

In The Matter Of:
Transcript of Public Hearing
DPHHS 2025-2029 Consolidated Plan

March 4, 2025

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STATE OF MONTANA
DEPARTMENT OF COMMERCE and
DEPARTMENT OF PUBLIC HEALTH AND HUMAN SERVICES

Public Hearing
for the 2025-2029 Consolidated Plan
and 2025-2026 Annual Action Plan

TRANSCRIPT OF PROCEEDINGS (VIA ZOOM)

BE IT REMEMBERED, that the proceedings in the
above-captioned matter was heard via Zoom on the
4th day of March, 2025, beginning at the hour of
10:00 a.m., before Laurie Crutcher, Registered
Professional Reporter, Notary Public.

* * * * *

1 DEPARTMENT PERSONNEL PRESENT:

2 Julie Flynn

3 Kimberly Koch

4 Nicole Newman

5 Chandler Rowling

6 Julianna Campbell

7 Stephanie Crider-Pridemore

8 Stacey Purvis

9 Rosie Goldich

10 Jen Stepleton

11

12 ATTENDEES:

13 Traci McArthur - Action Inc.

14 Paul Filicetti - A&E Design

15 John Hooks - MTPR

16 Amanda Cooley - Planner, Powell County

17 Morgan Heckford - Family & Community Services

18 Director at Quality Life Concepts, Inc.

19 Heather McMilin - Homeward

20 Liz Stotts - Homeward

21 Jake Clark - Great Falls Development Alliance

22 Shyla Patera - North Central Independent Living

23 Services

24

25 CONSULTANT: Megan Brace

1 WHEREUPON, the following proceedings were
2 had:

3 * * * * *

4 MS. FLYNN: So thank you for joining us
5 for the 2025-2029 Consolidated Plan and Annual
6 Action Plan hearing for our submission to the US
7 Department of Housing and Urban Development, for
8 the HOME program, the Housing Trust Fund, the
9 Community Development Block Grant, and the
10 Emergency Solutions Grant.

11 We have several folks from the
12 Department of Commerce in the meeting, as well as
13 folks joining us from the Department of Public
14 Health and Human Services.

15 I'm going to kick it off to Megan Brace,
16 who has helped us put together all the data that
17 we've collected in our Consolidated Plan, and
18 she'll do our presentation today. So Megan, I'll
19 turn it over to you. Thanks so much.

20 MS. BRACE: Great. Thank you, Julie.
21 Again, my name is Megan Brace. We've been
22 contracted with the State of Montana to help them
23 complete this Consolidated Plan and Annual Action
24 Plan.

25 The purpose of our meeting today is to

1 really talk about why we did this, what it means,
2 kind of the information that we found, and what
3 that means going forward in terms of these
4 different types of funding. I'm going to go ahead
5 and turn off my camera so we can focus on the
6 presentation.

7 I also just wanted to note that the
8 Department of Commerce does make reasonable
9 accommodations if you have a disability or limited
10 English proficiency, so if that applies to you,
11 there are ways to reach out for accommodations
12 throughout this process.

13 So what is a Consolidated Plan? A
14 Consolidated Plan is done every five years in
15 order to determine the need throughout the state.
16 This plan is mandated by the Department of Housing
17 and Urban Development, or HUD, and for Montana
18 it's the Department of Commerce and Public Health
19 and Human Services that oversees this plan.

20 So what we're going to talk about today
21 is how this has come about, and how this is being
22 integrated into Commerce and Public Health and
23 Human Services policies with these funds.

24 So I wanted to talk a little bit about
25 what we've done in terms of public participation.

1 This process started all the way back in March of
2 last year. We started with surveys. We had focus
3 groups, a number of focus groups of housing, and
4 homelessness, and community needs that occurred
5 through May to July of 2024. We've had three
6 public hearings prior to this in April, June, and
7 September.

8 And then we also had two surveys that
9 went out. The housing and community needs survey
10 was out in March and April of last year, and then
11 we also had a fair housing survey that was out in
12 May. We received I think about 400 responses for
13 the community needs survey, and so that was a
14 great input into this process as well. We also
15 have a number of documents that are created as
16 part of this process.

17 The objectives of the Montana
18 Consolidated Plan align with the national
19 objectives for these programs, and that is to
20 provide decent housing, provide a suitable living
21 environment, and to expand economic opportunities.

22 Julie mentioned briefly what kind of
23 funds we're talking about, but we're primarily
24 talking about four different types of federal
25 funding when we're talking about this Consolidated

1 Plan.

2 The first is the Community Development
3 Block Grant or CDBG. This is our broadest source
4 of funding. It can go for things like housing,
5 that can be both new construction, and rehab; it
6 can go to public and community facilities; it can
7 go to economic development; and it can go to
8 planning. So this is a wide range of funding
9 options with CDBG.

10 When we're talking about the HOME
11 Investment Partnership Program, this is primarily
12 directed to housing. This goes to rental and
13 homeowner housing, both new development and
14 rehabilitation. It can also go to things like
15 home buyer assistance.

16 The Housing Trust Fund is another
17 housing-focused funding source. It's very similar
18 to the HOME program except it's targeted to very
19 low income households, and used for things like
20 rental development and rental rehabilitation.

21 The last type of funding source that
22 we're talking about is the Emergency Solutions
23 Grant or ESG, and this is directed towards
24 households that are experiencing or at risk of
25 homelessness. It can be used for things like

1 street outreach, emergency shelters, homelessness
2 prevention, and rapid rehousing.

3 So when we're talking about those funds,
4 we're looking at the needs within the state. So
5 throughout this process we've used different
6 methods to analyze the need. We've looked at
7 quantitative and qualitative data, so we've looked
8 at all of the numbers, what's happening on that
9 birds-eye view, how the state is changing, how
10 those needs may be changing.

11 We're also looking at qualitative data,
12 that survey input, those public input
13 opportunities that I talked about, speaking with
14 stakeholders. We integrated all of that together
15 to identify priority needs. So these are the
16 needs that we are seeing that needs to be
17 addressed in the state, and can be addressed with
18 those funds that I just mentioned.

19 Once we identified those priority needs,
20 we developed a strategy or goals of how we're
21 going to meet those needs over the next five
22 years, and then we directed a certain amount of
23 funding that we're expecting to receive these next
24 five years to each of those goals.

25 So when we come out of this process,

1 we're starting a new cycle. This cycle starts
2 again every five years with this Consolidated
3 Plan. This is our over-arching document that
4 helps guide decisions about how funds are going to
5 be directed in that five-year period.

6 Each year, starting with this first
7 year, we have an Annual Action Plan, and this plan
8 outlines specific activities, goals, and
9 objectives for that one year period, and how that
10 would meet those over-arching goals.

11 At the end of each program year we have
12 the Consolidated Annual Performance and Evaluation
13 Report, or the CAPER, and the CAPER helps us look
14 back at each year, and see if we're meeting our
15 goals and objectives that were identified in this
16 Consolidated Plan; maybe if we need to change
17 things, and how we can continue to progress to
18 meeting those goals.

19 As part of the Consolidated Plan we
20 completed a needs assessment and a market
21 analysis. I'm just going to talk briefly about
22 some of the findings that we had from both of
23 those. I do encourage you to take a look at the
24 documents themselves, if you haven't already.
25 I'll let you know where those are at the end of

1 this. But there's a large amount of information
2 in those reports that is very pertinent to what
3 we're seeing in Montana.

4 So the needs assessment looks at the
5 socioeconomic characteristics of the state. It
6 looks at things like changes in population; if
7 we're seeing changes in race and ethnicity; people
8 with disability; and how those economic factors
9 are impacting households throughout the state.

10 When we're looking at this, we're
11 looking at a variety of data sources. This
12 includes the census, data coming directly from
13 HUD, as well as other sources that are available
14 for the state data.

15 So what we were seeing as we were
16 looking at this information is that the population
17 in Montana has grown. We're at over 1.1 million
18 people now, and it's over a 7 percent increase
19 over a five year period from 2017 to 2022, so
20 that's a pretty significant growth in the
21 population.

22 While we're seeing that population
23 growth, we are seeing a growth in the number of
24 housing units, so we have seen house units built,
25 but not at the same rate. So in that same period,

1 it's less than four percent increase in the number
2 of housing units.

3 So as we're seeing the significant
4 growth, housing market is not keeping up with
5 that. As a result, it's estimated that there are
6 about 22,000 units, additional units, that would
7 be needed, or a gap of about 22,000 units
8 statewide just to keep pace with the growth we've
9 seen.

10 In terms of income, we are seeing income
11 increase, about a 6 percent increase over that
12 same time period, to get to a median household
13 income of about \$67,000; but as we're seeing that
14 wage increase, we're also seeing increases in the
15 cost of housing.

16 So in that time period from 2017 to
17 2022, rents rose by about 32 percent -- excuse me
18 -- home values rose by about 32 percent, and rents
19 rose by about 10 percent. So we're seeing the
20 cost of housing significantly higher rates of
21 growth than we're seeing with the growth of
22 incomes for households.

23 So what this means for households
24 throughout the state is that housing is becoming
25 increasingly unaffordable for many households,

1 especially those in those lower income ranges.

2 One thing we look at when we're looking
3 at housing and access to housing is we look at
4 housing problems. There can be different types of
5 housing problems. There can be overcrowding;
6 there can be a lack of complete plumbing
7 facilities; there could be a lack of complete
8 kitchen facilities; and there can be cost burdens.

9 Cost burdens are the most common type of
10 housing problems. A cost burden exists if your
11 household is spending more than 30 percent of your
12 income on housing, and a severe cost burden exists
13 if you're spending more than 50 percent of your
14 income on housing.

15 So again, I encourage you to look at the
16 actual report because we break this down a little
17 bit more, but almost a third of households in
18 Montana experience cost burdens. It's even more
19 significant for renter households, and for those
20 very low income households.

21 When we're talking about households
22 making less than 30 percent of the area median
23 income, we're talking about almost three quarters
24 of those households experiencing cost burdens.
25 So just really significant proportions of our

1 population having difficulty affording housing in
2 the current market.

3 We also looked at homelessness. The
4 homelessness that we have listed here are the
5 point in time counts. These are representative of
6 a one-time snapshot of the number of people
7 counted throughout the state.

8 The unsheltered numbers tend to be lower
9 than what they actually are, but even with these
10 numbers, we're seeing an increase. The 2024
11 number was 2,008, so we're still seeing large
12 numbers of people that are experiencing
13 homelessness. In fact that's a 23 percent
14 increase between 2023 and 2022, just such growth
15 in this time period.

16 When we're talking about those who are
17 homeless, are experiencing homelessness, of those
18 who are receiving services, about 20 percent were
19 considered to be chronically homeless.

20 We're also seeing an increase in the
21 amount of time that people are experiencing
22 homelessness. It's up from 93 days in 2022 to 160
23 days or nights -- excuse me -- in 2023. So we're
24 not only seeing an increase in number, but also
25 the increase in the length of time that people are

1 experiencing homelessness.

2 American Indian and Alaskan Natives
3 households are also disproportionately represented
4 in this homeless population. And when we go back
5 and we talk about those growths in rental rates,
6 research does indicate that with every \$100
7 increase in median rent, there's an associated
8 increase of 9 percent in homelessness. So what
9 we're seeing in the state aligns with that as
10 well.

11 There's also various special needs
12 populations in the state. These are populations
13 that might need additional support or services, or
14 access to different types of housing. We've
15 identified these as the elderly and frail elderly;
16 persons with mental, physical, and developmental
17 disabilities; survivors of domestic violence;
18 persons with HIV and AIDS and their families;
19 persons experiencing substance abuse disorder;
20 public housing residents; Veterans; persons
21 experiencing homelessness; and youths exiting
22 foster care.

23 So these are the groups of people that
24 we've identified that may need additional supports
25 and services that can be addressed with this

1 funding that we're talking about.

2 Another part of the Consolidated Plan is
3 the market analysis. So this takes a closer look
4 at the housing stock that we have available, and
5 if it's meeting our needs. We've already seen
6 that there's not enough of it, and that it's too
7 expensive. But how is the housing stock
8 currently, and how can we assist that to meet the
9 needs of our residents.

10 Some highlights of the analysis:
11 Affordable housing is inadequate and difficult to
12 develop in both large and small communities.
13 Talking with some of our stakeholders, there's
14 barriers in development, whether that's cost or
15 other barriers that we're seeing.

16 There's been housing deficits reported
17 in Montana every year since 2018. We have a high
18 demand for housing, and we have very low vacancy
19 rates, less than one percent for homeowner units,
20 and about 4.5 percent for rental units. So these
21 vacancy rates just continue to demonstrate that
22 there's not enough housing available to our
23 residents.

24 The existing housing stock also tends to
25 be older in a lot of places, and in need of

1 repair. So again, we're looking at a limited
2 supply, and when we have housing units that are in
3 need of repair, it's an additional stress on
4 housing being available for our residents. Again,
5 those most highly impact our lower income
6 residents, who are being priced out of the market,
7 or have difficulty finding units within their
8 price range.

9 Part of the growth that we're seeing is
10 a result of in-migration into the state. As we
11 talked about that 6 percent growth since 2017, a
12 lot of that has been caused by that in-migration.
13 Overall Montana rate ranks fifth in the population
14 growth in 2023, so we are seeing a lot of growth
15 compared to other areas in the United States.

16 A lot of the development that we're
17 seeing is new development. Again, that's not
18 keeping pace with that growth. Most of the
19 housing supply that we're talking about, about 70
20 percent is single family, and we continue to see
21 this growth in single family production during
22 this period, but we've also seen a growth in
23 multi-family structures. So in that five-year
24 period that we're talking about, multi-family
25 structures accounted for the most growth during

1 that period.

2 Since 2006, the cost to rent subsidized
3 housing has increased, while the amount of funding
4 that we're getting has decreased. So as a result,
5 the number of households that can be assisted has
6 declined over this period.

7 Over this period we have seen those
8 incomes grow, although not with the pace of the
9 growth of the housing costs, but Montana does have
10 healthy job growth, and consistently low
11 unemployment rates. The real wage growth in
12 Montana was fourth in the nation in 2022, so we
13 are seeing positives in our economy to help
14 support at least some households in accessing
15 housing.

16 So I've talked about a lot of
17 information, and again, I do encourage you to look
18 at that plan. But once we came and looked at this
19 information, we took input from people who
20 participated in the surveys and the work groups,
21 we developed a set of priority needs, and aligned
22 them with goals.

23 So the five priority needs that we
24 identified were affordable housing, preservation
25 and construction. So again, that need for

1 preserving the housing that's already there to
2 keep that viable housing stock, and the need for
3 new housing in our communities, especially that is
4 housing that is affordable to our low to moderate
5 income households; and also the need for community
6 planning for local communities to help plan for
7 this influx of new residents, for these changing
8 housing situations.

9 We have the need for improving and
10 sustaining vital public infrastructure. So this
11 means that infrastructure that supports our
12 housing and that supports our economies, making
13 sure that that continues to work for our residents
14 and our communities.

15 We have the need for economic
16 revitalization, supporting businesses that help
17 provide jobs and economic opportunities for
18 residents throughout the state.

19 And the last priority need is to help
20 reduce homelessness. We've seen those homeless
21 numbers increase, and we'd like to see those
22 decline as much as possible.

23 So the goals that we've identified align
24 directly with those priority needs. The first
25 goal is to preserve and construct affordable

1 housing; the second goal is to plan for
2 communities; the third goal is to improve and
3 sustain public infrastructure; the fourth goal is
4 to revitalize local economies; and the fifth goal
5 is to reduce homelessness.

6 So these are goals that we will be using
7 to help guide decision making over the next five
8 years about how we're going to use those funds we
9 talked about -- so again, CDBG, HOME, Housing
10 Trust Fund, and ESG dollars -- and how we can
11 direct those to these various needs over five
12 years.

13 Now, each year we have an Annual Action
14 Plan, and this is when we decide specific amounts
15 of funding and specific projects that will be
16 undertaken in this year, and how we're going to
17 impact communities with these funds. I'm going to
18 take just a couple minutes to talk about how these
19 funds are being allocated for the 2025 to 2026
20 Annual Action Plan, and the goal outcomes that
21 we're hoping to achieve with these funds.

22 So when we're talking about preserving
23 and constructing affordable housing, for 2025
24 we're allocating \$1 million in CDBG funds; about
25 \$2.75 million in HOME funds; and about \$2.4

1 million in the Housing Trust Fund. With this
2 we're hoping to construct or rehabilitate about 30
3 rental units; increase homeowner housing
4 opportunities through construction/rehabilitation
5 for five homeowners; and then direct financial
6 assistance for ten home buyers.

7 When we are talking about that planning
8 for communities goal, for 2025 we're allocating
9 \$600,000 in CDBG funds, and this will go to help
10 twelve local governments in their planning for
11 that year.

12 When we're talking about improving and
13 sustaining public infrastructure, the funding for
14 2025 is about \$3 million. The outcome for this is
15 about 1,000 people that are benefiting from a
16 public facility or infrastructure improvement, and
17 about 20 low to moderate income households.

18 I want to note here that the dollar
19 amounts that we're talking about at this point are
20 based on the funding that we've gotten in past
21 years. We have not received the final amounts
22 that we will be getting for 2025, but the changes
23 are usually rather minor. So these numbers might
24 change slightly once we do get those 2025 numbers,
25 but this should be about the numbers that we're

1 talking about for this year.

2 With revitalizing economies, the funding
3 for 2025 is about \$1 million in CDBG funds, and
4 the goal outcomes we're hoping to achieve are 30
5 jobs created or retained; assisting two
6 businesses; and then one business facade treatment
7 or business building rehabilitation.

8 Our last goal of reducing homelessness,
9 for this year, we're committing \$500,000 in CDBG
10 funds; \$750,000 in HOME funds, \$750,000 in Housing
11 Trust Funds; and then \$744,000 in those ESG funds.
12 The goals that we're hoping to achieve with this
13 is 350 households receiving tenant-based rental
14 assistance or rapid rehousing; 20 people with
15 overnight shelter; 400 people receiving homeless
16 prevention services; and 20 units of housing for
17 homeless households.

18 So as I talked about, and I think Julie
19 put in the chat, there's a variety of different
20 ways you can look at this document. It's
21 available on Commerce's website. It's also
22 available at several repositories throughout the
23 state. The website has a list of those
24 repositories. It's also available by request.

25 All interested parties are encouraged to

1 review these published documents. If you're here
2 at this meeting, we thank you for participating in
3 this process, and you can also subscribe to
4 Consolidated Plan email updates as well.

5 If you do have questions or comments
6 that you'd like to leave written, I'll tell you
7 about addresses, and then in a couple minutes I'll
8 turn it back over for Julie to receive any verbal
9 comments. But if you do have any comments or
10 questions, you can send those to the Montana
11 Department of Commerce, and that's 301 South Park
12 Avenue in Helena, Montana 59601; or P.O. Box
13 200523, Helena, Montana 59620; you can also call
14 at 406-841-2770; or email at docconplan@mtgov;
15 also available on Commerce's website.

16 You can also leave comments with the
17 Department of Public Health and Human Services,
18 and they are at 1400 Carter Drive in Helena,
19 Montana 59601; or P.O. Box 202956 in Helena,
20 Montana 59620-2956; or you can also call them at
21 406-447-4265. You can also visit their website.

22 I am going to turn it back over to
23 Julie, and she will talk about the process if you
24 would like to leave a verbal comment.

25 MS. FLYNN: Great. Thanks so much,

1 Megan. I really appreciate you presenting that
2 mountain of information. I do encourage folks to
3 look at the plan. There is a lot of good data for
4 your own planning purposes in there. I see lots
5 of folks whose names I recognize in this meeting,
6 and we're happy to take comments from any of you
7 if you want to come off mute, and comment on our
8 plan.

9 MS. COOLEY: (Inaudible) How are you?

10 MS. FLYNN: Amanda, great to see you. I
11 can't hear you very well though.

12 MS. COOLEY: How is that? Is that any
13 better?

14 MS. FLYNN: That's great. Yes.

15 MS. COOLEY: Okay. I found the
16 microphone.

17 Hey, I heard about the Consolidated
18 Plan, and talked with some CDBG folks last week,
19 and I just really appreciate the work that you
20 guys did. I do have a couple just kind of brief
21 comments.

22 MS. GOLDICH: Sorry, can I just pause
23 you really quick before you get --

24 MS. COOLEY: Absolutely.

25 MS. GOLDICH: Do you mind stating and

1 spelling your name, and the organization you
2 represent, just for our records.

3 MS. COOLEY: Absolutely. Yes. My name
4 is Amanda Cooley, that's A-M-A-N-D-A, last name
5 C-O-O-L-E-Y, and I am the Planning Director for
6 Powell County, so I am located in Deer Lodge. And
7 our community uses lots of Department of Commerce
8 resources.

9 Specifically I'm looking at CDBG
10 funding. So Goal No. 2 of your plan is to plan
11 for communities. And costs have increased quite a
12 bit on planning documents nowadays. Looking at
13 updating our very rural community, capital
14 improvement plan is looking upwards of about
15 \$100,000, and CDBG is kind of still sitting at
16 that \$50,000 mark as far as the limit for funding.

17 So I know it's kind of a trade-off, you
18 know, if you increase funding, then that might
19 reduce the number of awards, but it is really
20 limiting for a community like ours to be able to
21 look at updating an entire plan.

22 Another thing that maybe could be
23 considered is that maybe allowing CIP's to be
24 updated in a piecemeal approach, but still be
25 considered an area wide activity, so that we can

1 maybe break it up a little bit. That's also kind
2 of nice, because it allows us to kind of reduce
3 the lift at any single time to update these
4 documents.

5 But yeah, just would love to see more
6 funding allocated towards those programs, and
7 maybe some higher funding caps, just because
8 professional services are so much more expensive
9 now.

10 And then just one other quick note. You
11 have a great section that talks about the large
12 and growing number of elderly and disabled in this
13 state, and we definitely see this in Powell
14 County. And because of that, just as a community
15 planner, we're really seeing a high need for just
16 access and mobility, especially to our downtown.
17 Most of our infrastructure is old. We don't have
18 storm water infrastructure.

19 So it looks like your Goal No. 3 does
20 kind of prioritize storm water management. But
21 with that, I would also definitely encourage the
22 inclusion of things like sidewalks, trail
23 development, anything that encourages mobility,
24 but also kind of plays into this need for
25 accessibility. There's a lot of people in our

1 community that they just can't even go out in the
2 wintertime. It's a real issue, just trying to
3 navigate ice. So thanks again.

4 MS. FLYNN: Thanks so much. Any further
5 comments?

6 MS. McMILIN: Trying to raise my hand.
7 I'm Heather McMilin. I'm Project Development
8 Director for Homeword based in Missoula. My last
9 name is spelled M-C-M-I-L-I-N.

10 I just wanted to go on the record and
11 give my appreciation for the thoughtfulness that
12 went into the overall Consolidated Plan. We have
13 a fairly evolving need in Montana. Housing has
14 always been an issue, but with the senior disabled
15 houseless individuals on the rise, it's good to
16 see the way you guys are focusing both the
17 assistance on the rental assistance side, and also
18 the bricks and mortar.

19 I know we don't have a lot of
20 confidence, or we don't know exactly what we're
21 going to get for allocations this year, but I
22 think the spread and distribution between the
23 focus areas makes sense, based on what you guys do
24 note today. So thank you for your efforts, and we
25 do support the Consolidated Plan.

1 MS. FLYNN: Thanks, Heather. Other
2 comments?

3 (No response)

4 MS. FLYNN: As Megan said, we will be
5 accepting comments through March 21st. That's a
6 Friday. We expect to hear about our allocations
7 hopefully in the June time frame. We will get
8 that word out when we do have solid numbers, and
9 as we're finalizing our Consolidated Plan and
10 Annual Action Plan for submission to HUD.

11 Megan, anything you would like to add
12 before we close this meeting?

13 MS. BRACE: No, just thank you all for
14 being here, for participating, and it's great to
15 have this participation in this process.

16 MS. FLYNN: Very good. Thanks,
17 everyone. Enjoy your day. It looks nice and
18 sunny out there. So thanks for joining, and be in
19 touch.

20 (The proceedings were concluded
21 at 10:35 a.m.)

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C E R T I F I C A T E

STATE OF MONTANA)

: SS.

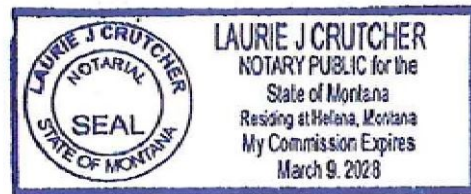
COUNTY OF LEWIS & CLARK)

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

That the proceedings were taken before me at
the time and place herein named; that the
proceedings were reported by me in shorthand and
transcribed using computer-aided transcription,
and that the foregoing - 26 - pages contain a true
record of the proceedings to the best of my
ability.

IN WITNESS WHEREOF, I have hereunto set my
hand and affixed my notarial seal this 6th day of
March, 2025.

Laurie J. Crutcher



	add (1) 26:11	Annual (7) 3:5,23;8:7,12; 18:13,20;26:10	6:5,13;8:22;14:12; 25:16	CDBG (10) 6:3,9;18:9,24; 19:9;20:3,9;22:18; 23:9,15
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