



Governor Steve Bullock

Montana Housing

Trust Fund

Allocation Plan

2016



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<http://comdev.mt.gov/Programs/HTF>

Montana Department of Commerce
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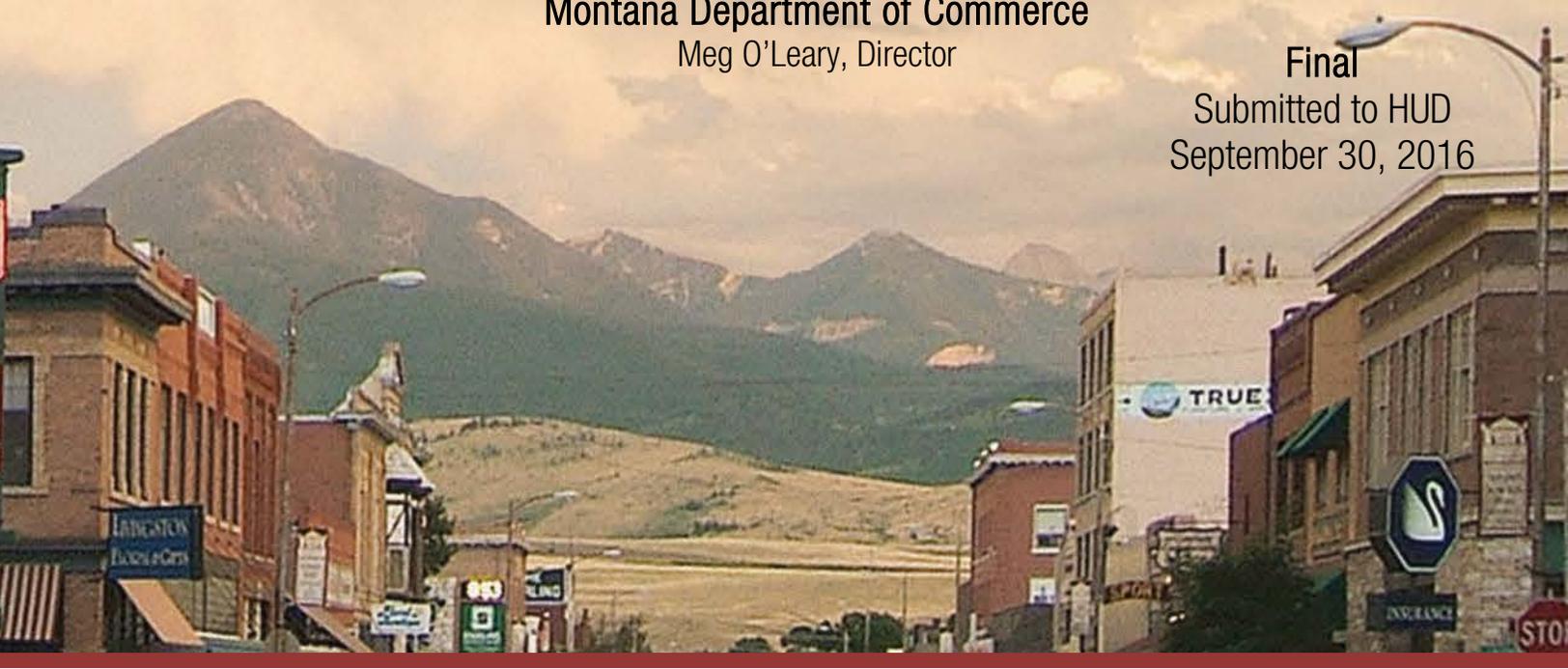


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I. GENERAL INFORMATION

HTF Allocation Plan

The Housing Trust Fund (HTF) Interim Rule (24 CFR Part 93) made the consolidated plan regulations at 24 CFR Part 91 applicable to the HTF. As a result, the State of Montana (State) will include HTF in its citizen participation plan (§ 91.115), strategic plan (§ 91.315), and annual action plan (§ 91.320). In addition, the State will submit to HUD for review and approval an HTF allocation plan with its annual action plan (§ 91.320(k)(5)). Also, as required in § 91.10, the HTF program will be administered by the State on the same program year it established for all grant programs covered by its Consolidated Plan.

The Housing Trust Fund Program (HTF) is an affordable housing production program that will complement existing federal, state and local efforts to increase the supply of decent, safe, and sanitary affordable housing for extremely low income (ELI) families, particularly the homeless, disabled, elderly, and other disadvantaged populations. Beginning in 2016, the State of Montana will receive and administer an annual allocation of federal funds from the Department of Housing and Urban Development (HUD) for HTF grants through the Montana Department of Commerce (Commerce). The HTF program will help qualified subrecipients direct funds to foster and maintain the construction, rehabilitation, and preservation of affordable rental housing for Montana's most vulnerable families.

HTF program grant application guidelines, the project grant administration manual, and other information and resources are available on the HTF website (<http://comdev.mt.gov/Programs/HTF>). Interested persons may also e-mail Commerce's HTF Program at DOCHTF@mt.gov or call staff at (406) 841-2770, or Montana Relay Service at (406) 841-2702 or 711 regarding any questions they may have about the HTF Program.

HUD will distribute HTF Program funds to the State of Montana's Department of Commerce, who will award grants through a two-phase application process outlined in the HTF Allocation Plan within the 2015-2020 Consolidated Plan to eligible grantees. Commerce will allocate approximately \$2,700,000 to complete HTF Program Activities. These application guidelines establish the process for obtaining HTF financial assistance for housing activities. The application form for these activities is available at the <http://comdev.mt.gov/Programs/HTF>.

The HTF allocation plan is an annual submission to HUD that describes how the State will distribute the HTF funds, including how it will use the funds to address its priority housing needs. The allocation plan also describes what activities may be undertaken with HTF funds and how recipients and projects will be selected. This document is provided as the Montana Housing Trust Fund (HTF) Allocation Plan. It provides responses to all HUD HTF Allocation Plan requirements to amend the sections of the 2015-2020 Montana Consolidated Plan and the 2016-2017 Annual Action Plan, relevant to the HTF program.

II. GRANTEE INFORMATION

State:

Montana

FY 2016 HTF Allocation Amount:

\$3,000,000

III. CONSOLIDATED PLAN REQUIREMENTS

Citizen Participation Plan

The consolidated plan regulation at § 91.115 requires the State to include HTF in its citizen participation plan. For the purposes of HTF, the State will make the following information available to the public:

- the amount of HTF assistance the State expects to receive,
- the range of activities the State may undertake, including the estimated amount that will benefit extremely low-income households, and
- the State's plans to minimize displacement and to assist any persons displaced.

The state conducted a citizen participation process for the HTF Allocation Plan following the state prescribed in the Citizen Participation Plan. The Montana Citizen Participation Plan, Appendix A, is attached to this document and includes the citizen participation process for all HUD related programs, including HTF.

Revised Consolidated Plan Screens

ES-05 Executive Summary: § 91.320(b) - *The Executive Summary includes seven narratives:*

(1) Introduction

As the lead agency for the Consolidated Plan (Plan), Commerce follows HUD's guidelines for citizen and community involvement, and is responsible for overseeing citizen participation requirements that accompany the Consolidated Plan and the Community Development Block Grant (CDBG), HOME Investment Partnerships, Housing Trust Fund (HTF), and Emergency Solutions Grant (ESG) programs, as well as those that complement the Commerce planning processes already at work in the state.

The Montana Department of Commerce modified the 2015-2020 Montana Consolidated Plan (Plan) and considers this a substantial amendment to the Plan. The modifications impact several areas of the Plan to include HTF information as required in 24 CFR 93.320(k)(5). The modifications incorporate the HTF Allocation Plan that describes the distribution of HTF funds, establishes the application requirements, and identifies the selection criteria for eligible applications.

(2) Summary of Objectives and Outcomes

The following list presents the objectives and outcomes of the 2010-2015 Montana Consolidated Plan for Housing and Community Development. The objectives and intended outcomes the state will pursue with HTF funds over the next four years are to support the goals and objectives identified in the 5-year Strategic Consolidated Plan.

Overall Objectives and Outcomes of the 2015-2020 Consolidated Plan

Specific to the HTF program, the goal and intended outcome is to provide equitable and affordable housing to extremely low income households through the preservation and construction of rental housing thereby reducing homelessness. HTF will achieve these objectives through permanent rental housing for extremely low income households and homeless persons or persons at risk of homelessness. The use of HTF funds for these goals are listed in Table 5 and described in section SP-45.

1. Support existing Montana communities:
 - a. Target funding toward existing communities to increase community revitalization, improve the efficiency of public works investments, and safeguard rural landscapes and natural resources;
 - b. Encourage appropriate and comprehensive planning, market studies, preliminary architectural reports, and other studies or plans that support the sustainability of local communities, affordable housing, public works investments, vital employment centers, and the environment;
 - c. Enhance the unique and resilient characteristics of all communities by investing in healthy, safe, and walkable neighborhoods—rural, urban, or suburban;
 - d. Encourage the rehabilitation of existing rental and owner-occupied homes, particularly for those with special needs and the elderly;
 - e. Encourage the development and rehabilitation of community facilities and services located within walkable neighborhoods and/or served by public transportation systems, particularly for those with special needs and the elderly.

2. Invest in vital public infrastructure:
 - a. Encourage appropriate and comprehensive pre-development planning activities for public infrastructure, including asset management, needs analysis, preliminary engineering and/or architectural reports, and other studies or plans;
 - b. Provide funding opportunities to improve the safety and efficiency of public infrastructure, promote healthy, safe, and walkable neighborhoods, and safeguard the environment; and
 - c. Provide funding opportunities to serve eligible Montanans, particularly those special needs and elderly populations, with safe, efficient public infrastructure.

3. Enhance Montana's economic competitiveness:
 - a. Provide reliable and timely access to employment centers, educational opportunities, services and other basic needs by workers as well as expanded business access to markets;
 - b. Support comprehensive planning for downtown revitalization, business development, and other studies or plans to attract and retain talent in Montana communities;
 - c. Provide job opportunities to eligible Montanans to strengthen communities within the State;
 - d. Encourage activities that support and strengthen new and existing businesses, particularly those located within traditional downtown business centers comprising a mix of businesses, housing, and services;

- e. Encourage housing and mixed-use development that contribute to broader revitalization efforts in Montana communities; and
 - f. Seek opportunities to achieve multiple economic development goals, such as removing barriers to collaboration, leveraging multiple funding sources, and increasing energy efficiency, through a single investment.
4. Promote equitable, affordable housing in Montana
- a. Expand location- and energy-efficient housing choices for people of all ages, incomes, races and ethnicities to increase mobility and lower the combined cost of housing and transportation through the preservation and construction of rental housing;
 - b. Encourage housing activities that incorporate energy-efficient design to help advance solar deployment and other on-site renewable energy installations in affordable housing that is aligned with the Federal Renewable Energy Target;
 - c. Encourage activities to acquire and/or construct new affordable housing for homeownership or rental in areas where existing investment in infrastructure, facilities, and services leverages multiple economic, environmental, and community objectives through the preservation and construction of rental housing;
 - d. Encourage appropriate and comprehensive planning, market studies, preliminary architectural reports, and other studies or plans in support of the efficient construction of affordable housing;
 - e. Encourage financial mechanisms that increase homeownership opportunities and provide rental assistance to eligible Montanans, particularly those with special needs and the elderly.
5. Reduce homelessness in Montana:
- a. Encourage activities that address the housing needs of homeless Montanans and/or those at risk of homelessness;
 - b. Encourage activities that increase the level of assistance programs to homeless Montanans and/or those at risk of homelessness, with the goal of achieving stable and sustainable housing; and
 - c. Encourage the development and rehabilitation of non-rental facilities for the shelter of temporarily homeless Montanans.

(3) Evaluation of Past Performance

As this is the inaugural HTF Allocation Plan, the state cannot provide an evaluation of past performance. Future updates to the Plan documents will include an evaluation of past performance related to HTF.

(4) Summary of the Citizen Participation and Consultation Process

Please see the narrative provided in PR-15 and Table 1 for information related to the Citizen Participation and Consultation Process.

(5) Summary of Public Comments

Please see the narrative provided in Appendix B for information related to the Summary of Public Comments.

(6) Summary of Comments Not Accepted

All comments were taken into consideration during the development of the 2015-2020 Consolidated Plan Amendment.

(7) Summary.

The Montana Department of Commerce has successfully completed the citizen participation process and finalized the HTF Allocation Plan to announce the method of distribution regarding the \$3,000,000 in HTF funds that will provide for administration funding (\$300,000) and activity funds (\$2,700,000) to assist eligible recipients; and complete construction, rehabilitation and redevelopment activities for rental housing; including using 100% of the HTF funds to benefit extremely low-income households, and, if applicable, plans to minimize displacement.

AP-05 Executive Summary: § 91.320(b) - The Executive Summary includes seven narratives.

Specific to the HTF program, the goal and intended outcome is to provide equitable and affordable housing to extremely low income households through the preservation and construction of rental housing thereby reducing homelessness. HTF will achieve these objectives through permanent rental housing for extremely low income households and homeless persons or persons at risk of homelessness. The use of HTF funds for these goals are listed in Table 5 and described in section SP-45.

(1) Introduction

As the lead agency for the Consolidated Plan (Plan), Commerce follows HUD's guidelines for citizen and community involvement, and is responsible for overseeing citizen participation requirements that accompany the Consolidated Plan and the Community Development Block Grant (CDBG), HOME Investment Partnerships, Housing Trust Fund (HTF), and Emergency Solutions Grant (ESG) programs, as well as those that complement the Commerce planning processes already at work in the state.

The Montana Department of Commerce modified the 2015-2020 Montana Consolidated Plan (Plan) and considers this HTF Allocation Plan a substantial amendment to the Plan. The modifications impact several areas of the Plan to include HTF information as required in 24 CFR 93.320(k)(5). The modifications the distribution of HTF funds, establishes the HTF application requirements, and identifies the selection criteria for eligible HTF applications.

(2) Summary of Objectives and Outcomes

The following list presents the objectives and outcomes of the 2010-2015 Montana Consolidated Plan and 2016-2017 Annual Action Plan for Housing and Community Development. The objectives and intended outcomes the state will pursue with HTF funds over the next four years are to support the goals and objectives identified in the Consolidated Plan as follows:

- I. Support existing Montana communities:

- a. Target funding toward existing communities to increase community revitalization, improve the efficiency of public works investments, and safeguard rural landscapes and natural resources;
- b. Encourage appropriate and comprehensive planning, market studies, preliminary architectural reports, and other studies or plans that support the sustainability of local communities, affordable housing, public works investments, vital employment centers, and the environment;
- c. Enhance the unique and resilient characteristics of all communities by investing in healthy, safe, and walkable neighborhoods—rural, urban, or suburban;
- d. Encourage the rehabilitation of existing rental and owner-occupied homes, particularly for those with special needs and the elderly;
- e. Encourage the development and rehabilitation of community facilities and services located within walkable neighborhoods and/or served by public transportation systems, particularly for those with special needs and the elderly.

II. Invest in vital public infrastructure:

- a. Encourage appropriate and comprehensive pre-development planning activities for public infrastructure, including asset management, needs analysis, preliminary engineering and/or architectural reports, and other studies or plans;
- b. Provide funding opportunities to improve the safety and efficiency of public infrastructure, promote healthy, safe, and walkable neighborhoods, and safeguard the environment; and
- c. Provide funding opportunities to serve eligible Montanans, particularly those special needs and elderly populations, with safe, efficient public infrastructure.

III. Enhance Montana’s economic competitiveness:

- a. Provide reliable and timely access to employment centers, educational opportunities, services and other basic needs by workers as well as expanded business access to markets;
- b. Support comprehensive planning for downtown revitalization, business development, and other studies or plans to attract and retain talent in Montana communities;
- c. Provide job opportunities to eligible Montanans to strengthen communities within the State;
- d. Encourage activities that support and strengthen new and existing businesses, particularly those located within traditional downtown business centers comprising a mix of businesses, housing, and services;
- e. Encourage housing and mixed-use development that contribute to broader revitalization efforts in Montana communities; and
- f. Seek opportunities to achieve multiple economic development goals, such as removing barriers to collaboration, leveraging multiple funding sources, and increasing energy efficiency, through a single investment.

IV. Promote equitable, affordable housing in Montana

- a. Expand location- and energy-efficient housing choices for people of all ages, incomes, races and ethnicities to increase mobility and lower the combined cost of housing and transportation;

- b. Encourage housing activities that incorporate energy-efficient design to help advance solar deployment and other on-site renewable energy installations in affordable housing that is aligned with the Federal Renewable Energy Target;
- c. Encourage activities to acquire and/or construct new affordable housing for homeownership or rental in areas where existing investment in infrastructure, facilities, and services leverages multiple economic, environmental, and community objectives;
- d. Encourage appropriate and comprehensive planning, market studies, preliminary architectural reports, and other studies or plans in support of the efficient construction of affordable housing;
- e. Encourage financial mechanisms that increase homeownership opportunities and provide rental assistance to eligible Montanans, particularly those with special needs and the elderly.

V. Reduce homelessness in Montana:

- a. Encourage activities that address the housing needs of homeless Montanans and/or those at risk of homelessness;
- b. Encourage activities that increase the level of assistance programs to homeless Montanans and/or those at risk of homelessness, with the goal of achieving stable and sustainable housing; and
- c. Encourage the development and rehabilitation of non-rental facilities for the shelter of temporarily homeless Montanans.

(3) Evaluation of Past Performance

As this is the inaugural HTF Allocation Plan, the state cannot provide an evaluation of past performance. Future updates to the Plan documents will include an evaluation of past performance related to HTF.

(4) Summary of the Citizen Participation and Consultation Process

Please see the narrative provided in PR-15 and Table 1 for information related to the citizen participation and consultation process.

(5) Summary of Public Comments

Please see the narrative provided in Appendix B for information related to the summary of public comments.

(6) Summary of Comments Not Accepted

All comments were taken into consideration during the development of the amendments.

(7) Summary

The Montana Department of Commerce has successfully completed the citizen participation process and finalized the HTF Allocation Plan to announce the method of distribution regarding the \$3,000,000 in HTF funds that will provide for administration funding (\$300,000) and activity funds (\$2,700,000) to assist eligible recipients; and complete construction, rehabilitation and redevelopment activities for rental housing; including using 100% of the awarded HTF funds to benefit extremely low-income households, and, where applicable, minimizing displacement.

PR-15 Citizen Participation: § 91.115 and § 91.300(c) – The State will revise this screen to provide a summary of the citizen participation efforts made for HTF, including efforts to broaden public participation, a summary of citizen comments or views on the plan, and a written explanation of comments not accepted and the reasons why these comments were not accepted.

During the 2016 Montana Housing Conference, a presentation and open discussion regarding the HTF program was conducted to solicit feedback in the development of the HTF program in anticipation of HTF Allocation Plan. Various comments in support of HTF and feedback regarding the development of the program were made. Over 50 people attended this meeting.

Commerce announced the HTF process prior to the allocation plan release to encourage participation and solicit feedback regarding the proposed HTF plan. Throughout the process, documents related to the development of the HTF Allocation Plan, including draft application materials, were posted on the website for public review. Comments were received for 30 days related to the inclusion of HTF in the 2015-2020 Consolidated Plan and 2016-2017 Annual Action Plan.

Commerce followed the Citizen Participation Plan (CPP), attached to this document (see Appendix A) to accept comments on these proposed modifications. The public comment period for this Draft Amendment began July 1, 2016 and ended August 1, 2016. A public hearing was held on July 20, 2016, in conjunction with the statewide Housing Coordinating Team meeting, to encourage a public discussion of the development of the HTF program, HTF Allocation Plan, and application process. The meeting was held via conference call to encourage maximum participation. The public meeting was held at Commerce, 301 South Park Ave. Helena, MT. The Consolidated Plan website has additional details regarding this process and can be found at <http://commerce.mt.gov/conplan> or contact DOCConPlan@mt.gov for details.

Commerce announced and published the draft HTF Allocation Plan by placing an advertisement in a statewide newspaper, provided copies of the draft HTF Allocation Plan available at accessible locations across Montana, and announced and published the draft HTF Allocation Plan by emailing notice to the Consolidated Plan contact list

The public hearing was announced through the Commerce website, listserv, Housing Coordinating Team meeting agenda, and distribution in a statewide newspaper. Thirteen (13) people attended the public hearing in person and twenty-six (26) people attended the public hearing via webinar/teleconference. The public comment period ended and a record of the public hearing and comments received is provided in Appendix B of this document. Commerce received twelve (12) verbal comments and four (4) written comments. All comments were taken into consideration during the development of the HTF Allocation Plan.

To receive HTF funds, applicants for grants must carry out citizen participation in a manner that complies with the 2015-2020 Montana CPP. Commerce encourages applicants to engage with their stakeholders (e.g. community organizations, general public, housing partners, etc.) through informal meetings or planning sessions that make information available, inform of the design of their proposed HTF activity, and otherwise contribute to a meaningful citizen participation process. Applicants are recommended to retain documentation, which may include posters, agendas, sign-ins, presentations materials and handouts, photos, and survey responses of such meetings and sessions.

Table 1 – HTF Program Citizen Participation Outreach

#	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	URL (if applicable)
Summary of comments not accepted and reasons: No comments have been received on Draft Amendments.					
1	Public Meeting	All interested citizens	During the 2016 Montana Housing Conference a presentation and open discussion regarding the HTF program was conducted to solicit feedback in the development of the HTF program in anticipation of HTF Allocation Plan.	Various comments in support of HTF and feedback regarding the development of the program were made. Over 50 people attended this meeting.	http://www.cvent.com/events/2016-annual-montana-housing-partnership-conference/agenda-afe0fe283abf4765bf7fc998654b686a.aspx
2	Internet Outreach	All interested citizens	Commerce announced the HTF process prior to the allocation plan release to encourage participation and solicit feedback regarding the proposed HTF plan. Throughout the process, documents related to the development of the HTF Allocation Plan, including draft application materials, have been posted on the website for public review.	Comments received for 30 days on documents related to the inclusion of HTF in the 2015-2020 Consolidated Plan and 2016-2017 Annual Action Plan.	http://commerce.mt.gov/conplan/documents
3	Newspaper Ad	All interested citizens	Commerce has announced and published the draft HTF Allocation Plan by publishing an advertisement in a statewide newspaper	N/A	http://commerce.mt.gov/conplan/documents
4	Other-Public Repositories	All interested citizens	Commerce has provided copies of the draft HTF Allocation Plan available at accessible locations across Montana	See Appendix A for a list of all public repositories	http://commerce.mt.gov/conplan/documents
5	Other – Email listserv	All interested citizens	Commerce has announced and published the draft HTF Allocation Plan by emailing notice to the Consolidated Plan contact list	See Appendix B for comments received.	
6	Public Hearing	All interested citizens	A public hearing is scheduled during the statewide Housing Coordinating Team meeting on July 20, 2016 to discuss the development of the HTF Allocation Plan.	See Appendix B for comments received.	http://housing.mt.gov/Portals/93/shared/HCTagenda20July2016_1.pdf

IV. STRATEGIC PLAN REQUIREMENTS

*The State will amend the affordable housing section of the strategic plan to include specific objectives that describe proposed accomplishments the State hopes to achieve and will specify the number of extremely low-income families to which the State will provide affordable housing to (homeownership- § 93.302; rental- § 93.304) over a specific period of time. The State will complete this requirement by including HTF on the **SP-45 Goals screen**.*

Revised Strategic Plan Screens

In addition to updating the affordable housing section of the strategic plan, the following screens in the eCon Planning Suite consolidated plan template in IDIS will be revised to include HTF.

- SP-10 Geographic Priorities: § 91.315(a)(1)-** *The State will revise this screen to discuss how investments are allocated geographically.*

HTF application guidelines will consider geographic diversity based on socio-economic factors gathered from federal, state and regional sources that correspond to the State of Montana Consolidated Plan and HTF Program goals and objectives to serve the homeless and those at risk of homelessness. HTF program guidelines include consideration of socio-economic factors, by county, to determine priority targets. Applications for projects located in Targeted Priority Counties will receive first consideration for HTF funding. Please see Appendix C which identifies the Targeted Priority Counties. However, because it is impossible to predict what applicants will apply to address local needs, this information will be reported in a future Consolidated Annual Performance and Evaluation Report (CAPER).

SP-25 Priority Needs: § 91.315(a)(2)- The State will revise this screen to indicate the general priorities for allocating investment of available resources among different needs.

HTF funds will exclusively benefit extremely low-income households through the construction, rehabilitation and redevelopment activities for rental housing and administrative costs. Therefore, \$2,700,000 will be used for rental housing activities for extremely low-income households; and \$300,000 will be used for administrative costs. Redevelopment, under HTF, means the conversion of a non-residential structure into rental housing for extremely low income households.

Table 2 - Priority Needs Summary

Priority Need	Priority Level	Population – Income Level	Family Types	Homeless Categories	Non-Homeless Special Needs
Affordable Housing Preservation and Construction	High	All	All	N/A	Elderly/Frail Elderly Disabled – All Addicted Persons HIV/AIDS Domestic Violence Victims
	<p>Description: Encourage the rehabilitation of existing and development of new rental and owner-occupied affordable housing located within walkable neighborhoods and/or served by public transportation systems, particularly for the homeless, disabled, elderly, and other disadvantaged populations. The HTF Program is specifically targeted to the preservation and construction of rental units for extremely low-income families, particularly the homeless, disabled, elderly, and other disadvantaged populations.</p>				
	<p>Basis for Relative Priority: As determined in the Needs Assessment, approximately 105,000 households (26%) in the State of Montana have one or more housing problems. The majority of these renters and homeowners are cost burdened, paying greater than 30% of their household income for housing expenses. Further, according to the Housing + Transportation Index and HUD’s Location Affordability Portal, the average household in the State of Montana spends approximately 56% of household income on housing plus transportation costs. Finally, of the 13% of Montanans living with a disability, over 75% of them are 65 years of age or older. Nationally, 32% of persons with a disability in this age category report needing help with or having trouble getting transportation. While Montana is perceived as vast and largely rural, preserving existing housing stock and encouraging higher-density infill housing projects that take advantage of existing buildings, infrastructure and transportation options to recognize the opportunity for mixed-use, flexible-use, and mixed-income projects is an appropriate focus for reducing cost burden. Prioritizing housing options in existing neighborhoods (“location efficiency”) has the additional benefit of increasing walking and cycling options and the health and well-being of all family types, income levels, and populations with special needs.</p>				
Reducing Homelessness	High	All	All	All	All
	<p>Description: Encourage activities that provide assistance and shelter to homeless Montanans and those at risk of homelessness, particularly homeless veterans, youths and children, and the chronically homeless living in unsheltered locations. The HTF Program is specifically targeted to the preservation and construction of rental units for extremely low-income families, particularly the homeless, disabled, elderly, and other disadvantaged populations.</p>				
	<p>Basis for Relative Priority: The U.S. Department of Housing and Urban Development (HUD) released the 2014 Annual Homeless Assessment Report (AHAR) documenting the national issues related to homelessness. As documented in the AHAR, Montana had an 84.4% increase in the number of homeless individuals between 2007 through 2014; and has the 5th highest rate (57.8%), among all states, of unsheltered homeless individuals in 2014 (1,167 homeless and 674 unsheltered individuals). Unfortunately the AHAR report stated, “Montana also had very high rates of unsheltered unaccompanied children and youth with 74 percent”. Additionally, Montana has the highest rate of unsheltered veterans in the nation (63.3%). Montana’s population has a high percentage of veterans, one in ten individuals in the state are veterans. Lastly, between 2007 and 2014, Montana has experienced the largest change in the number of chronically homeless individuals in the nation, at a staggering 208.4% increase in a seven year period. While homelessness has declined nationally, reducing homelessness for veterans, children and youths, and the chronically homeless is a critical priority in Montana.</p>				

☒ SP-30 Influence of Market Conditions: § 93.315(b)- *The State will revise this screen to describe how the characteristics of the housing market influenced the State’s decisions regarding allocation priorities among the types of housing assistance.*

Table 3 - Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
New Unit Production	As shown by this Market Analysis section, housing production has not been keeping pace with demand, resulting in an increase in price. New unit production will increase the number of affordable units available to Montana households. The 2014 Housing and Community Development Survey results indicated a high level of need for new unit production, especially for rental housing. The HTF Program is specifically targeted to the preservation and construction of rental units for extremely low-income families, particularly the homeless, disabled, elderly, and other disadvantaged populations.
Rehabilitation	The State of Montana has seen a slowdown in housing production, and an increase in demand for rental units. This combination calls for a rehabilitation of existing units, both rental and homeowner, in order to meet the needs of households throughout the state. The results of the 2014 Housing and Community Development Survey also indicated a high level of need for unit rehabilitation for both rental units and homeowner units. The HTF Program is specifically targeted to the preservation and construction of rental units for extremely low-income families, particularly the homeless, disabled, elderly, and other disadvantaged populations.
Acquisition, Including Preservation	As shown in this Plan, there are a number of subsidized units at risk of expiring. As the demand for affordable rental units continues to increase, the loss of these units will place additional households in need. This, in addition to survey results, has indicated a high level of need for preservation of affordable units. The HTF Program is specifically targeted to the preservation and construction of rental units for extremely low-income families, particularly the homeless, disabled, elderly, and other disadvantaged populations.

☒ SP-35 Anticipated Resources: § 91.315(a)(4); § 91.320(c)(1) and (2)- *The State will revise this screen to identify the federal, state, local, and private resources expected to be available to the State to address priority needs and specific objectives identified in the strategic plan.*

The following table illustrates the CDBG, HOME, and HTF resources expected for the first year of this Consolidated Plan. The State expects to receive \$3,000,000 in HTF funds for the 2016-2017 Annual Action Plan year. The HTF funds will be used exclusively to serve extremely low-income households through HTF-eligible activities. Therefore, \$2,700,000 of HTF funding will serve extremely low-income households through rental rehabilitation, redevelopment, and new construction activities. HTF funds, in an amount not to exceed \$300,000, will be used for administrative purposes. The State anticipates no program income from HTF projects, because this is the first year of the program.

Expected revenues for the CDBG program include repayments for funding loaned to businesses that create job opportunities for Montanans of low to moderate income. Expected revenues for the HOME program include recaptured and program income funding generated by the First Time Homebuyer Loan program. The State of Montana will also continue to receive program income attributable to the Neighborhood Stabilization Program. The State is unable to predict the amount of program income that will be received in any given plan year because the

amount that will be earned is unknown.

Table 4 - Anticipated Resources

Program	Source of Funds	Expected Amount				Expected Amount Available Remainder of Con Plan	Narrative Description
		Annual Allocation	Program Income	Prior Year Resources	Total		
Housing Trust Fund (HTF)	Public/Federal	\$3,000,000	\$0	\$0	\$3,000,000	\$12,000,000	State Allocation; HTF funds will be matched with additional resources by sub-recipients who may also receive CDBG, HOME, or LIHTC assistance; eligible CHDOs and local governments will also provide matching funds within their projects.
	Uses of Funds: Acquisition, Demolition, Reconstruction to support Rental Housing; Rehabilitation of Rental Housing, New Rental Housing Development, Administration						

SP-45 Goals: § 91.315(a)(4) and § 91.315 (b)(2)- *The State will revise this screen to summarize the State’s priorities and the specific goals it intends to initiate and/or complete within the term of the strategic plan. The State will also ensure its five-year goals include any accomplishments due to HTF funds and will also enter the number of extremely low-income families to which the State will provide assistance with its HTF funds.*

The following list presents the objectives and outcomes of the 2010-2015 Montana Consolidated Plan and 2016-2017 Annual Action Plan for Housing and Community Development. The objectives and intended outcomes the state will pursue with HTF funds over the next four years are to support the goals and objectives identified in the Consolidated Plan as follows:

1. Support existing Montana communities:
 - a. Target funding toward existing communities to increase community revitalization, improve the efficiency of public works investments, and safeguard rural landscapes and natural resources;
 - b. Encourage appropriate and comprehensive planning, market studies, preliminary architectural reports, and other studies or plans that support the sustainability of local communities, affordable housing, public works investments, vital employment centers, and the environment;
 - c. Enhance the unique and resilient characteristics of all communities by investing in healthy, safe, and walkable neighborhoods—rural, urban, or suburban;
 - d. Encourage the rehabilitation of existing rental and owner-occupied homes, particularly for those with special needs and the elderly;
 - e. Encourage the development and rehabilitation of community facilities and services located within walkable neighborhoods and/or served by public transportation systems, particularly for those with special needs and the elderly.

2. Invest in vital public infrastructure:
 - a. Encourage appropriate and comprehensive pre-development planning activities for public infrastructure, including asset management, needs analysis, preliminary engineering and/or architectural reports, and other studies or plans;
 - b. Provide funding opportunities to improve the safety and efficiency of public infrastructure, promote healthy, safe, and walkable neighborhoods, and safeguard the environment; and

- c. Provide funding opportunities to serve eligible Montanans, particularly those special needs and elderly populations, with safe, efficient public infrastructure.
- 3. Enhance Montana's economic competitiveness:
 - a. Provide reliable and timely access to employment centers, educational opportunities, services and other basic needs by workers as well as expanded business access to markets;
 - b. Support comprehensive planning for downtown revitalization, business development, and other studies or plans to attract and retain talent in Montana communities;
 - c. Provide job opportunities to eligible Montanans to strengthen communities within the State;
 - d. Encourage activities that support and strengthen new and existing businesses, particularly those located within traditional downtown business centers comprising a mix of businesses, housing, and services;
 - e. Encourage housing and mixed-use development that contribute to broader revitalization efforts in Montana communities; and
 - f. Seek opportunities to achieve multiple economic development goals, such as removing barriers to collaboration, leveraging multiple funding sources, and increasing energy efficiency, through a single investment.
- 4. Promote equitable, affordable housing in Montana
 - a. Expand location- and energy-efficient housing choices for people of all ages, incomes, races and ethnicities to increase mobility and lower the combined cost of housing and transportation;
 - b. Encourage housing activities that incorporate energy-efficient design to help advance solar deployment and other on-site renewable energy installations in affordable housing that is aligned with the Federal Renewable Energy Target;
 - c. Encourage activities to acquire and/or construct new affordable housing for homeownership or rental in areas where existing investment in infrastructure, facilities, and services leverages multiple economic, environmental, and community objectives;
 - d. Encourage appropriate and comprehensive planning, market studies, preliminary architectural reports, and other studies or plans in support of the efficient construction of affordable housing;
 - e. Encourage financial mechanisms that increase homeownership opportunities and provide rental assistance to eligible Montanans, particularly those with special needs and the elderly.
- 5. Reduce homelessness in Montana:
 - a. Encourage activities that address the housing needs of homeless Montanans and/or those at risk of homelessness;
 - b. Encourage activities that increase the level of assistance programs to homeless Montanans and/or those at risk of homelessness, with the goal of achieving stable and sustainable housing; and
 - c. Encourage the development and rehabilitation of non-rental facilities for the shelter of temporarily homeless Montanans.

The overarching goal of the HTF program complement existing federal, state and local efforts

to increase the supply of decent, safe, and sanitary affordable housing for extremely low income (ELI) families, particularly the homeless, disabled, elderly, and other disadvantaged populations.

To receive HTF funds, both Commerce and applicants for grants must carry out citizen participation in a manner that complies with the 2015-2020 Montana Consolidated Plan. Commerce encourages applicants to engage with their stakeholders (e.g. community organizations, general public, housing partners, etc.) through informal meetings or planning sessions that make information available, inform of the design of their proposed HTF activity, and otherwise contribute to a meaningful citizen participation process.

The application process for HTF funds is two-phased. Phase One is the submission of an Intent to Apply form, which gives the applicant an opportunity to demonstrate how closely aligned the proposed project is with the State of Montana's targeted geographical priorities, the Consolidated Plan and HTF Program goals, objectives, and regulations, and intent to assist particular disadvantaged ELI families without requiring extensive work by the applicant prior to a baseline determination of eligibility. Commerce will review the Intent to Apply and either:

1. Deny the applicant's project proposal and offer technical assistance for creating a successful future proposal; or
2. Invite the applicant to submit a full Phase Two application.

Phase Two is the submission of a complete and detailed application. Department staff will review and rank all Phase Two full applications on the following priority criteria:

- 1) The targeted geographical data points representing the housing difficulties faced by ELI households and the communities in which they reside;
- 2) The extent to which the proposed project aligns with the goals and objectives of the State of Montana's Consolidated Plan and HTF Program;
- 3) The extent to which the proposed project assists the homeless, disabled, elderly, or other disadvantaged populations;
- 4) The community support for the project, the long-term financial feasibility of the project, the consistency of the project with the community's comprehensive planning efforts, and the capacity of the applicant to implement and manage the grant and the project; and
- 5) The technical feasibility and appropriateness of the proposed project in light of identified needs, potential alternatives, available resources, financing, environmental considerations, and cost estimates.

Applications will be ranked based upon the extent to which the proposed project relates to each ranking criteria. The amount of HTF funding to be recommended will be based upon an analysis of the applicant's proposed level of local financial capacity and participation. Staff may take additional information, based upon knowledge and information about a proposed project or particular community problems, into account in the scoring of an application. The applicant may not submit any additional information after the application deadline unless requested by Commerce staff in order to clarify information already presented in the application.

The ranking team will prepare and submit a report containing the recommended projects. The Director will make the final decision on grant awards and funding.

Table 5 - Goals Summary

Goal Name	Years	Category	Area	Needs Addressed	Funding*	Goal Outcome Indicator
Preserve and Construct Affordable Housing	2015 to 2019	Affordable Housing	Statewide	Affordable Housing Preservation and Construction	CDBG: \$1 million HOME: \$2 million HTF: \$1.7 million	Rental units constructed: 125 Household / Housing Units
						Rental units rehabilitated: 125 Household / Housing Units
						Homeowner Housing Added: 25 Household / Housing Units
						Homeowner Housing: 20 Rehabilitated Household / Housing Units
						Direct Financial Assistance to Homebuyers: 250 Households Assisted
Description: The State of Montana will use CDBG, HOME, and HTF funds to fund affordable housing activities that primarily benefit Montanans of low to moderate income or less.						
Reduce Homelessness	2015 to 2019	Homeless	Statewide	Reducing Homelessness	CDBG: \$1 million HOME: \$1 million ESG: \$680,000 HTF: \$1 million	Tenant-based rental assistance/Rapid Rehousing: 3,000 Households Assisted
						Homeless Person Overnight Shelter: 600 Persons Assisted
						Overnight/Emergency Shelter/Transitional Housing Beds Added: 23 Beds
						Homelessness Prevention: 3,000 Persons Assisted
						Housing for Homeless added: 50 Household/Housing Units
Description: The State of Montana will use CDBG, HOME, HTF, and ESG funds to provide permanent housing, shelter and services for homeless persons and persons at risk of homelessness. Activities may include construction, rehabilitation, and direct assistance to serve this clientele throughout the state.						

* Funding shown in annual estimates

Based on the information above, the number of persons of low to moderate income or less to whom the State of Montana will provide affordable housing will be significant. Approximately 100 persons of LMI or less income will be assisted annually utilizing CDBG, HOME, and HTF resources. Through the HTF Program, approximately 250 ELI households will be assisted, with coordination from other resources.

V. ANNUAL ACTION PLAN REQUIREMENTS

The State will include HTF in its annual action plan or amend the plan to include HTF information as required in § 93.320(k)(5). The action plan includes an HTF allocation plan that describes the distribution of HTF funds, and establishes the application requirements and selection criteria of applications submitted by eligible recipients that meet the State’s priority housing needs.

Revised Annual Action Plan Screens

The State will revised the following screens in the eCon Planning Suite consolidated plan template in IDIS to include HTF:

AP-15 Expected Resources: § 91.320(c)(1) and (2)- The State will revise this screen to provide a concise summary of the federal resources expected to be available. The HTF resources added to the **SP-35 Anticipated Resources** screen will carry over to this screen.

The following table illustrates the CDBG, HOME, and HTF resources expected for the first year of this Consolidated Plan. The State expects to receive \$3,000,000 in HTF funds for the 2016-2017 Annual Action Plan year. The HTF funds will be used exclusively to serve extremely low-income households through HTF-eligible activities. Therefore, \$2,700,000 of HTF funding will serve extremely low-income households through rental rehabilitation, redevelopment, and new construction activities. HTF funds, in an amount not to exceed \$300,000, will be used for administrative purposes. The State anticipates no program income from HTF projects, because this is the first year of the program.

CDBG administration allocations are capped at 20% of the new CDBG allocation in addition to eligible program income received during the project year. HOME administration allocations are capped at 10% of the new HOME allocation and eligible program income received following the required affordability period. Revenue received during a project’s affordability period is considered recaptured and may not be used for administration. HTF administration allocations are capped at 10% of the new HTF allocation.

Table 6 - Anticipated Resources

Program	Source of Funds	Expected Amount				Expected Amount Available Remainder of Con Plan	Narrative Description
		Annual Allocation	Program Income	Prior Year Resources	Total		
Housing Trust Fund (HTF)	Public/Federal	\$3,000,000	\$0	\$0	\$3,000,000	\$12,000,000	State Allocation; HTF funds will be matched with additional resources by sub-recipients who may also receive CDBG, HOME, or LIHTC assistance; eligible CHDOs and local governments will also provide matching funds within their projects.
	Uses of Funds: Acquisition, Demolition, Reconstruction to support Rental Housing; Rehabilitation of Rental Housing, New Rental Housing Development, Administration						

AP-20 Annual Goals and Objectives: § 91.320(c)(3) and (e)- The State will revise this screen to summarize the specific goals it intends to initiate and/or complete within the term of the program year. Any HTF related goals and objectives entered on the **SP- 45 Goals** screen will carry over to this screen.

Table 7 - Goals Summary

Goal Name	Years	Category	Area	Needs Addressed	Funding*	Goal Outcome Indicator
Preserve and Construct Affordable Housing	2015 to 2019	Affordable Housing	Statewide	Affordable Housing Preservation and Construction	CDBG: \$1 million HOME: \$2 million HTF: \$1.7 million	Rental units constructed: 125 Household / Housing Units
						Rental units rehabilitated: 125 Household / Housing Units
Homeowner Housing Added: 25 Household / Housing Units						
Homeowner Housing: 20 Rehabilitated Household / Housing Units						
Direct Financial Assistance to Homebuyers: 250 Households Assisted						
Description: The State of Montana will use CDBG, HOME, and HTF funds to fund affordable housing activities that primarily benefit Montanans of low to moderate income or less.						

AP-25 Allocation Priorities: § 91.320(d) – *The State will revise this screen to describe the reasons for its allocation priorities and how the proposed distribution of funds will address the priority needs and goals of the strategic plan.*

The State of Montana will prioritize the award of HOME and HTF funds to eligible applicants that propose to preserve and construct affordable housing and reduce homelessness.

Funding Allocation Priorities

Table 8 – Funding Allocation Priorities

	Preserve and Construct Affordable Housing	Plan for Communities	Improve and Sustain Public Infrastructure	Revitalize Local Economies	Reduce Homelessness
CDBG	17.27%	8.63%	35.61%	25.99%	7.77%
HOME	73.46%	0	0	0	16.54%
ESG	0	0	0	0	100%
HOPWA	\$N/A	12.5%	25%	12.5%	50%
Housing Trust Fund	56.7%	0	0	0	33.33%

Reasons for Allocation Priorities

The State of Montana identified the allocation priorities set forth above for the HTF Allocation Plan through the 2015-2020 Consolidated Plan Needs Assessment and Market Analysis, past experience administering the competitive and non-competitive CDBG and HOME grant programs, collaboration with other state agencies and local governments on disaster resiliency priorities in communities with presidentially declared disasters in 2011, 2012, and 2013, and consultation with the state’s local government, non-profit, and private sector partners. The allocation priorities also reflect the extent to which eligible entities have other sources of funding available to accomplish each priority. HTF funds are planned for use to preserve and construct affordable housing and to reduce homelessness. These priorities will be achieved through rehabilitation, redevelopment, or new construction of rental housing for extremely low income populations with a focus on those households that are homeless or at risk of homelessness.

The priority needs, and the allocation of funds to address those needs as set forth above, are designed to specifically address the State of Montana’s objectives described in the Annual Action Plan., as listed below.

Support existing Montana communities. Montana will target CDBG, HTF, and HOME funding towards existing communities to increase community revitalization, improve the efficiency of public infrastructure, and safeguard rural landscapes and natural resources through comprehensive planning, rehabilitate existing homes, build social, economic, and environmental resiliency to severe events, and develop and rehabilitate community facilities and services within walkable neighborhoods and/or neighborhoods served by public transportation systems.

Promote equitable, affordable housing in Montana. Montana is committed to being a great place to live, work, and play, and that quality of life starts with equitable access to affordable housing. Montana will use CDBG, HTF, and HOME funding for preserving and constructing affordable housing that increases mobility and lowers the combined cost of housing and transportation, advancing solar and other on-site renewable energy installations aligned with the Federal Renewable Energy Target, building social and economic resiliency to severe events, and increasing homeownership and rental opportunities for eligible Montanans, particularly the homeless, disabled, elderly, and other disadvantaged populations.

Reduce homelessness in Montana. Montana and its partners have adopted a strategic plan to end family homelessness by 2016, veteran homelessness by 2019, individual chronic homelessness by 2022, and all homelessness in the State by 2023. Montana will target CDBG, HOME, HTF, and ESG funds to activities that address the housing needs and increase the level of assistance programs to homeless Montanans and/or those at risk of homelessness.

☒ AP-30 Method of Distribution: § 91.320(d) and (k5)- *The State will revise this screen to include a description of its method(s) for distribution for the “Other – Housing Trust Fund” selection based on the entry made on the SP-35 Anticipated Resources screen.*

Introduction

The Method of Distribution is identified for HTF below.

State Program Name: Housing Trust Fund (HTF) Program

Funding Sources: HTF

Describe the State Program addressed by the Method of Distribution: Within the Priority Needs to Preserve and Construct Affordable Housing and Reduce Homelessness, \$2,700,000 in HTF funds will be used to increase and preserve the supply of rental housing for extremely low income families, particularly the homeless, disabled, elderly, and other disadvantaged populations. The rental units will not exceed the HTF/HOME maximum per-unit subsidy limits and HUD-established rents will be used for each assisted unit. Commerce will not use HTF funds to assist first-time homebuyers, for homeownership housing financing, or for refinancing existing debt.

Describe all of the criteria that will be used to select applications and the relative importance of these criteria: Commerce proposes to establish a two-phase competitive grant process to receive and prioritize project proposals from eligible entities (entitlement communities, public housing agencies, as well as for-profit, non-profit, and tribally-designated entities). The Phase

One application (Intent to Apply) will identify how closely a proposed project meets the intent of the State of Montana Consolidated Plan and HTF Program goals and objectives without requiring extensive work by applicants prior to a determination of project readiness. Those projects that best demonstrate alignment with these goals and objectives will be invited to the Phase Two application process. Phase Two applications will be ranked according to the applicant's ability to best meet the intent of the State of Montana Consolidated Plan and HTF Program goals and objectives, demonstrate long-term financial feasibility, and document public engagement and community support. HTF Program applications, grant application guidelines, the project grant administration manual, and other relevant information and resources are available on the Commerce website at <http://comdev.mt.gov>.

Describe how resources will be allocated among funding categories: For Plan Year Two of the Annual Action Plan and this HTF Allocation Plan, Commerce will allocate approximately \$2,700,000 in HTF resources to complete HTF rental activities and \$300,000 for administrative costs. Of the activity portion, \$1,700,000 is designated for preserving (rehabilitation and redevelopment) and constructing affordable rental housing; and \$1,000,000 is designated for reducing homelessness through rental housing development. The allocation amount is based on beneficiary data of the project area, the feasibility and need for the activity, and the availability of other federal or state resources for the activity.

Describe threshold factors and grant size limits. All funded HTF activities must meet HTF requirements, including the HOME program's maximum per-unit development subsidy limit for housing assisted with HTF funds. The State has elected to use maximum per-unit subsidy for the HOME program (24 CFR 93.300(a)), which is calculated using the Uniform Application Form for Montana Housing Programs, available on the HTF website.

Anticipated Outcome Measure: 5 rental units will be constructed; 5 rental units will be rehabilitated; and, 4 units of permanent housing to reduce homelessness.

AP-50 Geographic Distribution: *§ 91.320(f)- The State will revise this screen to describe the geographic areas of the state in which it will direct assistance during the ensuing program year and provide rationale for its priorities in allocating investment geographically.*

As described in the Consolidated Plan, Commerce will not target any particular geographic area for special assistance, but will allow any non-entitlement community to apply for CDBG and all communities and non-profits to apply for HOME, and entitlement communities and non-profits to apply for and HTF program funding, dependent on eligible activities and programs. Entitlement communities may apply for competitive HOME funds if the project demonstrates clear segregation between State-assisted units and Entitlement-assisted units. ESG funds are allocated throughout the state.

HTF application guidelines will consider geographic diversity based on data points gathered from federal, state and regional sources that correspond to the State of Montana Consolidated Plan and HTF Program goals and objectives to serve the homeless and those at risk of homelessness. However, because it is impossible to predict what applicants will apply to address local needs, the Geographic Distribution table generated by the IDIS system has been left blank.

AP-55 Affordable Housing: *§ 91.320(g)- The State will revise this screen to specify goals for the number of homeless, non-homeless, and special needs households to be provided affordable housing within the program year.*

Below, Tables 9 and 10 list Plan Year Two goals for specific categories (Support Requirement and Type) that relate to HTF-assisted affordable housing. These goals are related only to the federal resources provided through HTF, and do not include numbers for those persons assisted through other federal or state resources, although they may coordinate and contribute to the achievement of the goals.

Table 9 – One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households to be Supported	
Homeless:	100
Non-Homeless	150
Disadvantaged (may be duplicated):	75
Total:	250

Table 10 – One Year Goals for Affordable Housing by Support Type

One Year Goals for the Number of Households Supported Through:	
The Production of New Units:	100
Rehab of Existing Units:	100
Acquisition of Existing Units:	50
Total:	250

Discussion

A significant number of households are served annually through the State of Montana’s affordable housing programs: CDBG, HOME, and ESG. With the addition of the HTF program, new emphasis will be placed on those who are homeless or at risk of homelessness.

The production of new units will be completed primarily through CDBG, HOME, and HTF resources in coordination with Low Income Housing Tax Credits, private financing, and other state, federal, and local funding sources.

☒ AP-65 Homeless and Other Special Needs Activities: § 91.320(h)- *The State will revise this screen to describe how HTF will help to address the State’s one-year goals and actions for reducing and ending homelessness, where applicable.*

Introduction

Homeless and other Special Needs activities will be carried out according to the eligible uses of funds for CDBG, HOME, and HTF as well as through the ESG program. The HTF Program intends to provide approximately one-third of the total funds spent to assist the homeless and those at risk of homelessness.

The causes of the homelessness for individuals and families in Montana vary. An individual or family may become homeless as a result of domestic violence, lack of medical assistance, or lack of stable employment. Many households experiencing homelessness are doubled up with family or friends or able to find assistance from a faith-based community for a few days. Non-homeless special needs populations in the state include the elderly and frail elderly, persons living with disabilities, persons with alcohol or other drug addiction, victims of domestic violence, and persons and the families of persons living with HIV. These populations are not homeless, but are at the risk of becoming homeless and therefore often require housing and service programs. Commerce responds to the specific needs of special needs groups with variations within the programs currently provided.

The State of Montana will work to encourage activities that address the housing needs of those at risk of homelessness, encourage activities that increase the level of assistance to programs serving the special needs groups including those at risk of homelessness. This includes supporting activities to reduce homelessness and encouraging the development and rehabilitation of non-rental facilities for the shelter and transition of temporarily homeless Montanans. Additionally, HOME, CDBG, HTF, and ESG will continue to support efforts by local governments and partner organizations providing services for those diagnosed with Human Immunodeficiency Virus/Acquired Immune Deficiency Syndrome (HIV/AIDS), substance abuse services, disability services, aiding victims of domestic violence, and assisting the disabled.

Montana divides itself into twelve districts to participate annually in the National Point-in-Time Counts of homeless, unduplicated one night estimates of both sheltered and unsheltered homeless populations, occurring during the last week in January of each year. One finding from that survey is that a growing segment of the homeless population is women, children, and families that have experienced life-altering situations, such as job loss, disaster, divorce, or abuse that have driven them into homelessness.

Montana uses the Continuum of Care model that originated with U.S. Department of Housing and Urban Development, with the goal of supporting the transition of homeless individuals into stabilized self-sufficiency in affordable housing. It is important to note that the Montana Continuum of Care feels that multiplying a single night’s data into an annual estimate does not necessarily result in an accurate representation. The HTF program intends to extend information to organizations that assist homeless persons so as to encourage their participation in the development of the HTF program.

Montana encourages efforts to provide shelter and other basic needs to people who are currently homeless, and supports these efforts with CDBG Public Facilities funds. In addition, because preventing homelessness is much less costly than addressing the problem after housing has been lost, Montana also supports efforts that will help people in crisis who are at risk of losing existing housing (homeless prevention) and place homeless people into permanent and affordable housing accompanied by intensive services that will aid them in establishing long-term stability (rapid re-housing).

As indicated in the Needs Assessment and Market Analysis, the longer one is homeless, the more difficult and costly it is to stabilize and re-house that person. During Plan Year Two, the State of Montana will seek to accomplish the following targets for reducing homelessness:

Table 11 – Strategies for Reducing Homelessness

STRATEGIES	1. Reallocation of TH to RR or Permanent Supportive Housing (PSH)		2. ESG Rapid Rehousing (Family Only)		3. TANF Short-term Rent Assistance		4. Prioritize Section 8 Vouchers for PSH Graduates		5. Decrease LoS – Increase Turnover PSH to Affordable Housing		6. 50 Montana State-Funded Vouchers		Total New Beds	Total Number Households Served
	Per Year	Total	Per Year	Total	Per Year	Total	Per Year	Total	Per Year	Total	Per Year	Total		
2015	10	10	30	30	10	10	10	10	5	5	20	20	85	27
2016	10	20	15	45	20	30	15	25	5	10	20	40	85	27
2017	10	30	15	60	20	50	15	40	5	15	20	60	85	27
Cumulative Total Beds	30		60		50		40		15		60		255	81

HTF funds will support activities by increasing and preserving the supply of rental housing for extremely low-income families, particularly the homeless, disabled, elderly, and other disadvantaged populations at risk of homelessness.

☒ AP-75 Barriers to Affordable Housing: § 91.320(i)- *The State will revise this screen to describe how HTF will help with any actions the State will take during the next year to reduce barriers to affordable housing, where applicable.*

Several barriers to affordable housing development and maintaining residency in housing were identified in the Needs Assessment, Market Analysis, and draft Analysis of Impediments to Fair Housing Choice in Montana (AI) of the Draft 2015-2020 Montana Consolidated Plan for Housing and Community Development, including:

- Rental unit owners or managers refusing to rent to prospective tenants based on their status in a protected class, particularly disability, race, and familial status;
- Negative patterns of lending and investment, particularly with respect to denial of loans and predatory loan terms for American Indian residents, Hispanic residents, and women;
- Lack of knowledge or understanding regarding fair housing laws or housing opportunities;
- Inadequate access to public transportation;
- Insufficient monitoring, oversight, or enforcement of fair housing laws; and
- Lack of local capacity to plan, obtain funding for, administer, and complete affordable housing projects.

Due in part to its rural nature, Montana's non-entitlement communities tend to have limited regulatory barriers to the development of new housing. Instead, barriers to affordable housing in Montana are generally a result of a lack of training, education, and outreach on fair housing rights.

Action 1: The State of Montana will engage partnerships that support and enhance outreach to and education of landlords and property management companies about fair housing rights.

Action 2: The State of Montana will support efforts to conduct audit tests on rental units.

Action 3: The State of Montana will ensure fair housing training is provided at the annual Montana Housing Conference and other local, regional, and statewide conference and education events, and will broadcast such meetings statewide using internet/online, digital, and phone capabilities.

Action 4: The State of Montana will help distribute fair housing informational flyers or brochures to grantees, applicants, and the general public.

Action 5: The State of Montana will create partnerships that enhance outreach and education for American Indian homebuyers through educational forums, credit counseling, and home purchase training.

Action 6: The State of Montana will continue to engage with the network of local fair housing organizations in Montana, and will encourage creation of inclusion of an additional fair housing participant specific to the American Indian population.

Action 7: The State of Montana will consider the extent to which a project addresses an identified barrier to affordable housing in its competitive review and ranking of applications for CDBG, HOME, and HTF grant awards.

Action 8: The State of Montana will provide outreach to and train prospective grantees and units of local government on affirmatively furthering fair housing.

Action 9: The State of Montana will sponsor or co-sponsor events during Fair Housing Month and throughout the year and work to increase awareness of fair housing rights.

Action 10: The State of Montana will help create model “best practice” fair housing practices for distribution to grantees and units of local government.

Through the above identified actions during Plan Year Two, the State of Montana will continue to address barriers to affordable housing. The State of Montana is committed to addressing these barriers throughout the implementation of the 2015-2020 Consolidated Plan and through the recently formed steering committee working on addressing goals and objectives identified in the 2015-2020 Analysis of Impediments.

Recently Commerce has held many meetings with large public participation to discuss the gaps and steps to accomplish the goals identified in the Analysis of Impediments that informs the Affirmative Fair Housing Plan. Additional work will continue in the coming year to achieve these goals and objectives.

☒ AP-85 Other Actions: § 91.320(j) – *The State will revise this screen to describe how HTF will help with any actions the State will take during the next year to carry out the following strategies outlined in the consolidated plan:*

- *Foster and maintain affordable housing;*
- *Evaluate and reduce lead-based paint hazards;*
- *Reduce the number of poverty-level families;*
- *Develop institutional structure; and*
- *Enhance coordination.*

In addition, the State will identify obstacles to meeting underserved needs and propose actions to overcome those obstacles using HTF funds, where applicable.

The following are actions planned for Plan Year Two and throughout the course of the Consolidated Plan period (2015-2020).

All of the activities which will be funded under the State of Montana’s CDBG, HOME, HTF, and ESG Programs will address obstacles to meeting underserved needs. The State will identify and respond to underserved needs as they arise from self-evaluation and citizen participation. In addition, the State of Montana continually provides technical assistance and planning resources to help communities engage in comprehensive planning, downtown master planning, business development planning, market studies, preliminary architectural reports, asset management, needs analysis, preliminary engineering, and other studies or plans that support the sustainability of local communities, affordable housing, public works investments, vital employment centers, and the environment.

The State of Montana has identified preserving and constructing affordable housing as one of its high priority needs. As set forth in the Consolidated Plan, actions planned to foster and maintain affordable housing include developing additional rental housing; developing additional homeownership units; providing down payment assistance; providing owner-occupied rehabilitation activities; and other housing activities. These actions will be funded through the HOME, CDBG, and HTF as set forth above.

The State of Montana will continue to diligently support acquisition and rehabilitation activities in order to ensure that households, particularly those with children, benefitting from federal

housing programs are safe from lead-based paint (LBP) hazards and comply with current requirements of Title X of the Residential Lead Based Paint Hazard Reduction Act of 1992. Both Commerce and DPHHS provide education and information on LBP hazards to parents, families, healthcare providers, grant recipients, and contractors. Commerce requires that any contractor or subcontractor engaged in renovation, repair and paint activities that disturb lead-based paint in homes, child and care facilities built before 1978 must be certified and follow specific work practices to prevent lead contamination. In addition to complying with Title X, UPCS inspections will be performed at rental properties assisted with HTF, HOME, Section 8, and other public rental properties throughout the state.

The Community Development and Housing Divisions added HUD's on-line Lead-Based Paint Visual Assessment Training to its employee on-boarding process to ensure that all staff involved in the funding of housing projects through the Department of Commerce are trained in identifying deteriorated paint and increased risk of the presence of LBP hazards.

The State of Montana, in coordination with non-profit organizations and the private sector, can influence the chances of helping individuals and families in poverty by supporting local and regional efforts to improve family and individual incomes. All of the strategies and priorities identified in the 2015-2020 Consolidated Plan and this 2016-2017 Annual Action Plan target the improvement of economic conditions of Montanans of lower income, from the rehabilitation and construction of affordable housing, homebuyer assistance, and temporary shelter services to investment in compact, walkable development where efficiencies of public infrastructure, community services, and employment center encourage health, vital, and resilient communities through the use of CDBG, HOME, HTF and ESG funds.

Gaps in the institutional delivery system exist primarily due to funding limitations that are outside the control of the State of Montana. CDBG, HOME, HTF, and ESG resources are not adequate to meet the needs of Montanans of low-moderate income or less particularly the homeless, disabled, elderly, and other disadvantaged populations. However, the ability to effectively relay information regarding existing grant opportunities and technical assistance from the State of Montana for eligible entities continues to be one of the State's greatest challenges. There are areas of opportunity for increased collaboration vertically and horizontally across and between agencies, organizations, and the private sector to ensure that services are delivered to the greatest number of eligible entities and individuals in the state. During Plan Year Two, the State will actively engage across state agencies and with the public and private sectors in broad discussions and educational opportunities regarding the economic, social, environmental, and health benefits of creating walkable, resilient communities with increased opportunities and access to affordable housing, community services, existing public infrastructure efficiencies, and jobs.

The State of Montana, using CDBG, HOME, HTF and ESG programs, will continue to coordinate with public and private partners to discuss current projects and methods to coordinate efforts throughout the State, including the following initiatives:

- DPHHS is represented on various social service state advisory groups to ensure housing services are coordinated with social services for needy populations in Montana.
- DPHHS works proactively with its Montana Coalition of Care (MTCOC) partners to ensure that efficient and effective coordination of services exists between affordable housing and social services.
- Commerce will continue to participate in the Montana Reentry Initiative Task Force and the Housing Coordinating Team.

Through the above identified actions during Plan Year Two, the State of Montana will continue to address these various issues. The State of Montana is committed to addressing these issues throughout the implementation of the 2015-2020 Consolidated Plan.

To further the goals and objectives of the HTF, CDBG, and HOME programs, the Anti-displacement and Relocation Assistance Plan is included with the 2016-2017 Annual Action Plan.

HTF Funding Priorities-§ 91.320(k)(5)(i)

*The State is responsible for distributing HTF funds throughout its jurisdiction according to its housing priority needs. The State will revise the **AP-30 Method of Distribution** screen in IDIS. Distribution is described below.*

- 1. The State will not distribute HTF funds through grants to subgrantees.*
- 2. The State will distribute HTF funds by selecting applications submitted by eligible recipients. The eligibility requirements for applicants as defined in § 93.2- definition of recipient are below:*

Eligible Recipients are organizations, agencies, or other entities (including public housing agencies, for-profit entities, or nonprofit entities) that receive HTF assistance from the State as an owner or developer to carry out an HTF-assisted project.

To be eligible for HTF assistance, a recipient must:

- (1) Make acceptable assurances to the State that it will comply with the requirements of the HTF program during the entire period that from the time the State selects the recipient to receive HTF funds until the conclusion of all HTF-funded activities;*
 - (2) Demonstrate its ability and financial capacity to undertake the eligible activity, comply with HTF regulations and State requirements, and manage the eligible activity;*
 - (3) Demonstrate its familiarity with the requirements of other Federal, State, or local housing programs that may be used in conjunction with HTF funds to ensure compliance with all applicable requirements and regulations of such programs; and*
 - (4) Have demonstrated experience and capacity to carry out an eligible HTF activity as evidenced by its ability to own, construct/rehabilitate, manage, and/or operate an affordable multifamily rental housing development.*
- 3. The State will distribute HTF funds by selecting application submitted by eligible recipients. At a minimum, as required in § 91.320(k)(5)(i), the selection criteria will include:*
 - Priority based upon geographic diversity*
 - Applicant’s ability to obligate HTF funds*
 - Applicant’s ability to undertake eligible activities in a timely manner*
 - For rental housing, the extent to which the project has Federal, State or local project-based rental assistance so rents are affordable to extremely low- income families*
 - For rental housing, the duration of the units’ affordability period*
 - The merits of the application in meeting the State’s priority housing needs*
 - The extent to which application makes use of non-federal funding sources*

Montana will distribute HTF funds by selecting applications submitted by eligible recipients. 100 percent of the HTF funds will benefit extremely-low income households and all funds will be used to support rental housing. The criteria to select applications, which each bear equal weight, include:

A. Targeted Geographical Data Points

This criterion considers Geographic Diversity: (IDIS Con Plan and Action Plan SP-10): The State will prioritize applications for projects from all counties, based on the following metrics compiled by the Department of Commerce, using 2010-2014 American Community Survey data:

- a. Percentage of families in poverty;
- b. Available and affordable housing units;
- c. Rental housing cost burden;
- d. Transportation plus housing cost burden;
- e. Substandard housing conditions; and
- f. Percentage of total population experiencing homelessness.

B. Alignment with Consolidated Plan and HTF Program Goals

C. Extent to which Proposed Project Assists Disadvantaged Populations

D. Support, Long-Term Financial Feasibility, and Coordination & Capacity

Commerce will consider the extent to which each application includes other funding sources and/or concessions. All HTF units in rental housing projects are required to remain affordable as HTF units for a minimum of 30 years. Projects for which the underwriting supports financial feasibility beyond the minimum period, and for which the owner is willing to commit to a longer affordability period, must demonstrate affordability to the maximum required by other funding sources. Proposals which include funding from other sources with their own programmatic requirements must include demonstrations of organizational capacity to coordinate and fulfill all programmatic requirements.

5. Technical & Financial Feasibility and Environmental Considerations

Commerce will review each applicant's experience and capacity to successfully develop or rehabilitate rental housing, obligate HTF funds, undertake eligible activities in a timely manner, and own/manage/operate a HTF-assisted property in compliance with HUD regulations. Projects, as proposed, must be eligible in nature, i.e., they must be compliant with the Montana Environmental Protection Act and HTF environmental regulations at § 93.301(f).

Recipient Application Requirements- § 91.320(k)(5)(ii)

1. *Will the State require that all recipient applications contain a description of the eligible activities to be conducted with HTF funds as required in § 93.200- Eligible activities?*

Yes

2. Will the State require that each eligible recipient certify that housing assisted with HTF funds will comply with HTF requirements?

Yes

Please see attached certification for application (See Appendix D).

Performance Goals and Benchmarks- § 91.320(k)(5)(iii)

The plan will include performance goals and benchmarks against which the State will measure its progress, consistent with the State’s goals established at § 91.315(b)(2). To comply with this requirement, the State will include HTF housing goals in the housing table on the **SP-45 Goals and AP-20 Annual Goals and Objectives** screens in the eCon Planning Suite consolidated plan template in IDIS.

VI. OTHER REQUIREMENTS

Maximum Per-unit Development Subsidy Amount- § 91.320(k)(5) and § 93.300(a)

The State will not establish its own maximum limitations on the total amount of HTF funds that can be invested per-unit for development of non-luxury housing. The State has adopted limits used in another federal programs, specifically HOME, and is submitting them with this HTF allocation plan (See Appendix E). Please see the State’s description of how existing limits developed for another program and being adopted for HTF meet the HTF requirements.

Indicate below what maximum per-unit development subsidy limits the State will use for its FY 2017 HTF program.

- The State adopted limits used in other federal programs, and the limits are:

Montana’s Maximum per Unit Development Subsidy is the same as for the HOME program (24 CFR 93.300(a)), and is calculated using the Uniform Application Form for Montana Housing Programs, available on the HTF website: <http://comdev.mt.gov/Programs/HTF/Toolkit> (also, see the chart below). By using the HOME subsidy limits, Montana applicants will be better able to apply HTF subsidy limits to projects across the state. Housing organizations across the state are accustomed to the use of the HOME subsidy limits and how to leverage other sources into their projects. Additionally, these subsidy limits accurately reflect the market conditions. These subsidy limits have historically served all areas of Montana well in the HOME program, and are expected to work similarly in the HTF program.

Montana	0 bedrooms	1 bedroom	2 bedrooms	3 bedrooms	4 bedrooms
Cost per Unit	\$140,107	\$160,615	\$195,304	\$252,662	\$277,344

Rehabilitation Standards - § 91.320(k)(5)(iv) and § 93.301(b)

As the State intends to use its HTF funds for housing being rehabilitated, it has established rehabilitation standards that all HTF-assisted housing undergoing rehabilitation will meet at the time of project completion in accordance with §93.301(b). The standards provide details on what work is required, how that work should be performed and what materials should be used. The State’s standards refer to applicable codes and establish requirements that exceed the minimum requirements of the codes. At a minimum, the rehabilitation standards address:

- Health and safety;
- Major systems;

- *Lead-Based Paint;*
- *Accessibility;*
- *Disaster Mitigation;*
- *State and local Codes, Ordinances, and Zoning Requirements; and*
- *Inspectable Areas and Observable Deficiencies from HUD’s Uniform Physical Condition Standards identified by HUD as applicable to HTF-assisted housing.*

The State plans to use HTF funds for the rehabilitation of housing and has attached its rehabilitation standards (below).

Eligible Projects must adhere to minimum standards for buildings constructed under HUD housing program, found at:

http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/hudclips/handbooks/hsg/4910.1 and which detail Montana’s rehabilitation standards, new construction standards and energy/water efficiency standards.

State and Local Codes, Ordinances, and Zoning Requirements: Eligible Projects must meet all applicable state and local codes, ordinances, and requirements. In the absence of state or local building codes, the housing must meet the International Building Code of the International Code Council.

The following additional standards apply to HTF Eligible Projects:

UPCS: Eligible Projects must follow property standards which include all inspectable items and inspectable areas specified by HUD based on the HUD physical inspection procedures, known as the Uniform Physical Condition Standards (UPCS) prescribed by HUD pursuant to 24 CFR Part 5.705.

Lead Paint Hazards: Eligible Projects must mitigate lead hazards in accordance with the applicable provisions of 24 CFR Part 35.

Accessibility:

Eligible Projects proposed for new construction must provide accessibility in accordance with the applicable provisions of 24 CFR part 8 (implementing section 504 of the Rehabilitation Act of 1973) and Titles II and III of the Americans with Disabilities Act implemented at 28 CFR parts 35 and 36. Eligible Projects that are “covered multifamily dwellings,” as defined at 24 CFR 100.205, standards must require that the housing meets the design and construction requirements at 24 CFR 100.205 and the required inclusion of:

- i. A smoke-free housing policy;
- ii. Broadband internet connectivity, that includes but is not limited to, cable, fiber optics, wiring and, other components to provide access; and
- iii. Minimum visitability features, including one zero-step entrance, one first-floor wheelchair-accessible bathroom, and first-floor doorways of 35 inches width or more.

Eligible Projects proposed for rehabilitation, requirements include all rehabilitation standards as set forth 24 C.F.R. § 93.301(b), and the *optional and encouraged* inclusion of:

- i. A smoke-free housing policy;
- ii. Broadband internet connectivity, that includes but is not limited to, cable, fiber optics, wiring and, other components to provide access; and
- iii. Minimum visitability features, including one zero-step entrance, one first-floor wheelchair-accessible bathroom, and first-floor doorways of 35 inches width or more.

Disaster Mitigation: Where relevant, construction design will mitigate the potential impact of potential disasters (i.e. earthquakes, hurricanes, floods and wildfires) in accordance with state or local codes, ordinances and requirements, or such other requirements that HUD may establish.

Capital Needs Assessment: A Capital Needs Assessment (CNA) must be submitted with an application package involving rehabilitation. The CNA must be completed by a competent, independent third party, such as a licensed architect or engineer, including information about past repairs and improvements, pending repairs and existing or chronic physical deficiencies. The assessment will include a site visit and a physical inspection of the interior and exterior of all units and structures. The assessment must determine the work to be performed and identify the long-term physical needs of the project. For example, if a proposed project is likely to address roofing deficiencies, there should be at least a generalized assessment of other building systems (i.e. mechanical, electrical, structural, etc.). The level of detail will vary with each project and should be commensurate with the deficiencies noted. The purpose of assessing the entire facility is to ensure that problems are appropriately prioritized, or that repairs to one building component won't be adversely affected by future repairs to another building component.

The assessment must address Health and Safety issues identifying life-threatening deficiencies and must address major systems including structural support, roofing; cladding and weatherproofing (i.e. windows, doors, siding, and gutters); plumbing; electrical; and heating, ventilation and air conditioning. The assessment must provide an estimate (based on age and condition) of the remaining useful life of these systems, upon project completion of each major system. The level of effort required to prepare the report and the depth of analysis within the report should be proportional to the size and complexity of the proposed project.

The assessment must consider the presence of environmental hazards such as asbestos, lead paint and mold on the site. The assessment will include an opinion as to the proposed budget for recommended improvements and should identify critical building systems or components that have reached or exceeded their expected useful lives. If the remaining useful life of any component is less than fifty percent (50%) of the expected useful life, immediate rehabilitation will be required unless capitalized. If the remaining useful life of a component is less than the term of the HTF loan, the application package must provide for a practical way to finance the future replacement of the component.

The assessment will examine and analyze the following:

- 1) The site, including
 - topography,
 - drainage and soil suitability,
 - pavement,
 - curbing,
 - sidewalks,
 - parking,
 - landscaping,
 - amenities,
 - water,
 - sewer,
 - storm drainage and
 - gas and electric utilities and lines;

- 2) Structural systems, both substructure and superstructure including
 - exterior walls and balconies,
 - exterior doors and windows,
 - roofing system and drainage; and

- interiors, including unit and common area finishes (carpeting, tile, plaster walls, paint).

Resale and/or Recapture Provisions- § 91.320(k)(5)(v) and § 93.304(f)

Indicate below if the State intends to use HTF funds for first-time homebuyers.

The State will **not** use HTF funds to assist first-time homebuyers.

HTF Affordable Homeownership Limits- § 91.320(k)(5)(vi) and § 93.305

Indicate below if the State will use HTF funds for homeownership housing and what affordable homeownership limits it will use.

The State will **not** use HTF funds for homeownership housing.

State Limited Beneficiaries or Preferences- § 91.320(k)(5)(vii)

Indicate below if the State will limit beneficiaries or give preferences to a particular segment of the extremely low-income population.

The State will limit beneficiaries and/or give preferences to the following segments of the extremely low-income population. The groups listed have also been identified in the action plan (below, from AP-25).

Montana will use CDBG, HTF, and HOME funding for preserving and constructing affordable housing that increases mobility and lowers the combined cost of housing and transportation, advancing solar and other on-site renewable energy installations aligned with the Federal Renewable Energy Target, building social and economic resiliency to severe events, and increasing homeownership and rental opportunities for eligible Montanans, particularly the homeless, disabled, elderly, and other disadvantaged populations. Montana has developed a scoring matrix to put particular emphasis on priority targets (see Appendix C).

Refinancing of Existing Debt- § 91.320(k)(5)(viii) and § 93.201(b)

Indicate below if the State will permit the refinancing of existing debt.

The State will not permit the refinancing of existing debt.

VII. GRANTEE CERTIFICATIONS

In addition to submitting an HTF allocation plan, the State will submit all the required certifications identified at § 91.225 (for new action plans). The State is amending the action plan to include HTF; therefore, it will resubmit the following certification to include HTF:

Consistency with plan- The jurisdiction will submit a certification that the housing activities to be undertaken with CDBG, HOME, HTF, ESG, and HOPWA funds are consistent with the strategic plan.

VIII. REQUIRED FORMS

In addition to submitting an HTF allocation plan, the State will submit and/or complete the following standard forms for its HTF program.

- Standard form- 424: [Application for Federal Assistance](#) (§91.320(a))
- Standard form- 1199 A : [Direct Deposit Sign up Form](#)

These documents have already been submitted and are on file in the Denver field office.

2017 Housing Trust Fund Allocation Plan Appendices

Appendix A: Citizen Participation Plan

Appendix B: Summary of Public Comments

Appendix C: Montana's Target Priority Counties

Appendix D: Certification for Application

Appendix E: Maximum per-Unit Subsidy Information

Appendix A:

Citizen Participation Plan

Montana Citizen Participation Plan 2015 – 2019 Consolidated Plan

Introduction

In 1994, the U.S. Department of Housing and Urban Development issued new rules consolidating the planning, application, reporting, and citizen participation processes of three formula grant programs: Community Development Block Grants (CDBG), Home Investment Partnerships (HOME), Housing Trust Fund (HTF) and Emergency Shelter Grants (ESG). The new single-planning process was intended to more comprehensively fulfill three basic goals: to provide decent housing, to provide a suitable living environment and to expand economic opportunities.

Provision of decent housing may involve assisting homeless persons in obtaining appropriate housing, retaining and improving the affordable housing stock, increasing the availability of permanent or transitional affordable housing for low-income households without discrimination or increasing supportive housing to assist persons with special needs. Providing a suitable living environment might entail improving the safety and livability of neighborhoods, including the provision of adequate public or community facilities; de-concentrating housing opportunities and revitalizing neighborhoods; restoring and preserving natural and physical features with historic, architectural, and aesthetic value; and conserving energy resources by promoting planning and thoughtful design. Expanding economic opportunities can involve creation of accessible jobs, providing access to resources for community development, assisting low-income persons in achieving self-sufficiency, and fostering a competitive workforce.

The Consolidated Plan is actually a three-part planning process required by HUD. The Consolidated Plan is comprised of a five-year strategic plan, annual action plans (including annual allocation plans for the HTF program), and annual performance reports; these documents construct the framework whereby Montana can identify its housing, homeless, community, and economic development needs. This process helps identify resources that will be employed and actions to be taken that will address the needs, as well as review and evaluate the State's progress toward achieving its strategic goals. Completing these documents on time and in a manner that is acceptable to HUD ensures program funding.

The Consolidated Plan process begins with the Citizen Participation Plan (CPP). The objectives of the CPP are to ensure that the citizens of Montana, particularly persons of low and moderate income, persons living in slum and blight areas, units of local government, housing agencies and other interested parties, are provided the opportunity to participate in the planning and preparation of the Consolidated Plan, including amendments to the 5-Year Strategic Plan, Annual Action Plans and the Annual Performance Reports. In doing so, the CPP sets forth general policies and procedures for implementing and carrying out the Consolidated Plan process, such as how the Consolidated Plan documents will be developed, dates and milestones along which the process will proceed, and methods for citizens to offer the State assistance and guidance in the formulation of the Plan. Furthermore, the provisions of the CPP fulfill statutory and regulatory requirements for citizen participation specified in the U.S. Department of Housing and Urban Development's rules for the Consolidated Plan, the HOME, CDBG, HTF and ESG programs. In Montana, the participation process will be developed and monitored by a Consolidated Plan Coordinating Committee consisting of representatives from the Montana Department of Commerce (Commerce) and the Montana Department of Public Health and Human Services (MDPHHS)

Purpose of the Citizen Participation Plan

In order to ensure maximum participation in the Consolidated Plan process among all populations and

needs groups, and in order to ensure that their issues and concerns are adequately addressed, the State of Montana followed the standards set forth in this Citizen Participation Plan during development of Consolidated Plan documents including: 5-Year Consolidated Plan, Annual Action Plans, Housing Trust Fund Allocation Plans prepared during the five year period and Consolidated Annual Performance, Evaluation Report (CAPER) documenting the State's performance during the five year period of the Consolidated Plan, and the Citizen Participation Plan.

The Citizen Participation Plan also provides citizens an opportunity to evaluate and comment on the State's Consolidated Plan documents, including this Citizen Participation Plan. Alternative formats of the Consolidated Plan documents are available upon request.

Citizens were invited to provide comments on all documents required under the Consolidated Plan electronically at DOCCP@mt.gov or by mail to the Community Development Division in the Montana Department of Commerce <http://comdev.mt.gov>.

Relevant Areas

The term "entitlement areas" refers to cities and counties that qualify to receive one or more formula grants. Entitlement areas must each complete a Consolidated Plan separate from the State's in order to receive funding. Montana's entitlement cities are Billings, Great Falls, and Missoula. Individuals wishing to contribute to the Consolidated Planning process in non-entitlement areas should contact housing and community development specialists in these cities.

For purposes of this Citizen Participation Plan, the phrase "non-entitlement areas" refers to cities and towns that neither file Consolidated Plans individually nor as part of a consortium and are not eligible to receive formula funding from HUD directly.

Encouraging Citizen Involvement

Public Notice and Outreach

An informed citizenry is critical to effective and responsive housing and community development programs. Efforts to educate residents and empower participation are an ongoing element of the Consolidated Planning process.

The CPP is the fundamental means of notifying interested citizens about the Consolidated Plan and related activities, such as the Annual Action Plan, Housing Trust Fund Allocation Plan, or the Consolidated Annual Performance and Evaluation Report. The State utilized display advertisement notices in newspapers of general circulation and through Commerce or MDPHHS websites and list serves. All notices are published at least 10 days prior to public hearings. All notices are written in plain, simple language and direct efforts are taken to publish and/or post information at locations that would elicit maximum low- and moderate-income and minority participation.

Public education and outreach are facilitated through the use of public advertisements that describe the Consolidated Planning process, opportunities for citizen participation and available funding through the CDBG, ESG, HTF and HOME programs. The State's Consolidated Plan mailing list includes social service organizations, local jurisdictions, low-income housing consumers, neighborhood groups, previous participants and commentators, businesses, developers, and other interested parties.

The Consolidated Plan offers many other opportunities for citizen participation. The State use surveys, general feedback or listening meetings for specific programs, and other means to solicit input in the development of the consolidated plan documents. The State particularly encourages participation of

persons with special needs and/or persons who are often underrepresented in public process (low-income, persons of color, non-English speaking persons, persons with disabilities, persons who are homeless). The State also encourages the participation of statewide and regional institutions and organizations that are involved or affected by the formula grants in the process of developing and implementing the Consolidated Plan. Participation is solicited and encouraged.

Public Hearings and Input Meetings

Two public input meetings are held before the publication of the final Consolidated Plan. The primary purpose of the first public hearing is to gather citizen input on housing and community development needs and the proposed Consolidated Plan before it is published for comment. The second public hearing is held during the Consolidated Plan 30-day public comment period for review and comment on the Consolidated Plan draft. The public hearings are announced at least 10 days prior to being held. Announcements are made through Commerce or MDPHHS websites, list-servs, and at least one newspaper of statewide circulation.

The public hearings take place in locations identified in the announcement of the public hearings that are accessible to persons with disabilities. The dates, times and locations for public hearings are convenient to potential and actual beneficiaries. Non-English speaking persons and those with disabilities are encouraged to attend. Where a significant number of non-English speaking residents are expected to participate, the State provides translators, when notified of this need, prior to the public meetings. Contact information is provided in all public announcements.

Regional, Interest Area Hearings, Focus Groups, and Other Meetings

In addition to the public hearings, Commerce and the MDPHHS solicits input on housing and community development issues and needs of the homeless population at regional or interest area forums or focus groups. Agencies, advocates, statewide and regional institutions and organizations, and community residents are informed of the meetings through state agency websites, personal contact, media releases, and other methods that the State believes as productive. All sites selected for the forums or focus groups are accessible to disable persons. The State works with advocacy groups to accommodate special needs groups and non-English speaking attendees.

The forums are conducted with the intention of providing Montana residents the opportunity to voice their opinions and provide insight into the issues prevalent in their communities. The forums provide an opportunity for citizens and interested parties to obtain information about state housing and community development programs, the administering agencies, and funding requirements.

Publication of Consolidated Plan Documents

The State publishes its draft Consolidated Plan documents for public review in a manner that affords citizens, public agencies and other interested parties a reasonable opportunity to examine its contents and submit comments.

The draft Consolidated Plan documents are available at selected repositories for the full public comment period. A list of the repositories appears at the end of this Citizen Participation Plan. The draft Consolidated Plan documents are available for viewing on the Montana Department of Commerce website, located at <http://comdev.mt.gov>. Although interested parties are encouraged to use the repositories' copies or view the Consolidated Plan on the Internet, a reasonable number of hard copies of the proposed Consolidated Plan are made available from Commerce during the public comment period.

Citizens or groups that attended any of the forums or public hearings are notified by mail or e-mail of the

Consolidated Plan's availability for comment.

The Consolidated Plan documents describe the amount of assistance the State expects to receive, or has received, and the range of activities that may be undertaken, including the estimated amount that will benefit persons of low- and moderate-income and plans to minimize displacement. The State openly considered any comments of individuals or groups received verbally or in writing, including e-mail, during the Consolidated Plan process or at public hearings. A summary of the written and public hearing comments are included in the final Consolidated Plan, along with the State's response to the comments.

Public Comment on the Consolidated Plan Documents

Prior to the adoption of the 5-year Strategic Consolidated Plan, Annual Action Plans, HTF Allocation Plans, and any amendments, the State makes available to interested parties the draft documents for a comment period of no less than 30 days. Notification of the availability of the proposed documents appeared in at least one newspaper that is circulated throughout the state.

Before the State submits Consolidated Annual Performance and Evaluation Reports (CAPER) to HUD, the State makes available to interested parties the proposed CAPER for a comment period of no less than 15 days. Citizens are notified of the CAPER's availability through newspaper and email notification informing citizens of the day the CAPER is available to view on the Department of Commerce Community Development Division's website and the specific time period available for comments and the contact information to submit comments.

Consolidated Plan documents are available on Commerce's website for the full public comment period. Hard copies of the documents are available upon request from Commerce during the applicable public comment period. The State considers any comments of individuals or groups received verbally or in writing, including e-mails, or at public hearings. A summary of the written and public hearing comments and the State's responses are included in applicable final documents.

Public Access to Records

The State provides all interested parties with access to information and records related to the State's Consolidated Plan and the State's use of assistance under all programs covered by the Consolidated Plan during the preceding five years. The public is provided with reasonable access to housing assistance records, subject to laws regarding privacy and obligations of confidentiality.

Consultation with Organizations and State Agencies

When preparing the Consolidated Plan, the State consults with public and private agencies that provide housing, health and social services in order to ensure that the interests and needs of all groups are adequately addressed. This consultation occurs through regional and interest area forums, interviews conducted with such organizations (especially those that provide services to special needs populations), and incorporation of data and reports produced by such organizations into the Consolidated Plan documents.

Amendments to the Consolidated Plan

There are two types of amendments to the Consolidated Plan: administrative amendments and substantial amendments. Pursuant to HUD regulations, a substantial amendment to the Consolidated Plan occurs whenever the jurisdiction determines on or more of the following criteria have been met:

- Substantially (15% or less) change the allocation priorities or its method of distributing HUD

- formula grant funds;
- Utilize formula grant funds (including program income) to carry out an activity not previously described in the action plan; or
- Change the purpose, scope, location or beneficiaries of an activity.

Such changes, prior to their implementation, are reviewed under various federal or local requirements, particularly rules on procurement and/or policies on the allocation of public resources. Substantial amendments to the Consolidated Plan are subject to a formal citizen participation process. Notice and the opportunity to comment is provided to citizens through public notices in local newspapers and other appropriate means. A public comment period of not less than 30 days is provided prior to implementing any substantial amendment to the Consolidated Plan. State staff prepares a summary of all comments received in writing and, in cases where any citizens' views are not accepted, provide reasons for the decision. This documentation is attached to the Substantial Amendment, which is made available to the public and submitted to HUD. After the program year has elapsed by 6 months, the Commerce Director, at his/her discretion, may reallocate up to 15% of the annual HUD CDBG, HOME, or HTF award that has not been expended or awarded to state grantees, in between normal grant application cycles, to expedite necessary projects and meet the expenditure of funds consistent with HUD regulation and the objectives of the programs.

Occasionally, public comments or events warrant an amendment to the Consolidated Plan. Montana uses Substantial Amendment Criteria to determine the need to amend the Consolidated Plan. The State's Substantial Amendment Criteria includes a change in the described method of distributing funds to local governments or nonprofit organization subrecipients to carry out activities. Application process for subrecipients and criteria for selecting subrecipients are elements of the "method of distribution."

"Standard amendments" are those that are not considered substantial in nature and chiefly pertain to minor administrative modifications of the programs. Thus they do not require in-depth citizen participation.

Citizen Participation in the Event of a Substantial Amendment

In the event of a substantial amendment of Consolidated Plan documents, the State will comply with the following citizen participation process:

1. The State will notify citizens of the availability of the draft substantial amendments, a minimum 30-day comment period, and, if in the State's judgment a public hearing is warranted, the time and location of the public hearing through a newspaper of statewide circulation.
2. Depending on which of the formula grant programs is affected, the substantially amended sections of the Consolidated Plan will be made available on the Commerce website, <http://comdev.mt.gov>.

Hard copies will also be available from Commerce and MDPHHS for the full duration of the public comment period.

Consideration of Public Comments on the Substantially Amended Plan

In the event of substantial amendments of Consolidated Plan documents, the State will openly consider any comments on the substantially amended Consolidated Plan from individuals or groups. Comments must be received in writing, including e-mail, or at public hearings if hearings are conducted. A summary

of the comments received on the substantial amendments will be included in the final substantially amended Consolidated Plan. A summary of all comments not accepted and reasons for their dismissal will be included in the final substantially amended Consolidated Plan.

Changes in Federal Funding Level

Change to federal funding levels that affect the distribution of funds identified in the documents will not be considered either an administrative amendment or a substantial amendment.

Complaints and Grievances

Citizens, administering agencies, local governments and other interested parties may submit complaints regarding violations of this Citizen Participation Plan or federal regulations regarding the preparation of the Consolidated Plan documents or amendments to the documents.

Citizens may also present complaints and grievances orally or in writing at the community meetings, and/or public hearings. All public comments, including complaints and grievances, made either orally or in writing within the 30-day public comment period, are included in the final Consolidated Plan. Such complaints or grievances should be directed to the Consolidated Plan representative, Jennifer Olson, Community Grants Bureau Chief, Community Development Division (or successor) at 301 S Park Ave, Helena MT 59602; 406-841-2770; or DOCConPlan@mt.gov.

Timely Response to Complaints or Grievances

Within 15 calendar days of receiving the complaint, the entity or individual receiving the complaint should forward the complaint to the Consolidated Plan representative listed above to respond to the complainant in writing. A copy of the State's response from the Consolidated Plan representative will be transmitted, concurrently, to the complainant and to the Commerce Director or MDPHHS Director, as programmatically applicable. If, due to unusual circumstances, the Consolidated Plan representative finds that it is unable to meet the prescribed time limit, the limit may be extended by providing written notice to the complainant. Such notice will include the reason for the extension and the date by which a response is expected to be generated, which may be based on the nature and complexity of the complaint.

Public review materials and performance reports will include data, as appropriate under confidentiality policy and regulations, on any written complaints received and how each was resolved.

Citizen Participation Requirements for Local Governments Receiving CDBG (Small Cities Development Program) Funds from the State

Units of general local government must provide for and encourage citizen participation as prescribed at 24 CFR 570.486. All Small Cities Program applicants for CDBG funds are required to provide citizen notification and involvement in planning and implementation of the proposed projects through one or more public hearings and other informational efforts. Public hearings must be held at times and in places that are convenient to all stakeholders. The needs of persons with disabilities and non-English speaking persons must be considered for the dissemination of information and the location of public hearings and meetings must be accessible to persons with disabilities. In addition, applicants are required to conduct a community development survey to allow for citizen input on the housing and community needs of the jurisdiction.

Availability of the Citizen Participation Plan

Copies of the CPP may be obtained by contacting Commerce’s website, <http://comdev.mt.gov>. Upon request, the State will make the Plan available in an alternative format accessible to persons with disabilities or non-English speaking persons.

Repositories

Copies of the draft Consolidated Plan documents may be reviewed at the following list of repositories across the state. Repositories will have hard copies of the documents available for review during the public comment periods only. Repositories are not responsible to receive public comments on the draft documents, as those must be submitted to Commerce as described earlier.

Entity	Address	City, State
Montana Department of Commerce	301 South Park Ave	Helena, MT
Montana Department of Public Health and Human Services	1400 Carter Drive	Helena, MT
Montana Human Rights Bureau	1625 11 th Ave	Helena, MT
Montana State Library	1515 E 6 th Ave	Helena, MT
Rocky Mountain Development Council	200 South Cruse	Helena, MT
Mountain Plains Equity Group	2825 3 rd Ave North	Billings, MT
District IX HRDC	32 South Tracy Ave	Bozeman, MT
Montana Fair Housing	519 E Front St	Butte, MT
Action for Eastern Montana	2030 North Merrill	Glendive, MT
NeighborWorks Montana	509 1 st Ave South	Great Falls, MT
Opportunities, Inc.	905 First Ave North	Great Falls, MT
District IV HRDC	2229 Fifth Ave	Havre, MT
Community Action Partnership of NW Montana	214 Main St	Kalispell, MT
District VI HRDC	300 First Ave North	Lewistown, MT
District XI HRC	1801 South Higgins	Missoula, MT
Homeward	1535 Liberty Ln Ste 116A	Missoula, MT
Montana Community Development Corporation	229 E Main St	Missoula, MT
Great Northern Development Corporation	233 Cascade St	Wolf Point, MT

Appendix B:
Summary of Public Comments

Public Comments and Agency Responses

The drafts of the Amendments to the 2016-2017 Annual Action Plan and the 2015-2020 Consolidated Plan were made available on July 1, 2016 for a 30-day public comment period, ending August 1, 2016. Once the public comment period ended, a record of the public hearing transcript was made available at the following website: <http://commerce.mt.gov/conplan/documents>. All comments were considered and responses provided in Appendix A of this document.

After the release of the draft Amendments to the 2016-2017 Annual Action Plan and 2015-2020 Consolidated Plan, Commerce received public comments beginning July 1, 2016 for a 30-day public comment period ending August 1, 2016. All comments received were recorded in this appendix and responses provided before final submission to HUD. This appendix is available at the following website: <http://commerce.mt.gov/conplan/documents>

Summary of Comments Received on the Amendments to the 2016-2017 Annual Action Plan and the 2015-2020 Consolidated Plan

Missoula Housing Authority
Lori Davidson, Executive Director

Comment #1:

Under Section II of the Program Overview: Eligible Applicants

MHA requests that the Department of Commerce revise the Program Overview to include public housing authorities as eligible recipients.

The draft program overview does not list public housing authorities as eligible applicants for Housing Trust Funds, and states they are only eligible to apply as partner organizations. This is not in accordance with federal law. In the comments section of *FR-5246-I-03 Housing Trust Fund* it is stated that PHAs are eligible to apply for HTF funding if they have the required capacity defined as Section 93.2 (see excerpt below). It is correct that HTF cannot be used for the expansion of public housing inventory, but many housing authorities are developing projects that do not include public housing units. They are, by law, eligible applicants as long as the funds are not being used for an excluded purpose and they meet the capacity requirements defined in Section 93.2. It is not required that they partner with another organization. That applicable comment is cited below:

Comments: Several commenters requested that HUD's rule explicitly include public housing authorities as eligible recipients of HTF funding. Some commenters requested that the development, preservation, and rehabilitation of public housing be allowed as an eligible activity, as the exclusion of public housing was not clearly mentioned in HERA or the Act; public housing tenants meet the HTF eligibility requirements and public housing funding sources are inadequate to meet the demands.

HUD Response: Public housing agencies (PHAs) are already eligible entities to be HTF recipients. They are eligible to apply for HTF funding if they have the required capacity defined in the HTF statute and at § 93.2. PHAs, if qualified as recipients, can compete for HTF funding to develop HTF-assisted projects. HUD has considered the comments that the HTF should be permitted to be used for public housing projects and agrees that there is a role for the HTF in public housing. HUD has decided to allow the use of HTF funds (1) in connection with the Choice and LIHTC programs for construction of new units that replace existing public housing properties; and (2)

for the rehabilitation of existing public housing units in connection with the Rental Assistance Demonstration (RAD), Choice, and LIHTC programs.

When the HTF program proposed rule was published on October 29, 2010, RAD was not yet established. RAD was established by HUD's 2012 Appropriations Act (Pub. L. 112-55, 125 Stat. 552, approved November 18, 2011, at 125 Stat. 673). Consequently, there were no public comments submitted on the HTF program proposed rule about the possible interplay between HTF and RAD. However, with RAD now an active demonstration program, questions have been raised to HUD about whether HTF may be used for RAD units, and HUD takes the opportunity to address those questions in this preamble. HTF funds can be used in connection with RAD for the rehabilitation of public housing properties in which assistance will be converted and used. HTF funds can also be used for rehabilitation of "RAD units" (that is public housing properties in which assistance has been converted) after conversion takes place. Such uses are not contrary to HUD's position that use of HTF funds for public housing is limited to use with other programs to rehabilitate or replace public housing properties, and not for the expansion of the public housing inventory, which can be achieved through other funding sources.

Section 93.2: Definitions

Recipient means an organization, agency, or other entity (including a public housing agency, or a for-profit entity or a nonprofit entity) that receives HTF assistance from a grantee as an owner or developer to carry out an HTF-assisted project. A recipient must:

(1) Make acceptable assurances to the grantee that it will comply with the requirements of the HTF program during the entire period that begins upon selection of the recipient to receive HTF funds, and ending upon the conclusion of all HTF-funded activities;

(2) Demonstrate the ability and financial capacity to undertake, comply, and manage the eligible activity;

(3) Demonstrate its familiarity with the requirements of other Federal, State, or local housing programs that may be used in conjunction with HTF funds to ensure compliance with all applicable requirements and regulations of such programs; and

(4) Have demonstrated experience and capacity to conduct an eligible HTF activity as evidenced by its ability to:

(i) Own, construct, or rehabilitate, and manage and operate an affordable multifamily rental housing development; or

(ii) Design, construct, or rehabilitate, and market affordable housing for homeownership.

(iii) Provide forms of assistance, such as down payments, closing costs, or interest rate buydowns for purchasers.

Agency Response #1:

Thank you for your comment. The Department of Commerce used language in an effort to simplify the eligible entity list, from the HTF regulations, and provide a list of partners with which to collaborate. We agree that the language has caused some confusion in the HTF Overview. This language has been modified to follow the HTF regulatory definition of eligible entity where entitlement communities, public housing agencies, for-profit and non-profit entities are eligible to apply for HTF funds from Commerce.

Housing Authority of Billings

Lucy Brown, Executive Director

Comment #2:

I have the exact same comment, unbelievable that you would think of leaving Public Housing Authority's out of being direct recipients. I have the exact same comment as Lori Davidson, and will be taking this to our Mayor and of Board of Commissioner's. If you are worried about

environmental reviews, it is not enough of a reason to exclude us; we are all going to make sure due diligence is done before the state needs to sign them.

Agency Response #2:

Thank you for your comment. Please see the Agency Response to Comment #1.

Housing Authority of the City of Anaconda
Kaitlin Leary, Executive Director

Comment #3:

The Montana NAHRO and Housing Authority of the City of Anaconda request that the Department of Commerce revise the Program Overview to include public housing authorities as eligible recipients.

It has come to the attention of the Board of Montana NAHRO that the draft program overview does not include public housing authorities as eligible recipients for Housing Trust Funds. It also states they are only eligible to apply as a partner organization. This is directly not in compliance with federal law. In the comments section of FR-5246-I-03 Housing Trust Fund it states that PHAs are eligible to apply for HTF funding if they have the capacity as defined at Section 93.2. We are aware that HTF cannot be used for the expansion of public housing inventory, however, many PHAs within the state are developing housing projects that are not public housing units. PHAs are by law eligible to apply for HTF monies as long as they are not being used for an excluded purpose and they meet the capacity requirements as defined under Section 93.2. It is also not required to partner with another organization.

HUD's response to comments states that PHAs are already eligible entities to be HTF recipients. They are eligible to apply for HTF funding if they have the required capacity as defined in the HTF statute and at Section 93.2. PHAs can compete for HTF funding to develop HTF-assisted projects.

Agency Response #3:

Thank you for your comment. Please see the Agency Response to Comment #1.

Unknown Public Comment

Comment #4:

Is that cap set by HUD or set by you?

Agency Response #4:

Thank you for your comment. The Housing Trust Funds will not have a cap on the amount of funds an eligible entity can apply to receive. The amount of funds awarded to the state for HTF funds are established by HUD and listed in the Housing Trust Fund Federal Register Notice Vol.81, No.87 issued May 5, 2016.

Missoula Housing Authority
Lori Davidson, Executive Director

Comment #5:

Have you split out the metropolitan areas in that or is just solely county based?

Agency Response #5:

Thank you for your comment on the HTF application processes, which were available during the public review of the amendments to the 2015-2020 Consolidated Plan and 2016-2017 Annual

Action Plan. The Department of Commerce will be publishing a final draft of all the application materials in the coming weeks. Your comment will be considered during the development of these materials.

North Central Independent Living Services
Shyla Patera, Specialist

Comment #6:

If a project is submitted, how will the grantees account for universal design or newer projects in aging construction if they rehab because the Centers for Independent Living have advocated for visitable housing in new construction and we have our website up called VisitableMT.com through Summit Independent Living Center, we want pictures of newer construction, but for purposes of HTF – somebody wants to rehab, how will that be accounted for so that if a person with a disability, particularly a mobility disability, or sensory disability, can move into some of those projects?

Agency Response #6:

Thank you for your comment. The Department has included minimum visit-ability features, including one zero-step entrance, one first-floor wheelchair accessible bathroom, and first-floor doorways of 35 inches width or more, will be required in all new construction and encouraged in all rehabilitation of multi-family housing activities. Additionally, HTF funds are not eligible to rehabilitate single family homes; however, the CDBG program does have funding available to rehabilitate single family homes of income eligible households.

North Central Independent Living Services
Jerry Clarke

Comment #7:

That's one of the biggest calls the centers get on older homes. After somebody falls or they've gone into a nursing home or rehab or extended stay – it's, how do I build my home so I can come back to it because I now own it and unless it's really bad I don't want to go down into an apartment and then struggle, so how can we encourage? They have the option, you've made it flexible, but a lot of the calls we hear are "How can I get a ramp for my home? "How can I make a bathroom more accessible?" And unless you, pretty much, have access to Medicaid, or a ton of money, or know a contractor, a lot of seniors and people with disabilities are kind of left out. That's a huge reason why Brian gets calls from MFP, I would assume, because a lot of the people have had accidents where they've had to go into nursing homes, or they've aged and their home isn't fit for them anymore.

Agency Response #7:

Thank you for your comment. The Department has included minimum visit-ability features, including one zero-step entrance, one first-floor wheelchair accessible bathroom, and first-floor doorways of 35 inches width or more, will be required in all new construction and encouraged in all rehabilitation of multi-family housing activities. Additionally, HTF funds are not eligible to rehabilitate single family homes; however, the CDBG program does have funding available to rehabilitate single family homes of income eligible households.

Department of Public Health & Human Services
Brian Barnes

Comment #8:

I agree, so is this set in stone, that the money has to be used towards, the whole \$2.7 million has

to be used for rehabilitation or as a supplement to building new construction? Has there been any suggestions on trying to have the funding for something else, like a modification fund? That was a huge component for us, because I've got certain consumers in rural areas and some of them don't want, they don't want to, I don't know how to help them apply because they have to work through their own planning department.

Agency Response #8:

Thank you for your comment. The use of HTF funds is guided by federal statute as established through the federal legislative process and is not subject to modification at the state level.

Missoula Housing Authority

Lori Davidson, Executive Director

Comment #9:

I am looking at the draft allocation plan about what the eligible operating costs are, and I am curious as to why you are, in order to be eligible for operating costs the project cannot receive project based assistance and tax credits must be a part of the total funding package. I'm wondering if that's a HUD rule or your rule and why you came up with that.

Agency Response #9:

Thank you for your comment. The use of HTF funds is guided by federal statute, and this particular use of funds was established as part of HUD guidance and is not subject to modification at the state level.

GL Development

Gene Leuwer, Owner

Comment #10:

The Board of Housing folks have struggled for years to serve people at 40% or less because of the limit that places on the rent that projects can collect. It's kind of going forward as an operating budget, whatever you're thinking in terms of your operating budget, projects make pro-form estimations that on the short end are 15 years and long end are 47 years. If a project from an operating stand point really depended on HTF money, my experience would say that the value of that is pretty limited if it's a year at a time. And understanding the source of these funds and whether or not they'll be available each year. You can't commit them because you don't know if you'll have them. So I think the lenders, or the operators, or the investors that look at projects will find it difficult to consider a one or two year operating commitment isn't going to matter a heck of a lot. It almost seems like given your fund limitations, and I missed whether or not if HTF required the product to code – if it doesn't you might be able to make some significant improvements in the living conditions in an individual unit or two. But it seems in the design of it there's a tie with the tax credit program and probably with whether it's Section 8 rental assistance, project based HUD rental assistance, or whether it's rural development rental assistance, to get to those 30% levels – you're almost going to need a rent subsidy source or from a cash-flow standpoint, it won't work. It does make some sense to me that in their design they've said we don't want to double dip. This thing is going to have to be used in conjunction with rural development and tax credits, so the operating costs will come from the other subsidy programs, the rental subsidy programs. Your Board of Housing and your tax credits folks, and I'm going to skip on a variety of things here, but they've got, in essence, a 46 year commitment, and your Board of Housing and their allocation process for tax credits, puts these restrictions on projects that functionally require them to be in that income assisted thing for the next 46 years. Rural development's got 40 or 50 year mortgages and rental assistance contracts, HUD's going back to 20 year Section 8 contracts – I guess, I think a fundamental question you got to kind of answer

from a policy standpoint, are you going to marry this program with tax credits, rural development, or HUD projects? And if you are, I think in some ways your timelines need to be compatible with those. The current letter of intent for tax credits is past. The Board of Housing will decide in January, in October I think, which projects they invite to submit an application. Actually they'll decide in August which ones to invite to submit an application by October - they'll fund it in January. Those projects need to have spent 10% of their estimated project costs, this point, essentially, by the end of December. A discussion with the Board of Housing it might add on a year to that. But, if your Phase 1 and Phase 2 process isn't compatible with the IRS requirements on the tax credits, you will functionally preclude yourself from participating in those. Because the folks that put those applications in and the agencies, like – you need to know whether their money is available. They need to know whether your money is available. And if the timeline's off or you got a 3 million or 6 million dollar project, and your funds are \$700,000 of it, if the project is stalled or the tax credits go away because your timing's off – unless there's an assurance up front that the timing will work, I don't know if you will see applications from that end of the world. I think there's nervousness now or there's historically been a reticence in some, by some folks that do that work to use HOME money because of the timing limitations. If you're looking at a 6-month process in a Phase 1 and kind of an extended process in a Phase 2, that won't work with the IRS required tax credit timelines.

Agency Response #10:

Thank you for your comment on the HTF application processes, which were available during the public review of the amendments to the 2015-2020 Consolidated Plan and the 2016-2017 Annual Action Plan.

MDOC has included the opportunity to apply for operating cost assistance and/or operating reserves to assist HTF-assisted units in HTF-assisted properties to ensure the long-term financial feasibility. The HTF funds used for operating costs and operating reserves cannot be greater than 30% of the funds annually allocated to Montana. HTF funds do not go through an appropriation process, but are annually allocated to Montana through proceeds from GSEs (Freddie Mac and Fannie Mae). HUD and MDOC recommend bringing rent subsidy to a HTF-assisted project to bring financial stability over the long term.

HTF regulations are not identical to the Rural Development or LITHC requirements, but those sources, as well as others, can be leveraged with HTF funds. MDOC will continue, similar to the HOME and CDBG programs, to work with other funding sources to limit the duplication of efforts and increase the coordination of requirements, where possible.

Comment #11:

Maybe it works around the second cycle, I mean I think functionally, I think an advantage of the HTF would be it's a relatively inexpensive application to submit; as opposed to a tax credit that's got a lot of ingrained expenses to submit. Folks' willingness to use it, if they had a tentative commitment on the project from HTF, assuming they could get tax credits, it might make some sense to build it into an application. If you had a tax credit application that required HTF money, given that timeline and the uncertainty of the process – you know, I just don't think you'd see people put those applications in.

Agency Response #11:

Thank you for your comment on the HTF application processes, which were available during the public review of the amendments to the 2015-2020 Consolidated Plan and 2016-2017 Annual Action Plan. The Department of Commerce will be publishing a final draft of all the application materials in the coming weeks. Your comment will be considered during the development of these materials.

Comment #12:

Let me phrase it this way. In a tax credit project you got to get the allocation from Board of Housing who has the competitive process and makes a judgement on the project's viability. For instance, if it's an acquisition rehab, which I think is what's going to have to fit for this, and if it's got rental assistance in it, the State has a process in place that determines both staff and Board judgement on viability through a pretty competitive process. The investors in a tax credit project look at it and from their point of the view will say, is this thing viable? You know, we're going to put 5 million dollars into this project and if it doesn't work, we're going to lose that 5 million dollars. That's their perspective - not only during construction, but during first 15 years of it. So, you've got a governmental and private sector industry that has a pretty sophisticated, and pretty robust underwriting process that from their perspective determines eligibility. I'd suggest that if you want to move money, I would trust those two processes and say we will let them determine whether the project is viable. Our role might be best used to understand whether our money is used – whether the project will be able to use our money in compliance with the HUD regulations. Will it serve 30% people? Is the rental assistance available to allow the project to be viable in the Board of Housing and the private investor world – I think if you get into making judgements on project viability, given what looks like the overall design of this program to me, I really think you're setting up some duplicative processes that will grind it to a halt.

Agency Response #12:

Thank you for your comment on the HTF application processes, which were available during the public review of the amendments to the 2015-2020 Consolidated Plan and 2016-2017 Annual Action Plan. The Department of Commerce will be publishing a final draft of all the application materials in the coming weeks. MDOC will continue, similar to the HOME and CDBG programs, to work with other funding sources to limit the duplication of efforts and increase the coordination of requirements, where possible. Your comment will be considered during the development of these materials.

Comment #13:

I absolutely understand that. And I wouldn't argue that you not have a system in place to assure that accountability. I think assuring that accountability and technical compliance, might be a little bit different than making a qualitative judgement about project viability. I think assuring compliance over a 30 year period, you clearly need a structure and a process to do that. From a developer perspective, I'd be really worried about the timing, the contradictions, and the tax credit requirements or you lose it. They go away. And in the commitment process, I wouldn't argue at all with the monitoring and the reporting and the oversight of compliance. In a tax credit project, if you've got soft costs under about 20- 21% on new construction, you get extra points for that. I think we tend to use sometimes soft costs interchangeably with administration. And I don't know what which are which. I think a tax credit project pays 20 or 30% soft costs because of third party reports professional service as legal fees – nothing to do with administration. And I think as you combine your 2.5% limitation with, whether it's soft cost of a different definition or whether it is admin costs. I think you hit that limit real easily. I think if you run a program separately it would be really helpful to distinguish the difference between admin and soft costs and which were allowable. Soft costs will run big percentages of programs in a lot of housing projects. Admin is almost nothing. But soft costs are high.

Agency Response #13:

Thank you for your comment on the HTF application processes, which were available during the public review of the amendments to the 2015-2020 Consolidated Plan and 2016-2017 Annual Action Plan. The Department of Commerce will be publishing a final draft of all the application materials in the coming weeks. Your comment will be considered during the development of

these materials.

Department of Public Health & Human Services

Brian Barnes

Comment #14:

Was it another route that the funds could go towards a TBRA, tenant-based rental system?

Agency Response #14:

Thank you for your comment. TBRA is not an eligible activity under the HTF program.

NeighborWorks Great Falls

Sheila Rice, Executive Director

Comment #15:

Want to echo to some agree Gene's comments that timing and collaborative regulations between the various funding sources is critical here - and I just want to be sure, thank you if you have, but also call out that those differences make a huge difference in a project being built so we just want to make sure we're within the timeline.

Agency Response #15:

Thank you for your comment on the HTF application processes, which were available during the public review of the amendments to the 2015-2020 Consolidated Plan and 2016-2017 Annual Action Plan. MDOC will continue, similar to the HOME and CDBG programs, to work with other funding sources to limit the duplication of efforts and increase the coordination of requirements, where possible. The Department of Commerce will be publishing a final draft of all the application materials in the coming weeks. Your comment will be considered during the development of these materials.

North Central Independent Living Services, Inc.

Shyla Patera

Comment #16:

I, Shyla Patera, submit the following comments to HTF consolidated plan amendment. My agency North Central Independent Living Services, Inc. and the other centers for Independent living have been a advocating for visitability. We believe and we hope that visitability in new construction will become the norm in Montana. We also advocate for universal design in newer construction.

We also advocate for Housing Trust funds to be used to rehab homes for lower income individuals to meet accessibility and universal design standards so that people may remain in their homes and communities where possible. We hope and know that while housing trust funds will primarily be utilized to construct a rehab new homes, we in Montana will find a way to use CDBG funding to fix and preserve pavement and streets to in order to access pathways. NCILS hopes that partnerships will continue to develop between commerce, DPHHS, as well as MDT to make this happen.

Emergency Shelter Grants and rapid rehousing are becoming a prime concern for all housing advocates. We understand that this may be an operational issue and that housing trust fund monies may only be used for construction. However, when one becomes homeless or in need of more accessible and affordable housing options, Montana may need to open up further funding sources to ensure that housing options are available. We support linking the 811, TBRA programs and funding streams, and HCBS waiver and veteran programs and funding streams where

possible Depending upon accessibility and housing availability needs, Montana may need to enhance funding for and redefine rapid rehousing and transition.

In order to ensure new housing stock and rehab existing stock, Montana may have to renegotiate HUD contracts find and new ways of maintaining housing stock if newer construction cannot be undertaken. Thank you for allowing me to submit these comments on the Housing Trust Fund. Montana's independent living centers and it's disability community will be monitoring housing projects, programmatic rules, and opportunities for further comments.

Agency Response #16:

Thank you for your comment. The Department has included minimum visit-ability features, including one zero-step entrance, one first-floor wheelchair accessible bathroom, and first-floor doorways of 35 inches width or more, will be required in all new construction and encouraged in all rehabilitation of multi-family housing activities. Additionally, HTF funds are not eligible to rehabilitate single family homes, however, the CDBG program does have funding available to rehabilitate single family homes of income eligible households. Due to the regulatory 10% limitation on the use HTF funds for purchase of single family homes, HTF funds will be focused on acquisition and multi-family housing activities. The HOME program does provide funding to assist with the purchase of single family housing for very-low income households.

Appendix C:

Montana's Targeted Priority Counties

Montana's Targeted Priority Counties - DRAFT

County	% of Families in Poverty	Available Units per 100 ELI HH	Median Gross Rent as a % of HH Income	% of HH in Poor or Unsound Conditions	% of MT's Total Homeless Population by District*	Transportation + Housing Cost as a % for Renters	Total Priority Score	Priority Target
								0-5 - Low
PRIORITY BASELINE MET	>11	<50	>26	>11	>8	>51		10-15 - Medium
PRIORITY SCORE	5	5	5	5	5	5		20-30 - High
Beaverhead	8.9%	52	28.7%	6.17	8.5%	53.0%	15	Medium
Big Horn	22.8%	52	23.6%	7.87	16.2%	55.2%	15	Medium
Blaine	21.7%	52	25.4%	9.43	1.6%	53.3%	10	Medium
Broadwater	8.4%	52	27.8%	2.46	14.4%	48.4%	10	Medium
Carbon	7.2%	52	25.4%	9.44	16.2%	44.9%	5	Low
Carter	8.2%	52	17.2%	40.02	1.4%	52.9%	10	Medium
Cascade	10.7%	44	26.4%	4.53	12.1%	47.5%	15	Medium
Chouteau	16.2%	52	19.1%	18.26	12.1%	52.9%	20	High
Custer	10.1%	52	24.8%	16.42	1.4%	46.7%	5	Low
Daniels	3.1%	52	31.7%	21.81	1.4%	51.8%	15	Medium
Dawson	9.9%	52	24.2%	15.61	1.4%	41.1%	5	Low
Deer Lodge	10.5%	52	27.5%	6.50	8.5%	54.5%	15	Medium
Fallon	5.2%	52	19.8%	13.69	1.4%	45.0%	5	Low
Fergus	6.4%	52	25.8%	8.18	0.3%	50.4%	0	Low
Flathead	9.4%	46	30.6%	2.04	14.1%	48.7%	15	Medium
Gallatin	6.6%	26	30.1%	0.40	4.8%	45.0%	10	Medium
Garfield	7.2%	52	15.3%	19.33	1.4%	53.1%	10	Medium
Glacier	25.7%	52	23.5%	8.35	12.1%	51.3%	15	Medium
Golden Valley	12.4%	52	21.8%	17.99	0.3%	54.9%	15	Medium
Granite	10.1%	52	20.7%	6.34	8.5%	55.2%	10	Medium
Hill	14.3%	52	26.8%	6.25	1.6%	49.0%	10	Medium
Jefferson	6.8%	52	27.3%	3.36	14.4%	41.8%	5	Low
Judith Basin	8.4%	52	18.5%	12.79	0.3%	53.4%	10	Medium
Lake	15.8%	34	27.4%	7.74	14.1%	54.4%	25	High
Lewis and Clark	8.1%	50	27.4%	2.29	14.4%	42.2%	15	Medium
Liberty	7.4%	52	22.8%	8.28	1.6%	54.8%	5	Low
Lincoln	11.6%	52	28.0%	5.33	14.1%	56.5%	20	High
McCone	6.9%	52	15.8%	17.42	1.4%	46.0%	5	Low
Madison	6.7%	52	24.6%	2.26	8.5%	48.2%	5	Low
Meagher	7.6%	52	25.0%	5.11	4.8%	56.1%	5	Low

Mineral	9.1%	52	31.9%	4.97	26.6%	59.6%	15	Medium
Missoula	8.9%	33	32.5%	0.45	26.6%	48.3%	15	Medium
Musselshell	9.8%	52	29.0%	14.11	0.3%	50.0%	10	Medium
Park	5.8%	52	27.4%	4.53	4.8%	51.4%	10	Medium
Petroleum	7.3%	52	50.0%	13.33	0.3%	59.1%	15	Medium
Phillips	11.4%	52	22.8%	5.29	1.4%	49.2%	5	Low
Pondera	13.6%	52	25.1%	8.10	12.1%	53.0%	15	Medium
Powder River	6.4%	52	25.4%	23.92	1.4%	52.6%	10	Medium
Powell	11.2%	52	20.1%	10.03	8.5%	52.4%	15	Medium
Prairie	13.1%	52	50.0%	22.37	1.4%	58.2%	20	High
Ravalli	13.7%	33	32.6%	3.37	26.6%	52.0%	25	High
Richland	8.5%	52	23.7%	12.37	1.4%	42.0%	5	Low
Roosevelt	19.3%	52	17.6%	35.54	1.4%	50.0%	10	Medium
Rosebud	13.0%	52	20.1%	18.13	1.4%	46.1%	10	Medium
Sanders	16.6%	52	28.2%	7.18	14.1%	62.3%	20	High
Sheridan	6.4%	52	26.8%	15.95	1.4%	45.8%	10	Medium
Silver Bow	13.9%	50	30.0%	6.09	8.5%	49.4%	20	High
Stillwater	4.2%	52	20.6%	3.25	16.2%	46.2%	5	Low
Sweet Grass	7.8%	52	26.1%	3.41	16.2%	50.7%	10	Medium
Teton	6.1%	52	26.1%	5.66	12.1%	51.4%	15	Medium
Toole	12.5%	52	25.6%	14.24	12.1%	47.9%	15	Medium
Treasure Co	11.5%	52	19.2%	17.07	1.4%	57.0%	15	Medium
Valley Co	7.7%	52	20.2%	27.11	1.4%	48.3%	5	Low
Wheatland Co	8.6%	52	23.1%	19.60	0.3%	64.3%	10	Medium
Wibaux County	11.8%	52	23.6%	19.54	1.4%	47.7%	10	Medium
Yellowstone Co	8.6%	32	28.5%	5.90	16.2%	44.7%	15	Medium

*Because HRDC Districts encompass more than one county, the district numbers are repeated; as a result, the total of this column is more than 100%.

Appendix D:

Certification for HTF Application

Certification for Application

- Each applicant must agree to comply with all applicable state and federal laws and regulations in implementing their proposed HTF project, if selected for funding.
- A copy of the Certifications for Application (provided below), signed by the chief elected official or executive officer of the applicant must accompany the application for HTF funds.
- Applicants should carefully review the following certifications for application and consider their potential impact when designing and implementing the HTF project.
- Since this is a brief summary and not intended to be a comprehensive description of each law, local officials who have any questions or concerns regarding the applicability of these requirements should contact Commerce for guidance.

MONTANA HTF CERTIFICATION FOR APPLICATION

The Applicant hereby certifies that:

It will comply with all requirements established by the Montana Department of Commerce (Commerce) and applicable state laws, regulations, and administrative procedures and accept all Montana Housing Trust Fund (HTF) program requirements.

It accepts the terms, conditions, selection criteria, and procedures established by the HTF program and expressly waives any statutory or common law right it may have to challenge the legitimacy and propriety of these terms, conditions, criteria, and procedures in the event that it is not selected for an award of HTF funds.

National Objective

It will complete a project that meets the benefit to extremely low- and very low-income national objective, by granting at least 80 percent to rental housing, up to 10 percent for homeownership, and up to 10 percent for reasonable administrative and planning costs.

State Objectives

It will complete project activities that meet one or more of the goals and objectives established in the most current version of the Montana Consolidated Plan.

Goals of the HUD programs administered by the State of Montana are:

- *Providing decent housing* by obtaining appropriate housing for homeless persons and assisting those at risk of homelessness; preserving the affordable housing stock; increasing the availability of permanent affordable housing, without discrimination; increasing the supply of supportive housing for persons with special needs; and providing affordable housing near job opportunities.
- *Providing suitable living environments* by improving the safety and livability of neighborhoods; improving access to quality facilities, infrastructure, and services; reducing the isolation of income groups within communities through de-concentration of low-income housing; revitalizing deteriorating neighborhoods; restoring and preserving properties of special historic architectural or aesthetic value; and conserving energy resources.
- *Expanding economic opportunities* by creating and retaining jobs; establishing, stabilizing, and expanding small businesses; providing public employment services; encouraging the employment of low-income persons in projects funded under this Plan; providing reasonable mortgage financing rates without discrimination; providing access to capital and credit for development activities that promote long-term economic and social viability of the community; and reducing generational poverty of those living in publicly assisted housing by providing empowerment and self-sufficiency opportunities.

The objectives and outcomes of the Montana Consolidated Plan are:

1. Support existing Montana communities:

- a. Target funding toward existing communities to increase community revitalization, improve the efficiency of public works investments, and safeguard rural landscapes and natural resources;
- b. Encourage appropriate and comprehensive planning, market studies, preliminary architectural reports, and other studies or plans that support the sustainability of local communities, affordable housing, public works investments, vital employment centers, and the environment;
- c. Enhance the unique and resilient characteristics of all communities by investing in healthy, safe, and walkable neighborhoods—rural, urban, or suburban;
- d. Encourage the rehabilitation of existing rental and owner-occupied homes, particularly for those with special needs and the elderly;
- e. Encourage the development and rehabilitation of community facilities and services located within walkable neighborhoods and/or served by public transportation systems, particularly for those with special needs and the elderly.

2. Invest in vital public infrastructure:

- a. Encourage appropriate and comprehensive pre-development planning activities for public infrastructure, including asset management, needs analysis, preliminary engineering and/or architectural reports, and other studies or plans;
- b. Provide funding opportunities to improve the safety and efficiency of public infrastructure, promote healthy, safe, and walkable neighborhoods, and safeguard the environment; and
- c. Provide funding opportunities to serve eligible Montanans, particularly those special needs and elderly populations, with safe, efficient public infrastructure.

3. Enhance Montana's economic competitiveness:

- a. Provide reliable and timely access to employment centers, educational opportunities, services and other basic needs by workers as well as expanded business access to markets;
- b. Support comprehensive planning for downtown revitalization, business development, and other studies or plans to attract and retain talent in Montana communities;
- c. Provide job opportunities to eligible Montanans to strengthen communities within the state;
- d. Encourage activities that support and strengthen new and existing businesses, particularly those located within traditional downtown business centers comprising a mix of businesses, housing, and services;
- e. Encourage mixed-use development that contributes to broader revitalization efforts in Montana communities; and
- f. Seek opportunities to achieve multiple economic development goals, such as removing barriers to collaboration, leveraging multiple funding sources, and increasing energy efficiency, through a single investment.

4. Promote equitable, affordable housing in Montana

- a. Expand location- and energy-efficient housing choices for people of all ages, incomes, races and ethnicities to increase mobility and lower the combined cost of housing and transportation;
- b. Encourage housing activities that incorporate energy-efficient design to help advance solar deployment and other on-site renewable energy installations in affordable housing that is aligned with the Federal Renewable Energy Target;
- c. Encourage activities to acquire and/or construct new affordable housing for homeownership or rental in areas where existing investment in infrastructure, facilities, and services leverages multiple economic, environmental, and community objectives;

- d. Encourage appropriate and comprehensive planning, market studies, preliminary architectural reports, and other studies or plans in support of the efficient construction of affordable housing;
- e. Encourage financial mechanisms that increase homeownership opportunities and provide rental assistance to eligible Montanans, particularly those with special needs and the elderly.

5. *Reduce homelessness in Montana:*

- a. Encourage activities that address the housing needs of homeless Montanans and/or those at risk of homelessness;
- b. Encourage activities that increase the level of assistance programs to homeless Montanans and/or those at risk of homelessness, with the goal of achieving stable and sustainable housing; and
- c. Encourage the development and rehabilitation of non-rental facilities for the shelter of temporarily homeless Montanans.

ACQUISITION, DISPLACEMENT AND RELOCATION

It will minimize displacement as a result of activities assisted with HTF funds and assist persons actually displaced. It will comply with:

- The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (The Uniform Act) as amended, and the implementing regulations 49 CFR part 24. These laws and accompanying regulations require the recipient to provide relocation payments and offer relocation assistance to all persons displaced as a result of acquisition of real property for an activity assisted under the HTF program. Such payments and assistance must be provided in a fair and consistent and equitable manner that ensures that the relocation process does not result in a different or separate treatment of such persons on account of race, color, religion, national origin, sex, source of income, age, handicap, or familial status (families with children). The recipient must assure that, within a reasonable period of time prior to displacement, decent, safe and sanitary replacement dwellings will be available to all displaced families and individuals and that the range of choices available to such persons will not vary on account of their race, color, religion, national origin, sex, source of income, age, handicap, or familial status (families with children); and
- The grantee must also inform affected persons of their rights and of the acquisition policies and procedures set forth in the regulations of 49 CFR, Part 24, Subpart B, and found in the local government's Anti-displacement and Relocation Assistance Plan.
- The Residential Anti-displacement and Relocation Assistance Plan adopted by the Montana Department of Commerce for the HTF program and the Anti-displacement and Relocation Assistance Plan adopted by the applicant.

Assessments for Public Improvements

It will not attempt to recover any capital costs of public improvements assisted with HTF funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless:

- a. HTF funds are used to pay the proportion of such fee or assessment that relates to the capital

costs of such public improvements that are financed from revenue sources other than HTF funds; or,

- b. for purposes of assessing any amount against properties owned and occupied by persons of low and moderate income who are not persons of very low income, the applicant certifies that it lacks sufficient HTF funds to comply with the requirements of clause a., above.

Building Standards

It will require every building or facility (other than a privately owned residential structure) designed, constructed, or altered with funds provided under the HTF program to comply with State or local residential and building codes, as applicable. If there is not an applicable State or local building code, new construction projects must meet the International Building Code of the International Code Council.

It will also comply with the accessibility requirements of 24 CFR part 8 and 28 CFR parts 35 and 36, and the Fair Housing Act (42 U.S.C. 3601-3619) as applicable. The applicant will be responsible for conducting inspections to ensure compliance with these specifications by the contractor; and will comply with HUD Cost-Effective Energy Standards, 24 CFR Part 39, and section 109 of the Cranston-Gonzalez National Affordable Housing Act (42 U.S.C. 12709).

Citizen Participation

It will comply with the detailed Citizen Participation Plan adopted by Commerce for the HTF program.

CIVIL RIGHTS, EQUAL OPPORTUNITY, FAIR HOUSING REQUIREMENTS

Civil Rights

It will comply with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), and the regulations issued pursuant thereto (24 CFR Part 1), which provides that no person in the United States shall on the grounds of race, color, or national origin, be excluded from participation in, be denied in the benefits of, or be otherwise subjected to discrimination under any program or activity for which the applicant received Federal financial assistance and will immediately take any measures necessary to effectuate this assurance. If any real property or structure thereon is provided or improved with the aid of Federal financial assistance extended to the applicant, this assurance shall obligate the applicant, or in the case of any transfer of such property, any transferee, for the period during which the real property or structure is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits.

Equal Opportunity

It will comply with 24 CFR Part 5, subpart A including the following:

- 24 CFR Part 107, which provides prohibits discrimination against individuals on the basis of race, color, national origin, or sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under, any program or activity funded in whole or in part with federal funds;
- The Age Discrimination Act of 1975, as amended (42 U.S.C. 6101 et seq.). The act provides that no person shall be excluded from participation, denied program benefits or subjected to

discrimination on the basis of age under any program or activity receiving federal funding assistance;

- Section 504 of the Rehabilitation Act of 1973, amended (29 U.S.C. 794). The act provides that no otherwise qualified individual shall, solely, by reason of his or her disability, be excluded from participation (including employment), denied program benefits or subjected to discrimination under any program or activity receiving federal assistance funds;
- Section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) (24 CFR Part 135). Section 3 of the Housing and Urban Development Act of 1968 requires, in connection with the planning and carrying out of any project assisted under the Act, to the greatest extent feasible, opportunities for training and employment be given to lower-income persons residing within the unit of local government or the non-metropolitan county in which the project is located, and contracts for work in connection with the project be awarded to eligible business concerns which are located in, or owned in substantial part, by persons residing in the project area. The grantee must assure good faith efforts toward compliance with the statutory directive of Section 3; and
- Executive Order 11246, as amended by Executive Orders 11375 and 12086, and the regulations issued pursuant thereto (24 CFR Part 130 and 41 CFR Chapter 60) prohibit a HTF recipient and subcontractors, if any, from discriminating against any employee or applicant for employment because of race, color, religion, sex or national origin. The grantee and subcontractors, if any, must take affirmative action to ensure that applicants are employed, and that employees are treated during employment, without regard to their race, color, religion, sex or national origin. Such action must include, but not be limited to, the following: employment, upgrading, demotion or transfer; recruitment or recruitment advertising; layoff or termination; rate of pay or other forms of compensation; and selection for training, including apprenticeship. The grantee and subcontractors must post in conspicuous places, available to employees and applicants for employment, notices to be provided setting for the provisions of this nondiscrimination clause. For contracts over \$10,000 the grantee or subcontractors will send to each applicable labor union a notice of the above requirements, the grantee and subcontractors will comply with relevant rules, regulations and orders of the U.S. Secretary of Labor. The grantee or subcontractors must make their books and records available to State and federal officials for purposes of investigation to ascertain compliance.

Fair Housing

It will affirmatively further fair housing and will comply with:

- Title VIII of the Civil Rights Act of 1968 (also known as The Fair Housing Act) (42 U.S.C. 3601 et seq.), as amended by the Fair Housing Amendments Act of 1988 and the regulations issued pursuant thereto. The law states that it is the policy of the United States prohibiting any person from discriminating in the sale or rental of housing, the financing of housing, or the provision of brokerage services, including in any way making unavailable or denying a dwelling to any person, because of race, color, religion, sex, national origin, disability, or familial status. HTF grantees must also administer programs and activities relating to housing and community development in a manner that affirmatively promotes fair housing and furthers the purposes of Title VIII; and
- Executive Order 11063, as amended by Executive Order 12259, requires HTF recipients to take

all actions necessary and appropriate to prevent discrimination because of race, color, religion, creed, sex or national origin; in the sale, leasing, rental and other disposition of residential property and related facilities (including land to be developed for residential use); or in the use or occupancy thereof if such property and related facilities are, among other things, provided in whole or in part with the aid of loans, advances, grants or contributions from the federal government.

Prohibition Against Discrimination on Basis of Religion

It will comply with section 109(a) of the Housing and Community Development Act that prohibits discrimination on the basis of religion or religious affiliation. No person will be excluded from participation in, denied the benefit of, or be subjected to discrimination under any program or activity funded in whole or in part with HTF funds on the basis of his or her religion or religious affiliation.

Prohibition Against Excessive Force

It will, if awarded HTF funds, adopt and enforce a policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations in accordance with Section 104(1) of the Housing and Community Development Act, as amended.

ADA Compliance

It will do a self-assessment of impediments to accessibility in compliance with the Americans with Disabilities Act (ADA) of 1990 (42 U.S.C. 12131-12189). Grantees are required to find a means of making HTF program activities and services accessible to persons with disabilities; to review their communities for impediments to disabled citizens; and develop a plan to address those impediments.

CONFLICT OF INTEREST

It will comply with the provisions of 2 CFR 200.318 or 24 CFR 93.353 as applicable and with sections 2-2-125, 2-2-201, 7-3-4367, 7-5-2106, and 7-5-4109, MCA, (as applicable) regarding the avoidance of conflict of interest.

ENVIRONMENTAL REQUIREMENTS

Air Quality

It will comply with the Clean Air Act (42 U.S.C. 7401, et seq.) which prohibits engaging in, supporting in any way or providing financial assistance for, licensing or permitting, or approving any activity which does not conform to the state implementation plan for national primary and secondary ambient air quality standards.

Environmental Impact

The undersigned certifies that:

- it will comply with environmental requirements under 24 CFR 93.301(f)(1) or (2) at project completion;
- the project complies with the requirements of Part 93 (including the property standards under

- 24 CFR § 93.301);
- it will maintain documentation demonstrating that the project meets the HTF Environmental Provisions at project completion [§ 93.407(a)(2)(iv)];
- It will meet the specific requirements for historic preservation, archaeological resources, farmland, airport zones, Coastal Barrier Resource System, coastal zone management, floodplains, wetlands, explosives and hazards, contamination, noise, endangered species, wild and scenic rivers, safe drinking water, and sole source aquifers. ; and
- The National Environmental Policy Act of 1969 (42 U.S.C. Section 4321, et seq.). The purpose of this Act is to attain the widest use of the environment without degradation, risk to health or safety or other undesirable and unintended consequences. Environmental review procedures are a necessary part of this process. Pursuant to these provisions, the grantee must also submit environmental certifications to the Department of Commerce when requesting that funds be released for the project. The grantee must certify that the proposed project will not significantly impact the environmental regulations and fulfilled its obligations to give public notice of the funding request, environmental findings and compliance performance.

When a local government is an HTF recipient, its chief executive officer or other officer of the applicant approved by the state:

1. consents to assume the status of responsible federal official under the National Environmental Policy Act of 1969 (NEPA) and other provisions of federal law, which further the purposes of NEPA, insofar as the provisions of such federal law apply to the HTF program; and
2. is authorized and consents on behalf of the applicant and himself to accept the jurisdiction of the Federal courts for the purpose of enforcement of his responsibilities as such an official.

Farmlands Protection

It will comply with the Farmlands Protection Policy Act of 1981 (7 U.S.C. 4202, et seq.) and activities must not result in the conversion of unique, prime, or statewide or locally significant agricultural properties to urban sites.

Floodplain Management and Wetlands Protection

It must:

- Avoid construction and other activities in the 100-year floodplain when practicable and if no practicable alternative is available to construction or other activities within the 100-year floodplain, then the structure must be elevated to at least the base flood elevation or flood proofed to one foot above the base flood elevation.
- Not conduct activities that adversely affect wetlands. Wetlands mean areas that are inundated by surface or ground water with a frequency sufficient to support, and under normal circumstances, does or would support a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction (24 CFR 93.301(f)(1)(vii)(B)).

Historic Preservation

It will comply with:

- Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. 470, as amended) through completion of the procedures outlined in 36 CFR 800 and 36 CFR 63. Project activities must not be performed on properties that are either listed in or determined eligible for listing in the National Register of Historic Places. Compliance with these procedures should include:
 1. consulting with the State Historic Preservation Office (SHPO) to identify properties listed in or eligible for inclusion in the National Register of Historic Places that exist with a proposed HTF project's area of potential environmental impact, and/or to determine the need for professional archaeological, historical, or architectural inventory of potentially affected properties to determine whether they would qualify for register listing; and
 2. consulting, with the SHPO and THPO, Keeper of the National Register of Historic Places, and the Advisory Council on Historic Preservation to evaluate the significance of historic or prehistoric properties which could be affected by HTF work and to determine how to avoid or mitigate adverse effects to significant properties from project work.

Lead-Based Paint

It will comply with current requirements of Title X of the Residential Lead Based Paint Hazard Reduction Act of 1992. It will comply with the requirement found in section 24 CFR part 35. Both Commerce and DPHHS provide education and information on LBP hazards to parents, families, healthcare providers, grant recipients, and contractors. Commerce requires that any contractor or subcontractor engaged in renovation, repair and paint activities that disturb lead-based paint in homes, child and care facilities built before 1978 must be certified and follow specific work practices to prevent lead contamination. In addition to complying with Title X, UPCS inspections will be performed at rental properties assisted with HTF, HOME, Section 8, and other public rental properties throughout the state.

Noise, Facility Siting

It will comply with conducting all activities in a manner to ensure internal noise levels are no more than 45 decibels and external noise levels are no more than 65 decibels.

Water Quality

It will use only lead-free pipes, solder, and flux for projects with a potable water system and comply with:

- the Safe Drinking Water Act of 1974 (42 U.S.C. Section 201, 300(f) et seq. and U.S.C. Section 349), as amended, particularly Section 1424(e) (42 U.S.C. Section 300H-303(e)) which is intended to protect underground sources of water. No commitment for federal financial assistance can be entered into for any project which the U.S. Environmental Protection Agency determines may contaminate an aquifer which is the sole or principal drinking water source for an area; and

- the Federal Water Pollution Control Act of 1972, as amended, including the Clear Water Act of 1977, Public Law 92-212 (33 U.S.C. Section 1251, et seq.) which provides for the restoration and maintenance of the chemical, physical and biological integrity of the nation's water.

Wildlife

It will comply with:

- the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 et seq.). The intent of this Act is to ensure that all federally assisted projects seek to preserve endangered or threatened species. Federally authorized and funded projects must not jeopardize the continued existence of endangered and threatened species or result in the destruction or modification of habitat of such species which is determined by the U.S. Department of the Interior, after consultation with the state, to be critical; and
- the Fish and Wildlife Coordination Act of 1958, as amended, (U.S.C. 661 et seq.) which requires that wildlife conservation receives equal consideration and is coordinated with other features of water resource development programs.

Wild and Scenic Rivers

It will comply with the Wild and Scenic Rivers Act of 1968, as amended (16 U.S.C. 1271, et seq.). The purpose of this Act is to preserve selected rivers or sections of rivers in their free-flowing condition, to protect the water quality of such rivers and to fulfill other vital national conservation goals. Federal assistance by loan, grant, license or other mechanism may not be provided to water resources construction projects that would have a direct and adverse effect on any river included or designated for study or inclusion in the National Wild and Scenic River System.

FINANCIAL MANAGEMENT

It will comply with the applicable requirements of:

- 2 CFR part 200. It will maintain a financial management system that includes records to document compliance with Federal and State laws and regulations and the terms and conditions of the HTF program. The records must be sufficient to allow for the preparation of reports required by general and program-specific terms and conditions and the tracing of funds to a level of expenditures adequate to establish that such funds have been used according to Federal statutes and program requirements.
- 24 CFR part 93, subpart I. It will comply with the program administration requirements relating to the following: disbursement of funds, program income, uniform administrative requirements, cost principles, audits, recordkeeping, property management, and performance reports.

It will promptly refund to Commerce any HTF funds determined by an audit to have been spent in an unauthorized or improper manner or for ineligible activities.

It will give Commerce, the Montana Legislative Auditor, HUD, and the Comptroller General, through any authorized representatives, access to and the right to examine all records, books, papers, or

documents related to the grant.

Labor Standards

It will comply with:

- State regulations regarding the administration and enforcement of labor standards. All laborers and mechanics employed by contractors or subcontractors on construction work assisted HTF funds shall be paid wages at rates not less than those prevailing on similar construction in the locality as determined by the Secretary of Labor in accordance with the Davis-Bacon Act, as amended (40 U.S.C. 276-1- 276a-5). By reason of the foregoing requirement the Contract Work Hours and Safety Standards Act (40 U.S.C. 327 et seq.) may also apply.;
- Contract Work Hours and Safety Standards Act (40 U.S.C. 327 et seq.). According to the Act, no contract work may involve or require laborers or mechanics to work in excess of eight hours in a calendar day, or in excess of 40 hours in a work week, unless compensation of not less than one and one-half times the basic rate is paid for the overtime hours. If this Act is violated, the contractor or subcontractor is liable to any affected employee for unpaid damages as well as to the United States for liquidated damages; and
- Federal Fair Labor Standards Act, (29 U.S.C.S. 201 et seq.).The act requires that covered employees be paid at least the minimum prescribed wage, and also that they be paid one and one-half times their basic wage rate for all hours worked in excess of the prescribed workweek.

Legal Authority

It possesses legal authority to apply for the grant and to execute the proposed project under Montana law and, if selected to receive a HTF grant, will make all efforts necessary to assure timely and effective implementation of the project activities described in the submitted application.

Lobbying

It certifies that:

- No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.
- If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influencing an officer or employee or any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.

- The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Political Activity

It will comply with the Hatch Act (5 U.S.C. 1501, et seq.; 5 CFR Part 151), which restricts the political activity of individuals principally employed by a state or local agency in connection with a program financed in whole or in part by federal loans or grants. An affected employee may not be a candidate for public office in a partisan election.

Procurement

All services will be procured in a manner that provides fair and unbiased, full and open competition, without conflicts of interest.

Signed: _____

Name: _____

Title: _____

Date: _____

DUNS Number: _____

EIN Number: _____

**Appendix E:
Supplementary Information for
Maximum per-Unit Subsidy**

ACTION: Notice.

SUMMARY: HUD is seeking approval from the Office of Management and Budget (OMB) for the information collection described below. In accordance with the Paperwork Reduction Act, HUD is requesting comment from all interested parties on the proposed collection of information. The purpose of this notice is to allow for 60 days of public comment.

DATES: *Comments Due Date:* January 19, 2016.

ADDRESSES: Interested persons are invited to submit comments regarding this proposal. Comments should refer to the proposal by name and/or OMB Control Number and should be sent to: Colette Pollard, Reports Management Officer, QDAM, Department of Housing and Urban Development, 451 7th Street SW., Room 4176, Washington, DC 20410-5000; telephone 202-402-3400 (this is not a toll-free number) or email at Colette.Pollard@hud.gov for a copy of the proposed forms or other available information. Persons with hearing or speech impairments may access this number through TTY by calling the toll-free Federal Relay Service at (800) 877-8339.

FOR FURTHER INFORMATION CONTACT:

Thann Young, Office of Rural Housing and Economic Development, Department of Housing and Urban Development, 451 7th Street SW., Room 7240, Washington, DC 20410; email Thann Young at Thann.Young@hud.gov or telephone 202-708-2290. This is not a toll-free number. Persons with hearing or speech impairments may access this number through TTY by calling the toll-free Federal Relay Service at (800) 877-8339. Copies of available documents submitted to OMB may be obtained from Ms. Pollard.

SUPPLEMENTARY INFORMATION: This notice informs the public that HUD is seeking approval from OMB for the information collection described in Section A.

A. Overview of Information Collection

Title of Information Collection: Indian Community Capital Initiative.

OMB Approval Number: 2506—New.

Type of Request: New Collection.

Form Numbers: SF 424; HUD 424CB; HUD 424-CBW; SF-LLL; HUD 2880; HUD 2990; HUD 2991; HUD 2993; HUD 2994A; HUD 27061; and HUD 27300.

Description of the need for the information and proposed use: The Indian Community Capital Initiative

(ICCI) is a collaborative effort among three federal agencies—the Department of Housing and Urban Development (HUD), the Department of the Treasury—Community Development Financial Institutions Fund (CDFI Fund), and the Department of Agriculture—Rural Development (USDA-RD). The ICCI's goal is to increase access to capital for business lending and economic development and entrepreneurship for Federally recognized Indian tribes.

Federally recognized Indian tribe means any tribal entity eligible to apply for funding and services from the Bureau of Indian Affairs by virtue of its status as an Indian tribe. The list of Federally recognized Indian tribes can be found in the notice published by the Department of the Interior on January 14, 2015 (Federal Register/Vol. 80, No. 9/Wednesday, January 14, 2015/Notices).

Respondents (i.e. affected public): Public.

Estimated Number of Respondents: 566.

Estimated Number of Responses: 566.

Frequency of Response: 1.

Average Hours per Response: 7211.

Total Estimated Burdens:

	Respondents	Annual responses	Total responses	Burden per response	Total annual hours	Burden cost per instrument
HUD-424CB	566	1	566	3.12	1,766	44,150
HUD-424CBW	566	1	566	3.12	1,766	44,150
HUD-2880	566	1	566	2.0	1,132	28,300
HUD-2990	566	1	566	0	0	0
HUD-2991	566	1	566	0	0	0
HUD-2993	566	1	566	0	0	0
HUD-2994A	566	1	566	.5	283	7,075
HUD-27061	566	1	566	1.0	566	14,150
HUD-27300	566	1	566	3.0	1,698	42,450
Total	5,094	5,094	7,211	180,275

B. Solicitation of Public Comment

This notice is soliciting comments from members of the public and affected parties concerning the collection of information described in Section A on the following:

(1) Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility;

(2) The accuracy of the agency's estimate of the burden of the proposed collection of information;

(3) Ways to enhance the quality, utility, and clarity of the information to be collected; and

(4) Ways to minimize the burden of the collection of information on those who are to respond; including through

the use of appropriate automated collection techniques or other forms of information technology, e.g., permitting electronic submission of responses.

HUD encourages interested parties to submit comment in response to these questions.

Authority: Section 3507 of the Paperwork Reduction Act of 1995, 44 U.S.C. Chapter 35.

Dated: November 4, 2015.

Harriet Tregoning,

Principal Deputy Assistant Secretary for Community Planning and Development.

[FR Doc. 2015-29461 Filed 11-17-15; 8:45 am]

BILLING CODE 4210-67-P

DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

[Docket No. FR-5886-N-01]

Annual Indexing of Basic Statutory Mortgage Limits for Multifamily Housing Programs

AGENCY: Office of the Assistant Secretary for Housing—Federal Housing Commissioner, HUD.

ACTION: Notice.

SUMMARY: In accordance with Section 206A of the National Housing Act, HUD has adjusted the Basic Statutory Mortgage Limits for Multifamily Housing Programs for Calendar Year 2015.

DATES: Effective date: January 1, 2015.

FOR FURTHER INFORMATION CONTACT:

Daniel J. Sullivan, Deputy Director, Office of Multifamily Development, Department of Housing and Urban Development, 451 Seventh Street SW., Washington, DC 20410-8000, telephone (202) 402-6130 (this is not a toll-free number). Hearing or speech-impaired individuals may access this number through TTY by calling the toll-free Federal Information Relay Service at (800) 877-8339.

SUPPLEMENTARY INFORMATION: The FHA Down Payment Simplification Act of 2002 (Pub. L. 107-326, approved December 4, 2002) amended the National Housing Act by adding a new Section 206A (12 U.S.C. 1712a). Under Section 206A, the following are affected:

I. Section 207(c)(3)(A) (12 U.S.C. 1713(c)(3)(A));

II. Section 213(b)(2)(A) (12 U.S.C. 1715e(b)(2)(A));

III. Section 220(d)(3)(B)(iii)(I) (12 U.S.C. 1715k(d)(3)(B)(iii)(I));

IV. Section 221(d)(4)(ii)(I) (12 U.S.C. 1715l(d)(4)(ii)(I));

V. Section 231(c)(2)(A) (12 U.S.C. 1715v(c)(2)(A)); and

VI. Section 234(e)(3)(A) (12 U.S.C. 1715y(e)(3)(A)).

The Dollar Amounts in these sections are the base per unit statutory limits for FHA's multifamily mortgage programs collectively referred to as the 'Dollar Amounts,' they are adjusted annually (commencing in 2004) on the effective date of the Consumer Financial Protection Bureau's adjustment of the \$400 figure in the Home Ownership and Equity Protection Act of 1994 (HOEPA) (Pub. L. 103-325, approved September 23, 1994). The adjustment of the Dollar Amounts shall be calculated using the percentage change in the Consumer Price Index for All Urban Consumers (CPI-U) as applied by the Bureau of Consumer Financial Protection for purposes of the above-described HOEPA adjustment.

HUD has been notified of the percentage change in the CPI-U used for the HOEPA adjustment and the effective date of the HOEPA adjustment. The percentage change in the CPI-U is 2.0% and the effective date of the HOEPA adjustment is January 1, 2014. The Dollar Amounts have been adjusted correspondingly and have an effective date of January 1, 2015.

The adjusted Dollar Amounts for Calendar Year 2015 are shown below:

BASIC STATUTORY MORTGAGE LIMITS FOR CALENDAR YEAR 2015*Multifamily Loan Program*

b Section 207—Multifamily Housing

b Section 207 pursuant to Section 223(f)—Purchase or Refinance Housing

b Section 220—Housing in Urban Renewal Areas

Bedrooms	Non-Elevator	Elevator
0	\$50,164	\$57,886
1	\$55,569	\$64,832
2	\$66,376	\$79,497
3	\$81,813	\$99,566
4+	\$92,622	\$112,581

bb Section 213—Cooperatives

Bedrooms	Non-Elevator	Elevator
0	\$54,364	\$57,886
1	\$62,683	\$65,583
2	\$75,598	\$79,749
3	\$96,766	\$103,170
4+	\$107,803	\$113,251

bb Section 234—Condominium Housing

Bedrooms	Non-Elevator	Elevator
0	\$55,474	\$58,378
1	\$63,962	\$66,923
2	\$77,140	\$81,377
3	\$98,742	\$105,276
4+	\$110,002	\$115,560

bb Section 221(d)(4)—Moderate Income Housing

Bedrooms	Non-Elevator	Elevator
0	\$49,924	\$53,928
1	\$56,671	\$61,822
2	\$68,501	\$75,176
3	\$85,980	\$97,251
4+	\$97,156	\$106,754

bb Section 231—Housing for the Elderly

Bedrooms	Non-Elevator	Elevator
0	\$47,465	\$53,928
1	\$53,062	\$61,822
2	\$63,364	\$75,176
3	\$76,255	\$97,251
4+	\$89,650	\$106,754

bb Section 207—Manufactured Home Parks per Space—\$23,030

Dated: November 9, 2015.

Edward L. Golding,

Principal Deputy Assistant Secretary for Housing.

[FR Doc. 2015-29469 Filed 11-17-15; 8:45 am]

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DEPARTMENT OF THE INTERIOR**Fish and Wildlife Service**

[FWS-R8-FHC-2015-N217:
FXFR1334088TWG0W4-123-FF08EACT00]

Trinity River Adaptive Management Working Group; Public Meeting

AGENCY: Fish and Wildlife Service, Interior.

ACTION: Notice.

SUMMARY: We, the U.S. Fish and Wildlife Service, announce a public meeting of the Trinity River Adaptive Management Working Group (TAMWG). The TAMWG is a Federal advisory committee that affords stakeholders the opportunity to give policy, management, and technical input concerning Trinity River (California) restoration efforts to the Trinity Management Council (TMC). The TMC interprets and recommends policy, coordinates and reviews management actions, and provides organizational budget oversight.

DATES: *Public meeting:* TAMWG will meet from 9:30 a.m. to 4:30 p.m. Pacific Time on Thursday, December 10, 2015.

Deadlines: For deadlines on submitting written material, please see "Public Input" under **SUPPLEMENTARY INFORMATION**.

ADDRESSES: The meeting will be held at the Trinity River Restoration Program Office, 1313 South Main Street, Weaverville, CA 96093.

FOR FURTHER INFORMATION CONTACT:

Joseph C. Polos, by mail at U.S. Fish and Wildlife Service, 1655 Heindon Road, Arcata, CA 95521; by telephone at 707-822-7201 or by email at joe_polos@fws.gov or Elizabeth W. Hadley, Redding Electric Utility, by mail at 777 Cypress Avenue, Redding, CA 96001; by telephone at 530-339-7308 or by email at ehadley@reupower.com. Individuals with a disability may request an accommodation by sending an email to either point of contact.

SUPPLEMENTARY INFORMATION: In accordance with the requirements of the Federal Advisory Committee Act, 5 U.S.C. App., we announce that the Trinity River Adaptive Management Working Group will hold a meeting.

Background

The TAMWG affords stakeholders the opportunity to give policy, management, and technical input concerning Trinity River (California) restoration efforts to the TMC. The TMC interprets and recommends policy, coordinates and reviews management actions, and provides organizational budget oversight.

FHA MULTIFAMILY STATUTORY MORTGAGE PROGRAMS
BASE CITY HIGH COST PERCENTAGES

Effective January 1, 2015

<u>Boston MA Hub</u>	270%
Hartford CT	270%
Bangor ME	270%
Manchester NH	270%
Providence RI	270%
Burlington VT	270%

<u>New York NY Hub</u>	270%
Buffalo NY	270%
Albany NY	270%

<u>Philadelphia PA Hub</u>	270%
Charlestown WV	270%
Camden NJ	270%
Newark NJ	270%
Pittsburg PA	270%
Wilmington DE	270%

<u>Baltimore MD Hub</u>	270%
Washington DC	270%
Richmond VA	265%

<u>Greensboro NC Hub</u>	239%
Columbia SC	244%

<u>Atlanta GA Hub</u>	258%
Louisville KY	245%
Knoxville TN	227%
Memphis TN	219%
Nashville TN	223%
San Juan PR	270%
US Virgin Isl. (spec limit)	405%

<u>Jacksonville FL Hub</u>	250%
Birmingham AL	221%
Jackson MS	217%
Miami FL	256%
Tampa FL	268%

<u>Chicago IL Hub</u>	270%
Springfield IL	270%
Indianapolis IN	251%

<u>Columbus OH Hub</u>	256%
Cleveland OH	270%
Cincinnati OH	245%

<u>Detroit MI Hub</u>	270%
Grand Rapids MI	246%

<u>Minneapolis MN Hub</u>	270%
Milwaukee WI	270%

<u>Fort Worth TX Hub</u>	217%
Little Rock AR	217%
New Orleans LA	221%
Shreveport LA	216%
Albuquerque NM	247%
Dallas TX	217%
Houston TX	213%
Lubbock TX	209%
San Antonio TX	193%

<u>Kansas City MO Hub</u>	270%
Des Moines IA	217%
Topeka KS	238%
St. Louis MO	270%
Omaha NE	228%
Oklahoma City OK	230%
Tulsa OK	226%

<u>Denver CO Hub</u>	270%
Helena MT	251%
Fargo ND	248%
Sioux Falls SD	234%
Salt Lake City UT	266%
Casper WY	261%

<u>Los Angeles CA Hub</u>	270%
Santa Ana CA (LA)	270%
San Diego CA	270%

<u>San Francisco CA Hub</u>	270%
Phoenix AZ	254%
Sacramento CA	270%
Honolulu HI (spec limit)	405%
Las Vegas NV	270%

<u>Seattle WA Hub</u>	270%
Anchorage AK (spec limit)	405%
Boise ID	270%
Portland OR	270%
Spokane WA	270%