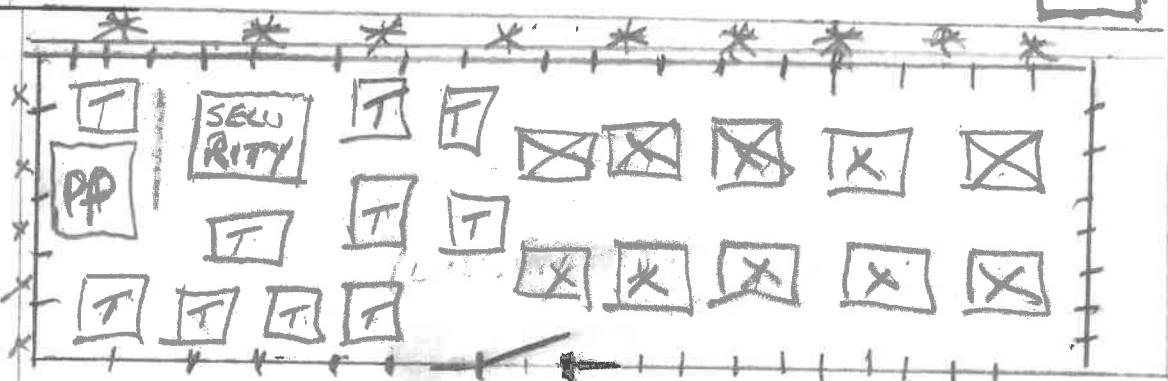
SEVENTH STREET NORTH



☒ TENTS

☐ T SITES FOR TENTS

ZIP TRIP PARKING LOT



(PAVED)

SECOND AVENUE NORTH

SIDE WALK

FENCE

ALLEY

WINDO USELL

FIRST UNITED METHODIST BUILDING



Commission Meeting Date: June 21, 2022

**CITY OF GREAT FALLS
COMMISSION AGENDA REPORT**

Item: Set Public Hearing for the CDBG & HOME Grant Annual Action Plan and Amended Consolidated Plan

From: Planning and Community Development Department

Initiated By: Tonya Shumaker, CDBG Administrator, Planning & Community Development

Presented By: Craig Raymond, Director, Planning & Community Development

Action Requested: Set the Public Hearing for the 2022 Annual Action Plan, and the Amended 2020-2024 Consolidated Plan for July 5, 2022

Suggested Motion:

1. Commissioner moves:

“I move that the City Commission (set/not set) a public hearing for July 5, 2022, to consider the Program Year 2022 Annual Action Plan and the Amended 2020-2024 Consolidated Plan related to the use of CDBG and HOME funds.”

2. Mayor requests a second to the motion, public comment, Commission discussion, and calls for the vote.

Staff Recommendation: Staff recommends the City Commission set July 5, 2022, as the public hearing date to consider the recommended priorities for the Program Year 2022 Annual Action Plan and the Amended 2020-2024 Consolidated Plan related to the use of Community Development Block Grant (CDBG) and Home Investment Partnerships (HOME) funds.

Summary: Holding a Public Hearing is a requirement outlined in the City’s Citizen Participation Plan submitted to the U.S. Department of Housing and Urban Development (HUD). The Public Hearing is the final formal opportunity for the public to impact the priorities the City will outline in the Annual Action Plan and the Amended 2020-2024 Consolidated Plan that is submitted to HUD.

Background: CDBG and HOME programs are federal programs administered by HUD to help fund local community development programs including affordable housing, public service agency assistance, economic development and public infrastructure projects. The primary goal of these programs is to assist low and moderate income (LMI) persons in Great Falls. State and local governments receive funding from HUD based on a formula derived from population and housing statistics. HUD requires public input, especially input from lower income citizens and the agencies representing them, on issues and needs of the community.

Proposed Funding Priorities in the Annual Action Plan: The Annual Action Plan implements the Consolidated Plan by focusing on the following programs: 1) Public Services, 2) Affordable Housing, 3) Housing Rehabilitation, 4) Fair Housing, 5) Economic Development, 6) Public Facilities and Improvements, and 7) Planning and Administration. Additionally, the Action Plan estimates the allocation of CDBG and HOME funds for each program category as well as the number of individuals that may be assisted by each program.

Public Input Process: For the development of the 2022 Annual Action Plan, a public needs hearing was held by the City Commission on April 5, 2022; a communication flyer outlining the priorities and upcoming schedule for public participation was distributed to Neighborhood Councils on May 27, 2022; a 30-day public comment period on the proposed Plan was provided from May 16, 2022 - June 15, 2022; and the proposed plan is currently on this agenda offering the public another opportunity to provide input. The final opportunity for public comment will be on July 5, 2022 when the 2nd Public Hearing will be held and the City Commission will presumably take action on the proposed plan.

Additional public outreach included notifications via traditional and social media outlets, including the Great Falls Tribune, and the City's Facebook page and webpage, as well as direct emails to other public, private, and non-profit agencies. A detailed review of public outreach and citizen participation for the draft Action Plan can be found in sections AP-10 and AP-12 of the document.

During the April 5, 2022 Public Needs Hearing, the City received both verbal and written testimony from citizens and agencies addressing community needs such as providing greater services including services to those individuals that are experiencing homelessness and maximizing the use of funds to provide affordable housing. The proposed Action Plan addresses this input as follows:

- The regulatory maximum of 15% of the total allocation is identified for Public Service activities. CDBG funds were allocated last program year with an emphasis on homeless services and the City will put an emphasis on homeless related services again this program year, and
- Identifying that both HOME funds and CDBG funds can be used to support affordable housing efforts. An amendment to the 2020-2024 Consolidated Plan is also proposed which would allow more eligible uses of CDBG funding specifically for affordable housing activities. This would include property acquisition in addition to slum and blight removal in association with affordable housing projects. For new affordable housing construction, staff notes that the City has approximately \$900,000 of unspent HOME funds from prior funding cycles available for eligible projects. Additionally, the City will be receiving approximately another \$1 million of HOME-ARP funds this year in association with the American Rescue Plan Act. These HOME-ARP funds represent a significant opportunity to add new affordable housing stock into the Great Falls community. Other than this proposed revision, the priorities for the proposed Annual Action Plan remain consistent with the current Action Plan.

Proposed amendment to the 2020-2024 Consolidated Plan: The proposed amendment to the 2020-2024 Consolidated Plan is required to broaden the eligible uses of CDBG funding for the use of affordable housing activities and not to limit CDBG funding only for the removal of slum and blight. Other than this revision, the adopted 2020-2024 Consolidated Plan remains unchanged.

Fiscal Impact: Adoption of the Annual Action Plan is a pre-condition for the City to receive its annual allocation of CDBG and HOME grant funds from HUD. For the upcoming fiscal year (FY 2022/2023), the City will receive \$764,295 in CDBG funds and \$319,759 of HOME funds. The Consolidated Plan amendment will not have any fiscal impact.

Alternatives: The City Commission could elect to not set the public hearing on the Annual Action Plan and the Amended 2020-2024 Consolidated Plan and thereby decide to delay or not accept CDBG and HOME funding for FY 2022/2023.

Attachments:

Attachment #1 - Proposed Annual Action Plan

Attachment #2 - Proposed Amended 2020-2024 Consolidated Plan

Attachment #1

Proposed Annual Action Plan

CITY OF GREAT FALLS

2022 Annual Action Plan for HUD-Funded Programs

Community Development Block Grant (CDBG) and
HOME Investment Partnerships Program (HOME)



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

Public Needs Hearing: April 5, 2022
Public Meeting: June 21, 2022
Public Comment: May 16 – June 15, 2022
Public Hearing and City Commission Action: July 5, 2022
Submitted to HUD: ****
Approved by HUD: ****

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2022 Annual Action Plan

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

The City of Great Falls Annual Action Plan for Program Year 2022 is scheduled for review by the Great Falls City Commission on July 5, 2022. City Commission action on the Annual Action Plan follows a plan development process which included input from local organizations and community residents through a public needs hearing held by the City Commission on April 5, 2022, a public meeting held on June 21, 2022 by the City Commission, and a 30-day public comment period extending from May 16, 2022 through June 15, 2022.

The purpose of this Annual Action Plan is to implement program year three of the five-year [2020-2024 Consolidated Plan](#), identify the housing and community development needs of low and moderate income (LMI) people in the community, and develop comprehensive, coordinated strategies for addressing those needs using available federal and non-federal resources. This Annual Action Plan for Program Year 2022 serves as the budget for the City of Great Falls Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME). Detailed within this Plan are the City's recommended community grant goals and priorities for the upcoming program year, which begins July 1, 2022, and ends June 30, 2023. The City expects to receive an annual allocation of \$764,295 through CDBG and \$319,759 through HOME.

The five-year Consolidated Plan and subsequent Annual Action Plans are required for participation by the City of Great Falls in the U.S. Department of Housing and Urban Development (HUD) CDBG and HOME programs. The Consolidated Plan combines the planning and application requirements for the CDBG and HOME programs. Combining the submission requirements for these two programs allows program planning and citizen participation to take place in a comprehensive context.

Eight priorities and related objectives are identified in the 2020-2024 Consolidated Plan to meet the diverse needs of low to moderate income households in Great Falls. These needs were identified primarily through the plan development process and citizen participation described in this section. Census data and other HUD-provided data were also reviewed to assist in identifying needs.

Summarize the Objectives and Outcomes Identified in the Plan

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

The eight objectives, or goals, identified in the City’s 2020-2024 Consolidated Plan are displayed in the following table.

2020-2024 Goals and Objectives

1	Goal Name	Public Services
	Goal Description	Provide support to public service agencies’ operating programs that benefit low to moderate income persons. The City of Great Falls will provide CDBG funds to social service agencies for activities that service low to moderate income people or areas.
2	Goal Name	Affordable Housing
	Goal Description	Increase and preserve affordable housing opportunities for very low to moderate income renters, homeowners, first-time homebuyers, and those experiencing homelessness. This includes, but is not limited to rehabilitation, acquisition/rehab/resale, demolition, site preparation, reconstruction, and slum and blight activities.
3	Goal Name	Housing Rehabilitation
	Goal Description	Provide construction and rehabilitation assistance for very low to moderate income homeowners, rental property owners through the City’s revolving loan fund. Provide construction and rehabilitation assistance for Public Housing Modernization activities. Housing Rehab may include meeting standard building code upgrades, demolition, site preparation, slum and blight activities, rehabilitation activities addressing livability and life safety.
4	Goal Name	Fair Housing
	Goal Description	Provide funding for activities that affirmatively further fair housing. The City of Great Falls will fund activities that include, but are not limited to fair housing education, counseling, outreach, and referrals pertaining to the laws, rights, and responsibilities related to housing and housing-related transactions, as well as service activities that reduce and remove barriers to fair housing choice.
5	Goal Name	Economic Development
	Goal Description	Provide funding for projects which create decent paying jobs with benefits for persons from low to moderate income households. The City of Great Falls will fund economic development projects which will result in the creation and retention of jobs for low to moderate income people.
6	Goal Name	Public Facilities and Improvements
	Goal Description	Provide public facility and infrastructure assistance, including but not limited to handicap accessibility, energy efficiency improvements, and removal of slum and blighted properties to provide a suitable living environment. The City of Great Falls will prioritize meeting handicap accessibility requirements in public facilities and infrastructure.
7	Goal Name	Planning and Administration
	Goal Description	City staff to administer, manage, and monitor CDBG and HOME funded activities.

8	Goal Name	CDBG Slum & Blight Removal
	Goal Description	The City will allocate funding to remediate properties negatively affected by slum and blighted conditions. This will include clearance with the end goal of providing affordable housing opportunities and/or public facility improvements.

Based on the 2020-2024 Consolidated Plan goals and objectives, as well as citizen input during this plan development process, the following priorities have been identified in the Annual Action Plan for Program Year 2022:

Public Improvements: The City of Great Falls will prioritize meeting handicap accessibility requirements in public facilities and infrastructure. There will be a focus on funding activities that are associated with public parks, public safety, public recreation as well as slum and blight removal this program year with the understanding that efforts are not limited solely to these priorities.

Affordable Housing: Increase and preserve affordable housing opportunities for very low to moderate income renters, homeowners, first-time homebuyers, and those experiencing homelessness through HOME Program funding, including the NeighborWorks Great Falls HOME-funded Down Payment Assistance and Owners in Partnership programs. Affordable housing efforts to remediate properties negatively affected by slum and blighted conditions will be funded through CDBG.

Public Services: The City of Great Falls will provide CDBG funds to social service agencies for activities that provide services for low to moderate income people or areas. The City will focus efforts on meeting the needs of our homeless population, health/mental health needs, substance abuse, underserved youth, and Fair Housing this program year. Applications will not be limited to these activities; however, the City will give priority to applications that directly address homelessness, health/mental health, substance abuse and youth services.

Residential Housing Rehabilitation: Provide construction and rehabilitation assistance for very low to moderate income homeowners, property owners and the Public Housing Authority. The City will focus on upgrading the City’s housing stock to meet standard building codes to provide and sustain safe, affordable housing through its revolving loan fund. The City of Great Falls will address Public Housing Authority rehabilitation or modernization with the use of CDBG funding. Housing efforts to remediate properties negatively affected by slum and blighted conditions will be funded through CDBG.

Economic Development All Economic Development Activities in this Program Year will be carried out by GFDA through the administration of their already established CDBG Revolving Loan Fund for the purpose of job creation and retention for low to moderate income households. This program operates on program income from CDBG.

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

In Program Year 2022, the City will continue to provide funding through the following programs utilizing program income:

CDBG Program Income: City of Great Falls – Housing Rehabilitation Loan Program

Great Falls Development Authority – Economic Development Revolving Loan Fund

HOME Program Income: NeighborWorks Great Falls – Down Payment Assistance and Owners in Partnership Program

At any time program income from the above programs may be reallocated to eligible grant activities if City Staff deem it necessary. Activities to be funded as a grant from the program income must meet an outlined priority already approved and a National Objective.

Evaluation of Past Performance

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

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

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

The evaluation of these issues led to updating the City's Grant Policies in 2018. The City now balances the funding of subrecipients with providing direct programming in order to reach community goals. Instead of funding many small grants, the City's most recent Annual Action Plans have focused on fewer goals. This narrowed funding approach is intended to make a greater impact by allocating greater funding amounts to a smaller number of projects annually. These updated policies will continue to be implemented in Program Year 2022.

Summary of Citizen Participation Process and Consultation Process

Summary from citizen participation section of plan.

Community involvement is a critical component of the planning process for the effective use and prioritization of CDBG and HOME funds. The Citizen Participation Plan contains the City of Great Falls' policies and procedures for involving the community in the development of the Citizen Participation Plan, Annual Action Plan and the Consolidated Plan; the review of the Consolidated Annual Performance and Evaluation Report (CAPER); and any substantial amendments to the Consolidated Plan. The City's Citizen Participation Plan was adopted by the City Commission on April 20, 2021, following a 15-day public comment period from March 22, 2021, through April 5, 2021. A copy of the Citizen Participation Plan can be found as an appendix to this document and on the City's [website](#).

A Community Needs Assessment survey and three public meetings were held to gather citizen input for the development of the 2020-2024 Consolidated Plan. As detailed in the [Consolidated Plan](#), a total of 529 survey responses were received, and the public meetings were attended by community residents, as well as public agencies, nonprofit agencies, and Neighborhood Council members. For the development of this 2022 Annual Action Plan, a public needs hearing was held by the City Commission on April 5, 2022; a 30-day public comment period on the proposed Plan was provided from May 16, 2022 through June 15, 2022; a public meeting at the City Commission was held on June 21, 2022, and a final public hearing was held at the City Commission Meeting on July 5, 2022. All public comments received and themes addressed in public meetings were transcribed and attached to this document as an appendix.

Public outreach included notifications via traditional and social media outlets, including the Great Falls Tribune, The Electric, and the City's Facebook page and webpage, as well as direct emails to other public, private, and non-profit agencies. Additionally, City Staff distributed a communication piece to partners and to all 9 Neighborhood Councils outlining the proposed priorities and process. A detailed review of public outreach and citizen participation for Program Year 2022 is found in sections AP-10 and AP-12 of this Plan.

Summary of Public Comments

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

All public comments received for the development of this Plan are attached to this document as an appendix. Below is a brief summary by commenter.

Public Needs Hearing – April 5, 2022:

Michael Yeagerlener – Spoke about the increased rent and how there is a need for more incorporated neighborhoods regardless of income.

Sherrie Arey – Encouraged staff to include the Housing Market Study information in the planning process. She also spoke about the need for housing in the community that is affordable.

Carrie Parker – Spoke about the need for housing and shelter and urged the commission to allocate funding for such activities.

Brenda Landsdale – Spoke about the need for affordable housing for all. She spoke about how homeless and non-homeless need shelter that is affordable.

Megan Miller – Spoke about the need for assistance to homeless in the community.

Carl Spitzmacher – Spoke about the need for homeless services and shelter.

Julie Bass – Spoke about her concern for an additional homeless shelter to the community as well as how that may impact taxes for the community in the long run.

Lisa Lord – Spoke about the need to provide hope to the homeless.

Shyla Patera – Submitted comments via email pertaining to the needs of affordable, accessible, universally designed housing. She also advocated for policy change at the federal level to allow for a reduction in fees to allow people to be housed.

30 Day Public Comment Period – May 16, 2022 to June 15, 2022:

Comment summary to be included once comment period has closed.

Public Meeting – June 21, 2022:

Comment summary to be included once meeting has been held.

Public Hearing – July 5, 2022:

Comment summary to be included once public hearing has been held.

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

All public comments were noted, transcribed, or accepted into the Annual Action Plan where applicable. No comments or views were rejected.

Summary

The needs of the Great Falls community are greater than the funding provided from the Entitlement Community's CDBG funds or Participating Jurisdiction's HOME funds. Despite this, coordination of public and nonprofit leaders seeks to make the best use of these federal funds. The joint use of the Fair Housing Specialist by the City and Great Falls Housing Authority is an example of working together to solve needs indicated by the community. Great Falls is the only municipality in Montana with this position.

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

Agency/entity responsible for preparing/administering the Consolidated Plan

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

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

HUD Table 1 – Responsible Agencies

Narrative

The Planning and Community Development Department is responsible for administering the Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME) within the City of Great Falls, Montana. An Annual Action Plan is required by the U.S. Department of Housing and Urban Development (HUD) in order to receive federal assistance annually. The City of Great Falls receives CDBG and HOME funds as an Entitlement Community and Participating Jurisdiction, respectively. The City Commission is required to review and approve the Consolidated Plan and associated Annual Action Plans and will continue to do so in July 2022.

The City of Great Falls will submit the 2022 Annual Action Plan to HUD by July 15, 2022, following the required public comment period and City Commission review. The City program year begins July 1 and ends June 30.

Consolidated Plan Public Contact Information

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

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

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

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

Introduction

The 2022 Annual Action Plan was authored by City of Great Falls Planning and Community Development Department staff. Other City departments were heavily involved either in attendance/guidance for input meetings or available for consultation in updating current City projects, particularly the Great Falls Housing Authority, Public Works, and Park and Recreation. Nonprofit service agencies, affordable housing service providers, and housing developers were heavily involved in the creation and fulfillment of past and current Consolidated Plan goals and are crucial to the further fulfillment of these goals during the 2022 program year.

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

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

The City partners with the Great Falls Housing Authority to fund a Fair Housing Program Specialist, and the City is actively engaged with the local Continuum of Care to assist with the collaboration of multiple agencies, including mental health and service agencies, to address homelessness. The City also partners with local Economic Development and Affordable Housing agencies to collaborate on enhancing community growth and providing opportunity for low-income individuals.

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

The Montana Continuum of Care Coalition (MT CoCC) was established by representatives of relevant geographies within the geographic state of Montana for the purpose of carrying out the duties of the CoCC program, as provided for in federal statute 24 CFR Part 578. Great Falls is within Region 5 of this statewide CoCC, and this Region is used to determine homeless survey data from the Montana Department of Health and Human Services.

The City participates in the local Continuum of Care for Homelessness (CoC) group. The CoC group meets monthly throughout the year to expand understanding of the services needed by those who are homeless, to facilitate consolidation and coordination of homeless services and to improve service delivery to people experiencing homelessness. The CoC meetings provide a networking opportunity and assist in keeping funding options open for future HUD homeless grant funds. Since September 2017, the

CoC has incorporated a Coordinated Entry System and bi-monthly Case Conferencing meetings. The progression of the CoC has allowed the community service providers to collaborate, partner, and offer wraparound services to address the community’s needs.

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

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

ESG funds are not projected to be available for the City for Program Years 2020-2024.

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

1	Agency/Group/Organization	NEIGHBORWORKS GREAT FALLS
	Agency/Group/Organization Type	Housing Services - Housing Services - Education Regional Organization Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Provided input on community needs; attended Public Needs Hearing and offered comments; attended meetings with City staff to develop potential project ideas.

2	Agency/Group/Organization	GREAT FALLS DEVELOPMENT AUTHORITY
	Agency/Group/Organization Type	Services - Education Services - Employment Regional Organization Planning Organization Business Leaders Community Development Financial Institution
	What section of the Plan was addressed by Consultation?	Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Provided input on community needs; attended meetings with City staff to develop potential project ideas for proposed Economic Development funds.
3	Agency/Group/Organization	CITY PARK AND RECREATION - COMMUNITY RECREATION CENTER
	Agency/Group/Organization Type	Services - Children Services - Persons with Disabilities Other Government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Facility/ADA Improvements
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended meetings with City staff to develop potential project ideas for proposed Public Infrastructure funds.
4	Agency/Group/Organization	Great Falls Public Housing Authority
	Agency/Group/Organization Type	Housing PHA Services - Fair Housing Other Government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended CoC meetings and bi-monthly Case Conferencing meetings. Attended meetings with City staff to develop potential project ideas for Public Housing Modernization.

5	Agency/Group/Organization	North Central Independent Living Services
	Agency/Group/Organization Type	Services - Housing Services - Elderly Persons Services - Persons with Disabilities Services - Homeless Services - Fair Housing Regional Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homelessness Strategy Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Provided input on community needs; attended Public Needs Hearing and offered comments; attended CoC meetings.
6	Agency/Group/Organization	HELPING HANDS
	Agency/Group/Organization Type	Services – Food & Clothing Services - Homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Homelessness Strategy Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Provided input on community needs; attended Public Needs Hearing and offered comments; attended CoC meetings.

HUD Table 2 – Agencies, groups, organizations who participated

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

The City attempted to contact local public and private agencies with public notice announcements and information via electronic mail as well as traditional and social media platforms. Media outlets included KFBB, KRTV, the Great Falls Tribune, The Electric, and the City’s webpage and Facebook page. Our community is noteworthy for its numerous existing social service and housing agencies, and all play a key role in participatory and advisory sessions that shape our Annual Action Plan.

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

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

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

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

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

AP-12 Participation – 91.105, 91.200(c)

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

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

The goals outlined in this Plan are primarily driven by community input through the Community Needs Assessment survey that was incorporated into the Consolidated Plan, a public meeting, a public needs hearing, and the public comment period. The City intentionally provided multiple avenues of public engagement to ensure the priority-setting process was community-driven and inclusive. The 2022 goals reflect the community's identified priorities, which allows for strategic funding in areas of need. These funding priorities will be used by City staff as a guideline for awards throughout the year.

Citizen Participation Outreach

1	Mode of Outreach: PUBLIC NEEDS HEARING	
	Target of Outreach	Minorities, Persons with disabilities, Non-targeted/broad community, Residents of Public and Assisted Housing
	Summary of response/attendance	Eight individuals commented at the Public Needs Hearing on April 5, 2022, while one other presented written comments via email.
	Summary of comments received	Comments received were related to the use of CDBG funds for affordable housing development, as well as prioritizing funding for services. Comments received are included as an appendix and summarized in this document.
	Summary of comments not accepted and reasons	No comments were rejected.
2	Mode of Outreach: PUBLIC MEETING	
	Target of Outreach	Minorities, Persons with disabilities, Non-targeted/broad community, Residents of Public and Assisted Housing
	Summary of response/attendance	On June 21, 2022 a public meeting was held during the City Commission meeting to present the City's Plan Goals and solicit input for Program Year 2022 activities and priorities.
	Summary of comments received	TBD
	Summary of comments not accepted and reasons	No comments were rejected.
3	Mode of Outreach: PUBLIC HEARING	
	Target of Outreach	Minorities, Persons with disabilities, Non-targeted/broad community, Non-profit agency personnel, faith-based institutions
	Summary of response/attendance	A second Public Hearing will be held on July 5, 2022, when the City Commission votes on the 2022 Annual Action Plan.
	Summary of comments received	Comments received are included as an appendix.
	Summary of comments not accepted and reasons	No comments were rejected.
4	Mode of Outreach: INTERNET OUTREACH	

	Target of Outreach	Minorities, Persons with disabilities, Non-targeted/broad community, Residents of Public and Assisted Housing, Non-profit agency personnel, faith-based institutions
	Summary of response/attendance	The City's website and Facebook page were utilized to provide additional sources of Public Notice for the following: public comment period for the proposed Citizen Participation Plan from May 16 – June 15, 2022; Public Needs Hearing on April 5, 2022; public comment period for the proposed Annual Action Plan from May 16 - June 15, 2022; Public Meeting on June 21, 2022; Public Hearing on July 5, 2022; and to host the proposed Citizen Participation Plan and Annual Action Plan drafts for public review, comment, and download.
	Summary of comments received	Comments received are included as an appendix.
	Summary of comments not accepted and reasons	No comments were rejected.
5	Mode of Outreach: NEWSPAPER AD	
	Target of Outreach	Minorities, Persons with disabilities, Non-targeted/broad community, Residents of Public and Assisted Housing, Non-profit agency personnel, faith-based institutions
	Summary of response/attendance	Legal Advertisements were placed with the Great Falls Tribune to run on the following dates for the corresponding Public Notices: March 20, 2022 and March 27, 2022 for the April 5, 2022 Public Needs Hearing; May 15, 2022 and May 22, 2022 for the 30-day comment period from May 16, 2022-June 15, 2022 for the proposed Annual Action Plan and Citizen Participation Plan; June 19, 2022 and June 26, 2022 for the July 5, 2022 Public Hearing.
	Summary of comments received	Comments received are included as an appendix.
	Summary of comments not accepted and reasons	No comments were rejected.

HUD Table 4 – Citizen Participation Outreach

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

Introduction

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

The expected resources include the annual allocations of CDBG and HOME federal grant funds that Great Falls receives as an Entitlement City and Participating Jurisdiction. The grant amounts are actual allocations for Program Year 2022. If the grant funding or program income comes in above or below the expected amounts identified in the Priority Table below, the project allocations (AP-38 Projects Summary) will be adjusted.

Anticipated Resources

Program	Source of Funds	Expected Amount Available for Program Year				Expected Amount Available Remainder of ConPlan
		Annual Allocation:	Program Income:	Prior Year Resources:	Total:	
CDBG	public - federal	\$764,295	\$150,000	\$2,098,647	\$3,012,945	\$1,528,590
<i>Uses of Funds</i>	<i>Acquisition, Economic Development, Housing, Public Improvements, Public Services, Admin and Planning</i>					
<i>Description</i>	<i>CDBG funds are anticipated to be \$800,000 annually for the program years 2020-2024.</i>					
HOME	public - federal	\$319,759	\$300,000	\$2,195,697	\$2,815,456	\$639,518
<i>Uses of Funds</i>	<i>Acquisition, Homebuyer Assistance, Rehabilitation (Multifamily & Homeowner), New Construction (Multifamily & Homeowner), Admin and Planning</i>					
<i>Description</i>	<i>HOME funds are anticipated to be \$280,000 annually for the program years 2020-2024.</i>					

HUD Table 5 - Expected Resources – Priority Table

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

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

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

None appropriate.

AP-20 Annual Goals and Objectives

Goals Summary Information

	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Public Services	2022	2023	Homeless, Non-Homeless Special Needs, Non-Housing Community Development	City of Great Falls	Public Services	CDBG: \$87,644	Public service activities other than Low/Moderate Income Housing Benefit: 300 Persons Assisted
2	Affordable Housing	2022	2023	Affordable Housing, Homeless, Non-Homeless Special Needs	City of Great Falls	Affordable Housing	HOME: \$2,783,481 CDBG: \$60,000	Homeowner Housing Added: 4 Household Housing Units Rental Units Rehabilitated: 4 Household Housing Units Direct Financial Assistance to Homebuyers: 7 Households Assisted Buildings Demolished: 1 Building
3	Housing Rehabilitation	2022	2023	Affordable Housing, Public Housing, Non-Homeless Special Needs	City of Great Falls	Housing Rehabilitation	CDBG: \$1,370,000	Rental Units Rehabilitated: 34 Household Housing Units Homeowner Housing Rehabilitated: 2 Household Housing Units
4	Fair Housing	2022	2023	Affordable Housing, Public Housing, Homeless, Non-Homeless Special Needs	City of Great Falls	Fair Housing	CDBG: \$27,000	Public service activities other than Low/Moderate Income Housing Benefit: 120 Persons Assisted

	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Economic Development	2022	2023	Non-Housing Community Development, Economic Development	City of Great Falls	Economic Development	CDBG: \$166,000	Jobs created/retained: 5 Jobs
6	Public Facilities and Improvements	2022	2023	Public Housing, Non-Homeless Special Needs, Non-Housing Community Development	City of Great Falls	Public Facilities and Improvements	CDBG: \$1,149,442	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2000 Persons Assisted Buildings Demolished: 1 Building
7	Planning and Administration	2022	2023	Planning and Administration	City of Great Falls	Planning and Administration	CDBG: \$152,859 HOME: \$31,975	

HUD Table 6 – Goals Summary

Program Year 2022 Goal Descriptions

1	Goal Name	Public Services
	Goal Description	The City of Great Falls will provide CDBG funds to social service agencies for activities that provide services for low to moderate income people or areas. The City will focus efforts on meeting the needs of our homeless population, health/mental health needs, substance abuse, underserved youth, and Fair Housing this program year. Applications will not be limited to these activities; however, the City will give priority to applications that directly address homelessness, health/mental health, substance abuse and youth services.
2	Goal Name	Affordable Housing
	Goal Description	Increase and preserve affordable housing opportunities for very low to moderate income renters, homeowners, first-time homebuyers, and those experiencing homelessness. This includes rehabilitation, acquisition, demolition, site preparation, and slum and blight activities. The HOME-funded Down Payment Assistance and Owners in Partnership programs will continue with HOME Program Income.
3	Goal Name	Housing Rehabilitation
	Goal Description	Provide construction and rehabilitation assistance for very low to moderate income homeowners, property owners and the Public Housing Authority. The City will focus on upgrading the City’s housing stock to meet standard building codes to provide and sustain safe, affordable housing through its revolving loan fund. The City of Great Falls will address Public Housing Authority rehabilitation or modernization through grant funding. Housing efforts to

		remediate properties negatively affected by slum and blighted conditions will be funded through CDBG.
4	Goal Name	Fair Housing
	Goal Description	Provide funding for activities that affirmatively further fair housing. The City of Great Falls will fund activities that include but are not limited to fair housing education, counseling, outreach, and referrals pertaining to the laws, rights, and responsibilities related to housing and housing-related transactions, as well as service activities that reduce and remove barriers to fair housing choice.
5	Goal Name	Economic Development
	Goal Description	All Economic Development Activities in this Program Year will be carried out by GFDA through the administration of their already established CDBG Revolving Loan Fund for the purpose of job creation and retention for low to moderate income households. This program operates on program income from CDBG.
6	Goal Name	Public Facilities and Improvements
	Goal Description	Provide public facility and infrastructure assistance to provide a suitable living environment. The City of Great Falls will prioritize meeting handicap accessibility requirements in public facilities and infrastructure. There will be a focus on funding activities that are associated with public parks, public safety, public recreation as well as slum and blight removal this program year with the understanding that efforts are not limited solely to these priorities.
7	Goal Name	Planning and Administration
	Goal Description	City staff to administer, manage, and monitor CDBG and HOME funded activities.

AP-35 Projects – 91.220(d)

Introduction

The City of Great Falls will strategically focus on 10 projects for funding from the CDBG and HOME program, which includes funding for administration and planning at the HUD limit.

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

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

Program Year 2022 Projects

	Project Name
1	2022 Public Services
2	2022 Residential Housing Rehabilitation
3	2022 Public Facilities and Improvements
4	2022 Fair Housing Program
5	2022 CDBG Slum and Blight Removal
6	2022 CDBG/HOME Affordable Housing
7	2022 HOME NeighborWorks Direct Assistance to Homebuyers
8	2022 HOME CHDO Project
9	2022 Great Falls Development Authority Job Creation
10	2022 CDBG/HOME Administration

HUD Table 7 – Project Information

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

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

AP-38 Project Summary

Project Summary Information

1	Project Name	2022 Public Services
	Target Area	City of Great Falls
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$87,644
	Description	The City of Great Falls will provide CDBG funds to social service agencies for activities that provide services for low to moderate income people or areas. The City will focus efforts on meeting the needs of our homeless population, health/mental health needs, substance abuse, and underserved youth this Program Year. Applications will not be limited to these activities; however, the City will give priority to applications that directly address the aforementioned needs.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	300 LMI individuals will benefit from the proposed activity.
	Location Description	City of Great Falls
	Planned Activities	The City will focus efforts on meeting the needs of our homeless population, health/mental health needs, substance abuse, and underserved youth this Program Year. Applications will not be limited to these activities; however, the City will give priority to applications that directly address the aforementioned needs.
2	Project Name	2022 Residential Housing Rehabilitation
	Target Area	City of Great Falls
	Goals Supported	Housing Rehabilitation
	Needs Addressed	Housing Rehabilitation
	Funding	CDBG: \$1,370,000

	Description	Provide construction and rehabilitation assistance for very low to moderate income homeowners, property owners and the Public Housing Authority. The City will focus on upgrading the City’s housing stock to meet standard building codes to provide and sustain safe, affordable housing through its revolving loan fund. The City of Great Falls will address Public Housing Authority rehabilitation or modernization through grant funding. Housing efforts to remediate properties negatively affected by slum and blighted conditions will be funded through CDBG.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	36 LMI households will benefit from this proposed activity.
	Location Description	City of Great Falls
	Planned Activities	Provide construction and rehabilitation assistance for very low to moderate income homeowners, property owners and the Public Housing Authority. The City will focus on upgrading the City’s housing stock to meet standard building codes to provide and sustain safe, affordable housing through its revolving loan fund. The City of Great Falls will address Public Housing Authority rehabilitation or modernization through grant funding. Housing efforts to remediate properties negatively affected by slum and blighted conditions will be funded through CDBG.
3	Project Name	2022 Public Facilities and Improvements
	Target Area	City of Great Falls
	Goals Supported	Public Facilities and Improvements
	Needs Addressed	Public Facilities and Improvements
	Funding	CDBG: \$949,442
	Description	Provide public facility and infrastructure assistance to provide a suitable living environment. The City of Great Falls will prioritize meeting handicap accessibility requirements in public facilities and infrastructure. There will be a focus on funding activities that are associated with public parks, public safety, public recreation as well as slum and blight removal this program year with the understanding that efforts are not limited solely to these priorities.
	Target Date	6/30/2023

	Estimate the number and type of families that will benefit from the proposed activities	These projects will primarily provide an area benefit to LMI families, an estimated 2000 residents this year.
	Location Description	City of Great Falls
	Planned Activities	Provide public facility and infrastructure assistance to provide a suitable living environment. The City of Great Falls will prioritize meeting handicap accessibility requirements in public facilities and infrastructure. There will be a focus on funding activities that are associated with public parks, public safety, public recreation as well as slum and blight removal this program year with the understanding that efforts are not limited solely to these priorities.
4	Project Name	2022 Fair Housing Program
	Target Area	City of Great Falls
	Goals Supported	Fair Housing
	Needs Addressed	Fair Housing
	Funding	CDBG: \$27,000
	Description	This is a shared position with the Great Fall Housing Authority to provide funding for activities that affirmatively further fair housing. The City of Great Falls will fund activities that include but are not limited to fair housing education, counseling, outreach, and referrals pertaining to the laws, rights, and responsibilities related to housing and housing-related transactions.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	120 LMI families will benefit from the proposed activity.
	Location Description	City of Great Falls
Planned Activities	The City of Great Falls will fund activities that include but are not limited to fair housing education, counseling, outreach, and referrals pertaining to the laws, rights, and responsibilities related to housing and housing-related transactions, as well as service activities that reduce and remove barriers to fair housing choice.	

5	Project Name	2022 CDBG Slum and Blight Removal
	Target Area	City of Great Falls
	Goals Supported	Affordable Housing, Public Facilities and Improvements
	Needs Addressed	Affordable Housing, Public Facilities and Improvements
	Funding	CDBG: \$210,000
	Description	The City will allocate funding to remediate properties negatively affected by slum and blighted conditions. This will include clearance with the end goal of providing affordable housing opportunities and/or public facility improvements.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	2 buildings will be demolished under the Slum and Blight National Objective.
	Location Description	City of Great falls
Planned Activities	The City will allocate funding to remediate properties negatively affected by slum and blighted conditions. This will include clearance with the end goal of providing affordable housing opportunities and/or public facility improvements.	
6	Project Name	2022 CDBG/HOME Affordable Housing
	Target Area	City of Great Falls
	Goals Supported	Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	HOME: \$2,410,518 CDBG: \$50,000
	Description	Allocate HOME Investment Partnerships Program (HOME) funds towards new construction and homeownership. HOME funds will be granted to continue the City's mission to improve and grow the community's affordable housing stock. HOME funding can be utilized towards building, buying, and/or rehabilitating affordable housing for rent or homeownership or providing direct rental assistance to low-income people. CDBG will be used for acquisition of properties for the goal of developing affordable housing.
	Target Date	6/30/2023

	Estimate the number and type of families that will benefit from the proposed activities	7 LMI households will benefit from this project.
	Location Description	City of Great Falls
	Planned Activities	Allocate HOME Investment Partnerships Program (HOME) funds towards new construction and homeownership. HOME funds will be granted to continue the City's mission to improve and grow the community's affordable housing stock. HOME funding can be utilized towards building, buying, and/or rehabilitating affordable housing for rent or homeownership or providing direct rental assistance to low-income people. CDBG will be used for acquisition of properties for the goal of developing affordable housing.
7	Project Name	2022 HOME-NeighborWorks Direct Assistance to Homebuyers
	Target Area	City of Great Falls
	Goals Supported	Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	HOME: \$325,000
	Description	NeighborWorks Great Falls will utilize HOME program income to provide direct assistance to first-time homebuyers in the form of down payment assistance, closing costs, or gap financing (OIP). Any activity providing direct assistance through this project will be required to utilize the Recapture Provision as outlined in the AAP and Program Income Plan.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	7 LMI families will benefit from the proposed activity.
	Location Description	City of Great Falls

	Planned Activities	NeighborWorks Great Falls will utilize HOME program income to provide direct assistance to first-time homebuyers in the form of down payment assistance, closing costs, or gap financing (OIP). Any activity providing direct assistance through this project will be required to utilize the Recapture Provision as outlined in the AAP and Program Income Plan.
8	Project Name	2022 HOME CHDO Project
	Target Area	City of Great Falls
	Goals Supported	Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	HOME: \$47,963
	Description	15% set-aside for HOME CHDO Project
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	At least 1 LMI household will benefit from this project.
	Location Description	City of Great Falls
	Planned Activities	Activities to increase affordable housing stock.
9	Project Name	2022 GFDA Job Creation
	Target Area	City of Great Falls
	Goals Supported	Economic Development
	Needs Addressed	Economic Development
	Funding	CDBG: \$166,000
	Description	All Economic Development Activities this Program Year will be carried out by GFDA through the administration of their already established CDBG Revolving Loan Fund for the purpose of job creation and retention for low to moderate income households. This program operates on program income from CDBG.
	Target Date	6/30/2022

	Estimate the number and type of families that will benefit from the proposed activities	5 LMI jobs created/retained.
	Location Description	City of Great Falls
	Planned Activities	All Economic Development Activities this Program Year will be carried out by GFDA through the administration of their already established CDBG Revolving Loan Fund for the purpose of job creation and retention for low to moderate income households. This program operates on program income from CDBG.
10	Project Name	2022 CDBG/HOME Administration
	Target Area	City of Great Falls
	Goals Supported	Planning and Administration
	Needs Addressed	Planning and Administration
	Funding	CDBG: \$152,859 HOME: \$31,975
	Description	City staff to administer, manage, and monitor CDBG and HOME funded activities.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	n/a - City staff to administer, manage, and monitor CDBG and HOME funded activities.
	Location Description	City of Great Falls
Planned Activities	City staff to administer, manage, and monitor CDBG and HOME funded activities.	

HUD Table 8 – Projects Summary

AP-50 Geographic Distribution – 91.220(f)

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

The geographic area for the entitlement city, Great Falls, Montana, is outlined as the area within the city limits as established by the City of Great Falls. Data from the 2018 American Community Survey 5-year Estimate suggests that minority populations represent less than 14% of the city’s total population. When considering areas of minority concentration, [HUD’s CPD Mapping Tool](#) indicates that a larger number of minority households live in Census Tracts 3, 4, 7, and 108 when compared to the rest of the city; however, Great Falls does not have any areas of minority concentration according to Federal Financial Institutions Examination Council (FFIEC) data or as defined by HUD Minority Neighborhoods. The city does, however, have areas of low-income concentration, which are defined as areas where 51% of the population has income at or below 80% AMI.

Geographic Distribution

Target Area	Percentage of Funds
City of Great Falls	100

HUD Table 9 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

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

AP-55 Affordable Housing – 91.220(g)

Introduction

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

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	51
Special-Needs	0
Total	51

HUD Table 10 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	4
Rehab of Existing Units	40
Acquisition of Existing Units	7
Total	51

HUD Table 11 - One Year Goals for Affordable Housing by Support Type

AP-60 Public Housing – 91.220(h)

Introduction

The Great Falls Housing Authority (GFHA) is the only Public Housing Authority within the city of Great Falls. GFHA owns and operates one main public housing site (Chowen Springs) and four scattered public housing sites (Austin Hall, Yeoman-Tynes, Russell Apartments, and Sunrise Court). These properties include a total of 490 apartment units that range in size from 1-4 bedrooms. Additionally, GFHA has budget authority for 250 Housing Choice Vouchers (HCVs). The HCV program, formerly known as the Section 8 program, allows private landlords to contract with GFHA, who inspects the units for Housing Quality Standards and subsidizes the rent for the approved tenant.

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

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

The Housing Authority will continue its multi-year rehabilitation project at the main site (MT2-1 and MT2-2) which involves upgrading the overhead electrical distribution system, street lights, sewer mains, water mains and gas distribution systems for 356 units and major interior renovation of 156 units. The units will be demolished down to the studs and rebuilt, including new roofs; windows; doors; walls; flooring; and electrical, plumbing and heating systems. Exterior sewer, water and electrical services will also be replaced. At the time of this report, the major interior renovations of 34 units have been completed as a part of this project. This modernization project began in 2015 and is expected to take 10 to 15 years to complete, contingent upon funding.

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

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

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

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

provided or other assistance.

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

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

Introduction

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

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

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

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

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

Addressing the emergency shelter and transitional housing needs of homeless persons

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

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

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

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

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

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

Discussion

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

conducts evaluations to determine whether symptoms of a mental disorder are evident. The agency coordinates with organizations such as Opportunities, Inc., Office of Public Assistance, Great Falls Rescue Mission, Salvation Army, and St. Vincent DePaul to provide assistance with housing, food, clothing and payee services.

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

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

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

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

Introduction

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

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

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

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

begun outreach with community stakeholders to seek input for its next affordable housing proposal for property south of Great Falls.

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

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

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

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

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

AP-85 Other Actions – 91.220(k)

Introduction

The Planning and Community Development Department (PCD) administers the CDBG and HOME grant funds that the City is allocated each year. For the 2022 program year, PCD will administer more than one million dollars in funding for projects in public services, affordable housing, housing rehabilitation, fair housing, economic development, and public facilities. These funds come from both federal dollars and program income.

Actions planned to address obstacles to meeting underserved needs

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

Actions planned to foster and maintain affordable housing

The preservation and development of quality, affordable housing continues to be a priority for the City of Great Falls. The [Consolidated Plan](#) details the overall housing strategy, which was developed based on a market analysis, an assessment of housing needs, and extensive community involvement. Data provided by HUD in the Needs Assessment section of the Consolidated Plan (NA-25) indicates that 28.2% of Great Falls households are cost-burdened, meaning they pay more than 30% of their income on housing needs. The goals listed below, as outlined in the Consolidated Plan, seek to foster and maintain affordable housing, affirmatively further fair housing, and preserve housing choice for households in Great Falls:

Affordable Housing Increase and preserve affordable housing opportunities for very low to moderate income renters, homeowners, first-time homebuyers, and those experiencing homelessness. This includes acquisition and affordable housing efforts that require funding to remediate properties negatively affected by slum and blighted conditions, but is not limited to these activities.

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

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

The City of Great Falls certifies to affirmatively further fair housing through its housing programs. Progress on actions taken by the City to affirmatively further fair housing will be reported annually in the City's Consolidated Annual Performance and Evaluation Report (CAPER).

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

Actions planned to reduce lead-based paint hazards

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

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

The City will pay for lead-based paint testing on all projects through the City's housing rehabilitation programs, with homeowners only incurring greater costs if a contractor has to be hired. The City will provide outreach activities for lead-based paint hazards through notifying contractors of the availability of lead-based paint certification classes if certified private companies hold such classes during the upcoming year. Lead-based paint hazards will be taken into consideration on all pertinent CDBG-funded projects being undertaken by sub-grantees.

Actions planned to reduce the number of poverty-level families

All planned activities for Program Year 2022 will promote the reduction of poverty-level families by providing resources and opportunities to assist low-income individuals to be able to grow and prosper. One specific example is that 15% of the CDBG Budget, approximately \$114,000, will be allocated to

provide public services to reduce the number of poverty-level families. This will provide funding toward public service projects that specifically focus on addressing barriers in the areas of homelessness, health/mental health, substance abuse, youth services, and fair housing. All public service projects must be new and/or expanding services that benefit low-to-moderate income persons.

Actions planned to develop institutional structure

The City has no plans at this time to make any significant institutional structure changes. The Planning and Community Development Department will continue to further develop and implement best practices to streamline the administration of federal funds. For example, the City recently expanded the size of its Municipal Grant Committee and soon plans to modify its grant application process to implement a compressed grant application cycle as opposed to allowing grants to be filed throughout the program year.

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

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

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

The Continuum of Care for Homelessness will meet in an ongoing effort to identify needs and coordinate delivery of services for people experiencing homelessness. The City will continue its close working relationship with the Great Falls Housing Authority. This relationship will include such aspects as sharing of staff, environmental clearances, and fair housing activities. The City Commission appoints the Housing Authority Board of Commissioners and the City Manager appoints the Executive Director of the Housing

Authority. Housing Authority staff is made up of City employees. The City will complete environmental reviews for all Housing Authority sponsored construction and rehabilitation projects; therefore, the City will be aware of and review any proposed development projects or proposed demolition of public housing units.

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

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

Introduction

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

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

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

Table with 5 rows of program income items and their values (0). Total Program Income: 0

Other CDBG Requirements

Table with 2 rows of other CDBG requirements and their values (0 and 70.00%).

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

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

Great Falls does not intend to use any other form of investment beyond eligible activities listed in 24 CFR 92.205(a).

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

All City HOME funds used for ONLY development and include NO direct assistance to a homebuyer will follow the resale provisions as required by federal regulation 24 CFR 92.254(a)(5)(i)(A). The HOME funds will be secured with a deed restriction.

The resale option will require that the home remain affordable for the period of affordability by ensuring that, if the property is sold during the period of affordability, that it is sold to an income eligible buyer, that it is affordable to a reasonable range of low to moderate income homebuyers, and that the original buyer receives a fair return, if the market allows.

When defining “*affordable to a reasonable range of low-income homebuyers*” it will mean that the home resale price will be affordable to the individuals or families at or below 80% of AMI. The general standard for affordability is 30% as a maximum percentage of income that a household should dedicate to housing costs. Consequently, what is *affordable to a reasonable range of low-income homebuyers* would be defined as a family at or below 80% of AMI paying no more than 30% of income for principal, interest, property taxes, and insurance.

When defining “*fair market return on investment*” the City will calculate based on an appraisal of the property. To determine the amount of market appreciation, if any, will be done by calculating the difference between the initial and resale appraisals. This figure will represent the basis for calculating the fair return on investment. In a declining market, it is possible that there will not be a return.

To calculate “*affordable to a reasonable range of low-income homebuyers*” as well as the “*fair market return on investment*”:

(Resale Appraisal – Initial Appraisal) x Clearly defined standard or index = Fair return on investment to homeowner

Affordable price at sale + Fair return on investment to homeowner = Resale price

Example:

Fair Market Value at Sale (Initial Appraisal): \$200,000

Affordable Price at Sale: \$150,000

Standard or Index: 25%

Fair Market Value at Resale (Resale Appraisal): \$275,000

Increase in Market Appreciation: \$275,000 - \$200,000 = \$75,000

Fair Return on Investment: \$75,000 x .25 = \$18,750

Resale Price: \$150,000 + \$18,750 = \$168,750

City HOME funds used as subsidies augmenting the affordable purchase by low to moderate income first-time homebuyer families of newly constructed or rehabilitated single family homes will be through NeighborWorks Great Falls (NHS) for its Owners in Partnership (OIP) program where NeighborWorks Great Falls operates as the owner and developer of the properties. NeighborWorks Great Falls is the City's only Community Housing Development Organization (CHDO). All City HOME funds used for first-time homebuyers down payment and closing cost assistance will be through NeighborWorks Great Falls in its role as a HOME grant subrecipient. The HOME funds will be secured with a deed restriction. Each down payment assistance grant to homebuyers is secured with a deed restriction stating that if the house is sold, the grant monies must be returned.

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

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

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

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

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

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

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

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

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

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

Written Agreements – NeighborWorks Great Falls executes a set of HOME written agreements that accurately reflects the recapture provisions with the homebuyer at the time of sale. These detailed written agreements, including an Occupancy Agreement, HOME rider to the Deed of Trust, and Deed Restriction Agreement, ensure that all parties are aware of the specific HOME requirements applicable to the unit (i.e., period or affordability, principal residency requirement, terms and

conditions of either the resale or recapture requirement), and helps NeighborWorks and the City of Great Falls enforce those requirements. When revisions to the recapture provisions in the City of Great Falls Annual Action Plan are submitted, homebuyer written HOME agreements are modified to reflect any changes. The written agreement creates a legal obligation for the City of Great Falls, NeighborWorks and the homebuyer. The HOME written agreements are separate legal documents from any loan instrument and comply with the requirements of §92.504(c)(5) of the HOME rule.

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

A Deed Restriction for HOME funds used ONLY for development and include NO direct assistance to a homebuyer will contain the following provisions: federal regulation 24 CFR 92.254(a)(5)(i)(A).

- Principal residency requirement (including a separate Home Occupancy Agreement signed by the borrower)
- Deed Restriction will be executed at time of closing and recorded at that time.
- Original Developer gets the right of first refusal to buy back the property
- New buyer must be income eligible
- Remaining resale restrictions apply to the new buyer upon transfer
- There must be a “*fair return on investment*” to the original buyer – if the market supports that
 - “*Fair Return on Investment*” will be calculated based on an appraisal of the property. To determine the amount of market appreciation, if any, will be done by calculating the difference between the initial and resale appraisals. This figure will represent the basis for calculating the fair return on investment. In a declining market, it is possible that there will not be a return.
- The home must be affordable

A Deed Restriction containing the following provisions will be used to enforce HOME Program requirements for activities with both HOME funded development subsidy and HOME funded direct assistance to a homebuyer:

- Principal residency requirement (including a separate Home Occupancy Agreement signed by the borrower)
- Recapture provision based on net proceeds available from sale (voluntary or involuntary)
- Deed Restriction will be executed at time of closing and recorded at that time. An agreement between NeighborWorks Great Falls and the City of Great Falls

ensures that the CHDO complies with all recapture provisions established, most recently updated in 2021. It notes when and how recapture is scheduled to occur. While a deed restriction acts as the primary agreement between borrower and lender, information provided in the Program Income Policy clearly states the terms of recapture to the prospective homeowner, the required length of affordability, and strongly associates responsibility to (ultimately) the Participating Jurisdiction, the City of Great Falls. This policy is attached as an appendix.

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

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

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Attachment #2

Proposed Amended
2020-2024 Consolidated Plan

CITY OF GREAT FALLS

Amended 2020-2024 Consolidated Plan for HUD-Funded Programs

*Amendments are noted in red text



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



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Section 1 | Executive Summary

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

Introduction

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

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

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

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

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

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

Goal 1: Public Services

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

Goal 2: Affordable Housing

Increase and preserve affordable housing opportunities for very low to moderate income renters, homeowners, first-time homebuyers, and those experiencing homelessness. This includes, but is not limited to rehabilitation, acquisition/rehab/resale, demolition, site preparation, reconstruction, and slum and blight activities.

Goal 3: Housing Rehabilitation

Provide construction and rehabilitation assistance for very low to moderate income homeowners, rental property owners through the City's revolving loan fund. Provide construction and rehabilitation assistance for Public Housing Modernization activities. Housing Rehab may include meeting standard building code upgrades, demolition, site preparation, slum and blight activities, rehabilitation activities addressing livability and life safety.

Goal 4: Fair Housing

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

Goal 5: Economic Development

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

Goal 6: Public Facilities and Improvements

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

Goal 7: Planning and Administration

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

Goal 8: CDBG Slum and Blight Removal

The City will allocate funding to remediate properties negatively affected by slum and blighted conditions. This will include clearance with the end goal of providing affordable housing opportunities and/or public facility improvements.

Evaluation of past performance

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

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

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

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

Summary of citizen participation process and consultation process

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

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

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

Summary of public comments

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

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

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

Summary

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

Section 2 | The Process

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

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

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

HUD Table 1 – Responsible Agencies

Narrative

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

Consolidated Plan Public Contact Information

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

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

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

PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)

Introduction

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

HUD Table 2 – Agencies, groups, organizations who participated

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

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

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

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

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

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

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

PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)

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

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

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

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

Citizen Participation Outreach

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

2	Mode of Outreach: PUBLIC MEETING	
	Target of Outreach	Minorities, Persons with disabilities, Non-targeted/broad community, Non-profit agency personnel, faith-based institutions

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

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

4	Mode of Outreach: IN-PERSON OUTREACH	
	Target of Outreach	Minorities, Persons with disabilities, Non-targeted/broad community, Residents of Public and Assisted Housing
	Summary of response/attendance	Staff member attended Council of Councils meeting on January 28, 2020, to present information on citizen participation opportunities during the consolidated planning process, including distributing physical copies of the community needs assessment as well as online survey link.
	Summary of comments received	No comments were received.
	Summary of comments not accepted and reasons	No comments were rejected.

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

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

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

Table 1 – Citizen Participation Outreach

Section 3 | Needs Assessment

NA-05 Overview

Needs Assessment Overview

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

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

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

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

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

- d. slum and blighted property removal
- 4. Prioritization of *Community Facilities Activities (Infrastructure)* that address:
 - a. youth centers
 - b. park and recreation
 - c. community centers
 - d. public restroom facilities
- 5. Prioritization of *Economic Development Activities* that address:
 - a. removing barriers to work (i.e., lack of public transportation)
 - b. increasing equitable pathways to opportunity (i.e., education, training, economic mobility)

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

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

Summary of Housing Needs

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

Table 5 - Housing Needs Assessment Demographics
 Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Number of Households Table

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

Household contains at least one person age 75 or older	415	915	760	545	925
Households with one or more children 6 years old or younger	675	554	775	365	610

Table 6 - Total Households Table
Data Source: 2011-2015 CHAS

Housing Needs Summary Tables

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

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

Table 7 – Housing Problems Table
Data Source: 2011-2015 CHAS

2. Housing Problems 2

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

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total

NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	1,590	455	195	90	2,330	510	375	180	25	1,090
Having none of four housing problems	1,015	1,390	1,835	1,015	5,255	285	1,305	2,105	1,655	5,350
Household has negative income, but none of the other housing problems	160	0	0	0	160	40	0	0	0	40

Table 8 – Housing Problems 2
Data Source: 2011-2015 CHAS

3. Cost Burden > 30%

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

Table 9 – Cost Burden > 30%
Data Source: 2011-2015 CHAS

4. Cost Burden > 50%

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

Table 10 – Cost Burden > 50%
Data Source: 2011-2015 CHAS

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	195	130	100	4	429	4	0	24	0	28

Multiple, unrelated family households (e.g. more than one unrelated household living in a single dwelling unit)	0	40	0	0	40	4	0	0	4	8
Other, non-family households	0	0	15	0	15	0	0	0	0	0
Total need by income	195	170	115	4	484	8	0	24	4	36

Table 11 – Crowding Information – 1/2

Data Source: 2011-2015 CHAS

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

Table 12 – Crowding Information – 2/2

Data Source: 2011-2015 CHAS (data unavailable)

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

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

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

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

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

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

the Housing Authority estimates 11 people with disabilities on the public housing wait list and 19 on the Housing Choice Voucher list.

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

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

What are the most common housing problems?

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

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

More than half of households with 0-30% AMI have one or more severe housing problems at a rate of 58%. Other, single-person household renters with 0-30% AMI represent 24% of renters experiencing cost burden and 37.5% of renters experiencing severe cost burden. Small, related household renters with 0-80% AMI represent 35% of renters experiencing cost burden and 32.5% of renters experiencing severe cost burden. HUD-determined Fair Market Rents for Great Falls in 2015 for efficiency, one-bedroom, and two-bedroom units--units of size that would likely serve these populations--were \$485,

\$505, and \$685, respectively. The supply of these units is not great enough to respond to the large demand in the community of Great Falls.

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

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

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

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

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

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

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

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

Housing that is considered affordable is defined as housing units that have sales prices or rents that are within the means of a low or moderate income household. The private housing market does not generally provide affordable housing without some type of subsidy or incentive. Public agencies and non-profit organizations have been very active in housing programs for many years, as described elsewhere in this report. Despite their success, however, the ability of low and moderate income families to acquire housing has still been adversely affected as a result of costs rising faster than incomes.

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

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

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

Introduction

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

For 0%-30% AMI:

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

For 30%-50% AMI:

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

For 50%-80% AMI:

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

For 80%-100% AMI:

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

0%-30% of Area Median Income

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

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2011-2015 CHAS

30%-50% of Area Median Income

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

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data Source: 2011-2015 CHAS

50%-80% of Area Median Income

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

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data Source: 2011-2015 CHAS

80%-100% of Area Median Income

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

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data Source: 2011-2015 CHAS

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

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

Introduction

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

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

For 0%-30% AMI:

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

For 30%-50% AMI:

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

For 50%-80% AMI:

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

For 80%-100% AMI:

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

0%-30% of Area Median Income

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

Table 17 – Severe Housing Problems 0 - 30% AMI

Data Source: 2011-2015 CHAS

30%-50% of Area Median Income

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

Table 18 – Severe Housing Problems 30 - 50% AMI

Data Source: 2011-2015 CHAS

50%-80% of Area Median Income

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

Table 19 – Severe Housing Problems 50 - 80% AMI

Data Source: 2011-2015 CHAS

80%-100% of Area Median Income

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

Table 20 – Severe Housing Problems 80 - 100% AMI

Data Source: 2011-2015 CHAS

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

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

Introduction

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

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

Table 21 – Greater Need: Housing Cost Burdens AMI

Data Source: 2011-2015 CHAS

Discussion

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

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

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

Disproportionately greater need is defined by being at least 10% larger than the total income level (all races combined). Based upon the data provided in section NA-20, disproportionately greater needs exist

among certain racial or ethnic groups despite their small percentage of the population. For extremely low incomes (0-30% AMI), Asian households and American Indian/Alaska Native households have disproportionate needs, while in the low income category (30-50% AMI) Asians and Hispanics have disproportionately greater needs. When considering moderate incomes (50-80% AMI), American Indian/Alaska Native and Hispanic populations have disproportionately greater needs.

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

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

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

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

NA-35 Public Housing – 91.205(b)

Introduction

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

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

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

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

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

Totals in Use

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

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

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

Characteristics of Residents

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

Table 24 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

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

Table 25 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

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

Ethnicity of Residents

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

Table 26 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

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

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

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

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

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

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

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

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

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

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

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction

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

Homeless Needs Assessment, January 31, 2019

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

Table 27 - Homeless Needs Assessment

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

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

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

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

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

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

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

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

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

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

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

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

Introduction

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

Describe the characteristics of special needs populations in your community.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Describe the jurisdiction's need for Public Facilities:

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

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

How were these needs determined?

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

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

Describe the jurisdiction's need for Public Improvements:

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

How were these needs determined?

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

Describe the jurisdiction's need for Public Services:

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

How were these needs determined?

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

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

Describe the jurisdiction's need for Economic Development:

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

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

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

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

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

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

How were these needs determined?

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

Section 4 | Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview

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

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

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

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

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

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

MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

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

All Residential Properties by Number of Units

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

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

Unit Size by Tenure

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

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

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

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

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

at-a-glance measure is available to public agencies and residents of Great Falls at <https://egis.hud.gov/cpdmaps/>.

Assisted properties, Low Income Housing Tax Credit (LIHTC) projects, and public housing projects have been mapped below, along with housing voucher concentration.

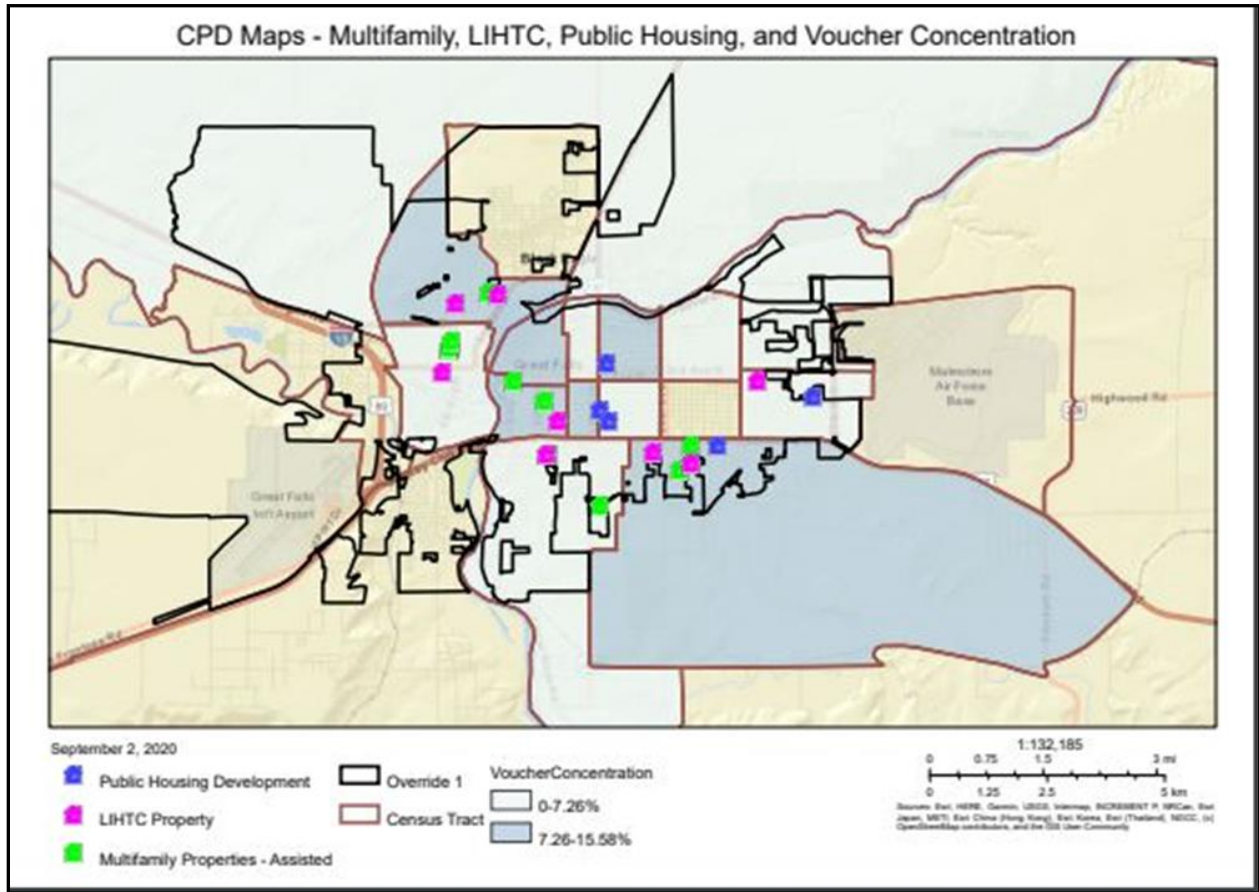


Figure 1 – Multifamily, LIHTC, Public Housing, and Voucher Concentration

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

HUD Multifamily properties in Great Falls:

- Aspen Village (60 units)
- Broadview Manor Apartments (20 units)
- Centennial Village (48 units)
- Park Manor (103 units)
- Parkview Apartments (83 units)
- Rainbow House (40 units)
- Sunshine Village (70 units)

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

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

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

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

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

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

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

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

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

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

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

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

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

Describe the need for specific types of housing.

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

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

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

Introduction

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

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

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

Cost of Housing

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

Table 33 – Cost of Housing

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

Rent Paid

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

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

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

Housing Affordability

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

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

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

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

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

Is there sufficient housing for households at all income levels?

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

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

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

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

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

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

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

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

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

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

Introduction

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

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

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

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

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

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

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

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

Condition of Units

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

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

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

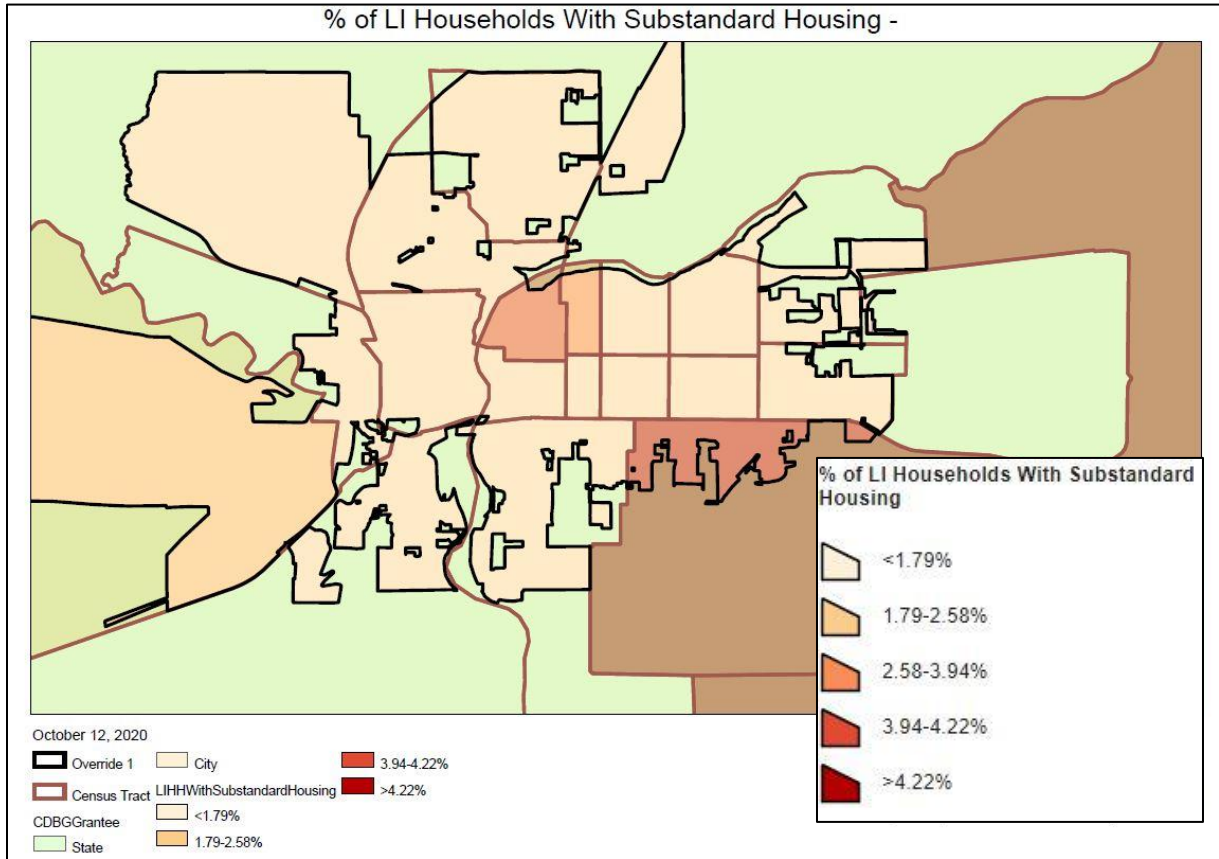


Figure 2 - Percent of Low Income Households with Substandard Housing

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

Year Unit Built

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

Table 38 – Year Unit Built

Data Source: 2011-2015 CHAS

Risk of Lead-Based Paint Hazard

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

Table 39 – Risk of Lead-Based Paint

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

Vacant Units

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

Table 40 - Vacant Units

Data Source Comments: Suitability for rehabilitation undetermined using ACS dataset

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

Need for Owner and Rental Rehabilitation

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

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

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

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

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

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

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

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

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

Introduction

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

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

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

Total Number of Units

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

Table 41 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

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

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

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

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

Public Housing Condition

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

Table 42 - Public Housing Condition

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

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

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

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

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

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

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

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

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

Introduction

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

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

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

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

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

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

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

Facilities and Housing Targeted to Homeless Households

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Introduction

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Affordable Housing

Increase and preserve affordable housing opportunities for very low to moderate income renters, homeowners, first-time homebuyers, and those experiencing homelessness. This includes, but is not limited to rehabilitation, acquisition/rehab/resale, demolition, site preparation, reconstruction, and slum and blight activities.

Housing Rehabilitation

Provide construction and rehabilitation assistance for very low to moderate income homeowners, rental property owners through the City's revolving loan fund. Provide construction and rehabilitation

assistance for Public Housing Modernization activities. Housing Rehab may include meeting standard building code upgrades, demolition, site preparation, slum and blight activities, rehabilitation activities addressing livability and life safety.

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

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

CDBG Slum and Blight Removal

The City will allocate funding to remediate properties negatively affected by slum and blighted conditions. This will include clearance with the end goal of providing affordable housing opportunities and/or public facility improvements.

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

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

Negative Effects of Public Policies on Affordable Housing and Residential Investment

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

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

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

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

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

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

MA-45 Non-Housing Community Development Assets – 91.215 (f)

Introduction

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

Economic Development Market Analysis

Business Activity

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

Table 45 - Business Activity

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

Labor Force

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

Table 46 - Labor Force

Data Source: 2011-2015 ACS

Occupations by Sector

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

Table 47 – Occupations by Sector

Data Source: 2011-2015 ACS

Travel Time

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

Table 48 - Travel Time

Data Source: 2011-2015 ACS

Education

Educational Attainment by Employment Status (Population 16 and Older)

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

Table 49 - Educational Attainment by Employment Status

Data Source: 2011-2015 ACS

Educational Attainment by Age (number of people)

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	110	44	50	205	495
9th to 12th grade, no diploma	750	815	330	955	720
High school graduate, GED, or alternative	2,170	2,220	1,540	5,060	3,865
Some college, no degree	2,210	2,410	1,835	3,715	2,350

Associate's degree	335	970	625	1,605	430
Bachelor's degree	380	1,630	1,130	2,505	1,630
Graduate or professional degree	10	610	635	1,295	745

Table 50 - Educational Attainment by Age
 Data Source: 2011-2015 ACS

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

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

Table 51 – Median Earnings in the Past 12 Months
 Data Source: 2011-2015 ACS

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

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

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

Describe the workforce and infrastructure needs of the business community.

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

GFDA provides a number of key services to assist business development and ensure the creation/retention of higher wage job opportunities. GFDA’s Community Development Finance Institution (CDFI) provides gap and bridge financing assistance for entrepreneurs and businesses. Additionally, their Community Development Corporation (CDC) provides SBA 504 loans. The Small

Business Development Center (SBDC) is also housed within GFDA and provides valuable training and technical assistance to businesses, particularly to new startup efforts. Additionally, the GFDA operates a Brownfield Revolving Loan Fund, which provides critical assistance for property owners in identifying and cleaning up previously contaminated properties so they can be redeveloped safely for future use. Finally, GFDA provides training on procuring government contracts for local businesses through its Procurement Technical Assistance Center (PTAC).

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

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

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

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

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

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

sectors depending on tourism and commerce. This economic downturn will significantly affect the community's use of federal entitlement funds.

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

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

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

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

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

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

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

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

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

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

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

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

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

MA-50 Needs and Market Analysis Discussion

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

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

overcrowded (more than 1.5 persons per room); and household is severely cost burdened (monthly housing costs (including utilities) exceed 50% of monthly income).

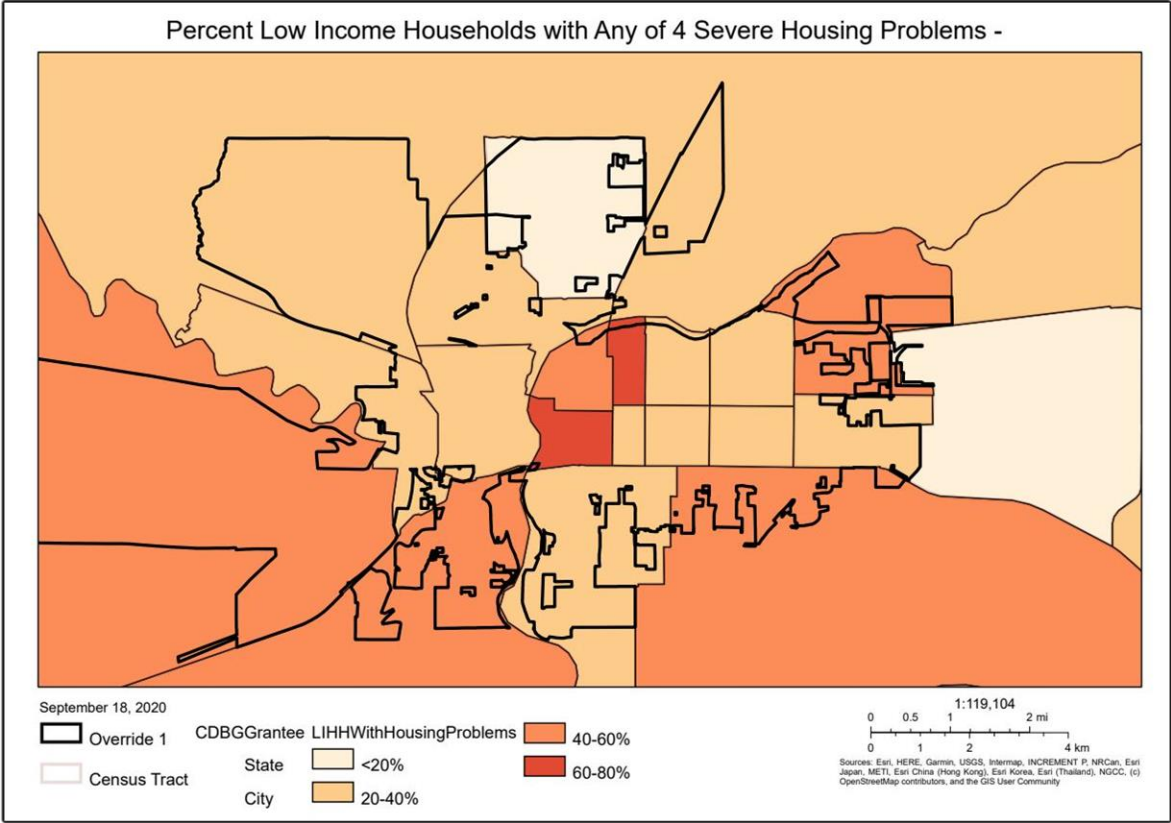


Figure 3 – Percent of Low Income Households with Any of 4 Severe Housing Problems
Data Source: U.S. Department of Housing and Urban Development, CPD Maps

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

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

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

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

higher than the total percentage of minorities for the housing market area as a whole; or in the case of a metropolitan area, the neighborhood's total percentage of minority persons exceeds 50 percent of its population.

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

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

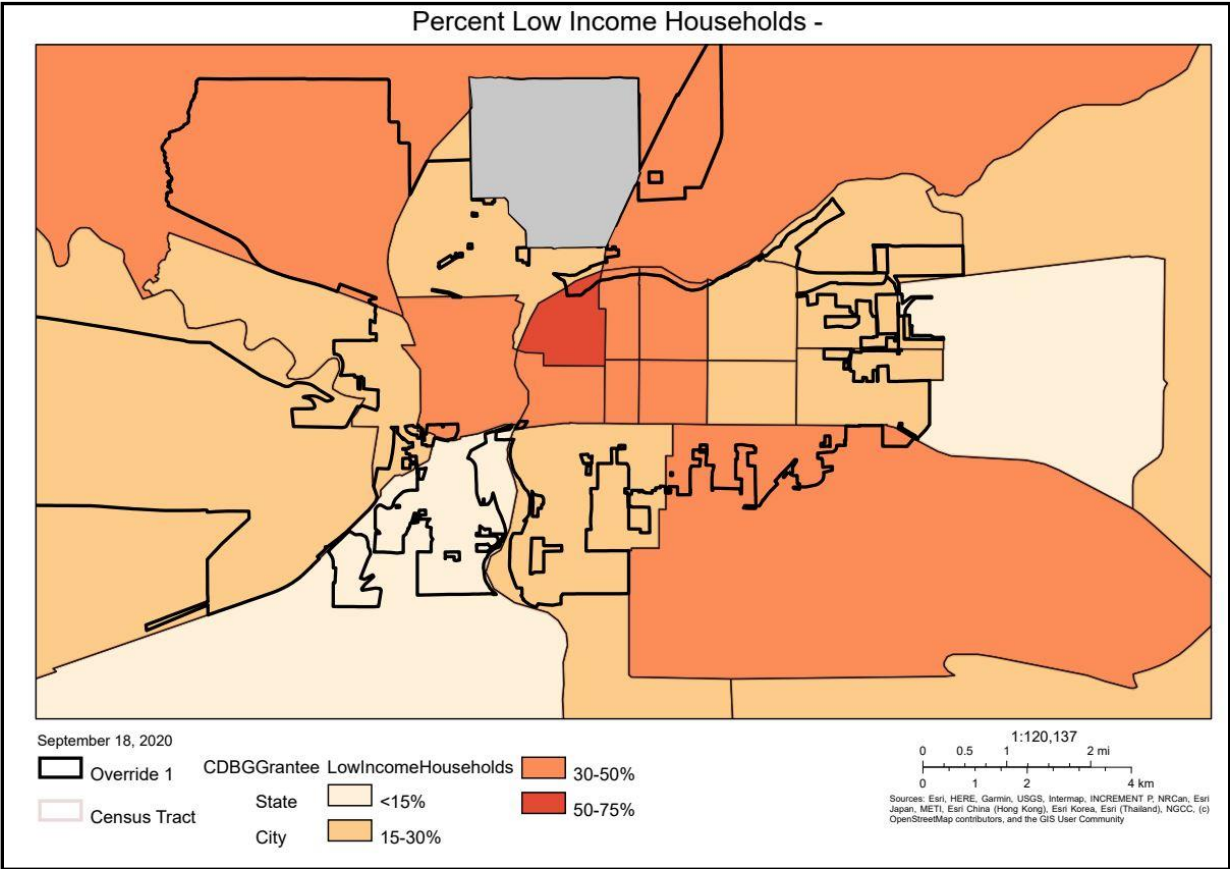


Figure 4 – Percent of Low Income Households, Data Source: U.S. Department of Housing and Urban Development, CPD Maps
What are the characteristics of the market in these areas/neighborhoods?

Census Tracts 108, 7, 8, 9, and 16 are all designated as Low to Moderate Income areas, and all at some point were included as part of a HUBZone (Tract 8 has since been reclassified). Census Tract 108 contains the city’s historic main street, Central Avenue, and the Central Business Historic District, which is recognized as a National Register Historic District by the National Park Service. Quoting the U.S. Small Business Administration (SBA) website:

The program encourages economic development in historically underutilized business zones - "HUBZones" - through the establishment of preferences. SBA's HUBZone program is in line with the efforts of both the Administration and Congress to promote economic development and employment growth in distressed areas by providing access to more federal contracting opportunities.

HUBZones Great Falls

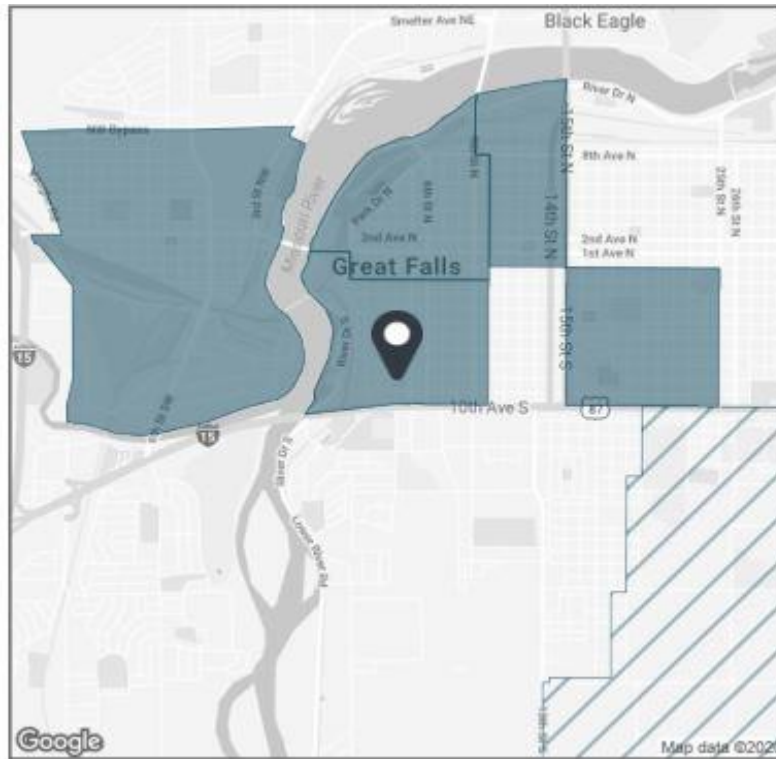


Figure 5 – HUBZones in Great Falls
Data Source: [\(HUBZone Mapping\)](#)

Are there any community assets in these areas/neighborhoods?

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

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

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

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

Are there other strategic opportunities in any of these areas?

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

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

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

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

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

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

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

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

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

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

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

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

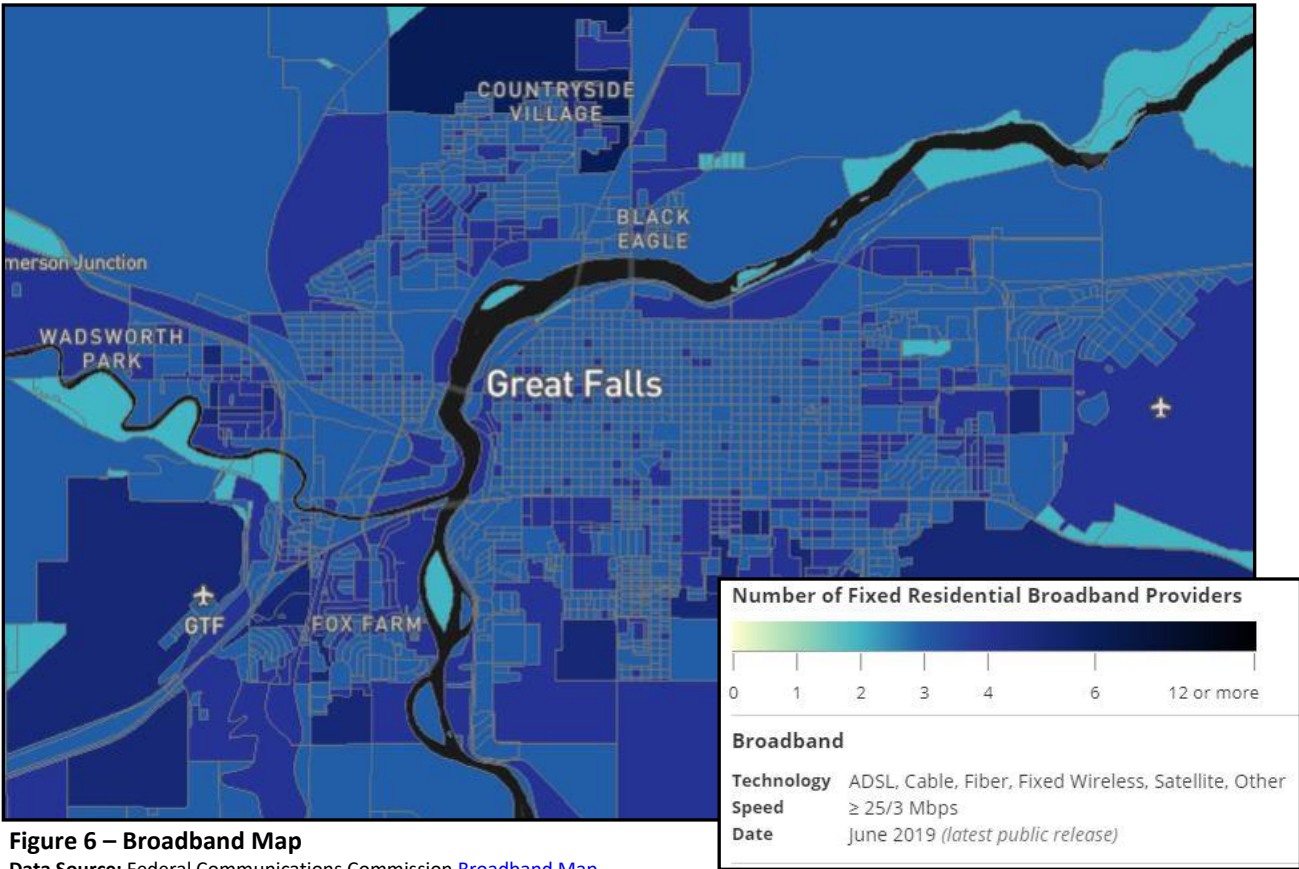


Figure 6 – Broadband Map
Data Source: Federal Communications Commission [Broadband Map](#)

MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

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

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

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

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

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

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

Section 5 | Strategic Plan

SP-05 Overview

Based on data contained in this report as well as input the City has received from the community, the City of Great Falls chose eight (8) objectives or goals to implement the 2020-2024 Consolidated Plan. The goals identified in relation to community needs are: Public Services, Housing Rehabilitation, Economic Development, Affordable Housing, Fair Housing, Public Facilities and Improvements, Planning and Administration, and CDBG Slum & Blight Removal.

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

Geographic Area

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

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction.

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

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

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

Priority Needs

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

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

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

				Victims of Domestic Violence, Unaccompanied Youth	Victims of Domestic Violence
	<i>Description: The City will allocate funding to remediate properties negatively affected by slum and blighted conditions. This will include clearance with the end goal of providing affordable housing opportunities and/or public facility improvements.</i>				

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

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

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

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

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

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

Table 55 – Anticipated Resources

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

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

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

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

SP-40 Institutional Delivery Structure – 91.215(k)

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

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

Table 56 - Institutional Delivery Structure

Assess Strengths and Gaps in the Institutional Delivery System

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

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

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

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

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

Table 57 - Homeless Prevention Services Summary

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

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

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

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

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

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

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

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Public Services	2020	2024	Homeless, Non-Homeless Special Needs, Non-Housing Community Development	City of Great Falls	Public Services	CDBG: \$475,000	Public service activities other than Low/Moderate Income Housing Benefit: 5000 Persons Assisted
2	Affordable Housing	2020	2024	Affordable Housing, Homeless, Non-Homeless Special Needs	City of Great Falls	Affordable Housing	HOME: \$1,000,000 CDBG: \$50,000	Homeowner Housing Added: 10 Household Housing Unit Direct Financial Assistance to Homebuyers: 35 Households Assisted
3	Housing Rehabilitation	2020	2024	Affordable Housing, Public Housing, Non-Homeless Special Needs	City of Great Falls	Housing Rehabilitation	CDBG: \$700,000	Rental units rehabilitated: 40 Household Housing Unit Homeowner Housing Rehabilitated: 25 Household Housing Unit
4	Fair Housing	2020	2024	Affordable Housing, Public Housing, Homeless, Non-Homeless Special Needs	City of Great Falls	Fair Housing	CDBG: \$125,000	Public service activities other than Low/Moderate Income Housing Benefit: 600 Persons Assisted
5	Economic Development	2020	2024	Non-Housing Community Development, Economic Development	City of Great Falls	Economic Development	CDBG: \$300,000	Jobs created/retained: 15 Jobs Businesses assisted: 10 Businesses Assisted
6	Public Facilities and Improvements	2020	2024	Public Housing, Non-Homeless Special Needs, Non-Housing Community Development	City of Great Falls	Public Facilities and Improvements	CDBG: \$1,250,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 10000 Persons Assisted

	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Planning and Administration	2020	2024	Planning and Administration	City of Great Falls	Planning and Administration	CDBG: \$800,000 HOME: \$140,000	
8	CDBG Slum & Blight Removal	2020	2024	Affordable Housing Homeless Non-Housing Community Development	City of Great Falls	Affordable Housing Public Facilities and Improvements	CDBG: \$300,000	Buildings Demolished: 4 Buildings

Table 58 – Goals Summary

Goal Descriptions

1	Goal Name	Public Services
	Goal Description	Provide support to public service agencies’ operating programs that benefit low to moderate income persons. The City of Great Falls will provide CDBG funds to social service agencies for activities that service low to moderate income people or areas.
2	Goal Name	Affordable Housing
	Goal Description	Increase and preserve affordable housing opportunities for very low to moderate income renters, homeowners, first-time homebuyers, and those experiencing homelessness. This includes, but is not limited to rehabilitation, acquisition/rehab/resale, demolition, site preparation, reconstruction, and slum and blight activities.
3	Goal Name	Housing Rehabilitation
	Goal Description	Provide construction and rehabilitation assistance for very low to moderate income homeowners, rental property owners through the City’s revolving loan fund. Provide construction and rehabilitation assistance for Public Housing Modernization activities. Housing Rehab may include meeting standard building code upgrades, demolition, site preparation, slum and blight activities, rehabilitation activities addressing livability and life safety.
4	Goal Name	Fair Housing
	Goal Description	Provide funding for activities that affirmatively further fair housing. The City of Great Falls will fund activities that include, but are not limited to fair housing education, counseling, outreach, and referrals pertaining to the laws, rights, and responsibilities related to housing and housing-related transactions, as well as service activities that reduce and remove barriers to fair housing choice.
5	Goal Name	Economic Development
	Goal Description	Provide funding for projects which create decent paying jobs with benefits for persons from low to moderate income households. The City of Great Falls will fund economic development projects which will result in the creation and retention of jobs for low to moderate income people.

6	Goal Name	Public Facilities and Improvements
	Goal Description	Provide public facility and infrastructure assistance, including but not limited to handicap accessibility, energy efficiency improvements, and removal of slum and blighted properties to provide a suitable living environment. The City of Great Falls will prioritize meeting handicap accessibility requirements in public facilities and infrastructure.
7	Goal Name	Planning and Administration
	Goal Description	City staff to administer, manage, and monitor CDBG and HOME funded activities.
8	Goal Name	CDBG Slum & Blight Removal
	Goal Description	The City will allocate funding to remediate properties negatively affected by slum and blighted conditions. This will include clearance with the end goal of providing affordable housing opportunities and/or public facility improvements.

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

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

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

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

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

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

Not applicable.

Activities to Increase Resident Involvement

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

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

information obtained from these hearings is considered in the annual grant application submitted by GFHA.

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

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

No

Plan to remove the ‘troubled’ designation

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

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

Barriers to Affordable Housing

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

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

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

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

The current zoning and setback requirements can be restrictive for developing affordable housing in situations where developers wish to use odd-size or small lots or construct high density housing. Additionally, no affordable housing incentives such as reduced lot sizes, setbacks or waived building fees are available to developers of affordable housing. Due to land prices and infrastructure costs, smaller lots are being developed for condensed housing at this time. As noted previously in this Plan, the City and NeighborWorks have partnered by using Planned Unit Development zoning to bring both affordable multifamily units and owner occupied homes into the Great Falls market.

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

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

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

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

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

CDBG:

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

HOME:

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

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

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

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

SP-60 Homelessness Strategy – 91.215(d)

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

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

Although the City does not receive CoC or Emergency Solutions Grant (ESG) funds to directly impact homelessness, there is a robust network of public service organizations in Great Falls who work to meet the needs of those experiencing homelessness or who are at risk of homelessness. A complete list of homeless service and outreach providers is included in Section 4 of this report (MA-30 Homeless Facilities and Services).

Addressing the emergency and transitional housing needs of homeless persons

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

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

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

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

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

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

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

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

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

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

Unaccompanied Youth: Young Parents Education Center provides on-site developmental day care, family support and outreach, pre-vocational activities and parenting/child development education to

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

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

Opportunities, Inc., is the central intake point for social service providers in Great Falls. This agency provides a wide range of services for homeless and low income people. Opportunities, Inc., will provide referral, limited case management and designated payee's status for Social Security recipients to prevent people from becoming homeless. This agency will collaborate with the Center for Mental Health to provide services for homeless individuals who have mental illness by referral for emergency services and direct assistance services.

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

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

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

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

All CDBG and HOME funded housing project sites which have visual paint deterioration where rehabilitation will take place will be tested by a certified risk assessor for the presence of lead-based

paint using the XRF Technology Lead Analyzer. On any sites that test positive, only contractors certified in safe work practices will be used for abatement. Clearance tests will be performed by an Environmental Protection Agency (EPA) certified risk assessor and a certified laboratory after interim controls are completed.

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

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

NeighborWorks Great Falls will comply with all HUD lead safe requirements on all City-funded housing rehabilitation projects for properties constructed prior to 1978. NWGF is a certified abatement company and has staff that is certified in lead safe practices. NWGF will have certified inspectors from the Housing Authority do initial tests using the XRF Lead Analyzer to check for the presence of lead-based paint in all projects involving a building constructed prior to 1978. If lead-based paint is found, NWGF staff or subcontractors certified in lead safe practices will do abatement or mitigation and obtain laboratory clearance tests from an EPA certified risk assessor after the abatement is completed.

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

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

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

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

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

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

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

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

Rural Dynamics, Inc., (RDI) is a non-profit organization which provides programs designed to assist low to moderate income people to obtain financial security. RDI was awarded grant funds through the Northwest Area Foundation several years ago to provide programs to help people get out of poverty. RDI will use these grant funds locally to provide credit building loans, enroll participants in a small business individual development account program and maintain a support group for people participating in financial security programs. RDI will hold financial education workshops, provide free financial literacy classes for low income people and administer a youth financial literacy program. The agency will also partner with local agencies to provide income tax assistance sites to assist eligible low income people file their federal tax returns and claim earned income tax credits.

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

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

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

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

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

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

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

SP-80 Monitoring – 91.230

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

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

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

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

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

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

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

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

Section 6 | Annual Action Plan

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

Introduction

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

The expected resources include the annual allocations of CDBG and HOME Federal Grant Funds that Great Falls receives as an Entitlement City. The grant amounts are actual allocations for Program Year 2020. If the grant funding or program income comes in above or below the expected amounts identified

in the Priority Table below, the project allocations (AP-38 Projects Summary) will be adjusted.

Anticipated Resources

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

Table 59 - Expected Resources – Priority Table

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

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

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

None appropriate.

AP-20 Annual Goals and Objectives

Goals Summary Information

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

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

Table 60 – Goals Summary

Goal Descriptions

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

AP-35 Projects – 91.220(d)

Introduction

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

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

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

Program Year 2020 Projects

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

Table 61 – Project Information

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

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

throughout the year.

AP-38 Project Summary

Project Summary Information

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

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

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

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

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

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

AP-50 Geographic Distribution – 91.220(f)

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

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

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

Geographic Distribution

Target Area	Percentage of Funds
City of Great Falls	100

Table 62 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

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

AP-55 Affordable Housing – 91.220(g)

Introduction

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

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

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

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

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

AP-60 Public Housing – 91.220(h)

Introduction

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

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

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

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

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

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

participate in homeownership

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

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

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

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

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

Introduction

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

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

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

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

their individual needs.

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

Addressing the emergency shelter and transitional housing needs of homeless persons

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

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

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

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

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

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

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

Discussion

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

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

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

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

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

Introduction

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

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

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

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

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

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

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

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

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

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

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

AP-85 Other Actions – 91.220(k)

Introduction

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

federal dollars and program income.

Actions planned to address obstacles to meeting underserved needs

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

Actions planned to foster and maintain affordable housing

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

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

Actions planned to reduce lead-based paint hazards

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

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

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

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

Actions planned to reduce the number of poverty-level families

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

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

Actions planned to develop institutional structure

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

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

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

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

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

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

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

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

Introduction

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

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

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

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

Total Program Income: 0

Other CDBG Requirements

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

involuntary)

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

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

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

Appendices

Appendix A: CDBG SF-424 and Certifications.....A-1

Appendix B: HOME SF-424 and Certifications.....B-1

Appendix C: NeighborWorks Great Falls Home Program Income Plan.....C-1

Appendix D: Citizen Participation Plan.....D-1

Appendix E: Meeting Attendee Lists.....E-1

Appendix F: Legal Notices.....F-1

Appendix G: Public Comments.....G-1

From: [Lisa C. Kunz](#)
To: [Krista Artis](#)
Subject: FW: Shyla Patera NCILS consolidated plan comments revised
Date: Wednesday, June 15, 2022 8:30:31 AM

Agenda Item 15

-----Original Message-----

From: Shyla Patera <shycpat@icloud.com>
 Sent: Wednesday, June 15, 2022 12:06 AM
 To: Tonya Shumaker <tshumaker@greatfallsmt.net>; commission <commission@greatfallsmt.net>; Alicia Eatherly <aliciaeatherly@gfhousing.org>; garyowen@uwccmt.org; Carol Bronson <cbronson@nwgf.org>
 Subject: Shyla Patera NCILS consolidated plan comments revised

My name is Shyla Patera. I am an Independent Living Specialist employed by and representing North Central Independent Living Services, Inc. in Black Eagle, Montana. I wish to comment on the City of Great Falls Consolidated plan for HUD and CDBG activities. NorthCentral Independent Living Services, Inc. advocates not only for accessible affordable universal designed housing stock but also policies that would allow with disabilities and those city residents who need or are eligible for income supports in our city to access and afford housing. The City of Great Falls must encourage our development community to invest in accessible, affordable home building and rental stock. We must approach MBOH in order to ensure that our city scores regarding community development and housing application to ensure that our community regarding development and housing application to ensure that our community development score on any potential housing applications is high enough to be funded by MBOH. The City of Great Falls and community developers must ensure that accessibility and universal designed features are available in many individual units and community development projects.

The City of Great Falls must ensure that all development used for housing and appropriate rental properties must incorporate universal design to the highest degree. Mixed used design can cause issues often when trying to maximize accessibility. The City also needs to encourage accessible pathways, sidewalks, and accessibility opp parking availability throughout our community.

Regarding affirmative housing policies, city officials should encourage use of all housing tools in our toolbox available to us as a community. we need to maximize use of section 8 vouchers, McKinney Vento Funding, HUD. Vash vouchers, mainstream 811 vouchers and more. We must as a community serve all with various disabilities and make sure if there is a medical emergency where one needs to be hospitalized in a medical setting that they can return to housing option that offers accessible features and potential services if needed, wanted and requested by citizens with disabilities. City officials should be encouraging HUD to implement policies regarding fair housing and dispendate impacts based upon income particularly if someone lives on a fixed income and find a need to appeal a HUD Great Falls Housing Authority bill or a landlord action in a unit. Just as we prorate for income eligibility in HUD programs based on medical expenses as well as family and custodial needs, should to also prorate HUD fines and adjust appeal time frames and opportunities to better match the Montana Human Rights Act.

The City and its partners must include broadband and affordable Internet in any community development opportunities.

On CDBG funding, the City should be following and modeling the community ADA transition plan for accessible sidewalks, alleys, and pathways. The City of Great Falls should assist homeowners, community members, and businesses where sidewalks are in need of repair to help develop and enforce policies which both encourage and promote accessibility in our neighborhoods rather than just leaving it up to the individual property owner or a business to ensure maximum disability accessibility in our sidewalk repair. I also advocate for accessible transportation options and policies through out both local and state wide community development opportunities through the potential use of discretionary grants and other opportunities. The City, as well as our business, military, employment, and our nonprofit sectors, need to explore innovative ways to grow our accessible transportation and housing infrastructure networks.

Thank you for the time and opportunity to submit comments on the City of Great Falls Consolidated and Citizens Participation Plans.

Shyla Patera IL Specialist
North Central Independent Living Services, Inc.
1120 25th Avenue North East
Black Eagle, Montana 59414
406-452-9834
spatera@ncils.org

Sent from my iPhone

Sent from my iPhone



Commission Meeting Date: June 21, 2022
CITY OF GREAT FALLS
COMMISSION AGENDA REPORT

Item: Civil Engineering Consulting Professional Services Agreement

From: Planning & Community Development

Initiated By: Craig Raymond, Director, Planning & Community Development

Presented By: Craig Raymond, Director, Planning & Community Development

Action Requested: Ratify the Signed Professional Services Agreement

Suggested Motion:

1. Commissioner moves:

“I move that the City Commission (Ratify/Not Ratify) the Professional Services Agreement with Sanderson Stewart for Civil Engineering Consulting Services.”

2. Mayor requests a second to the motion, public comment, Commission discussion, and calls for the vote.

Staff Recommendation: City Staff recommends that the City Commission ratify the attached Professional Services Agreement.

Background: Beginning in August 2020, the Planning & Community Development Department began transitioning the civil engineering development review responsibilities from the Engineering Division of Public Works to the Planning & Community Development Department. The purpose of the transition was to establish a more cohesive and complete “one-stop shop” for developers seeking to do business in Great Falls. While the Commission approved of hiring two engineers, we only filled one position, holding the second position in reserve for future capacity if needed.

In April of 2022, the single engineer that was part of the P&CD team elected to pursue other ventures and resigned. Since the time that the engineering review function had transitioned out of Public Works, the remaining Engineering Division staff have been refocused onto other Public Works priorities as well as taking on additional work assisting other city departments on planning and management of ARPA/CARES Act funded projects. They also have served to continue work on projects currently being processed for permit.

While the engineering staff of Public Works have served admirably in filling in the gaps in the near term, P&CD and the Engineering Division staff have concluded that permanent assumption of additional duties is not sustainable in the long term.

When staff began a search for a new P&CD Engineer, we quickly initiated discussions with a 3rd party consulting engineering firm to perform the review of remaining current projects as well as new upcoming development projects. The priority has been and will continue to be to minimize disruption of services and to keep development in Great Falls as pain-free as possible.

In order to avoid any actual or perceived conflicts of interest with local development companies and their engineering firms, city staff specifically sought out a firm that not only has the capacity and expertise to perform the required duties but also did not ordinarily do business in Great Falls in competition with local engineers. This significantly reduced the pool of potential firms to select from. Based on corporate profile and employee resumes submitted, staff is confident that Sanderson Stewart is qualified to perform the needed work.

This service will be performed on an as-needed basis for the duration of the recruitment process for the staff Engineer. The “Charge Out Rates” attached to the contract is the current fees charged by Sanderson Stewart and will be the basis of all costs charged to the City. For the most part, all tasks will be performed remotely from offices in Billings and/or other Sanderson Stewart office locations. It is not anticipated that a significant amount of travel will be required, although they remain willing and available to do so when requested by the City.

Fiscal Impact: The attached Charge Out Rate sheet is the current rate structure charged for services. It is unknown what the total cost of the contract will be as it is entirely dependent on economic and development trends. Staff anticipates bringing a Fee Resolution in order to accommodate a straight pass-through of fees to permit applicants to cover costs charged to the city.

Alternatives: The City Commission could elect to not ratify the Agreement. Approval of development projects would unnecessarily be delayed due to current staff workloads.

Concurrences: Public Works, the City Attorney’s Office and the City Manager’s Office have been involved in the development of this contract and scope of services.

Attachments/Exhibits:

Professional Services Agreement

PROFESSIONAL SERVICES AGREEMENT

THIS AGREEMENT is made and entered into by and between the **CITY OF GREAT FALLS, MONTANA**, a municipal corporation organized and existing under the laws of the State of Montana, P.O. Box 5021, Great Falls, Montana 59403-5021, hereinafter referred to as "City," and **SANDERSON STEWART**, 1300 N. Transtech Way, Billings, MT, 59102, hereinafter referred to as "Consultant."

In consideration of the mutual covenants and agreements herein contained, the receipt and sufficiency whereof being hereby acknowledged, the parties hereto agree as follows:

1. **Purpose:** City agrees to hire Consultant as an independent contractor to perform for City services described in the Scope of Services attached hereto as Exhibit "A" and by this reference made a part hereof.

2. **Term of Agreement:** This Agreement is effective upon the date of its execution. Both parties reserve the right to cancel this Agreement by providing a written thirty (30) day notice to the other party.

3. **Scope of Work:** Consultant will perform the work and provide the services in accordance with the requirements of the Scope of Services.

4. **Payment:** City agrees to pay Consultant at the hourly rate(s) set forth in the Scope of Services, for a total not to exceed amount of ONE HUNDRED THIRTY THOUSAND DOLLARS (\$130,000.00) for services performed pursuant to the Scope of Services. Any alteration or deviation from the described work that involves extra costs will be performed by Consultant after written request by the City, and will become an extra charge over and above the contract amount. The parties must agree upon any extra charges in writing.

5. **Independent Contractor Status:** The parties agree that Consultant is an independent contractor for purposes of this Agreement and is not to be considered an employee of the City for any purpose. Consultant is not subject to the terms and provisions of the City's personnel policies handbook and may not be considered a City employee for workers' compensation or any other purpose. Consultant is not authorized to represent the City or otherwise bind the City in any dealings between Consultant and any third parties.

Consultant shall comply with the applicable requirements of the Workers' Compensation Act, Title 39, Chapter 71, MCA, and the Occupational Disease Act of Montana, Title 39, Chapter 71, MCA. Consultant shall maintain workers' compensation coverage for all members and employees of Consultant's business, except for those members who are exempted by law.

Consultant shall furnish the City with copies showing one of the following: (1) a binder for workers' compensation coverage by an insurer licensed and authorized to provide workers' compensation insurance in the State of Montana; or (2) proof of exemption from workers' compensation granted by law for independent contractors.

6. **Indemnification:** To the fullest extent permitted by law, Consultant shall fully indemnify, defend, and save City, its agents, representatives, employees, and officers harmless from and against any and all claims, actions, costs, fees, losses, liabilities or damages of whatever kind or nature arising from or related to Consultant’s negligence and/or errors or omissions in the performance of this Agreement and Consultant’s work on the Construction Project or work of any subcontractor or supplier to Consultant. The indemnification obligations of this Section must not be construed to negate, abridge, or reduce any common-law or statutory rights of the City which would otherwise exist. Consultant’s indemnity under this Section shall be without regard to and without any right to contribution from any insurance maintained by City. Consultant also waives any and all claims and recourse against the City or its officers, agents or employees, including the right of contribution for loss or damage to person or property arising from, growing out of, or in any way connected with or incident to the performance of this Agreement except responsibility for its own fraud, for willful injury to the person or property of another, or for violation of law, whether willful or negligent, according to 28-2-702, MCA. These obligations shall survive termination of this Agreement and the services performed hereunder.

7. **Insurance:** Consultant shall purchase and maintain insurance coverage as set forth below. The insurance policy, except Workers’ Compensation and Professional Liability, must name the City, (including its elected or appointed officers, officials, employees, or volunteers), as an additional insured or contain a blanket additional insured endorsement and be written on a “primary—noncontributory basis.” Consultant will provide the City with applicable additional insured endorsement documentation. Each coverage shall be obtained from an insurance company that is duly licensed and authorized to transact insurance business and write insurance within the state of Montana, with a minimum of “A.M. Best Rating” of A-, VI, as will protect the Consultant, the various acts of subcontractors, the City and its officers, employees, agents, and representatives from claims for bodily injury and/or property damage which may arise from operations and completed operations under this Agreement. All insurance coverage shall remain in effect throughout the life of this Agreement and for a minimum of one (1) year following the date of expiration of Consultant’s warranties. All insurance policies, except Workers’ Compensation, must contain a provision or endorsement that the coverage afforded will not be canceled, materially changed, or renewal refused until at least thirty (30) days prior written notice has been given to Consultant, City, and all other additional insureds to whom a certificate of insurance has been issued. All insurance documentation shall be in a form acceptable to the City.

*** Insurance Coverage at least in the following amounts is required:**

1.	Commercial General Liability (bodily injury and property damage)	\$1,000,000 per occurrence \$2,000,000 aggregate
2.	Products and Completed Operations	\$2,000,000
3.	Automobile Liability	\$1,500,000 combined single limit
4.	Workers’ Compensation	Not less than statutory limits
5.	Employers’ Liability	\$1,000,000

- 6. Professional Liability (E&O) \$1,000,000 per occurrence
(only if applicable) \$2,000,000 aggregate

Consultant may provide applicable excess or umbrella coverage to supplement Consultant's existing insurance coverage, if Consultant's existing policy limits do not satisfy the coverage requirements as set forth above.

*** If a request is made to waive certain insurance requirements, insert the insurance item # and corresponding description from the list above:**

Legal reviewer initials: **Approved** **Denied**

8. Professional Service: Consultant agrees that all services and work performed hereunder will be accomplished in a professional manner consistent with the professional standard of practice under similar circumstance and in the same location.

9. Compliance with Laws: Consultant agrees to comply with all federal, state and local laws, ordinances, rules and regulations, including the safety rules, codes, and provisions of the Montana Safety Act in Title 50, Chapter 71, MCA. As applicable, Consultant agrees to purchase a City safety inspection certificate or special business license.

10. Nondiscrimination: Consultant agrees that all hiring by Consultant of persons performing this Agreement will be on the basis of merit and qualification and will not discriminate on the basis of race, color, religion, creed, political ideas, sex, age, marital status, physical or mental disability, national origin, or other class protected by state and/or federal law.

11. Default and Termination: If either party fails to comply with any condition of this Agreement at the time or in the manner provided for, the other party, at its option, may terminate this Agreement and be released from all obligations if the default is not cured within ten (10) days after written notice is provided to the defaulting party. Said notice shall set forth the items to be cured. Additionally, the non-defaulting party may bring suit for damages, specific performance, and any other remedy provided by law. These remedies are cumulative and not exclusive. Use of one remedy does not preclude use of the others. Notices shall be provided in writing and hand-delivered or mailed to the parties at the addresses set forth in the first paragraph of this Agreement.

12. Modification and Assignability: This document contains the entire agreement between the parties and no statements, promises or inducements made by either party or agents of either party, which are not contained in this written Agreement, may be considered valid or binding. This Agreement may not be enlarged, modified or altered except by written agreement signed by both parties hereto. The Consultant may not subcontract or assign Consultant's rights, including the right to compensation or duties arising hereunder, without the prior written consent of City. Any subcontractor or assignee will be bound by all of the terms and conditions of this Agreement.

13. **Ownership and Publication of Materials:** All reports, information, data, and other materials prepared by the Consultant pursuant to this Agreement are the property of the City. The City has the exclusive and unrestricted authority to release, publish or otherwise use, in whole or part, information relating thereto. Any re-use without written verification or adaptation by the Consultant for the specific purpose intended will be at the City's sole risk and without liability or legal exposure to the Consultant. No material produced in whole or in part under this Agreement may be copyrighted or patented in the United States or in any other country without the prior written approval of the City.

14. **Liaison:** City's designated liaison with Consultant is **Craig Raymond** and Consultant's designated liaison with City is **Erin Claunch, PE, PTOE**.

15. **Applicability:** This Agreement and any extensions hereof shall be governed and construed in accordance with the laws of the State of Montana.

IN WITNESS WHEREOF, Consultant and City have caused this Agreement to be executed and intend to be legally bound thereby as of the date set forth below.

CITY OF GREAT FALLS, MONTANA

CONSULTANT

By: [Signature]
Print Name: **Greg Doyon**
Print Title: **City Manager**
Date:

By: [Signature]
Print Name: **D.J. Clark, PE, PTOE**
Print Title: **Billings Region Manager**
Date: **5/31/2022**

ATTEST:

[Signature]
Lisa Kunz, City Clerk



APPROVED AS TO FORM:

By: [Signature]
Jeffrey M. Hincioien, City Attorney*

* By law, the City Attorney may only advise or approve contract or legal document language on behalf of the City of Great Falls, and not on behalf of other parties. Review and approval of this document was conducted solely from

the legal perspective, and for the benefit, of the City of Great Falls. Other parties should not rely on this approval and should seek review and approval by their own respective counsel.

Exhibit A

Basic Services of Engineer

City of Great Falls Engineering Plan Review

SCOPE OF SERVICES:

The scope of services covered by this agreement is described hereafter:

The project consists of detailed review of Engineering plans and technical reports submitted by a third party as required for Planning & Development processes for conformance to all applicable federal, state and local regulations and standards. Sanderson Stewart (ENGINEER) will bill for its services on a time-and-materials basis per the attached rate schedule. These submittals may be for various types and stages of development including, but not limited to construction plans, specifications, design and/or soil reports, and grading, drainage and other types of site plans for annexations, subdivisions, and commercial or industrial site development. Detailed review of soils reports and their recommendations may require the Engineer to engage a geotechnical engineering sub-consultant.

The following sections of this document describe phases of work that are expected to be associated with the scope of work for the duration of the contract. However, as individual projects are transmitted to ENGINEER for review, a separate Task Order may be amended to this contract which will outline specific phases, tasks, and deliverables.

Phase 1. Project Management/Coordination

This phase includes the internal coordination of Engineer staff resources, billing, weekly progress reports (during active assignments), and general correspondence with the City. Billing shall be itemized by project or Office File number and provide a detailed accounting of services provided.

Phase 2. City Staff Coordination

The process of review of various engineering reports will require direct input from various CITY departments and staff. Coordination efforts and meetings with various staff and/or the developer needed for the review will be included in this phase.

Phase 3. Project Plan, Technical Review & Construction Oversight

This phase includes preliminary planning, engineering review of construction plans, site plans, design and/or soil reports, specifications, and other various private development applications received by the City for annexations, subdivisions and commercial or industrial developments. This phase may also include communication with and providing recommendations to City Inspectors and other City Staff during construction. These items may include but are not limited to:

- Water/Sewer layout and design
- Potential conflicts with private and public utilities
- Stormwater design review
- Street layout and design
- Transportation facilities review
- Review of technical engineering design reports, specifications, drawings, and submittals
- Review of project change order design and specifications

All tasks assigned under this phase shall be performed timely; such that, the City is able to comply with its established planning and development review process timeframes.

ENGINEER shall provide the City with recommendations for any proposed deviations from City standard. The City Engineer solely has the responsibility and authority to approve deviations from City design and construction standards. ENGINEER shall also provide a certification that projects were constructed in substantial accordance with the approved plans, and provide the City recommendations on Municipal Facilities Exemptions from DEQ subdivision review.

Phase 4. Project Correspondence & Documentation

This phase will provide review comments and/or conditions of approval in a comprehensive report that will be conveyed to the City Point of Contact on the project. Any follow-up documentation and tracking of comment responses will be included in this phase. This phase may also include documentation of construction change orders or revisions subsequent to initial project review and approval. Correspondence related to a development project between the ENGINEER, City and developer will be preserved and delivered in a report to the City at completion of each project.

CHARGE OUT RATES

EFFECTIVE FEBRUARY 16, 2022

STAFF PERSONNEL SERVICES

SURVEY CREW SERVICES

Staff Engineer I	\$110.00/hour
Staff Engineer II	\$125.00/hour
Project Engineer I	\$130.00/hour
Project Engineer II	\$140.00/hour
Senior Engineer I	\$175.00/hour
Senior Engineer II	\$210.00/hour
Principal	\$235.00/hour
Engineer Intern	\$70.00/hour
Expert Witness/Special Consultant	\$285.00/hour
Staff Planner I	\$95.00/hour
Staff Planner II	\$105.00/hour
Planner I	\$130.00/hour
Planner II	\$145.00/hour
Senior Planner I	\$155.00/hour
Senior Planner II	\$170.00/hour
Right-of-Way Agent	\$165.00/hour
Staff Landscape Designer I	\$95.00/hour
Staff Landscape Designer II	\$105.00/hour
Landscape Architect I	\$130.00/hour
Landscape Architect II	\$145.00/hour
Senior Landscape Architect I	\$155.00/hour
Senior Landscape Architect II	\$170.00/hour
Field Survey Technician I	\$80.00/hour
Field Survey Technician II	\$85.00/hour
Staff Surveyor I	\$105.00/hour
Staff Surveyor II	\$115.00/hour
Professional Land Surveyor	\$125.00/hour
Senior Professional Land Surveyor	\$175.00/hour
Graphic Artist	\$95.00/hour
Marketing Director	\$155.00/hour
CADD Technician I	\$85.00/hour
CADD Technician II	\$90.00/hour
Designer I	\$100.00/hour
Designer II	\$105.00/hour
Senior Designer I	\$120.00/hour
Senior Designer II	\$130.00/hour
Construction Inspector	\$85.00/hour
Construction Engineering Technician	\$100.00/hour
Senior Construction Engineering Technician	\$135.00/hour
Construction Engineer I	\$130.00/hour
Construction Engineer II	\$140.00/hour
Project Administrator	\$100.00/hour
Administrative/Clerical	\$85.00/hour

1-man Crew/2-man Crew	\$Per Job
Survey Equipment	\$15.00 /fieldwork hour
Survey Vehicle Mileage	\$.75 /mile
Scanner Equipment	\$150.00 /hour
Scanner Equipment (Hourly)	\$150 /hour
Scanner Equipment (Full Day)	\$1,050 /day

OUTSIDE CONSULTANTS

- 1) At cost if independently billed direct to client.
- 2) Cost plus 5% if billed through us.

INDEPENDENT LABORATORIES

- 1) At cost if independently billed direct to client.
- 2) Cost plus 5% if billed through us.

ADMINISTRATIVE EXPENSES

Administrative expenses
(including copies, prints, phone, postage, materials, and travel) 3.5% *

* based on professional services only, unless modified by contract

Vehicle Mileage IRS Rate

These rates are updated periodically to reflect market conditions. Rate increases will be reflected in future invoicing.



Commission Meeting Date: June 21, 2022

**CITY OF GREAT FALLS
COMMISSION AGENDA REPORT**

Item: Approval of Software House International (SHI) Incorporated Customer Resale MSA for Sophos network security services.

From: Jon Legan, Manager – Information Technology

Initiated By: City of Great Falls Information Technology Department

Presented By: Tom Hazen, Grant and Project Administrator

Action Requested: Approval of ARPA funds for Active Network Threat Monitoring subscription services.

Suggested Motion:

1. Commissioner moves:

“I move that the City Commission (approve/not approve) SHI’s Customer Resale MSA for Sophos MTR network threat monitoring services and to allocate American Rescue Plan Act (ARPA) funds in the amount of \$140,269.60 as payment for those services.”

2. Mayor requests a second to the motion, public comment, Commission discussion, and calls for the vote.

Staff Recommendation: Staff recommends the Commission approve the SHI Customer Resale MSA to secure Sophos Network Threat Monitoring services.

Summary: The City requested proposals from internal departments for potential uses of ARPA funding in mid-2021. The IT Department submitted a request to secure subscription based active network threat monitoring. The Great Falls City Commission approved the collection of information and bid proposals for certain “Tier 1” projects during the April 5th, 2022 work session. This project was among those selected.

Background: The City of Great Falls currently uses Sophos antivirus software as a deterrent to computer viruses, malware, and other digital threats. This software is regularly updated and notifies the staff of any known threats. However, the software does not properly or thoroughly inspect incoming or outgoing data for potential or active threats. Threat Monitoring Services are comprised of Cyber Security Professionals who proactively look for and stop potential threats to the City network.

Alternatively, the City could hire its own Cyber Security Expert, However, these highly trained professionals earn close to or over \$100,000.00 on average. A more cost friendly option has developed in the form of subscription based security monitoring firms. These organizations employ a team of certified IT security professionals and use cloud and network access to monitor subscriber’s networks.

This approach has been widely adopted by entities that do not have the financial resources to hire dedicated security personnel.

IT Manager Jon Legan has researched potential IT security threat prevention providers. Sophos has been identified by other Montana communities as a reliable security provider. Mr. Legan contacted SHI and Sophos then negotiated for the attached proposal. If approved, this agreement would secure five years of network security for the City of Great Falls at a rate of approximately \$28,000.00 per year. This is roughly one third of the annual cost necessary to employ an in-house professional for the same role.

Workload Impacts

This subscription will place the majority of network security demands upon the Sophos Threat Monitoring team. This will decrease the demand of securing or responding to computer threats from City personnel.

Evaluation and Selection Process:

Sophos secures the networks of several other Montana communities. Mr. Legan has reached out to these communities to solicit their opinion on the quality of a subscription. Every contacted community has endorsed this business as a quality provider and is satisfied with the security of their computer systems.

Fiscal Impact: The entire cost of the SHI's network security services will be covered with ARPA funds. This is an effective use of funding under the Response to the COVID-19 Pandemic and Government Services categories. No local match is required for the project to be eligible.

Alternatives: The City Commission may reject the attached proposal and maintain the current systems security structure or elect to hire a dedicated IT security professional to bolster network security.

Concurrences: Coordination of this recommendation began after the City Commission approved the advancement of certain ARPA projects. This recommendation was coordinated extensively between IT, Finance, and the City Manager's office.

Attachments/Exhibits: SHI Pricing Proposal (quote) 21881489, Service Description – Sophos Managed Threat Response

Customer Resale MSA
between
SHI International Corp.
and
City of Great Falls

Customer Resale MSA
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This agreement, made this 15th day of June, 2022 (the "Effective Date"), together with the Exhibits attached hereto and incorporated herein which may be added hereto from time to time by mutual agreement of the Parties, (collectively, the "Agreement") is made by and between SHI International Corp., having an office and place of business at 290 Davidson Avenue, Somerset, NJ 08873 ("Reseller"), and City of Great Falls, having an office and place of business at 2 Park Drive S, Great Falls, MT 59401 ("Customer") (hereinafter collectively referred to as "the Parties," or individually as a "Party").

WHEREAS, Reseller is in the business of, and has expertise in, providing Products and Services as hereinafter described; and

WHEREAS, Customer wishes to obtain through Reseller and Reseller wishes to provide to Customer such Products and Services.

NOW THEREFORE, in consideration of the mutual covenants and promises set forth herein, the Parties agree as follows:

Article 1 - Definition of Terms

The following terms, wherever used in any documents which form part of this Agreement, shall have the meanings indicated below unless the context otherwise requires. Additional definitions may be contained elsewhere in this Agreement.

- A. "Affiliate" means any entity that controls, is Controlled by or is under common control with one of the Parties to this Agreement. "Control" or "Controlled" means beneficial ownership (direct or indirect) of the subject entity.
- B. "Commercially Reasonable" means taking all such steps and performing in such a manner as a well-managed company would undertake where it was acting in a determined, prudent and reasonable manner to achieve a particular desired result for its own benefit.
- C. "Deliverables" means those reports, documentation, and schedules to be developed and provided by Reseller to Customer in regard to the Services provided by Reseller hereunder.
- D. "OEM" means the original equipment manufacturer, or in the case of software, the software publisher/licensor.
- E. "Order" means the form of purchase order or other document used for the purpose of ordering Product and/or Deliverables pursuant to this Agreement. Order shall also include a phone order placed by Customer employee to Reseller utilizing Customer's corporate procurement card or Customer's written or electronic form of purchase requisition.
- F. "Products" means collectively third party software, computer peripherals, computer hardware, and associated IT services provided by third parties.
- G. "Services" means the resale services provided by Reseller under this Agreement; i.e. sourcing and fulfilling the Product and/or providing Deliverables identified in an Order.
- H. "Site" means the facility or office or other location, as designated in this Agreement or the Order, for which the Product and/or Deliverable is to be delivered.

Article 2 - Rules of Interpretation

- A. The term "including" means "including, but not limited to" and shall be interpreted as broadly as possible.
- B. All references to "days" shall be calendar days, not business days, unless otherwise explicitly stated.
- C. The captions and titles to articles and paragraphs of this Agreement are only provided for convenience and have no effect on the nature, extent, construction and meaning of this Agreement.
- D. In the event of any inconsistency between the provisions of the following documents, the inconsistency shall be resolved by giving precedence in the following order:
 - 1. The Order;
 - 2. Documents incorporated into the Order in the order in which they are listed
 - 3. Amendments to this Agreement, if any;
 - 4. This Agreement; and
 - 5. Documents incorporated into this Agreement in the order in which they are listed.

unless such inconsistency relates to modification to the Indemnification, Representations and Warranties, or Limitations of Liability Articles herein, in which case such modification must specifically state that it is amending this Agreement as so stated. This Agreement shall govern and supersede any preprinted terms and conditions stated on or attached to any Order, which are null and void with respect to this Agreement.
- E. Copies of documents referenced, attached, or incorporated in this Agreement, shall be deemed to be originals. Attachments, schedules, appendices and addenda shall be considered part of the documents in which they are

referenced. Documents that are referenced in this Agreement shall have the same force and effect as if contained in their entirety.

- F. Notwithstanding the general rules of construction, both Customer and Reseller acknowledge that both Parties were given an equal opportunity to negotiate the terms and conditions contained in this Agreement, and agree that the identity of the drafter of this Agreement is not relevant to any interpretation of the terms and conditions of this Agreement.

Article 3 - Attachments

The following documents are attached and are hereby incorporated into this Agreement by reference:

- A. Attachment One - SHI Quote # 21881489

Article 4 - Term of Agreement

This Agreement shall be effective on the Effective Date and continue in effect for three years thereafter, unless otherwise mutually extended by the Parties, or if terminated in accordance with this Agreement.

Article 5 - Scope of Agreement, Order

- A. This Agreement is not a commitment on the part of Customer to purchase Product from Reseller. Product will be purchased on an "as ordered" basis through the execution of one or more Orders, directing Reseller to deliver the Product, if any, for the benefit of Customer.
- B. The Product and any Deliverables to be provided shall be determined in such Order, including all attachments thereto. Each Order that refers to this Agreement shall be deemed a separate agreement that incorporates the terms and conditions of this Agreement by reference.
- C. Any Order issued hereunder shall, at a minimum, contain the following:
1. The incorporation by reference of this Agreement;
 2. The location where Product will be delivered;
 3. A detailed description of the Product, including, but not limited to, SKU, Manufacturer's part number, and any applicable designation and/or specifications which will avoid confusion regarding the Product to be delivered;
 4. A detailed description of Deliverable(s) to be provided by Reseller;
 5. Price, including any applicable fees, and payment terms;
 6. The scheduled delivery date;
 7. Reseller shall not be required to deliver any Product and/or Deliverable unless and until an Order has been provided to Reseller.
- D. If notice of rejection of an Order is not received by Customer within two business days from the date of its receipt by Reseller, then such Order shall be deemed to have been accepted by Reseller.
- E. Third party IT services resold under an Order are provided by third parties, and Customer acknowledges that Reseller shall have no liability to Customer for such third party IT services beyond the processing of invoices and payment therefor.

Article 6 - Invoicing, Terms of Payment, Price and Tax

- A. All invoices shall be submitted, upon shipment of Products, to the remit-to address specified in an Order, and shall reference the Order number.
- B. Subject to reconciliation with the terms of this Agreement and the Order, including verification that the Product was delivered, the invoice shall be paid ("paid" being defined as "issuance of payment from Customer's Accounts Payable Department") net thirty days after receipt of a valid invoice at the above referenced remit-to address.
- C. Any invoice or portion thereof that is subject to a good faith dispute will not be paid; in such case, Customer will promptly notify Reseller of any rejected invoice or portion thereof, with reasons for such rejection. The rejected costs, adjusted to the extent as mutually agreed to, shall then be re-invoiced on a separate invoice and paid net fifteen days thereafter.
- D. Invoices shall call for payments in U.S. Dollars or mutually agreed upon currency, and shall accurately reflect the amount(s) of the Price set forth in the Order.
- E. Price

The price specified in the Order for the Product shall consist of cost, plus mark-up percentages set forth in Attachment One hereto (the "Price"). The mark-ups represent Reseller's fee ("Fee") for performing the Services.

F. Payments Originating in Romania, APAC or Latin American Countries

Notwithstanding the foregoing, in cases where payments originate from Customer Affiliates located in Romania, APAC or Latin American countries, and portions of such payments will be subject to WHT (Withholding Tax), Reseller shall be permitted to incorporate the value of such withholding tax into the cost of the Product as a direct pass through to the Customer Affiliate, without markup.

G. Tax

1. Customer will be responsible for payment of any federal, state, and local sales, use, withholding tax, duties or similar taxes imposed or based on the sale of Products under this Agreement. Taxability will be calculated based on the ship-to location provided on the Order.
When Reseller is authorized to collect such taxes, they will be separately stated on Reseller's invoices and reported and paid to appropriate taxing authorities by Reseller. For destinations where Reseller is not authorized to collect such taxes, no tax will be shown on Reseller's invoice, and, if applicable, customer will be responsible for remitting such tax payments directly to the appropriate taxing authority.
2. At Customer's request, Reseller will, to a Commercially Reasonable extent, file any certificate or other document which may cause any such tax to be avoided or reduced, and cooperate with Customer in contesting any such tax or in claiming, on Customer's behalf, refunds of any such taxes paid by or on behalf of Customer.
3. All other taxes, including, but not limited to a Party's operations, such as payroll or income taxes, federal, state, and local income taxes, franchise taxes, gross receipts taxes, federal, state, and local sales and use taxes, and property taxes shall be the responsibility of the Party that incurs the tax liability
4. For those states that provide a sales and use tax exemption for electronically delivered software or software delivered on customer provided media, Reseller agrees that such taxes shall not be collected from Customer or remitted to the applicable state taxing authorities.

Article 7 - Title, Risk of Loss, Returns

A. Reseller shall transfer to Customer good and merchantable title to the Deliverables and Product, free from all liens, encumbrances and claims of others, upon delivery of the Deliverables and Product to and its receipt by Customer, at which time title and risk of loss shall vest fully in Customer, unless notice of rejection is provided to Reseller's authorized representative within 24 hours after such delivery.

B. Returns

1. General

Subject to Sections 2, 3, 4, 5, and 6, below,

- a. For a Product to be eligible for return it must be: (1) in Resale Condition (defined as unused and one hundred percent complete, including all original boxes, packing materials, manuals, blank warranty cards, and other accessories provided by the OEM), (2) within the OEM's or distributor's allowable time period for return after Customer's receipt of the Product, and (3) not designated as "non-cancellable" or "non-returnable" ("Special Order") when quoted by Reseller to Customer.
- b. If the Product is a Special Order item or not in Resale Condition, then Reseller will accept the return only if the OEM/distributor will accept the return.
- c. Shipping and any restocking fees imposed by the OEM or distributor shall be at Customer's cost.
- d. If return is due to Reseller's error, and the return request is made by Customer within thirty days of receipt of Product, then Reseller will accept the return at no additional cost to Customer.
- e. If Customer ordered the incorrect Product or has decided that it no longer wants the Product, then Reseller will accept the return from Customer, provided the OEM/distributor will accept the return.

2. Non-Conforming Product

- a. If Customer determines, in its reasonable discretion, that any Product is not in conformance with the description in the Order (a "Non-Conforming Product"), then Customer may at its option, either:
 - 1) Request that Reseller promptly initiate an order to replace the Non-Conforming Product at no cost to Customer, in which case Reseller will order a replacement unit within one business day of notice of nonconformance from Customer and Customer shall return the Product to Reseller, all at no cost to Customer; or
 - 2) Terminate the non-conforming portion of the applicable Order, in which case Customer shall return the Product to Reseller at no cost to Customer, and Reseller, upon receipt of the Product, shall promptly refund to Customer any payments made to Reseller therefor,

provided that the request for such return was made within OEM's or distributor's allowable time period for return after receipt of Product by Customer, and that the return will be made in accordance with Reseller's RMA process, described below.

3. Software License Returns

The OEM's return policy or the applicable license agreement, as the case may be, will govern returns for licensed software.

4. Damage, Defects and DOA

If the Product has concealed damage (i.e., there is no evident damage to external packaging), is defective, or dead on arrival ("DOA"), Reseller will accept the return from Customer, provided the OEM or distributor will accept the return from Reseller. In any event, the OEM's or distributor's policies, as applicable, (which may include processing as a warranty claim) will apply. Reseller will order a replacement unit within one business day of notice of damage, defect or DOA from Customer for prompt delivery to Customer, all at no cost to Customer.

5. Shipping Damage

- a. If a package containing Product purchased from Reseller arrives at Customer Order's ship-to address with external damage, Customer should refuse to accept delivery from the carrier. If Customer does accept delivery of such a package, Customer must:
 - 1) note the damage on the carrier's delivery record so that Reseller may file a claim;
 - 2) save, as is, the Product and the original box and packaging it arrived in; and
 - 3) notify Reseller in writing within five days of delivery acceptance to arrange for carrier's inspection and pickup of the damaged merchandise.
- b. If Customer does not comply with the above requirements, Customer will be deemed to have accepted the Product as if it had arrived undamaged, and Reseller's regular return policy, as described herein, and all OEM warranties and restrictions will apply.

6. RMA Process

In order for Reseller to accept return, Customer must first obtain from Reseller and apply a Returned Merchandise Authorization ("RMA") to the returned Product. If Customer returns Product directly to the OEM, distributor, or Reseller without an RMA, then Reseller shall not be responsible for accepting such return, Product replacement or refund, and such return may void any Customer claims on the Product. Customer shall ship all Product returns to Reseller designated recipient DDP (Delivered Duty Paid) per Incoterms®.

Article 8 - Packaging, Labeling, and Shipping

- A. Products shipped to Customer's facilities shall be packaged in such a manner as to preclude all reasonably anticipated in-transit damage and in accordance with commercial standards. All shipments of Products will be clearly labeled with the shipping address stated on the order, the applicable Order number, recipient's name and if applicable, building and room number.
- B. Reseller will deliver all Products FOB Destination to the ship to address designated in the Order, freight pre-paid and added, ground transportation.

Article 9 - Contractual Relationships, Relations

- A. Customer/Reseller Relationship: It is the intent of the Parties that the relationship of Customer and Reseller be that of the "customer" and "independent contractor," respectively. As an independent contractor, Reseller shall not act as or be an agent or employee of Customer in performing the Services, and shall determine the means and methods for satisfactorily providing the Services.
- B. Customer/OEM Relationship: Reseller has no privity of contract in any license agreement between Customer and OEM.
- C. Any provision herein referring to Reseller's subcontractors or OEM shall not create privity of contract between Customer and such parties.

Article 10 - Indemnification

- A. Each Party (the "Indemnifying Party") shall, to the extent permitted by law, indemnify, defend and hold harmless the other Party and its respective employees, officers, directors, agents and representatives (the "Indemnified Party") from and against any and all third party claims, actions liabilities, losses and damages (collectively, a "Claim") to the extent caused by or arising out of the gross negligence, willful misconduct, or violation of law of the Indemnifying Party or any agent of the Indemnifying Party in the course of its performance under this Agreement, including but not limited to personal injury, death, damage to property (tangible or intangible),

infringement of intellectual property rights, and/or injury, sickness, or disease to persons (including death), infringement of civil rights or other tortious acts settlements, judgments, court costs, reasonable attorneys' fees, fines, penalties and other litigation expenses. This indemnity shall apply to all Claims against the Indemnified Party made or threatened by, or in the name of or on behalf of the Indemnifying Party's employees which arise in the course of their employment.

- B. The Indemnified Party shall provide timely written notice to the Indemnifying Party of any claim, loss, suit, demand or lien under this Article that it becomes aware of. The Indemnified Party's failure to promptly notify the Indemnifying Party shall limit the Indemnifying Party's obligations to the extent that such failure prejudices Indemnifying Party's ability to defend the Claim.
- C. The Indemnifying Party shall have the right to assume exclusive control of the Claim, and the Indemnified Party shall provide reasonable assistance in the defense of the Claim at the Indemnifying Party's expense. The Indemnifying Party may: (a) use counsel of Indemnifying Party's own choosing (subject to the Indemnified Party's written consent, which shall not be unreasonably withheld) to defend against the Claim; and (b) settle the Claim as the Indemnifying Party deems appropriate, provided that the Indemnifying Party obtains the Indemnified Party's prior written consent, which shall not be unreasonably withheld, before entering into any settlement which will impact the Indemnified Party's rights under this Agreement. The Indemnified Party may also assume control of the defense and settlement of the Claim at any time at its own expense, as long as the Indemnifying Party is released of its obligations under this clause.
- D. If the Indemnified Party is obligated to respond to a third party subpoena or other compulsory legal order or process as a result of a Claim, the Indemnifying Party will reimburse the Indemnified Party for reasonable attorneys' fees, as well as time and materials costs incurred in responding to such third party subpoena or other compulsory legal order or process.

Article 11 - Software License

Software Products resold under this Agreement, as well as related maintenance or support services, will be governed by either the license/support agreement between Customer and the OEM or, if no such agreement exists, the OEM's standard license/support agreement, which Reseller shall forward to Customer at the time of delivery of the Products, when provided to Reseller by the manufacturer. Reseller is not a party to any such terms between Customer and manufacturer and Customer agrees to look solely to the OEM for satisfaction of any and all license and support claims or obligations related to that OEM's Product.

Article 12 - Limitation of Liability

- A. NEITHER PARTY WILL BE LIABLE FOR ANY SPECIAL, PUNITIVE, INDIRECT, INCIDENTAL OR CONSEQUENTIAL DAMAGES INCLUDING, BUT NOT LIMITED TO, LOSS OF OR DAMAGE TO DATA, LOSS OF ANTICIPATED REVENUE OR PROFITS, WORK STOPPAGE OR IMPAIRMENT OF OTHER ASSETS, WHETHER OR NOT FORESEEABLE AND WHETHER OR NOT A PARTY HAS BEEN ADVISED OF THE POSSIBILITY OF SUCH DAMAGES.
- B. EXCEPT IN THE CASE OF A PARTY'S OBLIGATION TO INDEMNIFY FOR THIRD PARTY CLAIMS UNDER Article 10 - Article 10 - Indemnification, OR BREACH OF CONFIDENTIALITY UNDER Article 13 - Confidential Information EITHER PARTY'S TOTAL CUMULATIVE LIABILITY TO THE OTHER IN CONNECTION WITH THIS AGREEMENT, WHETHER IN CONTRACT, TORT OR OTHER THEORY, WILL NOT EXCEED THE TOTAL AMOUNT OF FEES ACTUALLY PAID OR PAYABLE BY CUSTOMER TO RESELLER UNDER THIS AGREEMENT FOR THE YEAR PREVIOUS TO THE INCIDENT WHICH GAVE CAUSE FOR SUCH LIABILITY. CUSTOMER ACKNOWLEDGES THAT SUCH AMOUNT REFLECTS THE ALLOCATION OF RISK SET FORTH IN THIS AGREEMENT AND THAT RESELLER WOULD NOT ENTER INTO THIS AGREEMENT WITHOUT THESE LIMITATIONS ON ITS LIABILITY.

Article 13 - Confidential Information

- A. If a Party to this Agreement, its subcontractors and agents (the "Receiving Party") obtains access to Confidential Information (as defined below) of the other Party (the "Disclosing Party") in connection with the negotiation of or performance under this Agreement, the Receiving Party agrees that:
 1. The Disclosing Party shall retain ownership of the Confidential Information and that the Receiving Party shall not acquire any rights therein, except the right to use such Confidential Information to the extent provided in this Agreement.
 2. The Receiving Party shall use at least the same degree of care to protect the Confidential Information from unauthorized disclosure or access that the Receiving Party uses to protect its own Confidential Information, but not less than reasonable care, including measures to protect against the unauthorized use, access, destruction, loss and alteration of such Confidential Information.

3. The Receiving Party agrees not to use the Confidential Information received from the other during the term of this Agreement, either directly or indirectly, to solicit business from any individual, company, agency or institute, or to interfere with, impair or hinder any relationship between the Disclosing Party and any of its customers, prospective customers, suppliers, strategic partners, Affiliates or investors, or in any other manner to compete against the Disclosing Party.
 4. Except as otherwise provided in this Agreement, no Confidential Information disclosed pursuant to this Agreement shall be made available by the Receiving Party to any third party for any purpose, except to an Affiliate, consultant, attorney, subcontractor, or potential subcontractor who needs to know the Confidential Information for the performance of this Agreement and provided that they agree to be bound by the terms and conditions of this Article or another written agreement sufficient to require them to treat Confidential Information in accordance with this Agreement. The Receiving Party agrees to indemnify the Disclosing Party for any violation or breach of such restrictions.
- B. "Confidential Information" shall mean: (1) information which is (a) in tangible form, clearly and conspicuously identified by the Disclosing Party or a third party as proprietary and/or confidential (by stamp, legend or otherwise) when disclosed or, (b) in intangible form, if its proprietary and/or confidential nature is first announced, and then reduced to writing ("Summary") and furnished to the Receiving Party within thirty days of the initial disclosure, in which case the Confidential Information contained in such Summary shall be subject to the restrictions herein; (2) all information about or belonging to the Disclosing Party that is disclosed or otherwise becomes known to the Receiving Party in connection with this Agreement and that is not a matter of public knowledge; and (3) all trade secrets and intellectual property owned or licensed by the Disclosing Party. The terms of this Agreement, along with the fact of this Agreement's existence, are the Confidential Information of both Parties.
- C. Each Party shall endeavor to keep to a minimum the amount of Confidential Information that is furnished to the other upon which restrictions are imposed.
- D. Information of the Disclosing Party shall not be considered Confidential Information to the extent that the Receiving Party can demonstrate that such information:
1. was previously rightfully known by the Receiving Party free of any obligation to keep it confidential; or
 2. is or becomes publicly known through no wrongful act of the Receiving Party; or
 3. is independently developed by the Receiving Party without reference to, use of, or access to the Confidential Information of the Disclosing Party.
- E. If Confidential Information is subject to disclosure pursuant to a subpoena, judicial or governmental requirement, or order, the Receiving Party shall give the Disclosing Party sufficient prior notice of such subpoena, requirement, or order, to permit the Disclosing Party a reasonable opportunity to object to the subpoena, requirement, or order and to allow the Disclosing Party the opportunity to seek a protective order or other appropriate remedy. Except in connection with a failure in the discharge of responsibilities set forth in the preceding sentence, the Receiving Party shall not be liable in damages for any disclosure of Confidential Information pursuant to judicial decree or government regulation.
- F. The confidentiality obligations of each Party under this Agreement will survive any expiration or termination of this Agreement for a period of three years after receipt of such Confidential Information, or such time as may be required by federal or state law or regulations, whichever shall last occur. Upon the expiration of this Agreement, written request of the Disclosing Party or the Receiving Party's determination that it no longer has a need for such Confidential Information, the Receiving Party shall return all Confidential Information and copies in tangible form thereof or certify in writing that it has destroyed all Confidential Information and copies in tangible form thereof. Notwithstanding the foregoing, neither Party is obligated to return or destroy Confidential Information that (a) it is required by law or regulation to retain, (b) is commingled with other information or documents of the Receiving Party if it would pose a substantial administrative burden to destroy such Confidential Information, or (c) is contained in an archived computer system or backup made by the Receiving Party in accordance with its standard security or disaster recovery procedures, provided in each case that: (i) such retained documents will eventually be erased or destroyed in the ordinary course of records management and/or data processing procedures; and (ii) that the Receiving Party remains fully subject to the obligations of confidentiality in this Agreement until the later of the eventual destruction or the termination or expiration of the confidentiality obligations set out in this Agreement.
- G. The rights, duties and obligations of the Parties with respect to all Confidential Information disclosed before the date of this Agreement in contemplation of the execution of this Agreement shall be as set forth in this Article.

Article 14 - Representations and Warranties

- A. Reseller hereby represents and warrants to Customer that for the term of this Agreement:
1. Reseller shall perform the Services in a timely manner and with a high degree of professional skill and care using customarily accepted good and sound professional practices and procedures in the industry.
 2. Reseller will maintain all necessary local, state, and federal licenses and certifications that may be required in order to legally deliver the Product and Deliverables described in the Order(s). Reseller understands and acknowledges that Reseller is wholly responsible for ensuring compliance with all federal, state, and local laws associated with the delivery of all Services associated with this Agreement and associated Order(s).
 3. Reseller has all rights, approvals, and/or authorizations necessary to perform the Services hereunder, and provide the Product and/or Deliverables.
 4. Reseller is authorized to execute this Agreement, is qualified to perform the Services, and has good title to the materials, supplies and equipment constituting the Services, free from all liens, encumbrances and claims of others.
 5. The Services and any Deliverables will not contain any computer instructions, circuitry or other technological means whose purpose is to disrupt, damage or interfere with Customer's use of the Services, Deliverables or its computer and telecommunications facilities.

B. Remedy

If a defect occurs or appears in the Deliverables or Services provided hereunder, it shall be presumed that Reseller failed to meet such standards, and Reseller shall promptly and at its own expense, correct or re-perform any such Services which fail to meet such standards within a reasonable time frame acceptable to Customer at no additional cost.

C. Warranty of Product

1. Reseller is a value added reseller ("VAR") of Product, not the OEM or licensor, and therefore disclaims any warranty responsibility regarding Product provided under this Agreement. Reseller shall forward the warranties to Customer which are provided to Reseller from the OEM of the Product, and to the extent granted by the OEM, Customer shall be the beneficiary of the OEM's warranties with respect to the Product. Reseller is not a party to any such terms between Customer and OEM and Customer agrees to look solely to the OEM for satisfaction of any and all warranty claims related to that OEM's Product.
2. Customer has made and will make its own selection of the Products to be ordered hereunder based on its own evaluation of the character of such Product and its use needs.
3. Reseller shall forward to Customer all associated documentation provided or made available by the OEM at no additional cost, such as operator/user manuals, training materials, guides, and functional/technical specifications, whether in writing, electronic means or otherwise, (collectively "Documentation").

EXCEPT AS OTHERWISE PROVIDED IN THIS AGREEMENT AND/OR ANY ORDER ISSUED HEREUNDER, RESELLER HEREBY DISCLAIMS ALL OTHER WARRANTIES, EITHER EXPRESS OR IMPLIED, INCLUDING, BUT NOT LIMITED TO, ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, WARRANTY OF NONINFRINGEMENT, OR ANY WARRANTY RELATING TO THIRD PARTY SERVICES OR PRODUCTS. THE DISCLAIMER CONTAINED IN THIS PARAGRAPH DOES NOT AFFECT THE TERMS OF ANY WARRANTY PROVIDED BY AN OEM.

Article 15 - Publicity, Marks

- A. During or after the term of this Agreement, the Reseller shall not release any information (other than to its subcontractors on a need to know basis for purposes of performance under this Agreement and subject to the terms of this Agreement), including news releases, publicity, promotional, marketing, or other materials, media, or activities, any name, trade name, trademark, service mark, logo, or any other designation relating to the Customer, its Affiliates, or this Agreement, without the Customer's prior written approval and compliance with any terms and conditions related to such use which the owner of the mark provides to the other Party.
- B. Except as specifically set out in this Agreement, nothing in this Agreement shall grant, suggest or imply any authority for one Party to use the name, trademarks, service marks or trade names of the other for any purpose whatsoever.

Article 16 - Insurance

- A. Reseller represents that it now carries, and agrees it will continue during the term of the Order to carry, as a minimum, insurance as listed below:

Type of Coverage	Limits of Liability
1. Worker's Compensation	Statutory
2. Employers' Liability	\$1,000,000 Bodily Injury by Accident or Disease, per person
3. Commercial General Liability including:	\$1,000,000 Each Occurrence
• Damage to Rented Premises	\$1,000,000 Each Occurrence
• Medical Expenses	\$ 15,000 (any one person)
• Personal & ADV Injury	\$1,000,000
• General Aggregate	\$2,000,000
• Products/Completed Operations Aggregate	\$2,000,000
4. Automobile Liability Insurance (owned, hired, and non-owned)	\$1,000,000 Combined Single Limit (each accident)
5. Excess/Umbrella Liability	\$15,000,000 Each Occurrence \$15,000,000 Aggregate
6. Commercial Crime Policy	\$1,000,000 / \$100,000 deductible
7. Error & Omission/Cyber Liability	\$6,000,000 Each Occurrence \$6,000,000 Aggregate

- B. Prior to the start of on-site Services, at each subsequent policy renewal date, and each time a change is made in any insurance policy or insurance carrier, Reseller shall furnish one (1) insurance certificate to Customer for the foregoing coverages as proof of such insurance. The certificate shall include:
1. Name of insurance carrier, policy number and expiration date;
 2. This Agreement number, or statement of blanket applicability;
 3. The coverages required, whether on the basis of claims made or per occurrence, and the limits on each, including the amount of deductibles or self-insured retentions (which shall be for the account of Reseller);
 4. A statement that Customer and their respective officers, directors, employees and agents are additional insureds on Commercial General Liability; and
 5. All policies required by this Agreement shall be written by insurance carriers licensed to do business in the state in which the service is performed.
- C. The coverage may not be canceled, altered or permitted to lapse or expire without thirty days' advance written notice to Customer, except in the case of cancellation for insurance premium non-payment, in which case Customer shall be notified ten days prior to such cancellation.

Article 17 - Laws, Regulations and Permits

- A. Reseller shall at all times comply with all applicable federal, state and local laws, ordinances, statutes, rules or regulations including but not limited to those relating to wages, taxes, hours, environmental, fair employment practices, equal opportunity, antidiscrimination, safety, fire prevention and working conditions.
- B. Export of Products by Customer.
1. Products are subject to United States export controls. No Products may be downloaded or otherwise exported or re-exported: (a) into (or to a national or resident of) Cuba, Iraq, Libya, Sudan, North Korea, Iran, Syria, or any other country to which the United States has embargoed goods; or (b) to anyone on the U.S. Treasury Department's list of Specially Designated Nationals or the U.S. Commerce Department's Table of Denial Orders (collectively, "Prohibited Entities"). By purchasing Products under this Agreement, Customer agrees to the foregoing, and warrants that it is not located in, under the control of, a national or resident of, or transferring any Product to a Prohibited Entity, nor otherwise in violation of U.S. export laws or regulations, nor in violation of any applicable local laws or regulations. If Customer exports or re-exports any Product resold under this Agreement, then Customer is solely responsible for ensuring that such Products are exported and imported in accordance with the requirements of the country-specific trade compliance regulations as well as the US Export Administration Regulations (EAR) Products redirected outside the USA by a freight forwarder cannot be returned to the OEM or Reseller.
 2. With respect to any acquisition of any Product by or for any unit or agency of the Federal, State or Municipal Government (the "Government"), the Product shall be classified as "Commercially Available Off-The-Shelf (COTS)," as that term is defined in the applicable provisions of the Federal Acquisition Regulation (the "FAR") and supplements thereto, including the Department of Defense (DoD) FAR

Supplement (the "DFARS"). All Products provided under this Agreement were developed entirely at private expense, and no part of such Product was first produced in the performance of a Government contract. If the Product is supplied for use by the DoD, the Product is delivered subject to the terms of this Agreement and either (i) in accordance with DFARS 227.7202-1(a) and 227.7202-3(a), or (ii) with restricted rights in accordance with DFARS 252-227-7013 (c)(1)(ii)(OCT 1988), as applicable. If Product is purchased under this Agreement for use by a Federal agency other than the DoD, the Product is restricted computer software or hardware delivered subject to the terms of this Agreement and (i) FAR 12.212(a); (ii) FAR 52.227-19; or (iii) FAR 52.227-14(ALT III), as applicable.

Article 18 - Assignment and Subcontracting

- A. Neither Party may assign, subcontract, or transfer the Agreement or any part thereof without the other Party's prior written consent, and any such assignment or transfer without such consent shall be null and void. Notwithstanding the foregoing, either Party may assign this Agreement and its rights, interests, liabilities and obligations thereunder to a successor pursuant to a merger, consolidation or sale of all or substantially all its assets.
- B. Notwithstanding Customer's written consent to a proposed subcontract, Reseller shall remain responsible for all subcontracted Services and the payment therefor, and Reseller shall be liable to Customer for the acts and omissions of any subcontracted entity, their agents, representatives and persons directly or indirectly employed by them.
- C. This Agreement shall be binding upon and inure to the benefit of the Parties and their respective legal representatives, heirs, successors and assigns permitted by this Agreement.

Article 19 - Authorized Representatives and Notices

A. Contract Representatives, Notices

- 1. Any notice or demand required under the terms of this Agreement that must be made in writing shall be sent by facsimile, certified or registered mail, delivered by hand via a nationally recognized overnight carrier, or sent by Email with receipt confirmation addressed to the "Contract Representatives" named below. The effective date of any such notice shall be (1) upon evidence of successful facsimile or Email transmission, or (2) five days following the date mailed for certified or registered letters and two days following the date mailed for overnight letters, or (3) when delivered, if in person or by overnight carrier.
- 2. The Contract Representatives are designated as follows:

For Customer	For Reseller
Legal Department City of Great Falls 2 Park Drive S Great Falls, MT 59401	Contracts Department SHI International Corp. 290 Davidson Avenue Somerset, NJ 08873 Email: contracts@shi.com

- 3. The Contract Representatives shall have the authority to make binding and enforceable decisions on behalf of their employer, and to accept service of commercial notices and other contractual correspondence which a Party desires to give or is required to be given under this Agreement. Either Party may change its Contract Representative designee by giving the other Party prior written notice thereof

B. Account Representatives

- 1. Before commencing the Services, the Parties shall designate authorized Account Representatives to represent and act for them regarding the administration of the Services and all other aspects of the supply of Product and/or Deliverables. Such Account Representative shall have the authority to make binding and enforceable decisions regarding the Services to be performed.
- 2. The Account Representative is not authorized to terminate, suspend, change or waive any provision of, or amend this Agreement.
- 3. The Account Representatives are designated as follows:

For Customer	For Reseller
Jon Legan City of Great Falls 2 Park Drive S Great Falls, MT 59401	Ty Pellot Ty_Pellot@shi.com 7326523080

For Customer	For Reseller
jlegan@greatfallsmt.net	
4064558483	

Article 20 - Force Majeure

- A. Neither Party to this Agreement shall be liable to the other to the extent any failure or delay in performing its obligations hereunder, or for any loss or damage resulting therefrom, is due to: (1) acts of God or public enemy, acts of government, riots, terrorism, fires, floods, strikes, lock outs, epidemics, act or failure to act by the other Party, or unusually severe weather affecting Customer, Reseller or its subcontractors, or (2) causes beyond their reasonable control and which are not foreseeable (each a "Force Majeure Event"). In the event of any such Force Majeure Event, the date of delivery or performance shall be extended for a period equal to the time lost by reason of the delay.
- B. The Party experiencing the delay shall be prompt in restoring normal conditions, establishing new schedules and resuming operations as soon as the event causing the failure or delay has ceased. Reseller shall notify Customer promptly of any such delay and shall specify the effect on the Product delivery as soon as practical.
- C. Notwithstanding any of the foregoing to the contrary, neither Party shall be excused from those obligations not directly affected by a Force Majeure Event, and if the Force Majeure Event is caused by a Party's failure to comply with any of its obligations under this Agreement or by such Party's negligence or omission, there shall be no relief for such Party from any of its obligations under this Agreement. Notwithstanding anything to the contrary in this Agreement, if the delay or interruption of performance resulting from a Force Majeure Event exceeds thirty days, then the Party receiving the delayed performance may terminate this Agreement upon ten business days' notice to the other Party.

Article 21 - Termination

- A. Termination for Convenience
1. Either Party may terminate this Agreement, without cause and for its own convenience, by giving the other Party a written "Notice of Termination for Convenience," specifying the extent to which this Agreement is terminated and the date upon which such termination becomes effective. Such notice shall provide a minimum of thirty days' notification before the termination is effective.
 2. After receiving such a "Notice of Termination for Convenience" and except as otherwise directed by Customer's Contract Representative, Reseller shall:
 - a. stop the Services on the date and to the extent specified in the termination notice; and
 - b. place no further purchase orders for Products, except as may be necessary for completing such portions of the Orders which have not been terminated.
 3. Customer's payment obligations shall be limited to the amounts owed up to the termination date.
 4. An Order may be cancelled as follows:
 - a. Customer shall have the right to cancel or postpone, in whole or in part, any Order, without penalty, provided that notice of such cancellation or postponement is received by Reseller prior to shipment of the ordered Products;
 - b. If Customer cancels an Order following shipment of the Products but prior to delivery, Customer shall pay all freight and handling charges for shipment and return shipment of such Products to Reseller. All returns shall be made in accordance with Reseller Return Policy;
 - c. Notwithstanding the foregoing, any such cancellations shall be subject to charges imposed by the OEM/Distributor associated with cancellation;

provided the Order or some part thereof has not been designated Special Order, in which case the Order, or the part thereof which is non-cancellable or non-returnable may not be cancelled, once the Order is received by Reseller.
- B. Termination for Default
1. Either Party may terminate this Agreement in whole or in part by giving the defaulting Party a written "Notice of Termination for Default," specifying one or more of the following causes or circumstances:
 - a. if a Party becomes insolvent or makes a general assignment for the benefit of creditors; or
 - b. if a petition under the Bankruptcy Code is filed by or against a Party; or

- c. if material and adverse developments affecting a Party's business come to the attention of the non-defaulting Party, and it seeks but fails to receive from the Party in default reasonable assurances, in writing, as to its ability and intention to perform and complete its obligations under this Agreement; or
 - d. if a Party becomes involved in legal proceedings that in the non-defaulting Party's reasonable opinion materially interferes or will materially interfere with the defaulting Party's obligations under this Agreement; or
 - e. if the defaulting Party fails to perform any of the other material provisions of this Agreement and the Party in default does not cure such failure or substantially commence cure of such failure within ten business days (or such longer period as the non-defaulting Party may authorize in writing) after receipt of notice from the non-defaulting Party specifying such failure.
- C. Termination of this Agreement shall not affect the obligations of Customer or Reseller under any existing Order issued under this Agreement, and such Order shall continue in effect as though this Agreement had not been terminated, and was still in effect with respect to such Order.

Article 22 - No Waiver

Any failure by either Party to insist upon observance or performance by the other of the provisions of this Agreement shall not be deemed a "course of dealing," waiver of any such provision, or a waiver of the right of the Parties to enforce any and all provisions in the future. No waiver shall be binding unless it is in writing and signed by the Parties' Contract Representative. Any written waiver shall apply only to the specific default or to the instance specified, and a waiver of any default shall not be deemed a waiver of any other default, whether or not similar to the default waived.

Article 23 - Severance

Should any term or condition of this Agreement be declared unenforceable in law for whatever reason, all other terms and conditions shall survive and nevertheless remain valid, legal and enforceable, and the unenforceable provision will be severed from this Agreement.

Article 24 - Claims/Disputes/Governing Laws

- A. This Agreement, any Order thereunder, and any claims or disputes arising out of or relating thereto shall be governed by the laws of New Jersey, without regard to: (1) conflict of law principles; (2) the United Nations Convention on Contracts for the International Sale of Goods; and, (3) the Uniform Computer Information Transactions Act ("UCITA"). The Parties hereby consent to the exclusive jurisdiction and venue in the federal and state courts of the State of New Jersey in connection with any dispute or other matter arising out of this Agreement.
- B. Any claim or dispute which either Party may have against the other, arising out of this Agreement shall be presented by the claimant in writing to the other Party not later than thirty days after circumstances which gave rise to the claim or dispute have taken place or become known to the claimant, whichever is later. The claim or dispute shall contain a concise statement of the question or dispute, together with relevant facts and data to fully support the claim.
- C. In the event of any such claim or dispute, the Parties' Contract Representatives shall use their best efforts to negotiate a settlement. Upon the failure of such negotiations, such claim or dispute shall be further negotiated between more senior officials from each of the Parties who shall have decision making authority (but not direct responsibility for the administration of this Agreement); provided however, that nothing therein contained shall prohibit either Party from terminating its participation in the dispute during any stage of the process.
- D. If any claim or dispute arising hereunder is not resolved through such negotiations within thirty days following written presentment pursuant to paragraph B., above, either Party may, upon giving the other Party at least ten days' prior written notice, initiate litigation submitting such claims or disputes for decision by a court of competent jurisdiction within the venue stated in paragraph A., above, in accordance with the rules of that court and laws of that jurisdiction. Either Party may, at its option and at any time during the dispute resolution process, seek injunctive relief (including, but not limited to preliminary injunctive relief). Each Party irrevocably waives its rights to trial by jury in any action or proceeding arising out of or relating to this Agreement or the transactions relating to its subject matter.
- E. The Parties acknowledge that the remedies available to them under this Agreement, or that would otherwise be available at law, will be inadequate in case of any default or threatened default in the performance of the Parties' respective obligations under this Agreement and that such obligations shall be enforceable by a decree for the specific performance or by an injunction against any actual or threatened violation thereof.

- F. Except as expressly stated in this Agreement, the Parties' rights and remedies hereunder shall be cumulative and not exclusive of each other, shall be in addition to all other rights and remedies at law or in equity, and may be pursued separately or concurrently as the aggrieved Party determines.
- G. The prevailing Party in any litigation arising out of or relating to this Agreement shall be entitled to recover its expenses, costs of litigation (including, without limitation, clerk, paralegal, and expert witness costs), and reasonable attorneys' fees from the losing Party, whether or not otherwise specifically awardable under any law or court rule.

Article 25 - Survival of Obligations

The obligations of the Parties in the following Articles herein shall survive termination, cancellation or expiration of this Agreement:

- | | |
|---------------------------------------|---|
| Article 10 - Indemnification | Article 14 - Representations and Warranties |
| Article 12 - Limitation of Liability | Article 17 - Laws, Regulations and Permits |
| Article 13 - Confidential Information | Article 24 - Claims/Disputes/Governing Laws |

Article 26 - Execution/Counterparts/Electronic Transmission

This Agreement (and any Order) may be executed in two or more identical counterparts, each of which shall be deemed to be an original and all of which taken together will be deemed to constitute one and the same document when a duly authorized representative of each Party has signed a counterpart. The Parties may sign and deliver this Agreement (and any Order) by facsimile or other electronic transmission. Each Party acknowledges that the delivery hereof by facsimile or other electronic transmission will have the same force and effect as delivery of original signatures.

Article 27 - Entire Agreement

This Agreement, including all Orders issued by Customer and accepted by Reseller pursuant to this Agreement, shall constitute the entire agreement between the Parties with respect to the subject matter of this Agreement. This Agreement and any Order shall not be modified or rescinded, except by a writing signed by Reseller and Customer. The provisions of this Agreement supersede all contemporaneous and prior oral and written communications, understandings and agreements of the Parties with respect to the subject matter of this Agreement.

Authorization

IN WITNESS WHEREOF, the Parties have caused this Agreement to be executed by their duly authorized representatives, effective as of the date first above written.

City of Great Falls

SHI International Corp.

By: _____
 Authorized Signature

 Name

 Title

 Date

By: _____
 Authorized Signature

 Name

 Title

 Date



Pricing Proposal
 Quotation #: 21881489
 Created On: 4/13/2022
 Valid Until: 6/29/2022

CITY OF GREAT FALLS

Inside Account Executive

Jon Legan
 FISCAL SVCS DEPARTMENT
 PO BOX 5021
 ATTN: A/P
 GREAT FALLS, MT 59403
 United States
 Phone: 4067711180
 Fax:
 Email: jlegan@greatfallsmt.net

Ty Pellet
 290 Davidson ave,
 Somerset, NJ 08879
 Phone: 732-652-3080
 Fax: 732-652-3099
 Email: Ty_Pellet@shi.com

All Prices are in US Dollar (USD)

Product	Qty	Your Price	Total
1 Sophos Central Intercept X Advanced with EDR and MTR Standard - Subscription license renewal (3 years) - 1 user - volume, GOV - 500-999 licenses - Win, Mac Sophos - Part#: MUSJ3GTAA Serial #: L0000674936 Coverage Term: 6/30/2022 – 5/30/2027 Note: (Replacing existing License L0000674936 for 430 CIXAXDR 8/29/2021 8/28/2022)	500	\$140.90	\$70,450.00
2 Sophos Central Intercept X Advanced with EDR and MTR Standar Sophos - Part#: MUSJ2GTAA Serial #: L0000674936 Coverage Term: 6/30/2022 – 5/30/2027 Note: (Replacing existing License L0000674936 for 430 CIXAXDR 8/29/2021 8/28/2022)	500	\$105.68	\$52,840.00
3 Sophos Central Intercept X Advanced for Server with EDR and MTR Standard - Subscription license renewal (3 years) - 1 server - volume, GOV - 25-49 licenses - Linux, Win Sophos - Part#: MVSF3GTAA Serial #: L0004936227 Coverage Term: 6/30/2022 – 5/30/2027 Note: (Replacing existing License L0004936227 for 35 SVRCIXAXDR 8/29/2021 8/28/2022)	40	\$242.54	\$9,701.60
4 Sophos Central Intercept X Advanced for Server with EDR and Sophos - Part#: MVSF2GTAA Serial #: L0004936227 Coverage Term: 6/30/2022 – 5/30/2027 Note: (Replacing existing License L0004936227 for 35 SVRCIXAXDR 8/29/2021 8/28/2022)	40	\$181.95	\$7,278.00

Shipping \$0.00
 Total \$140,269.60

Additional Comments

We are constantly striving to provide you with World Class Support!
We'd love to hear about your quoting experience with this brief [survey!](#)

SHI SPIN: #143012572

SHI-GS SPIN (For Texas customers ONLY): #143028315

For E-rate SPI orders, applicant shall be responsible for payment of any outstanding or ineligible costs if USAC rejects reimbursement claim in whole or in part.

Please note, if Emergency Connectivity Funds (ECF) will be used to pay for all or part of this quote, please let us know as we will need to ensure compliance with the funding program.

Hardware items on this quote may be updated to reflect changes due to industry wide constraints and fluctuations.

Thank you for choosing SHI International Corp! The pricing offered on this quote proposal is valid through the expiration date listed above. To ensure the best level of service, please provide End User Name, Phone Number, Email Address and applicable Contract Number when submitting a Purchase Order. For any additional information including Hardware, Software and Services Contracts, please contact an SHI Inside Sales Representative at (888) 744-4084. SHI International Corp. is 100% Minority Owned, Woman Owned Business. TAX ID# 22-3009648; DUNS# 61-1429481; CCR# 61-243957G; CAGE 1HTFO

The Products offered under this proposal are resold in accordance with the [SHI Online Customer Resale Terms and Conditions](#), unless a separate resale agreement exists between SHI and the Customer.

Service Description - Sophos Managed Threat Response

This Service Description describes Sophos Managed Threat Response (the “Service”). All capitalized terms in this Service Description have the meaning ascribed to them in the Agreement (defined below) or in the Definitions section below.

This Service Description is part of and incorporated into, as applicable: (i) Customer’s or Managed Service Provider’s manually or digitally-signed agreement with Sophos covering the purchase of a Service subscription; (ii) Managed Service Provider’s manually or digitally-signed agreements with Sophos covering its purchase of Offerings of which the Service is a part; or (iii) if no such signed agreement exists, then this Service Description will be governed by the terms of the Sophos Services Agreement and/or Sophos End User Terms of Use, as applicable, posted at <https://www.sophos.com/en-us/legal> (collectively referred to as the “Agreement”). To the extent there is a conflict between the terms and conditions of the Sophos Services Agreement and this Service Description, the terms and conditions of this Service Description will take precedence.

Notwithstanding anything to the contrary in the Agreement, Customer/MSP acknowledges and agrees that: (i) Sophos may modify or update the Service from time to time without materially reducing or degrading its overall functionality; and (ii) Sophos may modify or update this Service Description at any time to accurately reflect the Service being provided, and any updated Service Description will become effective upon posting to <https://www.sophos.com/en-us/legal>.

I. DEFINITIONS

1. “Active Threat” is an infection, compromise, or un-authorized access of asset(s) that is attempting to circumvent controls in an effort to compromise a Managed Endpoint.
2. “Case” is a Detection or set of Detections that (i) is generated by a Managed Endpoint for human review, (ii) has been identified through Threat Hunting activities, or (iii) has been manually created at the discretion of the Security Services Team or at the request of the Customer/MSP.

3. “Detection” is a condition where data generated by a Managed Endpoint has been identified as an indicator of malicious or suspicious activity.
4. “Health” is the state of configurations and settings for the Managed Endpoint that affect the efficacy of the Managed Endpoint.
5. “Health Check” is the act of reviewing Health to identify configurations and settings that may negatively impact the efficacy of the Managed Endpoint.
6. “Managed Endpoint” is a desktop or server system where the Service Software is installed, up-to-date, and operational in support of Service delivery.
7. “Security Services Team” is the Sophos team conducting Threat Hunting, investigation, and Response Actions.
8. “Response Action” is an interaction with Managed Endpoints to investigate and neutralize Active Threats, including but not limited to remote query, host isolation, killing a process, blocking an IP address, and deleting malicious code.
9. “Threat Hunting” is the process of proactively and iteratively searching through data originating from Service Software to identify signals and indicators of malicious activity.
10. “Threat Response” includes the methods, processes, communications, and Response Actions utilized by the Security Services Team and the Customer/MSP, as applicable, to neutralize Active Threats.
11. “Threat Response Lead” is a member of the Sophos Security Services Team who is identified as the primary individual responsible for assisting a Customer/MSP during an Active Threat.
12. “Threat Response Mode” is the approach to notification, collaboration, and Threat Response adopted by the Security Services Team during delivery of the Service per Customer/MSP direction.

II. SCOPE OF SERVICE

1. The Service is provided on Managed Endpoints and includes the following activities:

1.1 Onboarding. During the onboarding process, the following activities must occur as a precondition to delivery of the Service:

- a. Customer/MSP will (i) provide contact information, (ii) determine Customer/MSP communication preferences (i.e. email, phone, Sophos Central portal), and (iii) determine the Threat Response Mode. MSP

must act as the contact for any Service to be provided to a Beneficiary of MSP's.

- b. MSP is solely responsible for: (i) obtaining any consents or information required from its Beneficiaries in order for Sophos to perform the Service, (ii) ensuring that Beneficiaries take all actions required of Customers in this Service Description; (iii) advising Beneficiaries of the risks and potential impacts of the Service.
- c. The Customer, MSP, or Partner will install the required Service Software on all Managed Endpoints to be covered by the Service.

Categories of Threat Response Modes are described below:

- o Notify: Investigate Cases to: (i) determine if a Response Action is advisable or required to stop an Active Threat or to improve Health, and (ii) provide related guidance to Customer/MSP through email or the Sophos Central portal. No Response Actions are taken by the Security Services Team.
- o Collaborate: Conduct investigation and Response Actions in conjunction with Customer/MSP. No Response Actions are taken by the Security Services Team without Customer/MSP's prior consent.
- o Authorize: Customer/MSP is notified of Response Actions taken by the Security Services Team.
- d. On receipt of the telemetry from a Managed Endpoint, a Health Check will be initiated by Sophos to determine if the policies configured are suitable for the environment and expected capabilities.
 1. Before any investigation and Response Actions are initiated, any configurations that could diminish the Customer's/MSP's/Beneficiary's security posture will be communicated to the Customer/MSP, along with recommended steps to remediate the issues identified by the Health Check.
 2. Failure of Customer/MSP/Beneficiary to implement Health Check recommendations during onboarding or during subsequent evaluations may result in diminished Service quality.

1.2 Investigations and Response. The following investigation and analysis activities for Detections originating from Managed Endpoints will be conducted by Sophos:

- a. Analysis is conducted to enhance identification, aggregation, and prioritization of Detections, resulting in machine-generated Cases.

- b. Cases are reviewed to determine what investigation and Response Actions are appropriate for neutralizing Active Threats.
- c. A formal investigation framework is utilized to supplement Cases with attack intelligence, drive continuous enrichment of Case details, and provide situational awareness throughout the investigation lifecycle.
- d. Escalation: information about the Case is shared with the Customer/MSP based on Customer's/MSP's pre-selected communication preferences.
- e. All monitoring, investigation, and Response Actions described in this Section 1.2 will be provided on a 24/7/365 basis.
- f. The following service level targets are utilized to provide Customers/MSPs with guidelines around timing expectations for Case creation and Response Actions resulting from investigations but excluding Threat Hunting.

Target time for Case creation	2 minutes from Detection
Target time for initial Response Action	30 minutes from Case creation

1.3 Threat Hunting. Threat Hunting will be conducted on Managed Endpoints to search for undiscovered or new threats, indicators of attack or compromise, or other attacker activities. When a Threat Hunt reveals signals or indicators of malicious activity, a Case is created, investigation is conducted, and upon verification of an Active Threat, Response Actions are initiated.

1.4 Reporting; Health Monitoring; Notification. Periodically, the Customer/MSP will be provided with (a) reports relating to Detections, investigations and Response Actions, and (b) notification of Health issues or significant misconfigurations that can degrade real-time protection, investigation, or the ability to take Response Actions.

1.5 Remote Access Tools. To support Service delivery, the Security Services Team may use remote access tools to access or make changes to Managed Endpoints and may utilize administrative access to Customer's/MSP's Sophos Central environment to view or modify configurations. Access will be subject to Customer/MSP approval, either on a per-escalation basis or based on blanket pre-approval if the Customer/MSP has selected the "Authorize" Threat Response Mode. All access by the Security Services Team to Managed Endpoints and Sophos Central is recorded and logged.

CUSTOMER/MSP ACKNOWLEDGES AND AGREES THAT CUSTOMER'S AUTHORIZATION FOR SOPHOS TO MAKE ANY CHANGES TO, OR

MODIFY CONFIGURATIONS IN, CUSTOMER'S/MSP'S/BENEFICIARY'S ENVIRONMENT COULD RESULT IN INTERRUPTION OR DEGRADATION OF CUSTOMER'S/MSP'S/BENEFICIARY'S SYSTEMS AND INFRASTRUCTURE.

1.6 Translation Services for Customers in Japan Only. Sophos may offer translation services through a third-party service provider(s) to translate all verbal communications between Sophos and Customer ("Translation Services"). The Translation Services are provided at Customer's sole option and for Customer's convenience only. Customer acknowledges and agrees that Sophos is not responsible for the accuracy, completeness, or reliability of the Translation Services provided by such third-party service provider(s), and Sophos is not liable for any issues arising from the Translation Services.

2. TIERS OF MTR SERVICE OFFERINGS.

The Service is offered under two tiers: Standard and Advanced. The Standard tier of the Service includes the scope and benefits described in Section 1 above. The Advanced tier of the Service includes the Standard tier plus the following:

- enhanced Threat Hunting utilizing proprietary methods to anticipate and identify indicators of attack and compromise based on factors specific to Customer's/MSP's/Beneficiary's environment;
- assignment of a Dedicated Response Lead during Threat Response (Dedicated Response Lead is a named lead per shift on the Security Services Team who is the single point of contact during Threat Response);
- direct call-in access to the Security Services Team;
- proactive recommendations to prevent or reduce Active Threats;
- scheduled discussion with Customer/MSP to review MTR capabilities and Cases upon Customer/MSP's request; and
- analysis of Detections originating from other Sophos Central-managed products via connectors.

III. CUSTOMER/MSP RESPONSIBILITIES.

Customer/MSP acknowledges and agrees that, in addition to the actions set out in Section II. 1.1 above, Customer/MSP must take the following actions to facilitate and enable delivery of the Service, and Sophos shall have no liability for any degraded, incomplete, or failed Service delivery which may result from Customer/MSP's failure to do so. Sophos reserves the right to suspend

Service delivery until such time as Customer/MSP performs the required actions.

1. Onboarding. Customer/MSP will (i) provide contact information, and (ii) determine Customer/MSP communication preferences (i.e. email, phone, Sophos Central portal), MSP must act as the contact for any Service to be provided to a Beneficiary of MSP's.
2. Installation Requirements. Customer/MSP/Beneficiary must: a) have a valid, active Sophos Central account, b) deploy and configure the Service Software to Managed Endpoints, and c) maintain compliance with all the requirements identified in Health Checks, and d) meet minimum system requirements to install Sophos Software.
3. Remediating Active Threats. Customer/MSP must make reasonable efforts to timely remediate any compromises reported by Sophos or by other third-party technologies that Customer/MSP/Beneficiary utilizes for cybersecurity detection and protection.
4. Time and Date Settings. Customer/MSP must ensure that all Managed Endpoints have accurate time and date settings. Sophos will not be responsible for errors, issues, and residual risk experienced or incurred by Customer/MSP for Detections generated by Managed Endpoints with inaccurate time and date settings.
5. Customer/MSP Personnel. Customer/MSP must identify an appropriate number of suitably skilled personnel who will work with Sophos during the provision of the Service. Customer/MSP's personnel must have the necessary technical and business knowledge and authority to make decisions concerning the Service.
6. Timely Response. Customer/MSP must promptly acknowledge receipt of Sophos communications in writing and must timely respond to Sophos's requests.
7. Actions Outside the Scope of Service. Customer/MSP is solely responsible for taking any actions suggested by Sophos that are outside of the scope of the Service (e.g., Sophos's suggestions regarding on-site response, litigation and e-Discovery support, and collaboration with law enforcement).
8. MSP Additional Responsibilities. MSP is solely responsible for: (i) obtaining any consents or information required from its Beneficiaries in order for Sophos

to perform the Service, (ii) ensuring that Beneficiaries take all actions required of Customers in this Service Description; (iii) ensuring that its Beneficiaries understand the risks associated with performance of this Service, and (iv) that any Beneficiary for which MSP performs this Service has agreed to accept all such risks. MSP will indemnify and hold Sophos harmless for any claim brought against Sophos by a Beneficiary if such claim results, in whole or in part, from MSP's failure to fully perform its obligations under this Service Description, the Services Agreement or the Agreement with respect to the Service.

Revision Date: 22 April 2022