

## Appendix B: Public Engagement Record

The State of Montana solicited public comment by announcing a public comment period and holding a public hearing for the 2021-2022 Annual Action Plan (AAP). Every comment received in writing and provided verbally at the hearing was considered. All comments received and the State's responses are outlined below. An official transcript of the public hearing as well as documentation showing outreach completed (tear sheets and affidavits of publication for print advertisements and proof of electronic announcement) are also attached.

### Comments Received and Responses Thereto

*Andrew Chanania, Principal, North Fork Development*

#### Comment #1:

This is Andrew Chanania, and I represent North Fork Development. First, I just want to say thank you to all of the staff who have had quite a year in putting all of this together, and many other things. You do so much for the State, and I cannot thank you enough for all of that. I also just want to indicate that I certainly support especially the changes to the rehab standards that are proposed to be part of the 2021-2022 AAP. I think that those will definitely make it easier to administer the HTF funds as we look at all of the various requirements that we have for various funding sources, building officials and others. So definitely thank you for that. With regard to the 2019-2020 Amendment, certainly there are lots of specific rules that aren't typical, that we don't typically see because of the nature of this. I would like to just put out there and encourage Commerce to think about housing as certainly a critical component of meeting needs in general in Montana, and I would say on par with public infrastructure and economic development and homelessness. So I would encourage the State to think about allocating funding equally to housing as it does public infrastructure. And then thinking about the homelessness. I think keeping that level of investment where it is appropriate, especially in light of the HOME ARP funds that we expect to come out here hopefully later this year. One more consideration for the 2019-2020 AAP is allowing a single local government to have more than one open CDBG CARES application at a time, seeing as local governments and everybody else is facing just a myriad of challenges. I think for CDBG CARES funds, lifting that limitation of one grant per local government would best help Montanans meet our needs. With regard to the 2021-2022 AAP, a couple of comments, thinking about funding allocations; again, encouraging the State to think of housing on par as far as priority with public infrastructure, and balancing that investment a little bit more equally. One item also, thinking about upcoming grant applications and funding rounds, a lot of fantastic projects were funded last year, and due to circumstances beyond our control, practitioners are facing -- many are facing some significant budget shortfalls, given the costs of some materials and labor just going through the roof. I would encourage the State to consider prioritizing last, credits that were awarded last year, making sure that those projects are whole and able to move forward in a successful manner, perhaps with a truncated and expedited application and award process. A lot of projects would be ready to go this summer or this fall but for some of these budget shortfalls that certainly were not predictable. And one more item I guess is to consider communication and collaboration with the Montana housing folks who are in charge of the significant rewrite of the Qualified Allocation Plan for low income housing tax credits. They are certainly undergoing a significant effort, and I would encourage folks who are in charge of the CDBG, HTF, and HOME funds, to openly and often communicate with the tax credit folks over there, just to help facilitate successful projects, and all of the various competing requirements. One more item,

thinking about the CDBG funds in particular for 2021-2022 AAP, I would encourage the State to lift the \$450,000 per project cap, like HOME did several years ago. We certainly, I think as part of that as a result of that, saw an increased use in HOME funds, and a more effective series of projects that were able to meet housing needs, and I guess additionally more investment in housing with the regular CDBG funds. And so those are the comments that I have. I will also be submitting written comments. I appreciate everybody's time and all your efforts. Thank you so much.

Response to Comment #1:

Regarding allocations under the 2021-2022 AAP, the State of Montana strives to balance program flexibility with administrative considerations. If additional program flexibilities are needed and are not provided for in the State's Consolidated Plan and Annual Action Plans (AAPs), Montana will consider amendments as needed. Some flexibility for funding allocations is already provided for in existing planning documents. Under CDBG, HOME, and HTF, the Director of Commerce is authorized to reallocate up to 15% of each program's planned total allocation among grant categories. A reallocation of more than 15% of a program's total allocation or the creation or elimination of a grant category within a program would necessitate an amendment to the applicable AAP and may require an amendment to the corresponding Consolidated Plan as well. Commerce is considering increasing this 15% reallocation cap to provide CDBG, HOME, and HTF with more flexibility to respond to the applications received among each program; this adjustment would occur this fall. In the interim, Montana encourages prospective and current grantees to communicate both community and project-specific needs as they arise.

Regarding prioritizing existing projects that have experienced budget shortfalls, the State of Montana is actively assessing options for supporting existing projects that are facing budget shortfalls and other challenges resulting from the COVID-19 pandemic. Grantees with concerns related to funded projects should work with their program specialists and Commerce leadership directly to ensure continued project feasibility. Additionally, grantees are encouraged to review application guidelines for upcoming application cycles for further direction.

Regarding the Qualified Action Plan (QAP), Commerce staff have been actively participating in the work to rewrite Montana Housing's QAP, and they will continue to be involved in the future.

Regarding the \$450,000 cap for CDBG, for the 2021-2022 plan year, Commerce intends to increase the award amount for CDBG Public and Community Facilities and CDBG Affordable Housing Development and Rehabilitation. Further information on the maximum award amount will soon be available in the applications and guidelines on the CDBG website: <https://comdev.mt.gov/Programs-and-Boards/Community-Development-Block-Grant-Program/>.

Please see the public comments and agency responses for the 2019-2020 AAP for information regarding CDBG CARES.

*Heather McMilin, Project Development Director, Homeword*

Comment #2:

This is Heather McMilin with Homeword. I'm assuming you guys can hear me all right. Excellent. I just hit the unmute indication four times. I didn't know if I was turning things on and off. So thank you. Again, Heather McMilin with Homeword, and I want to echo a lot of what Andrew testified to. There's been

nothing simple about the last 16 months, and all the work that you all have done and we have done on our end to implement projects, and so thank you for coming to the point we are today, and working with us, and taking testimony, and basically surviving the last year. One of the things I'd also like to echo is considering housing infrastructure with any of these funds. The even distribution to housing across the board with infrastructure is important, but also considering, if you are allocating to jurisdictions for infrastructure expansion, that certainly helps promote housing development. And maybe there's a way to give priority points for infrastructure projects that are helping to promote the construction, and preservation, and rehabilitation of housing as infrastructure, because we certainly have always had an issue, and there's been a need, but I would say over the last year we've had more impacts and will have decades worth of impacts from the COVID, people moving here, and buying our housing stock, and driving up prices. And so any way we can support proper infrastructure development and housing development, whether it be market rate or affordably bound would be great. Specifically we thank -- We are working on projects that have been funded by some of the funds discussed today, and for funds moving forward. So an area of need, I think, and very specifically with the Housing Trust Fund, one thing may be not allowed currently but we should consider allowing, is the Housing Trust Funds to be used for operational support. And I say that because in a project in the nature of permanent supportive housing, we have one, a project we're constructing now, and hope to close the financing package here in Missoula. We are also working with NeighborWorks Montana in Great Falls in a permanent supportive housing project serve the chronically homeless with wrap around services. The one that is critical on both those projects is setting up a service reserve within the project to ensure those wrap around services that are so critical for those types of projects, have a back stop with a loan and tax credit investor. We have to have all the risks taken care of. And these projects operate, they're just more expensive to operate because of those services, and having that reserve, being able to back stop operations will be critical. So if we could open up any and all funding sources, not just the Housing Trust Fund, but CDBG and HOME, and these COVID assistance dollars coming in, to allow the maximum. I don't have all of the rules on the federal funds, but as soon as they come out, we keep them as flexible as possible, and at the federal level of kind of the rules, so that we can get creative and fund projects like the NeighborWorks Great Falls project in Great Falls, and other needs around the communities in Montana, because I just don't know what we don't know yet. And so maximum flexibility within those funding sources would be good. I do support also multiple applications for different jurisdictions. There's definitely different needs in communities, and having multiple applications open would help us, especially with the amount of funds coming in that are above normal, and getting those allocated in the projects right away would be important. I also echo the participating with Montana Housing in their very much needed rewrite of the QAP in the process we're going through this year on that, and pairing these funds with the loan for housing tax credits, in the variety of projects that could be funded by that program. If we're all in concert together, we can simply get more done, and meet more need. The other piece would be around the cost. We've all, as we've developed and tried to put homes over people's heads, roofs over people's heads, we have survived cost impacts and timing impacts that are also cost impacts to projects at an unprecedented level. We're facing tax credit pricing that's worse than it was when the IRS basically bought the credits back and paid the states their credits to be sold for equity. They were just paid and used as funds during that 2008-2009. Really just talking to developers as a way to do a truncated kind of correction or addition to contracts, anything. Just consider having those conversations. We're all very creative, and we have survived the projects, at least we're trying to at this point, but anyway we can be creative to help support these one time various impacts that we've seen due to the global pandemic would be helpful. I think pretty much that's all I have for today. Thank you, Andrew, for setting the stage for at length testimony.

Response to Comment #2:

As mentioned above, some flexibility for reallocating funds across CDBG, HOME, and HTF grant categories is already provided for in existing planning documents. Under CDBG, HOME, and HTF, the Director of Commerce is authorized to reallocate up to 15% of each program's planned total allocation among grant categories. Commerce is considering increasing this 15% reallocation cap this fall. The State of Montana strives to balance program flexibility with administrative considerations. If additional program flexibilities are needed and are not provided for in the Consolidated Plan and Annual Action Plans (AAPs), Montana will consider amendments as needed.

Regarding using HTF for operations support, no state is currently using HTF for operations support. States are permitted to use up to one-third of each annual allocation from HUD for operating cost assistance and operating cost assistance reserves. This use is only allowed in properties that do not have project-based rental assistance and only for the proportion of HTF-assisted units in the property, i.e. if there are 5 HTF-assisted units in a 20 unit property, HTF could only support 25% of the operating costs. Operating costs include costs for insurance, utilities, real property taxes, and maintenance and scheduled payments to replacement reserves for major systems. Operating cost assistance reserves may only be for a period not to exceed 5 years. Montana's small allocation of HTF, the limitations of operating cost assistance, and the demand to add to or retain the affordable housing stock has informed Commerce's decision to allocate its HTF to construction or rehabilitation of rental housing.

Please see the 2019-2020 AAP for further information on the public comments and agency responses regarding CDBG CARES.

*Sindie Kennedy, Grants Administrator, Missoula County*

Comment #3:

Hi, this is Sindie Kennedy... with Missoula County. I, too, would like to echo what has already been said, and express my gratitude for all of the work that Commerce has done to make this all happen. It has been a challenging year for all of us. I also want to reinforce some of the things that have been said. Definitely would really appreciate an open CDBG application process, so it's similar to HOME, so that we're not tied down to a deadline. Projects just kind of land in our laps throughout the entire year, and we've had to say no to many that were really good eligible projects because, one, we already had an application or project underway; and two, the timing wasn't right. So that would be really beneficial. Being able to increase the amount of award above \$450,000 would also be very beneficial; and balancing the housing with public infrastructure would be helpful. And I will be providing some written comments as well. Thank you.

Response to Comment #3:

Regarding an open CDBG application process, CDBG Economic Development and CDBG Housing (specifically, single-family housing rehabilitation activities) currently use an open application process, and eligible applicants may apply on a rolling basis. However, applications for CDBG Housing (specifically, affordable housing development and rehabilitation) and CDBG Public and Community Facilities are due once a year in the fall, and applications for CDBG Planning are due twice a year. Because applications for these CDBG programs tend to outpace the funds available, having a set deadline ensures that all applicants have access to these CDBG funds.

As mentioned above, for the 2021-2022 plan year, Commerce intends to increase the award amount for CDBG Public and Community Facilities and CDBG Affordable Housing Development and Rehabilitation. Further information on the maximum award amount will soon be available in the applications and guidelines on the CDBG website: <https://comdev.mt.gov/Programs-and-Boards/Community-Development-Block-Grant-Program/>.

As mentioned above, some flexibility for reallocating funds across CDBG, HOME, and HTF grant categories is already provided for in existing planning documents. Under CDBG, HOME, and HTF, the Director of Commerce is authorized to reallocate up to 15% of each program's planned total allocation among grant categories. Commerce is considering increasing this 15% reallocation cap this fall. The State of Montana strives to balance program flexibility with administrative considerations. If additional program flexibilities are needed and are not provided for in the Consolidated Plan and Annual Action Plans (AAPs), Montana will consider amendments as needed.

Please see the 2019-2020 AAP for further information on the public comments and agency responses regarding CDBG CARES.

*Jim Morton, Executive Director, District XI Human Resource Council*

Comment #4:

Good morning. So, I want to echo what others have said in terms of appreciation for all the work that staff has put into the documents we have before us. Just quickly, I wanted to support allowing applications, more than one application from a local government for CDBG. As it has been said, it's been a tough two years. Also, with support of allowing the services component of CDBG to include multiple applications from jurisdictions. I think the entitlement cities, and entitlement areas, and the code is reasonable. So, by allowing multiple applications, both for services and for CDBG, should not disadvantage the non-entitlement areas. And I just echo what both Heather and Andrew have said in terms of the housing component being much in need of consideration, in terms of coordination with other services and expanded amounts allocated. And we will provide from Human Resource Council written comments.

Response to Comment #4:

As mentioned above, some flexibility for reallocating funds across CDBG, HOME, and HTF grant categories is already provided for in existing planning documents. Under CDBG, HOME, and HTF, the Director of Commerce is authorized to reallocate up to 15% of each program's planned total allocation among grant categories. Commerce is considering increasing this 15% reallocation cap this fall. The State of Montana strives to balance program flexibility with administrative considerations. If additional program flexibilities are needed and are not provided for in the Consolidated Plan and Annual Action Plans (AAPs), Montana will consider amendments as needed.

Please see the 2019-2020 AAP for further information on the public comments and agency responses regarding CDBG CARES.

*Sherrie Arey, Executive Director, NeighborWorks Great Falls*

Comment #5:

This is Sherrie Arey from NeighborWorks, Great Falls. I'm going to just hit on a few topics that have already been hit on, just to double down on them. The multiple applications allowed for the local governments is critical to the success for those. The Housing Trust Fund dollars being allowed to use for operational support. In order to use all of the tools in our tool box to help with the homelessness issue, that could become a make or break for a project, and so strongly advocate for that. And as Heather McMilin said, housing is infrastructure. The more ability to tie those two things together and help with the infrastructure needs in our community is essential to being able to provide affordable housing. Thank you all for everything that you do, and all the information you provided, and best of luck. Thank you.

Response to Comment #5:

As mentioned above, no state is currently using HTF for operations support, and there are parameters instituted by HUD on using HTF for operations support. The small size of Montana's HTF allocation, the limitations of operating cost assistance, and the demand to add to or retain the affordable housing stock has informed Commerce's decision to allocate its HTF to construction or rehabilitation of rental housing.

As mentioned above, some flexibility for reallocating funds across CDBG, HOME, and HTF grant categories is already provided for in existing planning documents. Under CDBG, HOME, and HTF, the Director of Commerce is authorized to reallocate up to 15% of each program's planned total allocation among grant categories. Commerce is considering increasing this 15% reallocation cap this fall. The State of Montana strives to balance program flexibility with administrative considerations. If additional program flexibilities are needed and are not provided for in the Consolidated Plan and Annual Action Plans (AAPs), Montana will consider amendments as needed.

Please see the 2019-2020 AAP for further information on the public comments and agency responses regarding CDBG CARES.

*Shyla Patera, IL Specialist, North Central Independent Living Services and Montana Community Living Task Force*

Comment #6:

Good morning, MBOH and Community Development Division staff. For the record, my name is Shyla Patera with North Central Independent Living Services in Black Eagle, and the Montana Community Living Task Force. I'm really happy to participate in this hearing today, and I am really supportive of Montana's QAP efforts are moving forward, and looking at the different funding sources, such as the Housing Trust Fund and different things being utilized for operation and different points, different points of work, as some of the developers and other housers have talked about. Some of the things that again, NCILS and the Independent Living Community for Montanans with Disabilities espouse is making sure that we have accessible access to both services in sidewalk and infrastructure, but also in Home and Housing Trust Fund. Some of the things that have impacted us through COVID are making sure that we also can house our homeless, and some of the things that I've thought of are looking at like accessible tiny homes -- one in particular is based out of Emmett, Idaho that I've been beginning to research -- and hopefully will look at our zoning opportunities, both for single family and multi-family, and different things as well. Just making sure that our people with disabilities have access to HOME, Mainstream, and 811 if needed, and working with HUD and others to make sure that people with disabilities aren't moving from one house to another, but making sure that they have stable opportunities that deal with

their funding sources that they are using. I'd also like to encourage some funding for accessible rehabbing of housing. We encourage, of course, visible and accessible new construction, and the universal design options, but a lot of calls that we get are also, "How do I rehab my house to make it so that I can age in place?" "How do I, as a long term homeowner, get to stay in our community as well, and with my house that I already are owning, or paying on, or working with?" And that's a big thing. And infrastructure, we also encourage communities to work on accessible pathways, pedestrian crosses, contiguous sidewalks, timing of things, development of accessible pathways for walking, rolling, parking, biking, anything a person with a disability needs. And I will be submitting written comments to follow my disjointed verbal ones. Everyone have a great day. Thank you for all your hard work.

#### Response to Comment #6:

Commerce, through its housing and community development programs, gives preference to applications that benefit extremely low-income, homeless, disabled, elderly, and other disadvantaged individuals and families in accordance with its Consolidated Plan. Under these programs, housing development can result in either single family or multifamily activities and may include new construction, redevelopment, or rehabilitation. Commerce strongly encourages all applicants (regardless of program or activity), to the maximum extent possible, to incorporate both accessibility and visitability features into their projects. (The three basic visitability features that increase access to friends and family with disabilities include a zero-step entrance, doors with 32 inches of clear passage space, and a wheelchair-accessible half bathroom on the main floor). Whether a project serves disabled persons and meets accessibility, visitability, and universal design requirements is considered during application ranking, which is Commerce's process for prioritizing and funding projects. HOME can be used to fund the development of newly constructed homes that are accessible and visitable while CDBG can be used to fund the rehabilitation of existing homes for accessibility and visitability.

Please see the 2019-2020 AAP for further information on the public comments and agency responses regarding CDBG CARES.

*Heather McMilin, Project Development Director, Homeword*

#### Comment #7:

Thank you. I will amend my previous testimony. Again, Heather McMilin, Homeword, Missoula, Montana. I would be remiss if I did not comment, and appropriate or not. If there's any way this department and the individuals on this call can support the work that will go into the next round of the state housing credit work at the legislative level. It's something that made it off the floor and to the Governor's desk, and unfortunately was not signed. And that would help, probably double the production of homes, rehabilitations, preservation, within the state. And so I wanted to go on the record to say if there's a way to support or participate, let us know. That would be great. Thanks.

#### Response to Comment #7:

Commerce's role in the legislative session is primarily as an informational witness, lending subject matter expertise on proposed legislation. Montana Housing with the Department of Commerce has historically served in this information role on proposed state / workforce housing tax credit bills (SB 18 during the 66<sup>th</sup> legislative session and HB 397 during the 67<sup>th</sup> legislative session). This role includes preparing fiscal notes upon request, serving as an information witness during bill hearings and responding to questions on proposed legislation from elected offices, the legislative fiscal division, budget office and Governor's office.

*Shyla Patera, IL Specialist, North Central Independent Living Services and Montana Community Living Task Force*

Comment #8:

My name is Shyla Patera. I am writing this comment in regards to the 2021-2022 State of Montana Annual Action Plan as well as Consolidated Plan that is to be submitted to HUD shortly. I'll submit these comments on behalf of North Central Independent Living Services Inc. I will submit both long-term goals and short term needs.

During the COVID-19 stay at home crisis or period, I heard from a lot of people that needed food delivered and equipment for wheelchairs and other types of durable medical equipment. I particularly found the farm the food box helpful in my own situation. I appreciate that EBT is taken by many farmers markets throughout Montana to purchase food. An idea as a short term solution for coronavirus ARPA funds is to maybe consider assistance to communities a restaurant collective similar to the little free pantries being considered now in Great Falls. This idea would involve local restaurants delivering meals in a food box if individuals or families needed and are or food boxes through local churches or nonprofits.

Another issue is housing Montana's homeless population. Many of us had talked about tiny homes and how to make them wheelchair or mobility accessible! Gateway, ZYL Vardos, and Med Cottage, (Pennsylvania) and Tinydahomes (Emmett, Idaho) FabCab (Seattle). Zoning may be an issue in Great Falls and throughout Montana as it has been for other community issues but I thought I'd bring the short term issues and ideas to the local discussion!

Now, for the longer-term ideas that NCILS and others have been discussing over a frequent period of time. The first is we need more visitable, affordable, universally designed housing in Montana. This may take many discussions with community developers and city staff as well as advocates from Montana's Disability and Senior Communities. NCILS hopes that Montana housing will work with DPHHS to effectively monitor and implement strategies for diverging disabled Montanans from homelessness. This can include and should include implementation of money falls the person as well as unique homeless strategies and interventions. It is hope that hood welll increase national and federal funding for Housing that it vouchers that can be used to assist Montanans with disabilities afford, maintain, and sustain accessible universally designed housing. Montana needs To support and fund I amto support and fund I am disabled homeownership opportunities in Montana this can include working with community developers, project designers, and others to codify visitable universal design opportunities! It may and is potentially time for Montana to explore once again using HOME vouchers to promote homeownership opportunities for people with disabilities. Montana must also work with those who are not traditional funders or lenders to explore opportunities for those Montanans who are traditionally non banked and underfunded.

Montana needs also to ensure that those who are living with disabilities in homeless shelters are congregate settings have appropriate supports to do so. NCILS hopes that Montana will encourage those who assist our homeless populations and homeless citizens will have access to Medicaid services and supports if needed and wanted! Montana definitely needs to maintain and upgrade both our youth housing services as well as our homeless substance abuse utilization opportunities!

I am also advocating for ADA accessible funding for housing rehabilitation and community sidewalks as well as curb ramps at the same time! I believe that we need to study pedestrian and traffic safety and measure how beneficial the current traffic timing and crosswalk systems are to those who use mobility devices and our pedestrians in Montana! Does each community have in their repertoire of plans and ADA transition plan?

I would also hope that employment and accessibility for citizens of Montana include competitive integrated employment options I am hopeful that Montana Housing leaders will sit down with employers, Social Security benefits planners and advocates for hiring and accommodating people with disabilities. I am hopeful that with Montana Housing and Community Development Division assistance, our state can truly take a holistic approach to many of our housing, transportation, and employment needs

On policies and procedures, particularly as it involves potential eviction proceedings regarding the eligibility and keeping of HUD vouchers for our city residents who utilize them, I am advocating for Montana housing leaders as well as Montana Housing staff to meet through Zoom with landlords, tenants and advocates to discuss short term and long term state eviction protections if the federal eviction moratorium is lifted or modified. Why are Montana Housing and Montana communities not applying for ARPA vouchers, utilizing main stream vouchers for people with disabilities and other potential funding streams to construct visitable universal designed housing or rehabilitation modification or working to prevent Montana evictions?

Sometime ago, NCILS had submitted comments to regarding fair housing and custodial arrangements in rental units. Staff has also submitted comments regarding the loss of section 8 vouchers and eviction processes due to medical circumstances. NCILS would encourage and examination of the disparate impacts of HUD housing policy in many areas especially fair housing appeals!

Thank you for your time and consideration of these short term and longtime Consolidated and Annual Action Plan amendment asks of myself and North Central Independent Living Services, Inc.

#### Response to Comment #8:

As mentioned above, Commerce, through its housing and community development programs, gives preference to applications that benefit extremely low-income, homeless, disabled, elderly, and other disadvantaged individuals and families in accordance with its Consolidated Plan. Commerce strongly encourages all applicants (regardless of program or activity), to the maximum extent possible, to incorporate both accessibility and visitability features into their projects. Whether a project serves disabled persons and meets accessibility, visitability, and universal design requirements is considered during application ranking, which is Commerce's process for prioritizing and funding projects. HOME can be used to fund the development of newly constructed homes that are accessible and visitable while CDBG can be used to fund the rehabilitation of existing homes for accessibility and visitability.

Commerce, Montana Housing, is partnering with the Montana Legal Services Association to form the Montana Eviction Intervention Project to provide civil legal assistance for Montanans facing evictions as a result of the COVID-19 pandemic. As noted in a recent Associated Press article (<https://www.usnews.com/news/best-states/montana/articles/2021-06-25/explainer-how-montana-will-use-funds-to-limit-evictions>) "Beginning last October, the state created the Montana Eviction Intervention Project, in partnership with the Montana Legal Services Association, to provide legal help to low-income renters facing eviction. Since then, attorneys have helped with 264 evictions statewide,

helping 608 clients and their family members... No clients assisted under the Montana Eviction Intervention Project have moved to a shelter or became homeless, the Montana Legal Services Association said.”

Please see the 2019-2020 AAP for further information on the public comments and agency responses regarding CDBG CARES.

*Andrew Chanania, Principal, North Fork Development*

Comment #9:

2021-2022 AAP Comments

1. Leverage Other Resources, Page 31

The AAP states, “The HOME Program requires 5% match funding for projects. Local match sources include local costs of infrastructure installation to serve HOME-assisted units, proceeds from bond financing, private grants, deferred or waived state or local taxes or fees, cash, and the value of donated land.” This list of eligible sources of HOME match does not specifically include certain eligible sources found in 24 CFR § 92.220, which is referenced in a footnote in the AAP. Allowing developers and grantees as much flexibility as possible makes the administration of HOME funds simpler and the projects more effective; accepting all forms of match included in the federal regulations gives practitioners more tools to successfully deploy HOME funds and realize successful projects.

2. Annual Goals and Objectives, Page 31, et. seq.

Table 6, Table 7, and other places specify the amount of CDBG funds allocated to finance eligible activities. In practice, the importance of preserving and constructing new affordable housing is equal to infrastructure as Montana moves to recover from the myriad impacts of COVID-19 and as we move forward once we have recovered. Without sufficient quantities of affordable housing, jobs will remain unfilled and would-be employees will be unable to enter or reenter the workforce. This is particularly true in the historically low-paying sectors of the labor market that have been hit the hardest: hospitality, tourism, and similar sectors of our economy. The CDBG program should recognize housing on par with infrastructure as one of the primary necessary recover and prosper. Allocating resources equally between the goal to Preserve and Construct Affordable Housing, Improve and Sustain Public Infrastructure, and Revitalize Local Economies is the most effective use of this resource. The Lewis and Clark County Public Health recently conducted a survey in preparation for the forthcoming Community Health Assessment report, which included the following question about housing. “What 3 items that you believe are most important for a healthy community?” (Community defined as Lewis and Clark County. Respondents indicated affordable housing is of significant concern, as 32% said access to affordable housing is of greatest importance. Access to healthcare services 49%; Good jobs and a healthy economy 47%; Access to affordable housing 32% (Data Source: COVID-19 Post Vaccination Survey (N=2,106), March-June, 2021. Lewis and Clark Public Health, Montana. Community defined as Lewis and Clark County). The funding allocation priorities percentages (Table 7 – Funding Allocation Priorities in the 2021-2022 AAP) organized as follows would best meet Montana’s needs.

Goal					
	Preserve and Construct	Plan for Communities	Improve and Sustain Vital	Revitalize Local Economies	Reduce Homelessness

	Affordable Housing		Public Infrastructure		
CDBG	27%	7%	27%	27%	7%

3. Annual Goals and Objectives, Page 31 et. seq., Allocation Priorities, Page 33 et. seq., and Methods of Distribution, Page 35 et. seq.

Through its annual competitive allocation process in 2020, the State awarded CDBG, HTF, and HOME funds to many worthy projects under the 2020-2021 Annual Action Plan. As we are all aware, much has changed since competitive applications were submitted in September 2020. Practitioners use expert third parties, existing market conditions, and historical trends to develop timelines and budgets for our projects. When the budgets for the 2020 application cycle were put together a year ago, no one could foresee the tremendous cost increase in labor basic building components, and in some cases the simple inability to acquire some of them due to supply chain issues. This has created significant gaps in project budgets that, in some cases, cannot be cured by re-designing the project or value engineering. For example, as captured in the chart showing lumber futures contract prices on the following page, in April and May 2020 (when last year’s project budgets were being put together), lumber’s price in the commodities market was around \$370. On May 7, 2021 lumber’s price hit a high of \$1,686 and it has since fallen to \$905 as of June 17, 2021. There is no telling where the price of lumber, OSB, and other basic goods needed to complete these projects will go from here. However, it is unrealistic to assume a return to last year’s prices and even though prices for commodity futures contracts have reduced, and furthermore, the price reductions seen in futures markets are still not being seen at the project level as of July 5, 2021. We are seeing neighboring states take proactive measures and double down on funding decisions they made last year by shifting resources to ensure those projects are made whole and have the ability to deal with these new challenges and shifting market conditions. As partners we all are invested in successful outcomes and these projects are in need of continued support, without which some of these projects may not be able to deliver the promised public benefits. Many of last year’s projects are (or will be this summer) ready to break ground but for the sudden increase in prices and budget shortfalls. To address budget shortfalls in projects awarded last year due to these unique, COVID-19-caused market conditions, Montana should consider prioritizing CDBG, HOME and HTF funds for projects awarded 2020 so these projects can be made whole and achieve successful completion. A truncated application, review, and award process outside the standard process for projects funded in 2020 would be most advantageous and ensure projects with existing financial commitments are successful. Secondly, with regard to the Preservation and Construction of Affordable Housing goal, CDBG, HOME, and HTF are most effective when used as gap financing for larger multifamily housing developments primarily funded with Low Income Housing Tax Credits (LIHTC) allocated by the Montana Board of Housing. Prioritizing CDBG, HOME, and HTF funds as gap financing for these larger multifamily projects will increase the return on these programs’ investments and the sheer volume of housing that is preserved and newly constructed. The LIHTC program is currently undertaking a significant review and overhaul of the application and award process outlined in the Qualified Action Plan. As this rewrite moves forward, open communication and collaboration between the LIHTC and HUD-funded programs will streamline administrative processes and more effectively address Montana’s growing need for affordable housing.

4. Distribution Methods - Page 38 CDBG Affordable Housing Development and Rehabilitation

The 2019-2020 AAP Amendment adding CDBG-CARES authority recognizes the fact that a project’s demonstrated need should govern the amount of funds invested in any given project rather than an arbitrary grant ceiling. We are experiencing a climate of economic uncertainties and increasing prices for basic supplies and labor. Limiting the size of the grant to the same amount it has been for more than a

decade (regardless of a project's demonstrated need and today's circumstances) undermines our ability to deliver successful projects and respond to growing need for quality, affordable housing. More often than not, a maximum of \$450,000 does not cover the increased project costs and workload complications affordable multifamily housing projects grapple with when using CDBG Housing funds. Several years ago, the State's per project limit on HOME funds was lifted and the result was an increased use of that resource and an increase in the production & preservation of affordable housing available for Montanans. Furthermore, in a time with spiking materials and labor costs, financing gaps CDBG could fill have grown and I encourage the State to give practitioners the tools necessary to fill those gaps. Lifting the CDBG Affordable Housing Development and Rehabilitation's \$450,000 per project limit and increasing the funds available for this category would allow practitioners to more effectively utilize this resource and deliver a greater number of successful projects.

#### 5. Distribution Methods - Page 38 CDBG Housing Stabilization Program

As proposed, funds not allocated within the first 12 months will be made available to the Public Facilities, Economic Development, and Affordable Housing Development and Rehabilitation categories of funds. Instead, making these funds not allocated within the first 12 months available to other Affordable Housing Development and Rehabilitation activities first would increase the amount of funds available to tackle's Montana's growing need for affordable housing as opposed to letting those resources assist non-housing activities.

#### Response to Comment #9:

Regarding HOME match, the 2021-2022 AAP refers the public to the eligible sources of match as outlined in 24 CFR 92.220 and lists the most common types of match that applicants have provided to Commerce. The complete list includes: cash contributions from nonfederal sources, forbearance of fees, donated real property the cost of on-site and off-site infrastructure that directly benefits HOME-assisted projects, proceeds from bond financing, reasonable value of donated site-preparation and construction materials, reasonable rental value of donated site preparation or construction equipment, value of donated or voluntary labor or professional services, value of sweat equity, direct cost of supportive services to residents of HOME-assisted units, and direct cost of homebuyer counseling. The 2021-2022 AAP will be changed to add the phrase "but are not limited to" so the paragraph will read, "The HOME Program requires 5% match funding for projects. Local match sources include, but are not limited to local costs of infrastructure installation to serve HOME-assisted units, proceeds from bond financing, private grants, deferred or waived state or local taxes or fees, cash, and the value of donated land."

As mentioned above, some flexibility for reallocating funds across CDBG, HOME, and HTF grant categories is already provided for in existing planning documents. Under CDBG, HOME, and HTF, the Director of Commerce is authorized to reallocate up to 15% of each program's planned total allocation among grant categories. Commerce is considering increasing this 15% reallocation cap this fall. The State of Montana strives to balance program flexibility with administrative considerations. If additional program flexibilities are needed and are not provided for in the Consolidated Plan and Annual Action Plans (AAPs), Montana will consider amendments as needed.

As mentioned above, the State of Montana is actively assessing options for supporting existing projects that are facing budget shortfalls and other challenges resulting from the COVID-19 pandemic. Grantees with concerns related to funded projects should work with their program specialists and Commerce leadership directly to ensure continued project feasibility. Additionally, grantees are encouraged to review application guidelines for upcoming application cycles for further direction.

As mentioned above, Commerce staff has been actively collaborating in rewriting Montana Housing’s Qualified Action Plan (QAP), and they will continue to be involved in the future. Commerce staff will ensure that there is open communication between the Low Income Housing Tax Credits (LIHTC) and HUD-funded programs such as CDBG, HOME, and HTF.

As mentioned above, for the 2021-2022 plan year, Commerce intends to increase the award amount for CDBG Public and Community Facilities and CDBG Affordable Housing Development and Rehabilitation. Further information on the maximum award amount will soon be available in the applications and guidelines on the CDBG website: <https://comdev.mt.gov/Programs-and-Boards/Community-Development-Block-Grant-Program/>.

Regarding the reallocation of funds not allocated within the first 12 months to other Affordable Housing Development and Rehabilitation activities, Commerce will strive to allocate unallocated CDBG Affordable Housing Development and Rehabilitation funds to housing activities to the extent feasible. This will assist the State of Montana in meeting its planning goals and preventing the need for amendments to the 2020-2024 Consolidated Plan or 2021-2022 AAP.

*Jim Morton, Executive Director, District XI Human Resource Council*

Comment #10:

*Leverage Other Resources, Page 31*

The AAP states, “The HOME Program requires 5% match funding for projects. Local match sources include local costs of infrastructure installation to serve HOME-assisted units, proceeds from bond financing, private grants, deferred or waived state or local taxes or fees, cash, and the value of donated land.”

This list of eligible sources of HOME match does not include certain eligible sources found in 24 CFR § 92.220, which is referenced in a footnote. Allowing developers and grantees as much flexibility as possible makes the administration of HOME funds simpler and the projects more effective; accepting all forms of match included in the federal regulations gives practitioners more tools to successfully deploy HOME funds and realize successful projects.

*Annual Goals and Objectives, starting on Page 31*

Table 6, Table 7, and other places specify the amount of CDBG funds allocated to finance eligible activities. In practice, the importance of preserving and constructing new affordable housing is equal to infrastructure as Montana moves to recover from the myriad impacts of COVID-19 and as we move forward once we have recovered. Without sufficient quantities of affordable housing, jobs will remain unfilled and would-be employees will be unable to enter or reenter the workforce. This is particularly true in the historically low-paying sectors of the labor market that have been hit the hardest: hospitality, tourism, and similar sectors of our economy.

The CDBG program should recognize housing on par with infrastructure as one of the primary efforts we must undertake to recover and prosper. Allocating resources equally between the goal to Preserve and Construct Affordable Housing, Improve and Sustain Public Infrastructure, and Revitalize Local Economies is the most effective use of this resource. The funding allocation priorities percentages organized as

follows would best meet Montana’s efforts to rebound from COVID-19, set the stage for future prosperity, and produce affordable quantities of affordable housing.

Goal					
	Preserve and Construct Affordable Housing	Plan for Communities	Improve and Sustain Vital Public Infrastructure	Revitalize Local Economies	Reduce Homelessness
CDBG	27%	7%	27%	27%	7%

On Page 38 CDBG Affordable Housing Development and Rehabilitation

The 2019-2020 AAP Amendment adding CDBG-CARES authority recognizes the fact that a project’s demonstrated need should govern the amount of funds invested in any given project rather than an arbitrary grant ceiling. We are experiencing a climate of economic uncertainties and increasing prices for basic supplies and labor. Limiting the size of the grant to the same amount it has been for more than a decade (regardless of a project’s demonstrated need and today’s circumstances) undermines our ability to deliver successful projects and respond to growing need for quality, affordable housing. A maximum of \$450,000 is simply not worth the increased project costs and work load complications affordable multifamily housing projects grapple with when using CDBG Housing funds.

Several years ago the State’s per project limit on HOME funds was lifted and the result was an increased use of that resource and an increase in the production of affordable housing available for Montanans. Furthermore, in a time with spiking materials and labor costs, financing gaps CDBG could fill have grown and I encourage the State to give practitioners the tools necessary to fill those gaps.

Lifting the CDBG Affordable Housing Development and Rehabilitation’s \$450,000 per project limit and increasing the funds available for this category would allow practitioners to more effectively utilize this resource and deliver a greater number of successful projects.

Page 38 CDBG Housing Stabilization Program

As proposed, funds not allocated within the first 12 months will be made available to the Public Facilities, Economic Development, and Affordable Housing Development and Rehabilitation categories of funds. Instead, making these funds not allocated within the first 12 months available to other Affordable Housing Development and Rehabilitation activities first would increase the amount of funds available to tackle’s Montana’s growing need for affordable housing.

Other Comments

The set aside for entitlement and participating jurisdictions should be held to twenty-five percent (25%) of the total funds awarded to the Montana Department of Commerce.

Response to Comment #10:

As mentioned above, the 2021-2022 AAP will be amended to clarify that HOME match is not limited to the eligible sources enumerated in the document. It will also refer the public to all eligible sources of match as outlined in 24 CFR 92.220.

As mentioned above, some flexibility for reallocating funds across CDBG, HOME, and HTF grant categories is already provided for in existing planning documents. Under CDBG, HOME, and HTF, the Director of Commerce is authorized to reallocate up to 15% of each program's planned total allocation among grant categories. Commerce is considering increasing this 15% reallocation cap this fall. The State of Montana strives to balance program flexibility with administrative considerations. If additional program flexibilities are needed and are not provided for in the Consolidated Plan and Annual Action Plans (AAPs), Montana will consider amendments as needed.

As mentioned above, for the 2021-2022 plan year, Commerce intends to increase the award amount for CDBG Public and Community Facilities and CDBG Affordable Housing Development and Rehabilitation. Further information on the maximum award amount will soon be available in the applications and guidelines on the CDBG website: <https://comdev.mt.gov/Programs-and-Boards/Community-Development-Block-Grant-Program/>.

As mentioned above, Commerce will strive to allocate unallocated CDBG Affordable Housing Development and Rehabilitation funds to housing activities to the extent feasible. This will assist the State of Montana in meeting its planning goals and preventing the need for amendments to the 2020-2024 Consolidated Plan or 2021-2022 AAP.

Regarding the "Other Comments," CDBG funds allocated in the 2021-2022 AAP are not available for entitlement communities. Please see the 2019-2022 AAP for further information on the public comments and agency responses for CDBG CARES, which is available for entitlement communities.

*Shane Walk, Acquisitions Manager, Mountain Plains Equity Group, Inc.*

Comment #11:

*Leverage Other Resources, Page 31*

*The AAP states, "The HOME Program requires 5% match funding for projects. Local match sources include local costs of infrastructure installation to serve HOME-assisted units, proceeds from bond financing, private grants, deferred or waived state or local taxes or fees, cash, and the value of donated land."*

This list of eligible sources of HOME match does not include certain eligible sources found in 24 CFR § 92.220, which is referenced in a footnote. Allowing developers and grantees as much flexibility as possible makes the administration of HOME funds simpler and the projects more effective; accepting all forms of match included in the federal regulations gives practitioners more tools to successfully deploy HOME funds and realize successful projects.

*Annual Goals and Objectives, Page 31, et. seq.*

Table 6, Table 7, and other places specify the amount of CDBG funds allocated to finance eligible activities. In practice, the importance of preserving and constructing new affordable housing is equal to infrastructure as Montana moves to recover from the myriad impacts of COVID-19 and as we move

forward once we have recovered. Without sufficient quantities of affordable housing, jobs will remain unfilled and would-be employees will be unable to enter or reenter the workforce. This is particularly true in the historically low-paying sectors of the labor market that have been hit the hardest: hospitality, tourism, and similar sectors of our economy.

The CDBG program should recognize housing on par with infrastructure as one of the primary efforts we must undertake to recover and prosper. Allocating resources equally between the goal to Preserve and Construct Affordable Housing, Improve and Sustain Public Infrastructure, and Revitalize Local Economies is the most effective use of this resource. The funding allocation priorities percentages organized as follows would best meet Montana’s efforts to rebound from COVID-19, set the stage for future prosperity, and produce affordable quantities of affordable housing.

Goal					
	Preserve and Construct Affordable Housing	Plan for Communities	Improve and Sustain Vital Public Infrastructure	Revitalize Local Economies	Reduce Homelessness
CDBG	27%	7%	27%	27%	7%

*Annual Goals and Objectives, Page 31 et. seq., Allocation Priorities, Page 33 et. seq., and Methods of Distribution, Page 35 et. seq.*

First, through its annual competitive allocation process in 2020, the State awarded CDBG, HTF, and HOME funds to many worthy projects under the 2020-2021 Annual Action Plan. As we are all aware, much has changed since competitive applications were submitted in September 2020. Practitioners use expert third parties, existing market conditions, and historical trends to develop timelines and budgets for our projects. When the budgets for the 2020 application cycle were put together a year ago, no one could foresee the tremendous cost increase in labor basic building components, and in some cases the simple inability to acquire some of them due to supply chain issues. This has created significant gaps in project budgets that, in some cases, cannot be cured by re-designing the project or value engineering.

For example, as captured in the chart showing lumber futures contract prices on the following page, in April and May 2020 (when last year’s project budgets were being put together), lumber’s price in the commodities market was around \$370. On May 7, 2021 lumber’s price hit a high of \$1,686 and it has since fallen to \$905 as of June 17, 2021. There is no telling where the price of lumber, OSB, and other basic goods needed to complete these projects will go from here. However, it is unrealistic to assume a return to last year’s prices and even though prices for commodity futures contracts have reduced, and furthermore, the price reductions seen in futures markets are still not being seen at the project level as of July 5, 2021.

We are seeing neighboring states take proactive measures and double down on funding decisions they made last year by shifting resources to ensure those projects are made whole and have the ability to deal with these new challenges and shifting market conditions.

As partners we all are invested in successful outcomes and these projects are in need of continued support, without which some of these projects may not be able to deliver the promised public benefits. Many of last year’s projects are (or will be this summer) ready to break ground but for the sudden increase in prices and budget shortfalls. To address budget shortfalls in projects awarded last year due

to these unique, COVID-19-caused market conditions, Montana should consider prioritizing CDBG, HOME and HTF funds for projects awarded 2020 so these projects can be made whole and achieve successful completion. A truncated application, review, and award process outside the standard process for projects funded in 2020 would be most advantageous and ensure projects with existing financial commitments are successful.

Secondly, with regard to the Preservation and Construction of Affordable Housing goal, CDBG, HOME, and HTF are most effective when used as gap financing for larger multifamily housing developments primarily funded with Low Income Housing Tax Credits (LIHTC) allocated by the Montana Board of Housing. Prioritizing CDBG, HOME, and HTF funds as gap financing for these larger multifamily projects will increase the return on these programs' investments and the sheer volume of housing that is preserved and newly constructed. The LIHTC program is currently undertaking a significant review and overhaul of the application and award process outlined in the Qualified Action Plan. As this rewrite moves forward, open communication and collaboration between the LIHTC and HUD-funded programs will streamline administrative processes and more effectively address Montana's growing need for affordable housing.

#### *Page 38 CDBG Affordable Housing Development and Rehabilitation*

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Several years ago the State's per project limit on HOME funds was lifted and the result was an increased use of that resource and an increase in the production of affordable housing available for Montanans. Furthermore, in a time with spiking materials and labor costs, financing gaps CDBG could fill have grown and I encourage the State to give practitioners the tools necessary to fill those gaps.

Lifting the CDBG Affordable Housing Development and Rehabilitation's \$450,000 per project limit and increasing the funds available for this category would allow practitioners to more effectively utilize this resource and deliver a greater number of successful projects.

#### *Page 38 CDBG Housing Stabilization Program*

As proposed, funds not allocated within the first 12 months will be made available to the Public Facilities, Economic Development, and Affordable Housing Development and Rehabilitation categories of funds. Instead, making these funds not allocated within the first 12 months available to other Affordable Housing Development and Rehabilitation activities first would increase the amount of funds available to tackle's Montana's growing need for affordable housing.

I appreciate the opportunity to give public comment on this very important topic and am looking forward to seeing the outcome and the final version of the Annual Allocation Plan. Please let me know if you have any comments or questions, you can reach me at 406-254-167

Response to Comment #11:

As mentioned above, the 2021-2022 AAP was amended to clarify that HOME match is not limited to the eligible sources enumerated in the document. It will also refer the public to all eligible sources of match as outlined in 24 CFR 92.220.

As mentioned above, some flexibility for reallocating funds across CDBG, HOME, and HTF grant categories is already provided for in existing planning documents. Under CDBG, HOME, and HTF, the Director of Commerce is authorized to reallocate up to 15% of each program's planned total allocation among grant categories. Commerce is considering increasing this 15% reallocation cap this fall. The State of Montana strives to balance program flexibility with administrative considerations. If additional program flexibilities are needed and are not provided for in the Consolidated Plan and Annual Action Plans (AAPs), Montana will consider amendments as needed.

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*Lori Ladas, Executive Director, Rocky Mountain Development Council, Inc.*

Comment #12:

**DRAFT 2021-2022 AAP Comments:**

*Leverage Other Resources, Page 31*

The AAP states, *"The HOME Program requires 5% match funding for projects. Local match sources include local costs of infrastructure installation to serve HOME-assisted units, proceeds from bond financing, private grants, deferred or waived state or local taxes or fees, cash, and the value of donated land."*

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*CDBG Housing Stabilization Program, Page 39*

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# Welcome to the Public Hearing for the 2021-2022 Annual Action Plan and 2019- 2020 Annual Action Plan Amendment

**Tuesday, June 22, 2021**

**11:00 a.m. – 12:00 p.m.**

Sponsored by the Montana Departments of  
Commerce and Health and Human Services

*The Department of Commerce will make reasonable accommodations for persons with disabilities or who have a Limited English Proficiency and who wish to participate in this process or need an alternative accessible format of this. Presentation materials will be provided in advance of the meeting.*



# 2021-2022 AAP and 2019-2020 AAP Public Participation Process

The State of Montana, through the Departments of Commerce and Public Health and Human Services, develops a 5-year plan to guide policy and investment for housing, economic, and other community development. The 5-year plan, also known as the “Consolidated Plan for Housing and Community Development” is required by the U.S. Department of Housing and Urban Development (HUD) to assess Montana’s needs and current conditions as well as to determine priorities and allocate HUD funding.



# 2021-2022 AAP and 2019-2020 AAP Public Participation Process

The perspectives and opinions shared by participants of this public hearing will help Commerce and DPHHS to edit and finalize the Draft 2021-2022 AAP, which falls under the 2020-2024 Consolidated Plan, and the Draft 2019-2020 AAP Amendment, which falls under the 2015-2019 Consolidated Plan. We hope that with your input, we can ensure housing and community development needs across Montana are identified and addressed.



# 2020-2024 Consolidated Plan Goals and Objectives

- The objectives of Montana's Consolidated Plan include:
  - Provide decent housing
  - Provide a suitable living environment
  - Expand economic opportunities
- The goals of Montana's Consolidated Plan are:
  - Goal 1 – Preserve and Construct Affordable Housing
  - Goal 2 – Plan for Communities
  - Goal 3 – Improve and Sustain Public Infrastructure
  - Goal 4 – Revitalize Local Economies
  - Goal 5 – Reduce Homelessness



# 2020-2024 Consolidated Plan Programs

- Community Development Block Grant (CDBG)
  - Housing (Rental Development / Single Family Rehabilitation)
  - Public Facilities
  - Community Facilities
  - Planning
  - Economic Development
- Emergency Solutions Grant (ESG)
- HOME Investment Partnerships Program (HOME)
  - Rental Development / Single Family Development / Rental Rehabilitation
  - Homebuyer Assistance
- Housing Trust Fund (HTF)
  - Rental Development / Single Family Development / Rental Rehabilitation
- Housing Opportunities for Persons with AIDS (HOPWA)

*For more information on Montana's competitive HOPWA grant, contact Julianna Crowley [JCrowley@mt.gov](mailto:JCrowley@mt.gov)*



# 2020-2024 Consolidated Plan Documents

- 5-Year Consolidated Plan for Housing and Community Development
  - Consolidated Plans are strategic plans that guide housing and community investments. **Montana is currently operating under the 2020-2024 Consolidated Plan.**
- Annual Action Plan (AAP)
  - AAPs are prepared each year of the Consolidated Plan and outline specific activities, goals, objectives, etc., for the given program year (not cumulative). **Montana's 2021-2022 AAP outlines activities that are planned for Program Year 2 of the 2020-2024 Consolidated Plan, which runs from April 1, 2021, to March 31, 2022.**
- Consolidated Annual Performance and Evaluation Report (CAPER)
  - CAPERs are annual reports that detail use of funds and progress towards meeting goals and objectives for AAPs.



# 2021-2022 AAP and 2019-2020 AAP

## Components of the AAP

- The Setup
  - Administrative details
- The Process (“PR”)
  - Public participation elements
- Annual Action Plan (“AP”)
  - Expected resources, goals, priorities, and how funds will be distributed by program



# 2021-2022 AAP

## Resources by Program – Plan Year 2

- Community Development Block Grant (CDBG) **\$6,982,827**
- HOME Investment Partnerships Program (HOME) **\$3,590,456**
- Emergency Solutions Grant (ESG) **\$743,529**
- Housing Trust Fund (HTF) **\$3,401,884**



# 2021-2022 AAP

## Goal Summary: Preserve and Construct Affordable Housing

- **\$750,000** in CDBG, **\$2,131,411** in HOME, and **\$2,041,696** in HTF
  - Rental Units Constructed: **12**
  - Rental Units Rehabilitated: **26**
  - Homeowner Housing Added: **2**
  - Homeowner Housing Rehabilitated: **3**
  - Direct Financial Assistance to Homebuyers: **50 households**



# 2021-2022 AAP

## Goal Summary: Plan for Communities

- **\$500,000** in CDBG
  - **15** Local Governments Assisted



# 2021-2022 AAP

## Goal Summary: Improve and Sustain Public Infrastructure

- **\$2,787,190** in CDBG
  - **1,000** Persons Assisted
  - **20** Households Assisted



# 2021-2022 AAP

## Goal Summary: Revitalize Local Economies

- **\$2,000,000** in CDBG
  - Jobs Created/Retained: **80**
  - Businesses Assisted: **3**



# 2021-2022 AAP

## Goal Summary: Reduce Homelessness

- **\$450,000** in CDBG, **\$650,000** in HOME, **\$750,000** in HTF, and **\$677,159** in ESG
  - Tenant-Based Rental Assistance/Rapid Rehousing: **200 households**
  - Homeless Person Overnight Shelter: **80 persons**
  - Homelessness Prevention: **480 persons**
  - Housing for Homeless Added: **20 households/housing units**



# 2021-2022 AAP

## Resources by Goal – Plan Year 2

Program	Goal										Admin	
	Preserve and Construct Affordable Housing	Plan for Communities	Improve and Sustain Vital Public Infrastructure	Revitalize Local Economies	Reduce Homelessness							
CDBG	\$750,000	11%	\$500,000	7%	\$2,787,190	41%	\$2,000,000	29%	\$450,000	7%	\$303,727	4%
HOME	\$2,131,411	69%	\$0	0%	\$0	0%	\$0	0%	\$650,000	21%	\$309,045	10%
ESG	\$0	0%	\$0	0%	\$0	0%	\$0	0%	\$687,765	93%	\$55,764	7%
HTF	\$2,041,696	66%	\$0	0%	\$0	0%	\$0	0%	\$750,000	24%	\$310,188	10%



# 2019-2020 AAP Amendment

## CDBG CARES

- CDBG CARES funds must be used for CDBG-eligible activities to prevent, prepare for, and respond to COVID-19
- CDBG CARES funds must primarily benefit low and moderate income Montanans
- Montana's allocation for CDBG CARES (CDBG-CV1, CDBG-CV 2, and CDBG-CV 3) is **\$10,174,175**



# 2019-2020 AAP Amendment

## CDBG CARES

- Montana will use CDBG CARES to fund projects within these Consolidated Plan goals:
  - Preserve and Construct Affordable Housing (20%)
  - Improve and Sustain Public Facilities (50%)
  - Reduce Homelessness (10%)
  - *The remaining funds will go towards state and local government administration and technical assistance*



# 2019-2020 AAP Amendment

## CDBG CARES

- Eligible applicants:
  - Towns, Cities and Counties
- Eligible uses:
  - Public Facilities: improvements to HVAC for ventilation; expansion to allow for social distancing
  - Public Services: support, including equipment, for senior centers, head start centers, shelters, health clinics
  - Housing/Homelessness: acquire or develop non-congregate shelter
- Must ensure CDBG CARES funds do not duplicate benefits of other sources of funds



# 2021-2022 AAP and 2019-2020 AAP Document Review

- Available:
  - On Commerce’s website at <https://commerce.mt.gov/Consolidated-Plan/Documents>
  - Several depositories throughout the state (see website for list)
  - By request



# 2021-2022 AAP and 2019-2020 AAP Contact Information

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# 2021-2022 AAP and 2019-2020 AAP Comments

Comments regarding the Draft 2021-2022 AAP and Draft 2019-2020 AAP Amendment are now being accepted.

***If you have a comment and are joining via webinar, please raise your hand so we can unmute you. If you are joining via phone, please press \*9 to indicate you have a comment and then press \*6 to unmute/re-mute yourself.***

When providing comment

- Please state and spell your name
- Please state the organization you represent (if applicable)

Written comments should be addressed to the address or email below and will be accepted until 5:00 p.m. on **July 8, 2021**, for the Draft 2021-2022 AAP and the Draft 2019-2020 AAP Amendment.

Montana Department of Commerce  
Community Development Division  
Attn: Con Plan  
PO Box 200523  
Helena, MT 59620-0523  
[DOCConPlan@mt.gov](mailto:DOCConPlan@mt.gov)



Page 1

1 PUBLIC HEARING FOR 2021-2022 AAP  
 2  
 3 SPONSORED BY MONTANA DEPARTMENT OF COMMERCE  
 4 2021-2022 ANNUAL ACTION PLAN AND  
 5 2019-2020 ANNUAL ACTION PLAN AMENDMENT  
 6  
 7  
 8  
 9  
 10 TRANSCRIPT OF THE PROCEEDINGS  
 11  
 12  
 13  
 14 Taylor Crowl, Facilitator  
 15  
 16 Via Zoom  
 17  
 18 June 22nd, 2021  
 19 11:00 a.m.  
 20  
 21 **REPORTED BY: LAURIE CRUTCHER, RPR**  
 22 **LESOFSKI COURT REPORTING**  
 23 **7 WEST SIXTH AVENUE, Suite 2C**  
 24  
 25

Page 2

1 PARTICIPANTS  
 2  
 3 Panelists:  
 4 Taylor Crowell  
 5 Julie Flynn  
 6 Janelle Egli  
 7 Julianna Crowley  
 8 Becky Anseth  
 9 Sara Loewen  
 10  
 11 Participants:  
 12 Erin Kautz  
 13 Andrew Chanania  
 14 Julie Stiteler  
 15 Ruth Burke  
 16 Ashleigh Byers  
 17 Heather McMilin  
 18 Annie Zimmerman  
 19 Jim Morton  
 20 Sindie Kennedy  
 21 Sherrie Arey  
 22 Shyla Patera  
 23 Katie Batterbee  
 24  
 25

Page 3

1 WHEREUPON, the following proceedings were  
 2 had and testimony taken, to-wit:  
 3 \* \* \* \* \*  
 4 **MS. CROWELL:** I wanted to start out by  
 5 thanking everybody for joining us today for the  
 6 public hearing for the 2021-2022 Annual Action  
 7 Plan, and 2019-2020 Annual Action Plan Amendment.  
 8 As you'll probably notice, this webinar is being  
 9 recorded, so go ahead and accept that on your  
 10 screen if that pops up.  
 11 We would love everybody to use the  
 12 question and answer feature. If you have any  
 13 technical issues that pop up during the webinar  
 14 for you, such as having trouble hearing us, need  
 15 someone to speak louder, something like that.  
 16 That way we can keep track of those and make sure  
 17 that we're answering everybody's questions that  
 18 pop up.  
 19 And then before we get started, it would  
 20 be great to have all of the attendees just pop  
 21 their name and the organization that you're  
 22 connected to in the chat, just so we can have a  
 23 sense of who is in the room. I'll pause there so  
 24 everybody has a chance to do that.  
 25 Great. Thank you guys so much. It is

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1 just helpful for us to have a sense of who we're  
 2 speaking with, and so you guys all have a sense of  
 3 who else is on the webinar. Okay.  
 4 And just so you know, we'll accept  
 5 comments and questions at the end of the  
 6 presentation, and so everybody should be muted  
 7 until then, but there will certainly be an  
 8 opportunity for you to unmute yourself at the end.  
 9 But again, in the interim, if there's any  
 10 questions that come up that need to be immediately  
 11 answered, feel free to pop them in the question  
 12 and answer.  
 13 So before diving into the specifics of  
 14 both of the Annual Action Plans, we wanted to  
 15 provide some context on the Consolidated Plan  
 16 process, which this is a part of.  
 17 So the State of Montana, through the  
 18 Departments of Commerce and Public Health and  
 19 Human Services, develop a five year plan to guide  
 20 policy investment for housing, economic, and other  
 21 community development activities throughout the  
 22 state. This five year plan, also known as the  
 23 Consolidated Plan for Housing and Community  
 24 Development, is required by the US Department of  
 25 Housing and Urban Development to assess Montana's

<p style="text-align: right;">Page 5</p> <p>1 needs and current conditions, as well as to 2 determine priorities and allocate HUD funding. 3 And so the 2021-2022 AAP and the 4 2019-2020 AAP Amendment are pieces of this kind of 5 broader Consolidated Plan process. And this 6 public hearing plays a critical role in developing 7 each Annual Action Plan. The perspectives and 8 opinions shared by participants of this public 9 hearing will help Commerce and DPHHS to edit and 10 finalize the draft 2021-2022 Annual Action Plan 11 which falls under the 2020-2024 Consolidated Plan, 12 and then also the draft 2019-2020 Annual Action 13 Plan Amendment, which falls under the 2015-2019 14 Consolidated Plan. 15 We hope that with your input we can 16 ensure housing and community development needs 17 across Montana are both identified and addressed. 18 So first we're going to turn to the 19 2021-2022 Annual Action Plan, which as I 20 mentioned, lives underneath the 2020-2024 21 Consolidated Plan, so we'll provide some context 22 on its goals and objectives. 23 And the 2019-2020 AAP lives under the 24 2015-2019 Consolidated Plan, but many of these 25 goals and objectives are similar between the two.</p>	<p style="text-align: right;">Page 7</p> <p>1 The second HUD funded program is the 2 Emergency Solution Grant, known as ESG, which is 3 housed within the Department of Public Health and 4 Human Services, and assists people to regain 5 permanent housing after experiencing housing 6 crises and/or homelessness. 7 The third program is the Home Investment 8 Partnership Program, known as HOME, which is 9 housed within the Department of Commerce, and 10 funds a range of activities to address affordable 11 housing. It's split into rental development, 12 single family development, rental rehabilitation, 13 and then also home buyer assistance. 14 The fourth program is the Housing Trust 15 Fund, known as HTF, which is housed within the 16 Department of Commerce, and aims to produce and 17 preserve affordable housing for extremely low and 18 very low income households, and it lives within 19 HUD1 Program that focuses on rental development, 20 single family development, and rental 21 rehabilitation. 22 And there's a fifth program that in 23 certain states can be funded as part of the CPD, 24 HUD CPD formula block grant program, and that's 25 HOPWA; but within the State of Montana, Montana</p>
<p style="text-align: right;">Page 6</p> <p>1 So for the 2020-2024 Consolidated Plan, 2 the objectives include providing decent housing, 3 providing a suitable living environment, and 4 expanding economic opportunities. 5 And in order to achieve these 6 objectives, the State of Montana will fund 7 projects that fall within five goals. The first 8 goal is preserving and constructing affordable 9 housing; the second goal is planning for 10 communities; the third goal is improving and 11 sustaining public infrastructure; and the fourth 12 goal is revitalizing local economies; and the 13 fifth goal is reducing homelessness. 14 And both of these Annual Action Plans 15 guide a number of HUD funded programs within the 16 State of Montana, the first being the Community 17 Development Block Grant, known as CDBG, which 18 funds a variety of activities to strengthen 19 communities, primarily for low and moderate income 20 Montanans. 21 This is housed within the Department of 22 Commerce, and split up into four different 23 programs: CDBG Housing, CDBG public and community 24 facilities, CDBG planning, and CDBG economic 25 development.</p>	<p style="text-align: right;">Page 8</p> <p>1 receives a competitive HOPWA grant, so it's not 2 enumerated and explained in the AAP's. So if 3 anybody needs further information on Montana's 4 competitive HOPWA grant, they can contact Julianna 5 Crowley at <a href="mailto:jcrowley@mt.gov">jcrowley@mt.gov</a>. 6 So as I mentioned earlier, both of these 7 AAP's are part of this larger Consolidated Plan 8 process, and there are a variety of documents that 9 make up this Consolidated Plan process. 10 First, there's the Five Year 11 Consolidated Plan for Housing and Community 12 Development, and these Consolidated Plans are done 13 every five years, and are strategic plans that 14 guide housing and community investments. 15 Currently the State of Montana is operating under 16 the 2020-2024 Consolidated Plan. 17 Then there are the Annual Action Plans, 18 known as AAP's, which is what we're discussing 19 today, and the AAP's are prepared each year of the 20 Consolidated Plan, and outline specific 21 activities, goals, objectives, etc., for the given 22 program year. 23 And Montana's 2021-2022 AAP outlined 24 activities that are planned for program year two 25 of the 2020-2024 Consolidated Plan, and this</p>

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1 program year to run from April 1st, 2021 to March  
2 31st, 2022.  
3 And then the third type of document is  
4 the Consolidated Annual Performance and Evaluation  
5 Report, known as the CAPER. CAPER's are annual  
6 reports that contain use of funds and progress  
7 towards meeting goals and objectives for AAP's.  
8 We won't be discussing CAPER's today,  
9 but we do have another public hearing on our CAPER  
10 tomorrow, so hope to see some of you there.  
11 So both the 2021-2022 AAP and the  
12 2019-2020 AAP have various components. The three  
13 major components are the setup, the process, and  
14 the Annual Action Plan. So the setup details  
15 various administrative details. The process has  
16 public participation elements, and then the Annual  
17 Action Plan itself is kind of the meat of the  
18 document. That's where we explain expected  
19 resources, goals, priorities, and how funds will  
20 be distributed by program.  
21 So now diving into the 2021-2022 Annual  
22 Action Plan, the State of Montana receives the  
23 following allocations from HUD by program. So for  
24 CDBG, the State of Montana receives \$6,982,827;  
25 for HOME, the State of Montana received

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1 \$3,590,456; for ESG, the State of Montana received  
2 \$743,529; and for Housing Trust Fund, the State of  
3 Montana receives \$3,401,884.  
4 With these federal allocations, the  
5 State of Montana will tackle the five goals that  
6 are explained in our Consolidated Plan. And so  
7 for the first goal, which is preserving and  
8 constructing affordable housing, the State of  
9 Montana is proposing to allocate \$750,000 in  
10 CDBG's; \$2,131,411 in HOME; and \$2,041,696 in HTF  
11 towards this goal to preserve and construct  
12 affordable housing.  
13 And through these various programs, we  
14 anticipate that this will help construct 12 rental  
15 units, rehab 26 rental units, add two homeowner  
16 housing units, rehabilitate three homeowner  
17 housing units, and provide direct financial  
18 assistance to 50 households.  
19 The State of Montana is proposing to  
20 allocate \$500,000 in CDBG to goal two, which is  
21 plan for communities, and through this program we  
22 anticipate assistance to 15 local governments.  
23 The State of Montana is proposing to  
24 allocate \$2,787,190 in CDBG funds onto the third  
25 goal, which is improving and sustaining public

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1 infrastructure. Through this program we  
2 anticipate that 1,000 persons will be assisted and  
3 20 households will be assisted.  
4 The State of Montana is proposing to  
5 allocate \$2 million in CDBG to goal four, which is  
6 revitalizing local economies, and through this  
7 program, we anticipate that 80 jobs will be  
8 created or retained, and three businesses will be  
9 assisted.  
10 The State of Montana is proposing to  
11 allocate \$450,000 in CDBG; \$650,000 in HOME;  
12 \$750,000 in HTF; and \$677,159 in ESG to the fifth  
13 goal, which is reducing homelessness; and through  
14 these programs we anticipate that 200 households  
15 will be assisted with tenant based rental  
16 assistance or rapid rehousing; 80 persons will be  
17 assisted with homeless persons overnight shelter;  
18 480 persons will be assisted with homeless  
19 prevention; and 20 households or housing units  
20 will be added for the homeless.  
21 This table provides some of the same  
22 information that was on the previous slides, but  
23 breaks it down by program as well. So you can  
24 see, if you read across the table left to right,  
25 for CDBG, we're allocating 11 percent of our CDBG

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1 funds to goal one, which is preserving and  
2 constructing affordable housing; 7 percent of our  
3 funds to goal two, which is plan for communities;  
4 41 percent of our funds to goal three, which is  
5 improve and sustain vital public infrastructure;  
6 29 percent of our funds to goal four, revitalize  
7 local economies; 7 percent of our funds to goal  
8 five, reduce homelessness; and four percent of our  
9 funds will be retained for admin.  
10 For HOME, 69 percent of our funds will  
11 go to towards goal one, preserve and construct  
12 affordable housing; and then 21 percent of our  
13 funds will go towards goal five, reduce  
14 homelessness; and 10 percent will be retained for  
15 admin.  
16 For ESG, 93 percent of the funds will go  
17 towards goal five, which is reduce homelessness;  
18 and 7 percent of the funds will be retained for  
19 admin.  
20 For Housing Trust Fund, 66 percent of  
21 the funds will go towards goal one, preserve and  
22 construct affordable housing; and 24 percent will  
23 go towards goal five, reduce homelessness; and 10  
24 percent will be retained for admin.  
25 And then now we're going to turn our

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1 attention to the 2019-2020 Annual Action Plan  
2 Amendment. So the 2019-2020 Annual Action Plan  
3 was previously drafted, and we had a separate  
4 public hearing for that document; and then it was  
5 also previously amended for ESG CARES. And so if  
6 anybody is looking for further information on  
7 either of those previous public hearings, that can  
8 be found on our website. So really our discussion  
9 today is limited to the 2019-2020 AAP amendment as  
10 it relates to CDBG CARES.  
11 So CDBG CARES funds must be used for  
12 CDBG eligible activities to prevent, prepare for,  
13 and respond to COVID-19. CDBG CARES funds must  
14 primarily benefit low and moderate income  
15 Montanans. And then Montana's allocation for CDBG  
16 CARES, which came in three allocations --  
17 CDBG-CV1, CDBG-CV2, and CDBG-CV3 -- is  
18 \$10,174,175.  
19 Montana is proposing to use CDBG CARES  
20 funds to fund projects within these Consolidated  
21 Plan goals, so we're proposing to use 20 percent  
22 of these CDBG CARES dollars to go towards  
23 preserving and constructing affordable housing; 50  
24 percent towards improving and sustaining public  
25 facilities; 10 percent towards reducing

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1 homelessness; and then the remaining funds will go  
2 towards state and local government administration  
3 costs and technical assistance.  
4 For CDBG CARES, eligible applications  
5 are town, cities, and counties, and eligible uses  
6 include public facility projects, so this could be  
7 improvements to HVAC systems for ventilation,  
8 expansion to allow for social distancing in these  
9 types of public facilities. It could be public  
10 service projects, support including equipment for  
11 senior centers, Head Start centers, shelters, and  
12 health clinics; or it could be housing or  
13 homelessness projects, which could include  
14 acquiring or developing non-congregate shelters.  
15 And for CDBG CARES, it's really  
16 important to ensure that these funds do not  
17 duplicate benefits of other funding sources.  
18 So both of these documents -- the  
19 2021-2022 AAP and 2019-2020 AAP Amendment -- are  
20 available on Commerce's website, which is  
21 [commerce.mt.gov/consolidatedplan/documents](http://commerce.mt.gov/consolidatedplan/documents). There  
22 are also several depositories throughout the  
23 state. We have a list on our website for all of  
24 these depositories, and we can certainly get that  
25 to anybody on request, and we can also get the

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1 documents to anybody on request as well.  
2 So if there is any questions about any  
3 of these programs, the programs housed within  
4 Commerce again are CDBG, HTF, and HOME, and  
5 Commerce can be reached at 301 South Park Avenue,  
6 in Helena, Montana 59601. That's our physical  
7 address. And then for mail, it's P.O. Box 200523,  
8 Helena, Montana 59620-0523.  
9 Our Interim Administrator for the  
10 Community Development Division is Cheryl Cohen;  
11 and our Interim Operations Manager is Becky  
12 Anseth. Our phone is 406-841-2770, and our fax is  
13 406-841-2771. Our email is [DOCConPlan@mt.gov](mailto:DOCConPlan@mt.gov); and  
14 again, our website is  
15 [commerce.mt.gov/consolidatedplans](http://commerce.mt.gov/consolidatedplans).  
16 If there are further questions about  
17 ESG, DPHHS can be reached at their physical  
18 location at 1400 Carter Drive, Helena, Montana  
19 59601; or by mail at P.O. Box 202956, Helena,  
20 Montana 59620-2956. The Interim Administrator is  
21 Morgan Taylor; the Bureau Chief is Sara Loewen.  
22 Their phone is 406-447-4265; the fax is  
23 406-447-4287; and their website is [dphhs.mt.gov](http://dphhs.mt.gov).  
24 So with that, we're going to turn to the  
25 comment section or portion of our presentation

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1 public hearing. So Commerce and DPHHS will  
2 consider and provide written responses to all  
3 comments received, and all comments received and  
4 responses provided will be documented in the final  
5 2021-2022 Annual Action Plan, and then in the  
6 2019-2020 Annual Action Plan Amendment.  
7 Commerce and DPHHS may respond verbally  
8 to comments received in order to provide  
9 clarification or further information.  
10 So with that, we're going to open up  
11 comments regarding both the draft 2021-2022 AAP,  
12 and draft 2019-2020 AAP Amendment. So if you have  
13 a comment and are joining via webinar, please  
14 raise your hand so we can unmute you. If you're  
15 joining via phone, please press star nine to  
16 indicate you have a comment, and then press star  
17 six to unmute and remute yourself.  
18 And then when providing a public  
19 comment, it would be helpful for us if you please  
20 state and spell your name, and then please state  
21 the organization you represent, if applicable.  
22 And right before we get started, I just wanted to  
23 note that written comments can be addressed to the  
24 address or email below, and will be accepted from  
25 5:00 p.m. on June 24th, 2021 -- Excuse me. My

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1 slides are old -- all of the comments will be  
2 accepted until 5:00 p.m. on July 8th, 2021, so  
3 both the draft 2021-2022 AAP and the draft  
4 2019-2020 AAP.  
5 In previous deliveries and other  
6 information that we sent out, we had June 24th,  
7 2021 listed for the 2019-2020 AAP Amendment, and  
8 that was a mistake on our behalf. So again, we're  
9 accepting comments until July 8th, 2021 at 5:00  
10 p.m.  
11 So with that --  
12 **MS. EGLI:** Taylor, just one quick thing.  
13 Andrew has his hand raised, and I just wanted to  
14 bring that to your attention.  
15 **MS. CROWELL:** Perfect. Thanks, Janelle.  
16 **MS. EGLI:** You're welcome.  
17 **MS. CROWELL:** Andrew, do you mind  
18 unmuting, Andrew?  
19 **MR. CHANANIA:** Good afternoon. How are  
20 you today?  
21 **MS. CROWELL:** Good.  
22 **MR. CHANANIA:** This is Andrew Chanania,  
23 the last name is spelled C-H-A-N-A-N-I-A, and I  
24 represent North Fork Development.  
25 First I just want to say thank you to

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1 all of the staff who have had quite a year in  
2 putting all of this together, and many other  
3 things. You do so much for the states, and I  
4 cannot thank you enough for all of that.  
5 I also just want to indicate that I  
6 certainly support especially the changes to the  
7 rehab standards that are proposed to be part of  
8 the 2021-2022 AAP. I think that those will  
9 definitely make it easier to administer the HTF  
10 funds as we look at all of the various  
11 requirements that we have for various funding  
12 sources, building officials and others. So  
13 definitely thank you for that.  
14 With regard to the 2019-2020 Amendment,  
15 certainly there are lots of specific rules that  
16 aren't typical, that we don't typically see  
17 because of the nature of this. I would like to  
18 just put out there and encourage Commerce to think  
19 about housing as certainly a critical component of  
20 meeting needs in general in Montana, and I would  
21 say on par with public infrastructure and economic  
22 development and homelessness.  
23 So I would encourage the State to think  
24 about allocating funding equally to housing as it  
25 does public infrastructure.

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1 And then thinking about the  
2 homelessness. I think keeping that level of  
3 investment where it is is appropriate, especially  
4 in light of the HOME AAP funds that we expect to  
5 come out here hopefully later this year.  
6 One more consideration for the 2019-2020  
7 AAP is allowing a single local government to have  
8 more than one open CDBG CARES application at a  
9 time, seeing as local governments and everybody  
10 else is facing just a myriad of challenges. I  
11 think for CDBG CARES funds, lifting that  
12 limitation of one grant per local government would  
13 best help Montanans meet our needs.  
14 With regard to the 2021-2022 AAP, a  
15 couple of comments, thinking about funding  
16 allocations; again, encouraging the State to think  
17 of housing on par as far as priority with public  
18 infrastructure, and balancing that investment a  
19 little bit more equally.  
20 One item also, thinking about upcoming  
21 grant applications and funding rounds, a lot of  
22 fantastic projects were funded last year, and due  
23 to circumstances beyond our control, practitioners  
24 are facing -- many are facing some significant  
25 budget shortfalls, given the costs of some

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1 materials and labor just going through the roof.  
2 I would encourage the State to consider  
3 prioritizing last, credits that were awarded last  
4 year, making sure that those projects are whole  
5 and able to move forward in a successful manner,  
6 perhaps with a truncated and expedited application  
7 and award process. A lot of projects would be  
8 ready to go this summer or this fall but for some  
9 of these budget shortfalls that certainly were not  
10 predictable.  
11 And one more item I guess is to consider  
12 communication and collaboration with the Montana  
13 housing folks who are in charge of the significant  
14 rewrite of the Qualified Allocation Plan for low  
15 income housing tax credits. They're certainly  
16 undergoing a significant effort, and I would  
17 encourage folks who are in charge of the CDBG,  
18 HTF, and HOME funds, to openly and often  
19 communicate with the tax credit folks over there,  
20 just to help facilitate successful projects, and  
21 all of the various competing requirements.  
22 One more item, thinking about the CDBG  
23 funds in particular for 2021-2022 AAP, I would  
24 encourage the State to lift the \$450,000 per  
25 project cap, like HOME did several years ago. We

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1 certainly, I think as part of that as a result of  
2 that, saw an increased use in HOME funds, and a  
3 more effective series of projects that were able  
4 to meet housing needs, and I guess additionally  
5 more investment in housing with the regular CDBG  
6 funds.  
7 And so those are the comments that I  
8 have. I will also be submitting written comments.  
9 I appreciate everybody's time and all your  
10 efforts. Thank you so much.  
11 **MS. CROWELL:** Thank you so much for  
12 those comments, Andrew. I'll pause right there,  
13 just in case any of the panelists want to jump in.  
14 But we really appreciate all of that.  
15 **MS. EGLI:** I think that Heather McMilin  
16 was the next to have her hand raised.  
17 **MS. McMILIN:** This is Heather McMilin  
18 with Homeward, last name is spelled M-C-M-I-L-I-N.  
19 I'm assuming you guys can hear me all right.  
20 **MS. CROWELL:** We can hear you well,  
21 Heather. Thank you.  
22 **MS. McMILIN:** Excellent. I just hit the  
23 unmute indication four times. I didn't know if I  
24 was turning things on and off. So thank you.  
25 Again, Heather McMilin with Homeward,

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1 and I want to echo a lot of what Andrew testified  
2 to. There's been nothing simple about the last 16  
3 months, and all the work that you all have done  
4 and we have done on our end to implement projects,  
5 and so thank you for coming to the point we are  
6 today, and working with us, and taking testimony,  
7 and basically surviving the last year.  
8 One of the things I'd also like to echo  
9 is considering housing infrastructure with any of  
10 these funds. The even distribution to housing  
11 across the board with infrastructure is important,  
12 but also considering, if you are allocating to  
13 jurisdictions for infrastructure expansion, that  
14 certainly helps promote housing development.  
15 And maybe there's a way to give priority  
16 points for infrastructure projects that are  
17 helping to promote the construction, and  
18 preservation, and rehabilitation of housing as  
19 infrastructure, because we certainly have always  
20 had an issue, and there's been a need, but I would  
21 say over the last year we've had more impacts and  
22 will have decades worth of impacts from the COVID,  
23 people moving here, and buying our housing stock,  
24 and driving up prices.  
25 And so any way we can support proper

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1 infrastructure development and housing  
2 development, whether it be market rate or  
3 affordably bound would be great.  
4 Specifically we thank -- We are working  
5 on projects that have been funded by some of the  
6 funds discussed today, and for funds moving  
7 forward. So an area of need, I think, and very  
8 specifically with the Housing Trust Fund, one  
9 thing may be not allowed currently but we should  
10 consider allowing, is the Housing Trust Funds to  
11 be used for operational support.  
12 And I say that because in a project in  
13 the nature of permanent supportive housing, we  
14 have one, a project we're constructing now, and  
15 hope to close the financing package here in  
16 Missoula. We are also working with Neighborworks  
17 Montana in Great Falls in a permanent supportive  
18 housing project serve the chronically homeless  
19 with wrap around services.  
20 The one that is critical on both those  
21 projects is setting up a service reserve within  
22 the project to ensure those wrap around services  
23 that are so critical for those types of projects,  
24 have a back stop with a loan and tax credit  
25 investor. We have to have all the risks taken

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1 care of. And these projects operate, they're just  
2 more expensive to operate because of those  
3 services, and having that reserve, being able to  
4 back stop operations will be critical.  
5 So if we could open up any and all  
6 funding sources, not just the Housing Trust Fund,  
7 but CDBG and HOME, and these COVID assistance  
8 dollars coming in, to allow the maximum. I don't  
9 have all of the rules on the federal funds, but as  
10 soon as they come out, we keep them as flexible as  
11 possible, and at the federal level of kind of the  
12 rules, so that we can get creative and fund  
13 projects like the Neighborworks Great Falls  
14 project in Great Falls, and other needs around the  
15 communities in Montana, because I just don't know  
16 what we don't know yet. And so maximum  
17 flexibility within those funding sources would be  
18 good.  
19 I do support also multiple applications  
20 for different jurisdictions. There's definitely  
21 different needs in communities, and having  
22 multiple applications open would help us,  
23 especially with the amount of funds coming in that  
24 are above normal, and getting those allocated in  
25 the projects right away would be important.

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1 I also echo the participating with  
2 Montana Housing in their very much needed rewrite  
3 of the QAP in the process we're going through this  
4 year on that, and pairing these funds with the  
5 loan for housing tax credits, in the variety of  
6 projects that could be funded by that program. If  
7 we're all in concert together, we can simply get  
8 more done, and meet more need.  
9 The other piece would be around the  
10 cost. We've all, as we've developed and tried to  
11 put homes over people's heads, roofs over people's  
12 heads, we have survived cost impacts and timing  
13 impacts that are also cost impacts to projects at  
14 an unprecedented level. We're facing tax credit  
15 pricing that's worse than it was when the IRS  
16 basically bought the credits back and paid the  
17 states their credits to be sold for equity. They  
18 were just paid and used as funds during that  
19 2008-2009.  
20 Really just talking to developers as a  
21 way to do a truncated kind of correction or  
22 addition to contracts, anything. Just consider  
23 having those conversations. We're all very  
24 creative, and we have survived the projects, at  
25 least we're trying to at this point, but any way

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1 we can be creative to help support these one time  
2 various impacts that we've seen due to the global  
3 pandemic would be helpful.  
4 I think pretty much that's all I have  
5 for today. Thank you, Andrew, for setting the  
6 stage for at length testimony.  
7 **MS. CROWELL:** Thank you so much,  
8 Heather. It looks like I don't see any other  
9 hands raised. I think, Shyla, you've had your --  
10 Okay. We have some more. Okay. I saw Jim at the  
11 top of my list.  
12 **MR. MORTON:** Good morning. Can you hear  
13 me?  
14 **MS. CROWELL:** Yes, we can hear you, Jim.  
15 **MR. MORTON:** So I want to echo what  
16 others have said in terms of appreciation for all  
17 the work that staff has put into the documents we  
18 have before us.  
19 Just quickly, I wanted to support  
20 allowing applications, more than one application  
21 from a local government for CDBG. As it has been  
22 said, it's been a tough two years. Also with  
23 support of allowing the services component of CDBG  
24 to include multiple applications from  
25 jurisdictions.

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1 I think the entitlement cities, and  
2 entitlement areas, and the code is reasonable. So  
3 by allowing multiple applications, both for  
4 services and for CDBG, should not disadvantage the  
5 non-entitlement areas.  
6 And I just echo what both Heather and  
7 Andrew have said in terms of the housing component  
8 being much in need of consideration, in terms of  
9 coordination with other services and expanded  
10 amounts allocated. And we will provide from Human  
11 Resource Council written comments.  
12 **MS. CROWELL:** Thank you so much, Jim.  
13 Next I have Sindie on my list.  
14 **MS. KENNEDY:** Hi, this is Sindie  
15 Kennedy. Can you hear me?  
16 **MS. CROWELL:** Yes, I can hear you,  
17 Sindie. Thanks so much.  
18 **MS. KENNEDY:** Thank you. It's Sindie,  
19 S-I-N-D-I-E, Kennedy, K-E-N-N-E-D-Y, with Missoula  
20 County.  
21 I, too, would like to echo what has  
22 already been said, and express my gratitude for  
23 all of the work that Commerce has done to make  
24 this all happen. It has been a challenging year  
25 for all of us.

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1 I also want to reinforce some of the  
2 things that have been said. Definitely would  
3 really appreciate an open CDBG application  
4 process, so it's similar to HOME, so that we're  
5 not tied down to a deadline. Projects just kind  
6 of land in our laps throughout the entire year,  
7 and we've had to say no to many that were really  
8 good eligible projects because, one, we already  
9 had an application or project underway; and two,  
10 the timing wasn't right. So that would be really  
11 beneficial.  
12 Being able to increase the amount of  
13 award above \$450,000 would also be very  
14 beneficial; and balancing the housing with public  
15 infrastructure would be helpful. And I will be  
16 providing some written comments as well. Thank  
17 you.  
18 **MS. CROWELL:** Thank you so much, Sindie.  
19 Next I have Sherrie.  
20 **MS. AREY:** This is Sherrie Arey from  
21 Neighborworks, Great Falls. I'm going to just hit  
22 on a few topics that have already been hit on,  
23 just to double down on them.  
24 The multiple applications allowed for  
25 the local governments is critical to the success

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1 for those. The Housing Trust Fund dollars being  
2 allowed to use for operational support. In order  
3 to use all of the tools in our tool box to help  
4 with the homelessness issue, that could become a  
5 make or break for a project, and so strongly  
6 advocate for that.

7 And as Heather McMilin said, housing is  
8 infrastructure. The more ability to tie those two  
9 things together and help with the infrastructure  
10 needs in our community is essential to being able  
11 to provide affordable housing.

12 Thank you all for everything that you  
13 do, and all the information you provided, and best  
14 of luck. Thank you.

15 **MS. CROWELL:** Thank you so much,  
16 Sherrie. Next on my list is Shyla. I'm going to  
17 unmute you.

18 **MS. PATERA:** Good morning, MBOH and  
19 Community Development Division staff. For the  
20 record, my name is Shyla Patera, spelled S-H-Y-L-A  
21 P-A-T-E-R-A, with North Central Independent Living  
22 Services in Black Eagle, and the Montana Community  
23 Living Task Force.

24 I'm really happy to participate in this  
25 hearing today, and I am really supportive of

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1 Montana's QAP efforts are moving forward, and  
2 looking at the different funding sources, such as  
3 the Housing Trust Fund and different things being  
4 utilized for operation and different points,  
5 different points of work, as some of the  
6 developers and other housers have talked about.

7 Some of the things that again, NCILS and  
8 the Independent Living Community for Montanans  
9 with Disabilities espouse is making sure that we  
10 have accessible access to both services in  
11 sidewalk and infrastructure, but also in Home and  
12 Housing Trust Fund.

13 Some of the things that have impacted us  
14 through COVID are making sure that we also can  
15 house our homeless, and some of the things that  
16 I've thought of are looking at like accessible  
17 tiny homes -- one in particular is based out of  
18 Emmett, Idaho that I've been beginning to research  
19 -- and hopefully will look at our zoning  
20 opportunities, both for single family and  
21 multi-family, and different things as well.

22 Just making sure that our people with  
23 disabilities have access to HOME, Mainstream, and  
24 811 if needed, and working with HUD and others to  
25 make sure that people with disabilities aren't

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1 moving from one house to another, but making sure  
2 that they have stable opportunities that deal with  
3 their funding sources that they are using.

4 I'd also like to encourage some funding  
5 for accessible rehabbing of housing. We  
6 encourage, of course, visible and accessible new  
7 construction, and the universal design options,  
8 but a lot of calls that we get are also, "How do I  
9 rehab my house to make it so that I can age in  
10 place?" "How do I, as a long term homeowner, get  
11 to stay in our community as well, and with my  
12 house that I already are owning, or paying on, or  
13 working with?" And that's a big thing.

14 And infrastructure, we also encourage  
15 communities to work on accessible pathways,  
16 pedestrian crosses, contiguous sidewalks, timing  
17 of things, development of accessible pathways for  
18 walking, rolling, parking, biking, anything a  
19 person with a disability needs.

20 And I will be submitting written  
21 comments to follow my disjointed verbal ones.  
22 Everyone have a great day. Thank you for all your  
23 hard work.

24 **MS. CROWELL:** Thank you so much, Shyla.  
25 They were not disjointed. We understood it all.

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1 It looks like Heather had her hand up again, so  
2 I'm going to unmute you.

3 **MS. McMILIN:** Thank you. I will amend  
4 my previous testimony. Again, Heather McMilin,  
5 Homeward, Missoula, Montana, M-C-M-I-L-I-N.

6 I would be remiss if I did not comment,  
7 and appropriate or not. If there's any way this  
8 department and the individuals on this call can  
9 support the work that will go into the next round  
10 of the state housing credit work at the  
11 legislative level. It's something that made it  
12 off the floor and to the Governor's desk, and  
13 unfortunately was not signed. And that would  
14 help, probably double the production of homes,  
15 rehabilitations, preservation, within the state.

16 And so I wanted to go on the record to  
17 say if there's a way to support or participate,  
18 let us know. That would be great. Thanks.

19 **MS. CROWELL:** Thank you so much,  
20 Heather. If there's any further comments, just  
21 feel free to raise your hand. Again, if you're  
22 joining us via phone, you can do that by pressing  
23 star nine to indicate that you have a comment, and  
24 then star six to unmute or remute yourself.

25 (No response)

1 **MS. CROWELL:** It doesn't look like we  
2 have any other comments, so we will keep this  
3 screen up for a couple of more seconds, just in  
4 case anybody needs to jot down where written  
5 comments can be sent. Again, it's at the bottom  
6 of this screen. It's the Montana Department of  
7 Commerce, Community Development Division,  
8 Attention: Con Plan, P.O. Box 200523, Helena,  
9 Montana, 59620-0523, or DOCConplan@mt.gov.

10 And with that, we just wanted to say  
11 thank you guys. You have had a lot of really  
12 great, in depth, and insightful comments today,  
13 and we will take all of those to heart. We really  
14 appreciate you taking time out of your I'm sure  
15 busy days to spend 45 minutes with us.

16 These documents and our programs are  
17 just as strong, or only as strong as all of us  
18 working together to get things done for Montanans.  
19 So thank you all. And I'll pause there just in  
20 case there's anybody else from Commerce or DPHHS  
21 that has anything else to add.

22 (No response)

23 **MS. CROWELL:** Okay. Thank you guys.

24 (The proceedings were concluded  
25 at 11:47 a.m. )

1 C E R T I F I C A T E

2 STATE OF MONTANA )

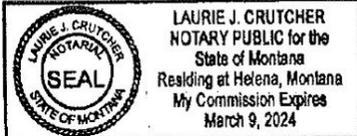
3 : SS.

4 COUNTY OF LEWIS & CLARK )

5 I, LAURIE CRUTCHER, RPR, Court Reporter,  
6 Notary Public in and for the County of Lewis &  
7 Clark, State of Montana, do hereby certify:

8 That the proceedings were taken before me at  
9 the time and place herein named; that the  
10 proceedings were reported by me in shorthand and  
11 transcribed using computer-aided transcription,  
12 and that the foregoing - 33 - pages contain a true  
13 record of the proceedings to the best of my  
14 ability.

15 IN WITNESS WHEREOF, I have hereunto set my  
16 hand and affixed my notarial seal this 28th day of  
17 June, 2021.

18  
19 *Laurie J. Crutcher*  
20  
21   
22  
23  
24  
25

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**Crowl, Taylor**

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**From:** Montana Department of Commerce <commerce@announcements.mt.gov>  
**Sent:** Monday, June 7, 2021 12:08 PM  
**To:** Crowl, Taylor  
**Subject:** CAPER 2020-2021



**The Montana Departments of Commerce and  
Public Health and Human Services  
Announce the Public Comment Periods for  
the 2019-2020 Annual Action Plan (AAP)  
Amendment, 2020-2021 Consolidated Annual  
Performance and Evaluation Report  
(CAPER), and 2021-2022 AAP**

The 2019-2020 AAP has been amended to include supplemental Community Development Block Grant (CDBG) funds made available to the State through the Coronavirus Aid, Relief, and Economic Security (CARES) Act. Additionally, the 2021-2022 AAP has been drafted. Both AAPs are available for public comment June 8, 2021, with the

2019-2020 AAP comment period ending **June 24, 2021**, and the 2021-2022 AAP comment period ending **July 8, 2021**. For more information and to provide oral comment, the public is invited to attend a virtual public hearing concerning both AAPs June 22, 2021.

The 2020-2021 CAPER, which covers the period April 1, 2020, to March 31, 2021, has been drafted and is available for public comment June 8, 2021, through **June 25, 2021**. For more information and to provide oral comment, the public is invited to attend a virtual public hearing concerning the CAPER June 23, 2021.

All documents are available electronically at <https://commerce.mt.gov/Consolidated-Plan/Documents>, in hardcopy by request, or at select locations across the state (<https://commerce.mt.gov/Consolidated-Plan/List-of-Repositories>).

**All comments must be submitted to the address or email below no later than 5:00 p.m. on the applicable comment period end date.**

Montana Department of Commerce  
Community Development Division  
Attention: Con Plan  
301 S. Park Avenue  
P.O. Box 200523  
Helena, MT 59620-0523  
[DOCConPlan@mt.gov](mailto:DOCConPlan@mt.gov)

Both public hearings, **Tuesday, June 22, 2021**, and **Wednesday, June 23, 2021**, will be held on Zoom and will begin at **11:00 a.m.** Presentation materials will be available on Commerce's website at <https://commerce.mt.gov/Consolidated-Plan/Updates> prior to each hearing. Each public hearing will provide an overview of applicable requirements, affected programs, and public participation process, as well as key takeaways from the pertinent document(s). The State will consider any comments or views provided in writing during the specified comment periods or orally during the public hearings.

**To participate in one or both public hearings via webinar, please register using the links provided at the URL below. To participate via phone, please follow dial-in instructions at the URL below.**

<https://commerce.mt.gov/Consolidated-Plan/Updates>

*The Department of Commerce will make reasonable accommodations for persons with disabilities or persons with limited English proficiency who wish to participate in this process or need an alternative accessible format of this notice or presentation materials.*

*Presentation materials will be provided in advance of the hearing. If you require an accommodation, please contact the Department of Commerce no later than **5:00 p.m. on June 16, 2021**, to advise us on the nature of the accommodation that you need. Please contact Bonnie Martello or email [DOCConPlan@mt.gov](mailto:DOCConPlan@mt.gov).*

***Have questions? Email [DOCConPlan@mt.gov](mailto:DOCConPlan@mt.gov)***



**MONTANA DEPARTMENT OF COMMERCE**

301 S. PARK AVE. | PO BOX 200501 | HELENA, MT 59620-0501  
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SCOTT OSTERMAN  
DIRECTOR



GREG GIANFORTE  
GOVERNOR

June 3, 2021

Clint Wynne, Executive Director  
Action for Eastern Montana  
HRDC Districts I, II, III  
2030 N Merrill Ave  
PO Box 1309  
Glendive, MT 59330

Greetings,

Enclosed please find draft copies of Montana's amended 2019-2020 Annual Action Plan (AAP), 2021-2022 AAP, and 2020-2021 Consolidated Annual Performance and Evaluation Report (CAPER).

If you recall, your organization agreed to be a repository for the Consolidated Plan for Housing and Community Development and its associated AAP and CAPER documents for the 2020-2024 period. This responsibility only requires you to have documents accessible to the public for review and does not obligate you to receive public comment. All comments should be directed to the Community Development Division via phone 406-841-2770 or email [DOCConPlan@mt.gov](mailto:DOCConPlan@mt.gov).

The public will be noticed June 7, 2021, that draft copies of the 2019-2020 AAP, 2021-2022 AAP, and 2020-2021 CAPER are available electronically at <https://commerce.mt.gov/Consolidated-Plan/Documents>, in hardcopy by request, or at select locations, including your place of business (<https://commerce.mt.gov/Consolidated-Plan/List-of-Repositories>). All documents must be available for the full public comment period for each document, as follows: (1) 2019-2020 AAP – **June 8, 2021 to June 24, 2021**; (2) 2021-2022 AAP – **June 8, 2021 to July 8, 2021**; and (3) 2020-2021 CAPER – **June 8, 2021 to June 25, 2021**. After the applicable comment period end date, documents provided can be destroyed and do not need to be returned to Commerce.

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Community Development Division  
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P.O. Box 200523  
Helena, MT 59620-0523  
[DOCConPlan@mt.gov](mailto:DOCConPlan@mt.gov)

For more information and to provide oral comment, the public is invited to attend a virtual public hearing concerning both AAPs **June 22, 2021** and/or a virtual public hearing concerning the CAPER **June 23, 2021**. Both public hearings will be held on Zoom and will begin at **11:00 a.m.** Registration information and dial-in instructions for both public hearings are available at <https://commerce.mt.gov/Consolidated-Plan/Updates>.

We thank you greatly for your willingness to be a repository location for the citizens of Montana.

Sincerely,

Cheryl Cohen, Acting Administrator  
Community Development Division  
301 S Park Avenue  
Helena, MT 59601

June 3, 2021

Tracy Diaz, Executive Director  
Community Action Partnerships of NW Montana  
HRDC District X  
214 Main St  
PO Box 8300  
Kalispell, MT 59904

Greetings,

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Sincerely,

Cheryl Cohen, Acting Administrator  
Community Development Division  
301 S Park Avenue  
Helena, MT 59601

June 3, 2021

Carilla French, Executive Director  
District IV HRDC  
2229 Fifth Ave  
Havre, MT 59501

Greetings,

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Montana Department of Commerce  
Community Development Division  
Attention: Con Plan  
301 S. Park Avenue  
P.O. Box 200523  
Helena, MT 59620-0523  
[DOCConPlan@mt.gov](mailto:DOCConPlan@mt.gov)

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We thank you greatly for your willingness to be a repository location for the citizens of Montana.

Sincerely,

Cheryl Cohen, Acting Administrator  
Community Development Division  
301 S Park Avenue  
Helena, MT 59601

June 3, 2021

Cathy Seilstad, Fiscal Officer  
District 6 HRDC  
300 1st Ave N #203  
Lewistown, MT 59457

Greetings,

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Sincerely,

Cheryl Cohen, Acting Administrator  
Community Development Division  
301 S Park Avenue  
Helena, MT 59601

June 3, 2021

Heather Griner, Executive Director  
District IX HRDC  
32 S Tracy Ave  
Bozeman, MT 59715

Greetings,

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Sincerely,

Cheryl Cohen, Acting Administrator  
Community Development Division  
301 S Park Avenue  
Helena, MT 59601

June 3, 2021

Jim Morton, Executive Director  
District XI HRC  
1801 S Higgins  
Missoula, MT 59801

Greetings,

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Sincerely,

Cheryl Cohen, Acting Administrator  
Community Development Division  
301 S Park Avenue  
Helena, MT 59601

June 3, 2021

Tori Matejovsky, Executive Director  
Great Northern Development Corporation  
233 Cascade St  
Wolf Point, MT 59201

Greetings,

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Sincerely,

Cheryl Cohen, Acting Administrator  
Community Development Division  
301 S Park Avenue  
Helena, MT 59601

June 3, 2021

Andrea Davis, Executive Director  
Homewood  
1535 Liberty Ln  
Ste 116A  
Missoula, MT 59808

Greetings,

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Sincerely,

Cheryl Cohen, Acting Administrator  
Community Development Division  
301 S Park Avenue  
Helena, MT 59601

June 3, 2021

Carlos Ramalho, Executive Director  
Living Independently for Today and Tomorrow  
1201 Grand Ave  
Ste 1  
Billings, MT 59101

Greetings,

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Community Development Division  
301 S Park Avenue  
Helena, MT 59601

June 3, 2021

Dave Glaser, President  
MoFi  
229 E Main St  
Missoula, MT 59802

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Cheryl Cohen, Acting Administrator  
Community Development Division  
301 S Park Avenue  
Helena, MT 59601

June 3, 2021

Ruby Benasky, Administrative Assistance  
Montana DPHHS, Human and Community Serv Div  
111 N Last Chance Gulch  
5th Floor  
Helena, MT 59620

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Sincerely,

Cheryl Cohen, Acting Administrator  
Community Development Division  
301 S Park Avenue  
Helena, MT 59601

June 3, 2021

Pam Bean, Executive Director  
Montana Fair Housing  
519 E Front St  
Ste 533  
Butte, MT 59701

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Sincerely,

Cheryl Cohen, Acting Administrator  
Community Development Division  
301 S Park Avenue  
Helena, MT 59601

June 3, 2021

Marieke Beck, Program Manager  
Montana Human Rights Bureau  
33 S Last Chance Gulch  
Ste 2B, PO Box 1728  
Helena, MT 59601

Greetings,

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Sincerely,

Cheryl Cohen, Acting Administrator  
Community Development Division  
301 S Park Avenue  
Helena, MT 59601

June 3, 2021

Bob Maffit, Executive Director  
Montana Independent Living Project  
825 Great Northern Blvd  
Ste 105  
Helena, MT 59601

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Community Development Division  
301 S Park Avenue  
Helena, MT 59601

June 3, 2021

Bob Maffit, Executive Director  
Montana Independent Living Project  
3475 Monroe  
Ste 100  
Butte, MT 59701

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Montana Department of Commerce  
Community Development Division  
Attention: Con Plan  
301 S. Park Avenue  
P.O. Box 200523  
Helena, MT 59620-0523  
[DOCConPlan@mt.gov](mailto:DOCConPlan@mt.gov)

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We thank you greatly for your willingness to be a repository location for the citizens of Montana.

Sincerely,

Cheryl Cohen, Acting Administrator  
Community Development Division  
301 S Park Avenue  
Helena, MT 59601

June 3, 2021

Bob Maffit, Executive Director  
Montana Independent Living Project  
2015 Charlotte Street  
Ste 2  
Bozeman, MT 59718

Greetings,

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Sincerely,

Cheryl Cohen, Acting Administrator  
Community Development Division  
301 S Park Avenue  
Helena, MT 59601

June 3, 2021

Jim Kammerer, Library Information Services Manager  
Montana State Library  
1515 E Sixth Ave  
PO Box 201800  
Helena, MT 0

Greetings,

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Sincerely,

Cheryl Cohen, Acting Administrator  
Community Development Division  
301 S Park Avenue  
Helena, MT 59601

June 3, 2021

Shane Walk, Acquisitions Manager  
Mountain Plains Equity  
2101 Overland Ave  
Billings, MT 59102

Greetings,

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Sincerely,

Cheryl Cohen, Acting Administrator  
Community Development Division  
301 S Park Avenue  
Helena, MT 59601

June 3, 2021

Kaia Peterson, Executive Director  
NeighborWorks Montana  
509 First Ave S  
Great Falls, MT 59401

Greetings,

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Sincerely,

Cheryl Cohen, Acting Administrator  
Community Development Division  
301 S Park Avenue  
Helena, MT 59601

June 3, 2021

Tom Osborn, Executive Director  
North Central Independent Living Services  
1120 25th Ave N  
Black Eagle, MT 59414

Greetings,

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Sincerely,

Cheryl Cohen, Acting Administrator  
Community Development Division  
301 S Park Avenue  
Helena, MT 59601

June 3, 2021

Karla Seaman, Executive Director  
Opportunities, Inc.  
District V HRDC  
905 First Ave N  
Great Falls, MT 59401

Greetings,

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Sincerely,

Cheryl Cohen, Acting Administrator  
Community Development Division  
301 S Park Avenue  
Helena, MT 59601

June 3, 2021

Lori Ladas, Executive Director  
Rocky Mountain Development Council  
200 S Cruse  
Helena, MT 59601

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Community Development Division  
301 S Park Avenue  
Helena, MT 59601

**Affidavit of Publication for the Newspaper Advertisements  
for the 2021-2022 AAP Public Hearing**



Montana Newspaper Association  
825 Great Northern Boulevard Suite 202 Helena MT 59601  
406-443-2850 | fax 406-443-2860 | e-mail randy@mtnewspapers.com

**AFFIDAVIT OF INSERTION**

This will certify that the print advertisement for the "*Department of Commerce Consolidated Planning*", was inserted and published in the following newspapers:

Great Falls Tribune, Bozeman Daily Chronicle, Billings Gazette, and The Missoulian on the date 6/6/2021 and 6/9/2021. With a total circulation of 46,833

Ryan Staynes

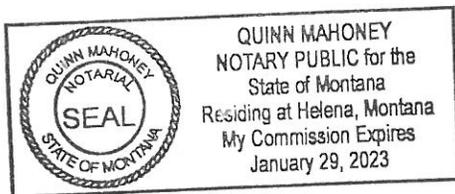
Ryan Staynes Member Relations

Date 6/29/2021

Quinn Mahoney

Subscribed and sworn to before me this

29th day of June, 2021.



Notary Public for the State of Montana

Residing at Helena

My commission expires 1-29-23

20    .

# Gaza's bereaved civilians await justice

22 members of 1 family killed in Israeli attacks

KARIN LAUB AND FARES AKRAM  
Associated Press

**GAZA CITY, Gaza Strip** — The al-Kawliks, a family of four generations living next door to each other in downtown Gaza City, were utterly unprepared for the inferno.

Like others, they were terrified by the heavy bombing in Israel's fourth war with Gaza's Hamas rulers that began May 10. The explosions felt more powerful than in previous fighting. At night, parents and children slept in one room so they would hear or die together.

Yet the relatively well-to-do Rimal neighborhood where the family lived in a cluster of apartment buildings seemed somewhat safer than areas along Gaza's border with Israel, which had been devastated in this and past fighting.

Then one night disaster struck. Aam al-Kawli, 49, four children had gone to bed, and his wife was preparing to join them.

At around 1 a.m. on May 16, a thunderous boom shook his top-floor apartment, followed quickly by a second and third. "The floor cracked below our feet and the furniture was thrown to the wall," the 42-year-old engineer said.

The four-story building collapsed, with Azzam's apartment dropping to the ground. The family escaped through the kitchen balcony, to an almost ground-level. Bizarrely, the laundry hanging on a clothesline seemed untouched.

## Family's death toll at 22

It took a day for the full horror to emerge, as bodies and survivors were pulled from the rubble. The family and neighbors used ropes to clear chunks of concrete, working alongside ill-equipped rescue teams.

By nightfall, the family's death toll stood at 22. Eight bodies were dug out of Azzam's building and 14 from the one next door. The dead included 89-year-old family patriarch Amin, his son Fawaz, 62, his grandson Sa'ad, 28, and his great-grandson, 6-month-old Qusai.

Just a day earlier, Qusai's parents had celebrated a small milestone, his first tooth. Azzam's two younger brothers were killed. Three nieces — 5-year-old Rula, 10-year-old Yara and 12-year-old Hala — were found in a tight embrace, their bodies almost pulled out.



ASSOCIATED PRESS

Members of the al-Kawlik family who died in the deadliest airstrike of the 11-day war between Israel and Gaza's Hamas rulers. The May 16 bombing, which Israel said targeted Hamas tunnels, collapsed two apartment buildings in Gaza City and killed 22 members of the al-Kawlik clan, including a 6-month-old boy and his 89-year-old grandfather.

said Azzam's surviving older brother, Awni.

The bombing along several hundred yards of al-Wahda Street took just minutes. In all, it brought down three houses — two in the al-Kawlik compound and one nearby — and killed a total of 43 people, making it the single deadliest air raid of the 11-day war.

Israel said the target was a Hamas tunnel underneath the street, part of what it called a roughly 220-mile underground network. The tunnels served offensive and defensive purposes, military officials said, accusing Hamas of using civilians as human shields.

Lt. Col. Jonathan Conriss, a military spokesman, said during a war-time briefing that the military target in Rimal collapsed, causing nearby houses and their supporting structures to collapse as well. "That caused a large amount of civilian casualties, which were not the aim," he said.

He said the army was reviewing the incident and "adjusting the analysis and the ordinance used in the future" to prevent similar events from occurring again. "It's not a totally mathematic exercise in choosing the ordinance," he said.

He said Israel carried out dozens of airstrikes in areas just as densely populated, with far fewer casualties.

Defense Minister Benny Gantz told foreign journalists this week that Israel does everything it can to avoid civilian casualties, but Gaza's crowded urban landscape makes it virtually impossible to avoid

them altogether. "Hamas is aiming to hit civilians by purpose and we are trying our best for that not to happen," he said.

The fighting began May 10 after Hamas fired rockets toward Jerusalem in support of Palestinian protests against Israel's heavy-handed policing of the Al-Aqsa Mosque compound, a site sacred to Jews and Muslims, and the threatened eviction of dozens of Palestinian families by Jewish settlers. In all, Hamas fired more than 4,000 rockets toward Israel during the war, while Israel said it struck hundreds of targets linked to militants in Gaza.

The Israeli military did not respond when asked what bombs were used in the al-Wahda Street strikes.

## Bomb made in Missouri

At Gaza City's main police compound, Capt. Mohamed Meqdad picked through pieces of bomb fragments in a cardboard box labeled "al-Wahda Street."

Two had serial numbers identifying them as fitted with Joint Direct Attack Munition like manufactured by Boeing Co. at its factory in St. Charles, Missouri, to make them so-called "smart bombs" able to be guided to a target by GPS or lasers. Boeing did not answer questions about the bombing, only saying in a statement: "In accordance with U.S. law, the U.S. government authorizes and provides strict oversight for all defense exports."

Meqdad said that based on the fragments, the bombs that brought down the al-Kawlik homes were likely GBU-31s, packed with 945 pounds of

explosives. The GBU-31 typically is used for large buildings, but also can destroy underground targets, said N.R. Jenzon-Jones, the director of Armament Research Services, a specialist arms investigations firm.

The bombs carry a powerful blast, meaning surveillance, intelligence-gathering, pre-planning and the correct choice and explosive punch of the weapon should be carefully considered before an attack, he said.

"The intrinsic wide-area effects of large explosive munitions mean they must be used judiciously in the urban environment," he said.

The Israeli military did not respond when asked what bombs were used in the al-Wahda Street strikes.

## War crimes investigations

Earlier this year, the International Criminal Court began investigating Israel and Hamas for possible war crimes going back to the previous 2014 war. This includes random Hamas rocket fire toward Israeli communities — widely seen as a violation of the rules of war — and some

teams calling off strikes because they spotted children in the vicinity. In many cases, it ordered occupants to evacuate buildings before bombing them.

International law professor Paola Gaeta said that "certainly we are witnessing something which is wrong," referring to civilian deaths, but there is a high threshold for proving a war crime. This includes proving disproportionate use of force and intentional targeting of civilians, said Gaeta, who teaches at the Graduate Institute of International and Development Studies in Geneva.

If Israel said it made a reasonable mistake in calculating the amount of explosives in the al-Wahda Street strike, this could serve as a defense, she said.

In all, 254 people were killed in Gaza in this war, including 47 children and 34 women, according to the Gaza health ministry. Hamas has acknowledged the deaths of 80 militants. Twelve civilians, including two children, were killed in Israel, along with one soldier.

## World 'will forget our problem'

Awni al-Kawlik keeps 22 death certificates in a brickcase, along with the deeds for the two destroyed homes. A third family house was damaged and awaits demolition. The family business, a generator repair shop, was also destroyed. Two apartment buildings, including Awni's home, remain intact.

Sitting in a courtyard behind the rubble, the 49-year-old shrugged when told of Israel's apparent acknowledgment of error. "What will I do with this information?" he said. "I lost my livelihood and I lost my brothers and their children."

The fear that justice will never come makes it harder for the family to deal with loss, he said. He worries that Gaza and its problems, including a suffocating blockade enforced by Israel and Egypt since 2007 to contain Hamas, will soon sink back into oblivion.

"We know that the world is now empathetic, but after a while it will forget our problem," he said. "Even when they remember us as numbers."

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Annual Action Plan Public Comment Period

**MONTANA**  
DEPARTMENT OF COMMERCE

The Montana Department of Commerce and Public Health and Human Services announce public comment periods for the following: 2021-2022 Annual Action Plan (AAP), 2021-2022 AAP and 2020-2021 Combined Fiscal Performance and Evaluation Report (CFPER).

The 2019-2020 AAP has been amended to include supplemental Community Development Block Grant (CDBG) funds made available to the State through the Coronavirus Aid, Relief, and Economic Security (CARES) Act. Annually, the 2019-2020 AAP has been updated. Both AAPs are available for public comment June 8, 2021, with the 2019-2020 AAP comment period ending June 24, 2021, and the 2021-2022 AAP comment period ending July 8, 2021. For more information on public comment periods, the public is invited to attend a virtual public hearing concerning both AAPs June 22, 2021.

The 2020-2021 CFPER, which covers the period April 1, 2020, to March 31, 2021, has been drafted and is available for public comment June 8, 2021 through June 23, 2021. For more information and to provide oral comment, the public is invited to attend a virtual public hearing concerning the CFPER June 22, 2021.

All documents are available electronically at <https://www.mt.gov/Departments/Commerce/DoingBusinessInMontana>. For hard copy, please contact the Montana Department of Commerce at [info@mt.commerce.mt.gov](mailto:info@mt.commerce.mt.gov) or call 406-497-2000.

All comments must be delivered to the address or email below no later than 5:00 p.m. on the applicable comment period end date.

Montana Department of Commerce  
Commerce and Public Health and Human Services Division  
Montana, Commerce Plan  
301 S. Park Avenue  
1400 Helena, MT 59604-0523  
DCC@mt.commerce.mt.gov

The public hearings, Tuesday, June 22, 2021, and Wednesday, June 23, 2021, will be held on Zoom and will begin at 11:00 a.m. Presentations will be available on Commerce's website at [www.mt.gov/Departments/Commerce/DoingBusinessInMontana](https://www.mt.gov/Departments/Commerce/DoingBusinessInMontana) prior to each hearing. Each public hearing will provide an overview of applicable requirements, affected businesses, and public participation options, as well as an opportunity for the public to provide input. The State will consider any comments or views indicated in writing during the applicable comment periods or orally during the public hearing.

To participate in one or both public hearings via webinar, please register using the links provided in the URL below. To participate in person, please follow instructions in the URL below.

<https://commerce.mt.gov/DoingBusinessInMontana>

The Department of Commerce will make reasonable accommodations for persons with disabilities who are unable to participate in person. Requests for accommodations should be made to the Department of Commerce at least 10 business days prior to the date of the hearing. If you require an accommodation, please contact the Department of Commerce at [info@mt.commerce.mt.gov](mailto:info@mt.commerce.mt.gov) or call 406-497-2000. The request will be reviewed on a case-by-case basis.

Please contact Emily Martini at [emartini@mt.commerce.mt.gov](mailto:emartini@mt.commerce.mt.gov) for more information.

Have questions? Email [DCC@mt.commerce.mt.gov](mailto:DCC@mt.commerce.mt.gov)

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**NOTICE OF PUBLIC HEARING BEFORE THE MONTANA DEPARTMENT OF ENVIRONMENTAL QUALITY (DEQ)**

A public hearing for the Drinking Water and the Water Pollution Control State Revolving Fund Loan Programs will be held Thursday, June 17, 2021, at 1:00 p.m. The public hearing will be held to consider Proposed Project Priority Lists and Intended Use Plans for State Fiscal Year 2022 for both SRF programs. The Intended Use Plans identify the intended uses of funds in the loan programs and describe how the goals of the programs will be satisfied. The Project Priority Lists identify projects that are eligible to be funded with loan monies authorized and appropriated to the State of Montana through Federal Fiscal Year 2022.

Copies of both Intended Use Plans, which contain the priority lists, may be obtained from the DEQ, Water Quality Division, SRF Engineering, P.O. Box 20990, Helena, Montana 59620-0990, telephone (406) 444-5447, or on the Department website at: <http://deq.mt.gov/water/DrinkingWater/DesignApprovals>.

Oral or written comments on the Priority Lists or Intended Use Plans may be presented at the public hearing or sent to Mark Smith ([marksmith@deq.mt.gov](mailto:marksmith@deq.mt.gov)), Drinking Water Revolving Fund Program Manager, or Mike Abrahamson ([mabrahamson@deq.mt.gov](mailto:mabrahamson@deq.mt.gov)), Water Pollution Control Revolving Fund Program Manager, P.O. Box 20990, Helena, Montana 59620-0990. These comments must be received by 5:00 p.m., Tuesday, July 6, 2021. In addition, communities wanting to add their proposed drinking water or water pollution control projects to either Project Priority List should contact DEQ prior to the hearing date.

The Department will make reasonable accommodations for persons with disabilities who wish to participate in this hearing. If you need an accommodation or verbal access, please notify the Department staff, Candice Gerbrandt, email: [Candice.Gerbrandt@mt.gov](mailto:Candice.Gerbrandt@mt.gov), phone (406) 444-4443, or fax (406) 444-4434.

Kevin Smith  
Kevin Smith, P.E., Bureau Chief Engineering Bureau  
Water Quality Division  
Department of Environmental Quality  
June 9, 2021 (47-9151) June 9, 2021

**MNAXLP**

The Montana Departments of Commerce and Public Health and Human Services announce a public comment period for the following 2021-2022 Community Development Block Grant (CDBG) funds made available to use through the Coronavirus Aid, Relief, and Economic Security (CARES) Act authority. The 2021-2022 CDBG has been drafted. Both CDBGs are available for public comment June 4, 2021, with the 2021-2022 CDBG comment period ending June 23, 2021, and the 2021-2022 CDBG comment period ending June 23, 2021. For more information and to receive oral comments, the public is invited to attend a public hearing concerning the CDBGs June 23, 2021.

The 2021-2022 CDBG, which covers the second cycle, is available for public comment June 4, 2021, through June 23, 2021. For more information and to receive oral comments, the public is invited to attend a public hearing concerning the CDBGs June 23, 2021.

All documents are available via transparency at <https://commerce.mt.gov/docs/default-source/cdbg>. Comments may be submitted by request or oral. Project locations across the state (<https://commerce.mt.gov/docs/default-source/cdbg>).

All comments must be submitted to the address or email below no later than 5:00 p.m. on the applicable comment period date.

Montana Department of Commerce  
Community Development Division  
Attention: Con Plan  
301 S. Park Avenue  
P.O. Box 20923  
Helena, MT 59620-0923  
[DC@ConPlan.mt.gov](mailto:DC@ConPlan.mt.gov)

With public hearings, Tuesday, June 15, 2021, and Wednesday, June 23, 2021, at 1:00 p.m. and all times of 1:00 p.m. to 5:00 p.m. on the applicable comment period date.

Each public hearing will provide an overview of applicable requirements, affected systems, and public participation procedures. For more information from the proposed documents, the state will consider any comments or issues provided in writing during the specified comment periods, or orally during the public hearings.

To participate in one or both public hearings via webinar, please register using the link provided in the URL below. To participate in person, please follow public instructions at the URL below: <https://commerce.mt.gov/uncategorized/cdbg/>

The Department of Commerce will make reasonable accommodations for persons with disabilities. For more information, please contact the Department of Commerce at (406) 444-4443. If you require an accommodation, please contact the Department of Commerce at (406) 444-4443. If you require an accommodation, please contact the Department of Commerce at (406) 444-4443.

Have questions? Email: [DC@ConPlan.mt.gov](mailto:DC@ConPlan.mt.gov)

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MNAXLP (47-9151) June 9, 2021

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**Legals Government MMAXLP**

**PUBLIC HEARING ON A RESOLUTION OF THE CITY COUNCIL AWARDED CDBG AND HOME PROGRAM FUNDS**

Notice is hereby given that the City of Missoula is seeking public input on its updated 2021 annual Action Plan for the Community Development Block Grant (CDBG) and Home Investment Partnerships Program (HOME). Participating jurisdictions for the program will begin on July 1, 2021. The City's Program Year 2021 updated draft Action Plan, which includes project funding recommendations, is now available online at [www.missoula.gov](http://www.missoula.gov) for a public review and comment period ending on Monday, June 17, 2021.

The annual Action Plan and funding recommendations were presented to the Administration & Finance Committee of the City Council on Tuesday, May 11, 2021. The committee is scheduled for a public hearing before the City Council on Tuesday, June 15, 2021 at 7:00 PM.

Submit any written comments to the City of Missoula, City Development (CD) Division by June 17, 2021. City of Missoula, Community Development, Engineering, and Planning, 435 Ryan, Missoula, MT 59801. To receive a copy of the updated draft Action Plan or to review in an alternative format, or to request special accommodations in order to participate, please contact CD at 408.552.3172, or email [community@missoula.mt](mailto:community@missoula.mt) or contact the Montana Relay Service at 1-877-711-7171.

Public comments on the CD's proposed activities submitted by June 17, 2021 will be included in the final version of the annual Action Plan submitted to the Department of Housing and Urban Development (HUD).

**Legals Government MMAXLP**

**MONTANA**  
DEPARTMENT OF COMMERCE

The Montana Department of Commerce and Public Health and Human Services are seeking comments for the proposed Consolidated Plan for the years 2019-2023 Annual Action Plan (AAP) 2021-2023. The 2019-2023 AAP has been amended to include supplemental Community Development Block Grant (CDBG) funding allocations to the State, County, and City of Missoula. The AAP is available for public review and comment from June 15, 2021 to June 23, 2021. The 2021-2023 AAP, consent period ending July 8, 2023. For further information and to request a public hearing, please contact the Montana Department of Commerce, Public Health and Human Services, at 408.552.3172. All comments must be submitted to the address or email below no later than the date on the applicable consent period end date.

Montana Department of Commerce  
Community Development Division  
Attention: Con Plan  
303 N. Park Avenue  
PO Box 70923  
Helena, MT 59623  
DOCC@mt.gov

Public hearing, Tuesday, June 22, 2021, and Wednesday, June 23, 2021, will be held on Zoom and will begin at 11:00 a.m. Presentation materials will be available on Zoom. Comments may be submitted via email to [conplan@mt.gov](mailto:conplan@mt.gov) or by mail to the Montana Department of Commerce, Public Health and Human Services, 303 N. Park Avenue, PO Box 70923, Helena, MT 59623. All comments must be submitted to the address or email below no later than the date on the applicable consent period end date.

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**Legals Missoula MMAXLP**

Notices under this classification are intended by law to be run in a newspaper of general circulation. A newspaper of general circulation is defined as a newspaper that is published at least once a week, has a circulation of at least 10,000 copies, and is published in the State of Montana. A newspaper of general circulation is defined as a newspaper that is published at least once a week, has a circulation of at least 10,000 copies, and is published in the State of Montana.

**NOTICE OF HEARING ON NAME CHANGE**

Deaf No. 2021-037  
In RE THE ESTATE OF MICHAEL DOCKERY, Plaintiff  
vs.  
MICHAEL DOCKERY, Defendant  
This is notice that Plaintiff has filed a Petition for Name Change with the District Court of the Fourth Judicial District, Missoula County, Montana. The hearing will be held at the District Court on June 22, 2021 at 10:00 a.m. The hearing will be held at the District Court on June 22, 2021 at 10:00 a.m. The hearing will be held at the District Court on June 22, 2021 at 10:00 a.m.

**SUMMONS FOR PUBLICATION**  
Cause No. 2021-037  
MICHAEL DOCKERY, Plaintiff  
vs.  
MICHAEL DOCKERY, Defendant  
This is notice that Plaintiff has filed a Petition for Name Change with the District Court of the Fourth Judicial District, Missoula County, Montana. The hearing will be held at the District Court on June 22, 2021 at 10:00 a.m. The hearing will be held at the District Court on June 22, 2021 at 10:00 a.m. The hearing will be held at the District Court on June 22, 2021 at 10:00 a.m.

**Legals Missoula MMAXLP**

**WESTERN VALLEY LAND COMPANY, L.P., HARRIS AND ALL, vs. WESTERN VALLEY LAND COMPANY, L.P., HARRIS AND ALL, et al.**

Plaintiffs vs. Defendants  
This is notice that Plaintiff has filed a Petition for Name Change with the District Court of the Fourth Judicial District, Missoula County, Montana. The hearing will be held at the District Court on June 22, 2021 at 10:00 a.m. The hearing will be held at the District Court on June 22, 2021 at 10:00 a.m. The hearing will be held at the District Court on June 22, 2021 at 10:00 a.m.

**Legals Missoula MMAXLP**

**MONTANA FOURTH JUDICIAL DISTRICT COURT, MISSOULA COUNTY**

In the Estate of the Estate of Michael Doekery, Plaintiff vs. Michael Doekery, Defendant  
This is notice that Plaintiff has filed a Petition for Name Change with the District Court of the Fourth Judicial District, Missoula County, Montana. The hearing will be held at the District Court on June 22, 2021 at 10:00 a.m. The hearing will be held at the District Court on June 22, 2021 at 10:00 a.m. The hearing will be held at the District Court on June 22, 2021 at 10:00 a.m.

**Legals Government MMAXLP**

**PUBLIC NOTICE**

Montana Fish, Wildlife & Parks (MFWP) is seeking public input on its proposed to develop approximately 15 acres of riparian land along the banks of the Park Creek in the Park Creek area. The proposed development includes a new parking area, a new restroom, and a new picnic area. The proposed development is located on the east side of the Park Creek, just north of the intersection of Park Creek and Highway 101. The proposed development is located on the east side of the Park Creek, just north of the intersection of Park Creek and Highway 101. The proposed development is located on the east side of the Park Creek, just north of the intersection of Park Creek and Highway 101.

**Legals Missoula MMAXLP**

**NOTICE TO CREDITORS**

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MICHAEL DOCKERY, Plaintiff  
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**Legals Missoula MMAXLP**

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**Legals Missoula MMAXLP**

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**Legals Missoula MMAXLP**

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