



Annual Action Plan FY2021-2022

Amended in November 2021:
Include CDBG funding to augment
CDBG-CV public facility and services activities
for pandemic prevention, preparation, and response.

Community Development Division
2825 Third Avenue North
Billings, Montana 59101
www.BillingsMT.gov/comdev
406.657.8281 TTY711

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Section I: Executive Summary

Introduction

Five-year Consolidated Plans and one-year action plans are required by the United States Department of Housing and Urban Development (HUD) for the City of Billings to receive funding through the Community Development Block Grant (CDBG) and HOME Investment Partnerships programs (HOME). The City's five-year [Consolidated Plan for FY2020-2024](#) identifies activities to be carried out from July 1, 2020 through June 30, 2025 to address priority needs in the community and serves as a guiding document for the use of the City's CDBG and HOME funding.

This one-year Annual Action Plan addresses priority needs and outlines the use of the City's CDBG and HOME funding for activities to be carried out from July 1, 2021 to June 30, 2022. Plans should be submitted to HUD 45 days prior to the start of the City's program year start date: July 1.

Focused on CDBG and HOME activities, the Consolidated and Annual Action Plans combine the planning and application requirements for the CDBG and HOME programs. Consolidation of the submission requirements for the CDBG and HOME programs allows program planning and citizen participation to take place in a comprehensive context covering both programs. The CDBG and HOME programs covered by the Consolidated Plan have three basic goals:

- **To provide decent housing**, including maintaining the affordable housing stock in the community; increasing the availability of permanent housing that is affordable to low-income households without discrimination; increasing support of housing that enables persons with special needs to live independently; and assisting homeless persons to obtain affordable housing.
- **To provide a suitable living environment**, including improving the safety and livability of neighborhoods; increasing access to quality facilities and services; reducing the isolation of low-income households within areas by de-concentrating housing opportunities and revitalizing deteriorating neighborhoods; restoring and preserving natural and physical features of special value for historic, architectural, or aesthetic reasons; and conserving energy resources.
- **To expand economic opportunities**, including creating jobs accessible to low-income individuals; providing access to credit for community development activities promoting long-term economic and social viability; and empowering low-income persons living in public and federally assisted housing to achieve self-sufficiency.

All activities undertaken by the City utilizing CDBG and HOME funding must primarily benefit low-income persons. The strategies described in the Consolidated and Annual Action Plans outline a specific course of action for the community's housing and community development activities. The plan builds on local assets to meet the needs of the community and sets forth goals, objectives, and performance measures to ensure progress in achieving the strategies described herein.

Substantial Amendment to the FY2021-2022 Annual Action Plan: The City would like to allocate CDBG funding in FY2021-2022 to augment CDBG-CV activities for pandemic prevention, preparation, and response. CDBG-CV public service and public facility activities are already included in the Consolidated Plan and FY2020-2021 Annual Action Plan. The City is also updating this Annual Action Plan to include the Off The Streets rehabilitation project. A substantial amendment for this project is not required as Affordable Housing Development projects are already included in this Annual Action Plan. However, the allocation was moved through the public hearing process to notify citizens of a CDBG allocation in support of rehabilitating the Off The Streets homeless shelter and coronavirus isolation units.

Summarize the objectives and outcomes identified in the Plan

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

The most significant housing issues in Billings include housing cost burden, the availability of affordable housing, and equal opportunity in homeownership for minority households.

- **Housing Cost Burden:** Over 80% of low-income households have been paying more than 30-50% of their income for housing costs. Minorities are disproportionately impacted by housing cost burden including Black / African American, Asian, Native American, and Hispanic families.
- **Affordable Housing Availability:** Housing affordability and availability are the most significant factors in limiting housing choice for both renters and homeowners. While there are an adequate number of housing units in Billings to accommodate the population, there is a housing deficit of over 4,700 units for households with incomes less than 30% of the AMI. According to HomeFront, the local public housing authority and formerly the Housing Authority of Billings, there are also over 5,500 households on waiting lists for public housing. Over 2,000 people are waiting for single-person housing.
- **Homeownership and Opportunity:** Racial and ethnic minorities have a lower homeownership rate than the White population (67%) in Billings. The Black cohort has the lowest homeownership rate at 16% followed by Native Americans at 31%. Thirty-three percent of the Hispanic cohort are homeowners.

The City's goals are to: create, preserve, and expand affordable housing options; promote neighborhood revitalization through foreclosure program, and to impact poverty. The City will continue to offer programs on a citywide basis to ensure equal opportunity in all Billings neighborhoods:

- **First Time Home Buyer** - Promote financial security, home equity, housing self-sufficiency, housing and neighborhood quality and stability; increase minority homeownership, promote equal access and opportunity, and decrease segregation citywide; improve affordable housing opportunities for the elderly, persons with disabilities, and other special populations; and reduce predatory lending through education and standardized procedures.
- **Housing Rehabilitation** - Help current homeowners maintain homes in safe, quality condition; and Increase value, quality, and durability of existing affordable housing stock.
- **Affordable Housing Development** - Expand access and availability of decent, affordable housing citywide; improve the physical quality of affordable housing; and foster suitable living environment and quality of life through the improvement of physical conditions including infrastructure for housing projects and housing development.
- **Foreclosure, Acquisition, Rehabilitation** - Mitigate the negative community impact of vacant, foreclosed properties; improve affordable housing quality, condition, safety, livability, and accessibility; stabilize property values in neighborhoods with existing vacant, foreclosed homes; and eliminate the potential for crime related to existing vacant, foreclosed properties.
- **Billings Metro VISTA Project** - Provide resources to nonprofit organizations to undertake poverty impact activities and to support the low-income individuals and families they serve; and focus areas include education, healthcare, food security, economic opportunity, housing, financial literacy, and others.

HUD's EnVision Center Demonstration Project - EnVision Centers focus on empowering people to leave HUD-assisted housing through self-sufficiency to become responsible homeowners and renters in the private housing market. In May / June 2020, the City of Billings staff facilitated a connection between the City's public housing authority, HomeFront, and HRDC District 7 to HUD's Region 8 representatives. Planning for a Billings EnVision center continues. However, a dedicated federal funding source must be identified to bring the center into fruition.

Evaluation of past performance

An evaluation of past performance that help the City choose goals or projects.

The City of Billings has been receiving CDBG funds since the 1970s and began receiving HOME funds in the mid-1990s. Performance on past goals and projects has been adequate, given declining resources. As a result, City staff have consolidated smaller programs focused on meeting priority needs, including affordable housing preservation and the provision of new housing opportunities. In 2012, stakeholders recommended prioritizing loan programs to maximize sustainability of community development programs to continue funding programs in the future. Loan repayment revenue has increased to an annual average of \$230,000 over the past seven years, which has enabled the City to serve dozens of additional low-income households through home buyer and repair programs. The City's progress on goals and projects is listed below.

- **Create, preserve, and expand affordable housing options:**
 - **Affordable Housing Development:** The C & C Community, a resident owned manufactured housing project, is making progress with infrastructure improvements and the project should be completed in 2021. Sixty households will benefit from this project.
 - **Housing Rehabilitation:** There is a significant decline in homeowners seeking Housing Rehabilitation Loans and an increased need for affordable housing and infrastructure development. Additional resources may be directed towards longer-term investments to benefit low-income neighborhoods overall. Projects under construction were delayed due to the pandemic. Approved applicants seeking bids put their projects on hold to limit the number of non-household members entering their homes during the pandemic. In addition, new applications nearly stopped during the pandemic. Eligible contractors for the program are also limited and the costs for building materials, [specifically wood products](#), has greatly increased.
 - **First Time Home Buyer:** Thirty-eight households were assisted in purchasing their first homes so far this year; the City has met the set annual goal. However, the number of available affordable homes has significantly declined as families from across the nation relocate to Montana and this may impact sales in the future. The trend has been dubbed "The Zoom Boom". [In Yellowstone County, there were less than 300 homes](#) listed for sale in February 2021: one-month's supply. In November 2018, there were over 750 properties listed and in November 2019 there were 629.
- **Neighborhood revitalization:**
 - **Foreclosure Acquisition / Rehabilitation Program:** The North Park property rehabilitation has been completed and is currently being marketed to low-income households. The coronavirus pandemic resulted in limitations on foreclosure proceedings. Therefore, there are no foreclosed homes listed for sale in Billings. Building supply shortages and overall construction cost increases may also limit progress in the coming years.
- **Impact poverty:**
 - **Billings Metro VISTA Project:** Eighteen full-time AmeriCorps members have been working on poverty-impact programs this fiscal year. They focus on expanding services for the homeless and special needs populations: Healthcare; Food Security; Education; Employment; Financial Literacy; and Housing. Host Site Recruitment has declined, as many agencies expressed hesitation to take on new initiatives with changing organizational needs and services in response to the coronavirus pandemic. VISTA Member recruitment spiked in early 2020, as many employment and other service opportunities were unavailable to candidates due to pandemic response; however, recruitment of qualified candidates has become more challenging due to a lower number of Host Sites as well as a growing job market. The City has also not been able to establish a viable Summer Associate AmeriCorps program due to pandemic influences.

Summary of citizen participation process and consultation process

91.200(b)

Summary from citizen participation section of plan.

Citizen participation is the foundation of housing and community development programs. The City of Billings has adopted a *Citizen Participation Plan* which is implemented during Consolidated and Annual Action Plan processes to ensure active participation by residents and affiliate organizations. The City has also adopted a *Language Assistance Plan* to ensure meaningful access to program information and equal opportunity for persons with hearing impairment and limited English proficiency. Both plans can be found online at www.Billingsmt.gov/CDreports.

The Citizen Participation Plan describes public access and engagement through public comment periods, public hearings, published notices, online and hard copy access to documents, and access for the disabled and limited English proficiency. The Plan also details the public decision-making processes via the Community Development Board and the Billings City Council.

Criteria for amending the Consolidated and Annual Action Plans includes substantial changes; *the creation of any new program, project, or activity to be funded or carried out under the City's CDBG and / or HOME programs*. All substantial changes to the Consolidated and Annual Action Plans must meet demonstrated need substantiated by HUD-approved data sources. Minor amendments include the *expansion of an existing program, project, or activity funded or carried out under the City's CDBG and / or HOME programs*. Minor changes must also meet demonstrated need by HUD-approved data sources.

In the event of a pandemic or other infectious disease, the City may alter public participation to include social distancing, virtual attendance, and other forms of virtual participation in lieu of, or in addition to, efforts described in the Citizen Participation Plan. The City may also implement shorter public comment periods as allowed by HUD. As per federal regulation, the City of Billings may publish its application for CDBG-CV funds for no less than five calendar days to solicit public comments.

Summary of public comments

Brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

The FY2021-2022 Annual Action Plan was open for public comment from March 27 through April 26, 2021. A public hearing was held on April 26, 2021 during the Billings City Council meeting to accept public comments on the Annual Action Plan and Community Development Board recommendations for funding allocation. To facilitate an open public involvement process, the public hearing was available live and remains available on demand at the www.comm7tv.com website and also on Community 7's public Facebook page at www.facebook.com/comm7tv.

Public Comment & Hearing: Comments from Councilmembers Ronning, Neese, and Yakawich are summarized in the Appendix.

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

All comments were taken into consideration during the development of the Annual Action Plan.

Summary

Comments received were generally supportive of the City's Annual Action Plan.

Section II: The Process

PR-05 Lead & Responsible Agencies

24 CFR 91.200(b)

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

The City of Billings - Community Development Division staff is responsible for preparing the Consolidated Plan and administration of CDBG and HOME grant programs.

Agency Role	Name	Department/Agency
CDBG Administrator	City of Billings	Community Development Division
HOME Administrator	Brenda Beckett, Division Manager	

Table 1 – Responsible Agencies

Consolidated Plan Public Contact Information

Brenda Beckett, Community Development Manager
Community Development Division, 2825 3rd Avenue North, Suite 610, Billings, MT
Phone: 406-657-8286 (TTY 711)
Email: beckettb@billingsmt.gov
Web: www.Billingsmt.gov/comdev

AP-10 Consultation

91.100, 91.200(b), 91.215(l)

Introduction

Several organizations in the community are involved in affordable housing and community development-related activities in Billings and are asked to comment on the Consolidated and Annual Action Plans. The continued cooperation of these organizations in pursuing affordable housing for the community is required to meet the Consolidated Plan goals. Consultations include review of the plan with public and private agencies that provide health care, social services, and fair housing education. Populations targeted for consultation include agencies that provide services for children, the elderly, the disabled, minorities, single-headed households, persons with HIV / AIDS and their families, and homeless individuals and families.

The Consolidated and Annual Action Plans are distributed widely during the public comment period and interested persons were invited to attend several staff-facilitated, regularly scheduled meetings to find out more about Community Development initiatives. Routine meetings were facilitated through staff for the Community Development Board; six of the nine total members represent and reside in low-income neighborhoods.

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

Public Housing: The City's public housing authority, HomeFront, is primarily responsible for administration of the public housing and Section 8 Programs for the community. HomeFront is a municipal housing authority established under the laws of the State of Montana (MCA 7-15-44). Board members for HomeFront are appointed by the Mayor for the City of Billings. 91.100(c)

Housing Opportunities for Persons with AIDS: Public and private agencies have assisted the City in reviewing the Consolidated Plan. Organizations providing housing, health services, and social services have been involved in planning processes for the homeless and chronically homeless. The City supports the Human Resources Development Council District 7 in their implementation of Housing Opportunities for Persons with AIDS (HOPWA) goals and objectives. 91.100(b)

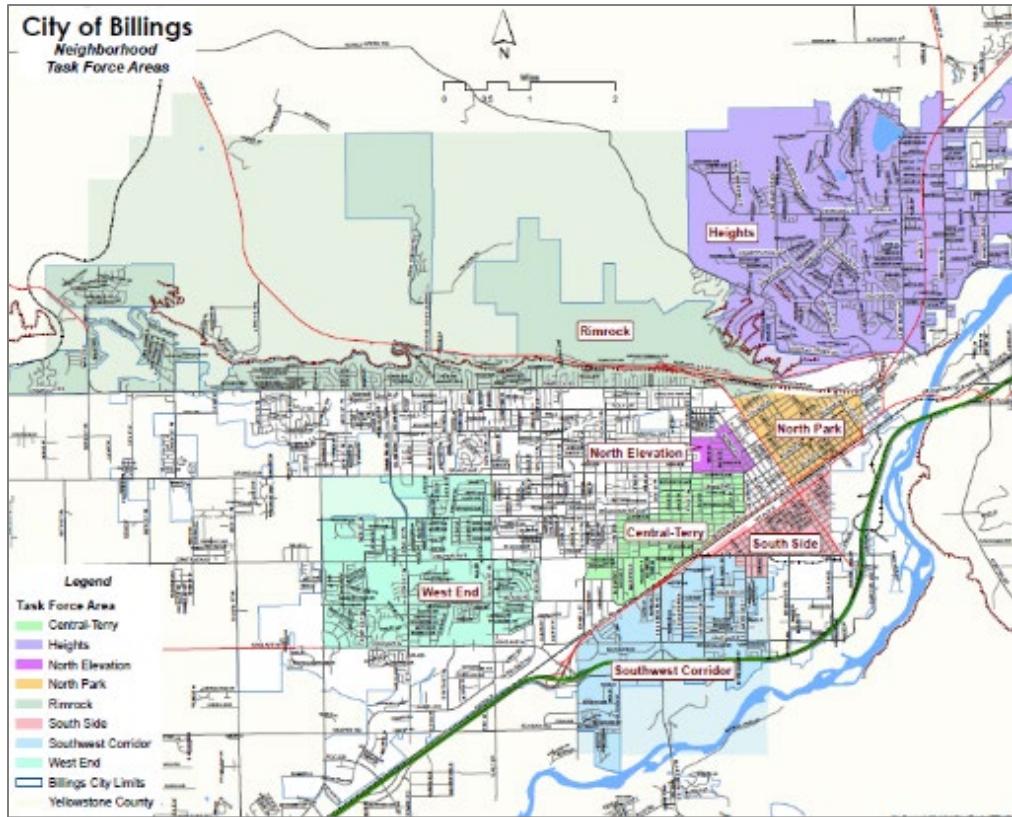
Adjacent Governments: Communication regarding non-housing community development needs is conducted via collaboration through adjacent units of local government including the State of Montana and Yellowstone County. 91.100(a)(4)

Metropolitan Planning: The City of Billings - Community Development Division is included in the Planning and Community Services Department. The department, overall, includes Code Enforcement, and Planning / Transportation (includes the City of Billings and Yellowstone County). These Divisions work internally to implement the Growth Policy, Infill Policy, Transportation Plan and Neighborhood Plans collectively. All City-assisted projects are reviewed for residential access to public transportation and broadband infrastructure. 91.100(a)(5)

Community Development Board: The **Community Development Board** is a citizen's advisory board consisting of nine members who are appointed by the Mayor of Billings with the consent of the City Council. Six members are appointed to represent low-income neighborhoods of the City as defined by federal regulations for the CDBG program and three members represent the community at large. The Community Development Board makes recommendations to the City Council regarding the Consolidated Plan, the Annual Action Plan, the Citizen Participation Plan, and the CAPER. In addition, the Board reviews applications submitted for CDBG and HOME funding to make recommendations to the City Council for approval.

Billings City Council: The **Billings City Council** is the final governmental policy body that reviews and acts on the Consolidated and Annual Action Plans, including the Citizen Participation Plan. Recommendations are presented to the City Council and a public hearing is held. After receipt and consideration of public comments, the City Council can approve proposed plan(s) and funding allocations.

Low-Income and Minority Households: To ensure citizen participation emphasizing the involvement of low income and minority residents in areas where housing and community development funds may be spent, the City's Community Development Board is comprised of six members representing lower income neighborhoods. The City's Planning and Community Services Department also continues to coordinate meetings with the Adjacent Neighborhood Committee including those representing the City's low-income areas with high concentrations of minorities.



The City also continues to support the ***Adjacent Neighborhood Committee*** comprised of Task Force officers who meet quarterly to collaborate. The City also seeks input from low-income neighborhood representatives on housing, neighborhood, and public service activities for the annual allocation process.

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

Continuum of Care Funding: Funding is provided to the State of Montana and are distributed by the State to various regions in Montana through the Human Resource Development Councils (HRDCs). A Continuum of Care application is prepared on a statewide basis and the City plays a small role in this process. One or two organizations in Billings may receive Continuum of Care funding, but a very small percentage of the available statewide Continuum of Care funding is allocated to local projects: five to seven percent annually.

Billings Metro VISTA Project: To maintain momentum for City's ten-year plan to impact homelessness, the City's Community Development Division created an AmeriCorps Volunteers in Service to America (VISTA) program known as the *Billings Metro VISTA Project*; sponsored by the Corporation for National and Community Service. VISTA members work to create or expand community-based programs, services, and systems that prevent and intervene in homelessness. VISTA members may be supervised by City staff for over-arching, community-wide benefit programs and they can also be supervised by nonprofit organization staff that are spearheading efforts to impact poverty and homelessness.

Statewide Continuum of Care: The Montana Continuum of Care Coalition (MT CoC) is the statewide organization designed to bring homeless service providers together from across the state to identify needs, inventory resources, recognize gaps and prioritize HUD funding as part of a greater planning effort to eradicate homelessness in Montana. The coalition was formed to address homelessness with very few resources to cover Montana's vast geographical area. In 2012, MT CoC restructured to incorporate a Board of Directors to oversee the operations of the coalition. The MT CoC consists of 15 delegates; ten from districts mirroring the same planning districts used by the Montana Department of Health and Human Services and five at-large delegates. The Board of Directors is the decision-making entity for the MT CoC and is responsible for ensuring compliance with the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act.

Local Continuum of Care: The South-Central Montana Continuum of Care serves as the City's local Continuum of Care organization. It is a subsidiary of the MT CoC and represents Big Horn, Carbon, Stillwater, Sweet Grass, and Yellowstone counties. The South-Central Montana Continuum of Care collaboratively works to develop, support, and promote a continuum of resources, services, and housing opportunities that prevent homelessness and promote long-term stability.

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

The City does not receive ESG funds as an entitlement; these funds are distributed statewide by the Montana Department of Public Health and Human Services through ten HRDCs throughout the state. Therefore, the City does not develop performance standards, evaluate outcomes, or develop funding, policies, or procedures for the administration of HMIS. District 7 HRDC utilizes ESG funding for homeless prevention activities and rapid rehousing. HRDC has received additional HUD Continuum of Care funds for rapid-rehousing homeless families living in shelters.

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

Table 2 – Agencies, groups, organizations who participated

#	Agency/Group/Organization	Type(s)	Consolidated Plan Section(s)	How Consulted / Outcomes
1.	HomeFront	Public Housing Authority; Services - Homeless	Housing Need Assessment; Public Housing Needs; Homeless Needs - Chronically Homeless, Families with Children, Veterans; Homelessness Strategy; Market Analysis; Anti-Poverty Strategy	Email / phone / web retrieval; data exchange for the development of relevant sections
2.	Homeword	Housing	Housing Need Assessment; Market Analysis; Anti-Poverty Strategy	
3.	Rimrock	Housing; Services - Persons with Disabilities	Housing Need Assessment; Homeless Needs - Chronically Homeless; Anti-Poverty Strategy	
4.	Mental Health Center	Housing; Services - Persons with Disabilities	Housing Need Assessment; Non-Homeless Special Needs; Anti-Poverty Strategy	
5.	Family Service, Inc.	Services - Housing	Housing Need Assessment; Market Analysis; Homeless Needs - Families with Children; Homelessness Strategy; Anti-Poverty Strategy	
6.	District 7 HRDC	Housing; Services - Housing, Children, Persons with HIV/AIDs, Homeless	Housing Need Assessment; Homeless Needs - Chronically Homeless, Families with Children; Homelessness Strategy; HOPWA Strategy; Anti-Poverty Strategy	
7.	Adult Resource Alliance	Services - Elderly Persons	Housing Need Assessment; Non-Homeless Special Needs; Anti-Poverty Strategy	
8.	Big Sky Senior Services	Services - Elderly Persons	Housing Need Assessment; Non-Homeless Special Needs; Anti-Poverty Strategy	
9.	Living Independently for Today and Tomorrow	Housing; Services - Persons with Disabilities	Housing Needs Assessment; Market Analysis; Non-Homeless Special Needs	
10.	City of Billings - Planning Division	Local Government; Planning Organization	Housing Needs Assessment; Market Analysis; Economic Development; Anti-Poverty Strategy; Broadband Access; Resiliency	
11.	YWCA Gateway House	Housing; Services - Domestic Violence, Children	Housing Needs Assessment; Market Analysis; Homeless Needs - Families with Children; Anti-Poverty Strategy	
12.	Billings Public Schools	Services - Homeless, Education	Homeless Needs - Families with Children; Anti-Poverty Strategy	
13.	Billings Job Service	Services - Employment	Economic Development; Anti-Poverty Strategy	
14.	Montana Fair Housing	Services - Fair Housing	Housing Needs Assessment; Non-Homeless Special Needs; Anti-Poverty Strategy	
15.	The Alliance	Health Agency	Non-Homeless Special Needs; Anti-Poverty Strategy	
16.	Montana Department of Commerce	State; Housing	Housing Need Assessment; Market Analysis; Anti-Poverty Strategy	
17.	Billings Public Works Department	Local Government	Non-Housing Community Development Needs	
18.	Billings Police Department	Local Government; Services - Domestic Violence, Homeless	Housing Need Assessment; Anti-Poverty Strategy	

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

The City of Billings staff is not aware of any agency types that have not been consulted in preparation of the Annual Action Plan. City staff contacted many agencies to assist with the development of the Consolidated and Annual Action Plans and has widely circulated information relative to proposed programs and funding allocations to garner feedback. Additional efforts were made during the public comment period to distribute the Annual Action Plan for review and feedback.

Describe other local/regional/state/federal planning efforts considered when preparing the Plan.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Montana State Continuum of Care	Identifies Federal and State resources to impact homelessness.
Growth Policy	City of Billings - Planning Division	Promotes affordable housing and infill development.
Infill Policy	City of Billings - Planning Division	Promotes affordable housing and infill development.
Annexation Policy	City of Billings - Planning Division	Promotes infill development.
Transportation Plan	City of Billings - Planning Division	Improves transit impacting project affordability
Neighborhood Plans	City of Billings - Planning Division and Neighborhood Task Forces	Guides development efforts in each neighborhood.
Consolidated Plan	Montana Department of Commerce - Community Development	State CDBG and HOME resources may be available to further projects. Consultation and coordination of statewide Analysis of Impediments to Fair Housing Choice.

Table 3 – Other local / regional / federal planning efforts

AP-12 Participation

91.105, 91.200(c)

Summary of citizen participation process/Efforts made to broaden citizen participation. Summarize citizen participation process and how it impacted goal setting.

Public comments are requested at least 30 days prior to submission of reports required under HUD's Consolidated Plan process. City staff has considered all written comments by citizens, public agencies, and other interested parties prior to submission of its final Consolidated Plan and related reports to HUD and attach a summary of each comment to the final submission. If written comments were not accepted for inclusion in the Plan, City staff has provided written explanation of why those comments were not accepted.

Staff utilizes data-driven analysis processes along with citizen and community participation to establish goals, strategies, and funded activities.

Citizen Participation Outreach

#	Mode of Outreach	Target of Outreach	Summary of response/attendance
Summary of comments not accepted and reasons: No comments were rejected.			
1	Public Notices	Nonprofit and other organizations with an interest in CDBG and / or HOME funding opportunities, Broad Community,	Public Notices regarding the availability of CDBG and HOME funding were published through the Yellowstone County News on December 11 and 18, 2020.
The City did not receive applications from nonprofit or other organizations.			
2	Public Notices	Nonprofit organizations with an interest in AmeriCorps VISTA funding opportunities, Broad Community,	Public Notices regarding the availability of AmeriCorps VISTA resources were published through the Yellowstone County News on December 11 and 18, 2020.
The City received numerous proposals for AmeriCorps VISTA placements for projects designed to impact poverty.			
3	Public Notices	Minorities, Disabled, Broad Community, Public & Assisted Housing Residents	Public Notices regarding the publication of the drafted Annual Action Plan on the City's website, the public comment period from March 27 through April 26, 2021. Notice of the public hearing, to be held during the April 26, 2021 City Council meeting, was published in the Yellowstone County News on March 26, April 2, and April 9, 2021.
No responses or comments were received.			
4	Website	Minorities, Disabled, Broad Community, Public & Assisted Housing Residents	The drafted Annual Action Plan was available online, from March 27 through April 26, 2021, for public comment and feedback. Emails were also sent to local nonprofit, healthcare, and housing organizations.
No responses or comments were received.			
5	Public Meetings	Minorities, Disabled, Broad Community, Public & Assisted Housing Residents	Monthly Community Development Board meetings are streamed live and video is available on demand on the Billings Planning and Community Services Department Facebook page.
There were no public comments made during the meetings.			
6	Public Meeting	Minorities, Disabled, Broad Community, Public & Assisted Housing Residents	The City Council public hearing, held on April 26, 2021, was streamed live and video is available on demand at www.comm7tv.com . Video is available, on demand, at www.facebook.com/comm7tv .
See the appendix for a summary of responses.			

Table 4 – Citizen Participation Outreach

Section III: Annual Action Plan

AP-15 Expected Resources

91.220(c)(1,2)

Introduction

The table below illustrates the CDBG and HOME resources expected for the program year. CDBG administration allocations are capped at 20% of the new CDBG allocation in addition to eligible program income received during the project year. Maximum amounts for public service activities are capped at 15% of the new CDBG allocation and 15% of the previous year's program income. HOME administration activities are capped at 10% of the new HOME allocation and eligible program income received following the required affordability period. Revenue received during a project's affordability period is considered recaptured and may not be used for administration.

Expected revenues from the CDBG program include repayments for funding loaned through the Housing Rehabilitation Loan program and other revitalization efforts. The City expects to receive approximately \$75,000 to \$300,000+ in repayments for the upcoming fiscal year and this funding will be reprogrammed for programs identified herein. The City will not receive proceeds for Section 108 loan guarantees, surplus funds from urban renewal settlements, or float-funded activities.

Revenue expected for the HOME program includes recaptured and program income funding generated by the First Time Homebuyer Loan program. The City expects to receive approximately \$150,000 to \$300,000+ in HOME funding through these venues, and the funding will be utilized to further programs identified in this Plan. The City of Billings programs utilize 100% of CDBG and HOME funding to benefit low to moderate income households and / or areas. The City may also receive program income attributable to the Neighborhood Stabilization Program and other previously funded federal and state programs.

Routine revenues including program income, recaptured / repaid funds, and re-programmed monies will be utilized for existing and previously approved programs as it is received during each fiscal year. Routine revenues are allocated on a close- and shovel-ready basis to ensure timely commitment and expenditure. These changes are customary and facilitate funding allocations to projects and activities most in demand and do not require a substantial or minor amendment to the Consolidated Plan.

The City has also been awarded \$909,126 in CARES Act funding (CDBG-CV) to support coronavirus response for low-income individuals and families in Billings. The City will be submitting a substantial amendment to the FY2020 Annual Action Plan prior to August 2021 with recommended allocations for these funds to exclusively prevent, prepare for, and respond to the coronavirus pandemic.

Anticipated Resources

Program	Source of Funds	Expected Amount Available				Expected Amount Available Reminder of Con Plan	Narrative Description
		Annual Allocation	Program Income	Prior Year Resources	Total		
CDBG	Public / Federal	\$654,649	\$500,000	\$0	\$989,649	\$0	Entitlement Allocation
	Uses of Funds: Administration, Homeowner Rehabilitation, Homebuyer Acquisition, New Housing Development, Public Services						
HOME	Public / Federal	\$334,548	\$325,000	\$0	\$659,548	\$0	Entitlement Allocation
	Uses of Funds: Administration, Homebuyer Acquisition, New Housing Development						

Table 5 - Expected Resources – Priority Table

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

The HOME program requires 25% match funding for projects be dedicated from non-federal sources. The City of Billings meets HOME matching requirements through low-interest financing available for First Time Homebuyer Loans issued through the Montana Board of Housing (MBOH) and matching funds provided for other affordable housing projects undertaken with HOME funds, such as private contributions and other local bank financing.

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

The City of Billings does not have plans to use publicly owned land to address needs identified in the Consolidated Plan and is not required to do so, as per federal regulation.

Requirements set forth in CFR 24 91.220 and 91.520 indicate the City may indicate publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the Consolidated / Annual Action Plan.

While the City has not dedicated land to the Community Development Division, the Billings City Council supported the Division's housing programs by dedicating nearly \$450,000 in non-federal funds to support Consolidated Plan activities.

AP-20 Annual Goals and Objectives

Goals Summary Information: Projects are funded on a close- and shovel-ready basis for core programs as described in this Plan.

#	Goal Name	Needs	Outcome	Objective	\$	City Program	Goal Outcome Indicator	One Year Goal
1	Create, preserve, and expand affordable housing options	Affordable Housing	Affordability	Decent Affordable Housing	CDBG \$667,820 HOME \$626,093 NSP TBD	Affordable Housing Development	Public Infrastructure: Low-income Housing Benefit	# Households Assisted*
							Homeless Person Overnight Shelter	40 Persons Assisted*
							Rental Units Constructed	# Housing Units*
							Rental Units Rehabilitated	# Housing Units*
							Homeowner Housing Added	# Housing Units*
		Housing Rehabilitation	First Time Home buyer				Homeowner Housing Rehabilitated	2 Housing Units
							Direct Financial Assistance to Homebuyers	35 Households Assisted
		<ul style="list-style-type: none"> Encourage the citywide development and renovation of affordable single-family, multi-family and special needs housing in the community through private developers and nonprofit organizations. Provide direct, affordable financing and assistance to low-income homeowners for the completion of needed repairs citywide. Provide affordable financing and support to promote homeownership opportunities citywide. <p>November 2021 Update: The City will provide \$450,000 to rehabilitate 40 units currently being used for coronavirus isolation and as a homeless overnight shelter.</p> <p>Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b): The City's intent is to assist 35 low-income (under 80% AMI) families this fiscal year through the First Time Home Buyer program. Of these households, zero are expected to be extremely low-income.</p>						
2	Neighborhood Revitalization: Foreclosures	Affordable Housing	Affordability	Decent Affordable Housing	CDBG \$0	Foreclosure Acquisition Rehabilitation	Homeowner housing rehabilitated	1 Housing Unit
							Buildings Demolished	# Buildings*
3	Impact Poverty	<ul style="list-style-type: none"> Revitalize neighborhoods through foreclosure remediation, redevelopment, and infill development. 						
		Other: Poverty Impact	Availability / Accessibility	Create Suitable Living Environment	CDBG \$25,000 CNCS TBD	Billings Metro VISTA Project	Public service activity for low-income benefit	200 Persons Assisted
		<ul style="list-style-type: none"> Provide public service activity funding to support the Billings Metro VISTA Project to support local nonprofit organizations expand services for the homeless and special needs populations: Healthcare; Food Security; Education; Employment; Financial Literacy; and Housing. 						
4	Prevent, Prepare for, and Respond to Coronavirus	Pandemic Response / Poverty	Availability / Accessibility	Pandemic Response	CDBG \$330,899	Coronavirus Response	Public service activity for low-income benefit	# Persons Assisted
							Public Facility / Infrastructure for low-income benefit	100 Persons Assisted
		<p>November 2021 Amendment: Provide public service activity and public facility improvement funding to prevent, prepare for, and respond to the coronavirus. Priority needs have been identified in the City's Community Assessment Report, including, but not limited to:</p> <ul style="list-style-type: none"> Low-Income Beneficiaries: Rent, mental health care, meal distribution, mortgage payments, internet access, utility assistance, childcare, etc. Public Improvements & Facilities: Handwashing stations, additional public restrooms / cleaning, infrastructure, etc. Social Service Agencies & Public Health Support: Client remote access, vaccination activities, virtual service ability, exposure prevention - staff training, unmet hospital / public health needs, FEMA match, facility social distancing, etc. 						

HOME Investment Partnerships Program (HOME)

Community Development Block Grant (CDBG)

Corporation for National and Community Service (CNCS)

Table 6 – Goals Summary

Introduction

The City of Billings is recommending the following projects for CDBG and HOME funding for FY2021-2022. Revenues received from CDBG, HOME, and other sources will be allocated to current programs under a close- / shovel-ready basis to ensure commitment and expenditure timeliness. The City will be receiving \$654,649 in new CDBG funds and \$334,548 in new HOME funds. CDBG and HOME administration will be funded at the maximum allowable caps (20 and 10 percent, respectively).

Initial CDBG allocations have been updated as of November 2021 due to high repayment revenues and stalling Housing Rehabilitation and Foreclosure programs. CDBG programs will be funded with new entitlement funding as follows: Administration at the 20% maximum; \$450,000 for the Off The Streets project in the Affordable Housing Development program; \$25,000 is reserved for the Housing Rehabilitation program; and \$330,899 in public facilities for infrastructure in parks to encourage social distancing, healthy lifestyle, and to provide handwashing and restroom facilities to curb pandemic spread.

Coronavirus projects are included in the City's FY2020-2024 Consolidated Plan and the FY2020-2021 Annual Action Plan and are funded through CDBG-CV. A substantial amendment (November 2021) to the FY2021-2022 Annual Action Plan includes the use of CDBG funding to augment CDBG-CV funding to facilitate flexibility in responding to the coronavirus Delta variant surge this fiscal year. These funding allocations are subject to the City's standard close- and shovel-ready allocation process.

The City is reserving 15 percent minimum HOME funding for a Community Housing Development Organization (CHDO) project to prioritize families in current need. All other HOME funds would be dedicated to the First Time Home Buyer program. These funding allocations are also subject to the City's standard close- and shovel-ready allocation process.

#	Project Name	FY2021-2022 Allocations					
		CDBG			HOME		
		EN	PI*	Total	EN	PI*	Total
1 & 2	Administration	\$130,930	-	\$130,930	\$33,455	-	\$33,455
3	Affordable Housing Devel - CHDOs	\$325,000	\$125,000	\$450,000	\$50,182	-	\$50,182
4	Housing Rehabilitation	\$0	\$25,000	\$25,000	-	-	-
5	First Time Home Buyer	\$173,719	\$19,101	\$192,820	\$250,911	\$325,000	\$575,911
6	Foreclosure Acquisition / Rehabilitation	\$0	-	\$0	-	-	-
7	Billings Metro VISTA Project	\$25,000	-	\$25,000	-	-	-
8	CDBG: Coronavirus Public Services	\$0	-	\$0	-	-	-
9	CDBG: Coronavirus Public Facilities	\$0	\$330,899	\$330,899	-	-	-

Table 7 – Project Information

*Estimated Program Income / Repayment Revenue

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

The allocation priorities were established by identifying community needs through the Needs Assessment and Market Analysis:

- **Affordable Housing:** Single- and multi-housing development, Housing Rehabilitation, and First Time Home Buyer, and Foreclosure Acquisition and Rehabilitation.
- **Poverty Impact:** Billings Metro VISTA Project.

Limited funding is the primary obstacle faced by the City in undertaking the activities described in its Consolidated Plan and meeting under-served needs. The Needs Assessment identified the affordable housing needs and conditions of our community. These conditions, particularly the cost burden faced by very low-income renters and homeowners, is difficult to address given existing resources.

#	Project Name	Target Area	Goals / Needs	Funding	Target Date	Estimate #/Type Beneficiaries
1 & 2	Administration	City of Billings	Affordable Hsg	CDBG \$130,930 HOME \$33,455	June 30, 2022	Not Applicable
		General grant administration for CDBG and HOME programs.				
3	Affordable Housing Development	City of Billings	Affordable Hsg	CDBG \$450,000	June 30, 2022	40 Homeless Persons Overnight Shelter
		<p>Description: Encourage the citywide development of new affordable single-family, multi-family and special needs housing in the community through private developers and nonprofit organizations. Planned Activities: This funding would be utilized to facilitate the development of new affordable housing.</p> <p>November 2021 Amendment: Provide \$450,000 of CDBG funding for rehabilitation of the Off the Streets: boiler repair, installation of individual heating / cooling units for rooms, and rehabilitation for four units damaged by boiler malfunction.</p>				
4	Housing Rehabilitation	City of Billings	Affordable Hsg	CDBG \$25,000	June 30, 2022	2 Low-Income Housing Units (10*)
		<p>Description: Provide direct, affordable financing and assistance to low-income homeowners for the completion of needed repairs citywide. Preserve existing affordable housing supply, particularly in older neighborhoods, to support the stability of the current affordable housing stock. Planned Activities: This program provides low-income households with zero interest, no payment financing to make needed improvements. This program revitalizes established neighborhoods and preserve the existing affordable housing stock through the completion of repairs to housing.</p>				
5	First Time Home Buyer	City of Billings	Affordable Hsg	HOME \$575,911 CDBG \$192,180	June 30, 2022	35 Low-Income Households Assisted (11*)
		<p>Description: Provide affordable financing and support to promote homeownership opportunities citywide.</p> <p>Planned Activities: This program provides financial resources to support low-income first-time homebuyers with down payment and closing costs.</p>				
6	Foreclosure Acquisition & Rehabilitation	City of Billings	Affordable Hsg	CDBG \$0	June 30, 2022	1 Housing Unit – Low-Income Household (10*)
		<p>Description: Revitalize low-income neighborhoods through foreclosure remediation, redevelopment, and infill development.</p> <p>Planned Activities: Funding to support the purchase of vacant and foreclosed properties for the purpose of rehabilitation and direct homeownership assistance to income-qualified homebuyers as their primary residence. Properties may also be demolished to make way for new construction of affordable housing. The purpose of the program is to stabilize neighborhoods, stem the decline of house values of neighboring homes due to foreclosure, and to preserve decent affordable housing.</p>				
7	Billings Metro VISTA Project	City of Billings	Poverty Impact	CDBG \$25,000	June 30, 2022	200 Low-Income Persons Assist (3*)
		<p>Description: Provide public service activity funding to support the Billings Metro VISTA Project to support local nonprofit organizations expand services for the homeless and special needs populations: Healthcare; Food Security; Education; Employment; Financial Literacy; and Housing.</p> <p>Planned Activities: AmeriCorps members work on poverty impact issues in the community including hunger, homelessness, education, and veterans / military family support. Members are placed at nonprofit organization Host Sites and the City to assist in strengthening services in the poverty-impact service continuum.</p>				
8	CDBG: Coronavirus - Public Services	City of Billings	Prevent, prepare for, respond to coronavirus	CDBG \$0 unless organizations apply for these activities	June 30, 2022	# Low-Income Persons Assisted (3*)
		<p>November 2021 Amendment - Description: CDBG funds, in addition to CDBG-CV funds, to be used for public service activities to prevent, prepare for and respond to the Coronavirus. Planned Activities: Rent, mental health care, meal distribution, mortgage payments, internet access, utility assistance, childcare, client remote access, vaccination activities, virtual service ability, exposure prevention - staff training, additional cleaning, unmet hospital / public health needs, FEMA match, etc.</p>				
9	CDBG: Coronavirus - Public Facilities	City of Billings	Prevent, prepare for, respond to coronavirus	CDBG \$330,899	June 30, 2022	100 Low-Income Persons Assisted (1*)
		<p>November 2021 Amendment - Description: CDBG funds, in addition to CDBG-CV funds, may be used for public facility improvement activities to prevent, prepare for and respond to the Coronavirus. Planned Activities: Handwashing stations, public restrooms improvements, infrastructure, accessibility, small-scale rehabilitation, public facility systems, rehabilitation for social distancing, touchless / nonporous surfacing, etc.</p>				

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

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

The geographic area served by the Consolidated and Annual Action Plans is defined by the current City of Billings limits. Citation 24 CFR 91.220(f) reads as follows, *“When appropriate, jurisdictions should estimate the percentage of funds they plan to dedicate to target areas.”* Estimating the percentage of funds planned for dedication to target areas is not appropriate for the Billings community due to the following reasons:

- Geographic area is defined by the current Billings city limits.
- Citywide strategies encourage the distribution of resources to support affirmatively furthering fair housing and equal opportunity to avoid segregation in Billings.
- Geographic distribution of investments description includes the focus of resources on a citywide basis to support diversity across the community.
- The City of Billings is classified as a smaller city on a national scale.
- The actual dollar amount planned for allocation to each program is included in this Action Plan.

The City will focus distribution of investments on a citywide basis to support diversity and mixed-income development across the community. Neighborhood Revitalization Strategy Areas **have not been established** in Billings and there is no specific amount of funding allocated for a target area in the City's geographic distribution of resources. **Therefore, the City plans to dedicate zero percent of funding to target areas in favor of supporting a citywide approach to further fair housing, equal opportunity, and anti-segregation efforts.**

Geographic Distribution	
Target Area	Percentage of Funds
Citywide	100%

Table 7 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The strategies identified in the Consolidated and Annual Action Plans will be addressed on a citywide basis to encourage the distribution of low-income affordable housing and other assistance to lower income households throughout the community.

Introduction

Planned affordable housing activities for the upcoming year include Housing Rehabilitation, Foreclosure Acquisition / Rehabilitation, Affordable Housing Development, and First Time Home Buyer. While many of these programs may serve the homeless or special needs households, the programs are not designed to exclusively serve one or more of the following cohorts.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	38
Special-Needs	0
Total	38

Table 8 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	3
Acquisition of Existing Units	1
Total	4

Table 9 - One Year Goals for Affordable Housing by Support Type

Introduction

The City's public housing authority, HomeFront, serves extremely low income, very low income, and low-income citizens. HomeFront plans to apply for all grants that will assist the organization in adding units to its existing programs and any programs that complement existing services and are able to be implemented. HomeFront will continue to assess and implement modernization funds to upgrade and restore units, (with sustainability as the priority) and complete energy efficient repairs as needed.

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

HomeFront may apply for funding to develop affordable housing through the Affordable Housing Development Program. In the past, the City has granted funds to build new units through the HOME and CDBG programs in neighborhoods where HomeFront property exists. The City has also provided funding for a variety of rehabilitation and new construction projects to neighborhoods that have public housing units in need of upgrading.

The City has helped rehabilitate properties, sold land for new businesses, and granted land to nonprofits to assist with neighborhood revitalization efforts in neighborhoods where HomeFront complexes have been built. The City has provided funding for parks and play areas for the neighborhoods where HomeFront families reside. In addition, the businesses that have moved into areas where HomeFront properties are located have contributed to the economic stability of HomeFront clients. The City's First Time Home Buyer program assists with home ownership down payment assistance and home ownership counseling for clients considering homeownership.

The City coordinates with HomeFront for housing needs assessments, assists in funding new projects when appropriate, and assists with applications for supportive services when called upon.

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

HomeFront implements the Family Self-Sufficiency program. This program links participants to community agencies to help them become self-sufficient through individual goal setting. Forty-one households have achieved homeownership through this program to date. Resident councils, an Advisory Board and the Family Self-Sufficiency Panel are involved in providing input on program needs and assisting others to become actively involved in the process. Additional information is included in the five-year plan on file at the HomeFront office.

Each year goes through a process to assess physical needs addressed by tenants through their Resident Advisory Board for the Annual Plan process; comments are also solicited via Resident Council functions throughout the year. These comments, Board participation, tenant commissioners, and Public Housing Administration's daily communications with HomeFront's client base serve to assist in assessing client needs for physical adjustments, security issues, and needed links with the community. The physical needs requests are implemented along with staff recommendations in the Capital Fund planning process.

If the PHA is designated as troubled, describe the way financial assistance will be provided or other assistance

Not applicable. HomeFront is a High Performer for the Public Housing Assessment System (PHAS) and the Section 8 Management Assessment Program (SEMAP). Therefore, a review of troubled status needs is not required as part of the Consolidated and Annual Action Plans.

Introduction

As previously stated in the SP-60 Homelessness Strategy of the Consolidated Plan (www.BillingsMT.gov/ConPlan), the Community Development Division's ongoing activities include:

- Continuing to distribute the City's *Resource Map*, *Notepad*, and the *Veteran's Resource Map*. These documents include comprehensive service directories for anyone seeking assistance.
- To the greatest extent possible, City staff will continue to provide local nonprofit organizations access to AmeriCorps VISTA members through the *Billings Metro VISTA Project* resources. VISTA members may be placed at the City to undertake objective citywide initiatives. VISTA members may also be placed at nonprofit Host Site organizations to work on specific anti-poverty initiatives.

The City does not directly receive Continuum of Care, Emergency Shelter Grant, or other federal funds to exclusively support efforts to impact homelessness. City staff does not provide direct services to those experiencing homelessness.

A network of over 50 local service providers in the community strive to meet the diverse needs of those experiencing homelessness, those who are at-risk of homelessness, and people experiencing poverty. The Mental Health Center manages a Projects for Assistance in Transition from Homelessness (PATH) outreach program to engage those living outside or in areas unfit for human habitation. Tumbleweed runs a Street Outreach program to seek out unaccompanied youth to engage them in services. A complete listing of services, including outreach, is included in the MA-30 Homeless Facilities and Services section of this Consolidated Plan.

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

The Mental Health Center manages the PATH outreach program to engage those living outside or in areas unfit for human habitation. Tumbleweed runs a Street Outreach program to seek out unaccompanied youth to engage them in services. Additional services for the homeless are included in the MA-30 Homeless Facilities and Services section of the Consolidated Plan(www.BillingsMT.gov/ConPlan).

Addressing the emergency shelter and transitional housing needs of homeless persons

The shelter needs for those experiencing homelessness in the Billings community are primarily met by the Montana Rescue Mission. The organization operates men's shelter and a shelter to serve women and their children. Montana Rescue Mission does not seek nor utilize federal funds for its operation. Several local service providers assist homeless families by providing funding for rent, mortgage, utility, and deposit assistance.

The Community Crisis Center provides crisis intervention, and 23 hour stays as a technique to impact chronic homelessness. The YWCA provides transitional housing for victims of domestic violence. Additional services for the homeless are included in the MA-30 Homeless Facilities and Services section of the Consolidated Plan(www.BillingsMT.gov/ConPlan).

For those living on the downtown streets of Billings, a position was created for an addiction / mental health counselor to accompany two downtown police officers when engaging people living on the streets. This initiative was undertaken as one of the many outcomes from the Community Innovations Summit, which was facilitated by the Community Development Division and the Downtown Billings Alliance. Non-federal funding through the City of Billings has been allocated to support the counselor staff position.

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

Family Promise of Yellowstone Valley provides emergency shelter to several families at a time in a network of church congregations. The organization also operates a transitional housing program that provides apartments for those who have graduated from the shelter program.

YWCA Gateway House provides housing for female-headed households who have been victims of domestic violence. Additional services provided include case management, mental health treatment, budgeting assistance, and the facilitation of access to benefits. The organization also provides transitional housing and permanent supportive housing.

HRDC District 7 receives Emergency Shelter Grant funds and manages a rapid rehousing program to provide deposit and rent payment assistance to help families quickly regain stability into permanent housing.

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

The City does not receive McKinney-Vento Homeless Assistance Act funds and is not required to develop and implement a Discharge Coordination Policy. The Montana Continuum of Care (MT CoC) for the Homeless Coalition is the state's lead agency for addressing homeless activities and is a statewide collaboration of diverse homeless service providers, nonprofit organizations, and local and state governments. The coalition was formed to address homelessness with very few resources to cover Montana's vast geographical area. The system is established upon community and regionally based continuum of care systems, which form the statewide coalition and continuum of care process. The City supports the MT CoC in their efforts to establish a Statewide Discharge Coordination Policy.

The City does not receive Emergency Shelter Grant funds. These funds are distributed statewide by the Montana Department of Public Health and Human Services through ten HRDCs throughout the state. The local District 7 HRDC utilizes these funds to support rapid re-housing activities in conjunction with the local shelters.

Introduction

Barriers to affordable housing are noted in the MA-40 and SP-55 Barriers to Affordable Housing sections of the Consolidated Plan, which can be found online at www.BillingsMT.gov/ConPlan.

Additional barriers have been identified in the City's Analysis of Impediments to Fair Housing Choice, including:

- Concentrations of minorities that would not exist in a free market not distorted by discrimination suggest that Billings has a dual housing market; one for non-Hispanics, Whites and Asians and another for all other minorities.
- Discriminatory real estate industry practices such as racial and ethnic steering distort the free market in housing.
- Discrimination against Latinos in issuing government-backed mortgage and refinancing loans continues unabated in Billings as it does throughout the nation.
- The relatively high cost of housing continues to pose a barrier to fair housing choice in Billings.
- A review of Unified Zoning Regulations and review requirements to foster compliance with fair housing law and to promote inclusionary zoning.
- There is a serious shortage of housing affordable to holders of Housing Choice Vouchers in the areas where the proportion of public-school students from low-income neighborhoods is relatively low.

ACTIONS IT PLANNED TO REMOVE OR AMELIORATE THE NEGATIVE EFFECTS OF PUBLIC POLICIES THAT SERVE AS BARRIERS TO AFFORDABLE HOUSING SUCH AS LAND USE CONTROLS, TAX POLICIES AFFECTING LAND, ZONING ORDINANCES, BUILDING CODES, FEES AND CHARGES, GROWTH LIMITATIONS, AND POLICIES AFFECTING THE RETURN ON RESIDENTIAL INVESTMENT.

The City plans on assisting with housing affordability and poverty impact through the following programs:

- Housing Rehabilitation
- Foreclosure Acquisition / Rehabilitation
- First Time Home Buyer
- Affordable Housing Development
- Billings Metro VISTA Project

The City of Billings recently adopted, and has begun implementing, a new zoning code that includes several provisions to expand affordable housing options and choice citywide. [Project Re:Code](#) was a three-year process to modernize zoning codes, diversify neighborhoods, and remove barriers to affordable housing development. The new code allows for smaller, accessory dwelling units to create more compact, affordable housing options in existing residential neighborhoods. With the assistance of AmeriCorps VISTA members through the Billings Metro VISTA Project, the City also built a [new Pattern Guide website](#) to provide guidance to homeowners and small business owners investing in [Billings' First Neighborhoods](#).

In 2019, City officials met with locally with several HUD officials from the Office of Fair Housing and Equal Opportunity: Assistant Secretary Anna Maria Farias; Regional Director Amy Frisk; and Enforcement Branch Chief Chris Vogel. After reviewing Project Re:Code, Farias...commended the effort, saying [Project Re:Code] was "very impressive," before adding her thoughts on the importance of zoning codes. "If you are serious about affordable housing, then somebody has to be willing to start talking about zoning." ([Billings Gazette](#))

Introduction

The City's programs have been designed to meet priority needs in the community. However, there is very limited funding coming through the City to meet the needs of local citizens.

Actions planned to address obstacles to meeting underserved needs

The City plans on meeting underserved needs through the following programs:

- **First Time Home Buyer**
 - Promote financial security, home equity, housing self-sufficiency, housing and neighborhood quality and stability.
 - Increase minority homeownership, promote equal access and opportunity, and decrease segregation citywide.
 - Improve affordable housing opportunities for the elderly, persons with disabilities, and other special populations.
 - Reduce predatory lending through education and standardized procedures.
- **Housing Rehabilitation**
 - Help current homeowners maintain their homes in safe, quality condition.
 - Increase value, quality, and durability of existing affordable housing stock.
- **Affordable Housing Development**
 - Expand access and availability of decent, affordable housing citywide.
 - Improve the physical quality of affordable housing.
 - Foster suitable living environment and quality of life through the improvement of physical conditions including infrastructure for housing projects and housing development.
- **Foreclosure, Acquisition, Rehabilitation**
 - Mitigate the negative community impact of vacant, foreclosed properties.
 - Improve affordable housing quality, condition, safety, livability, and accessibility.
 - Stabilize property values in neighborhoods with existing vacant, foreclosed homes.
 - Eliminate the potential for crime related to existing vacant, foreclosed properties.
- **Billings Metro VISTA Project**
 - Provide resources to nonprofit organizations to undertake poverty impact activities and to support the low-income individuals and families they serve.
 - Focus areas include education, healthcare, food security, economic opportunity, housing, financial literacy, and others.
- **Prevent, Prepare for, and Respond to Coronavirus**
 - Provide public service activity funding to prevent, prepare for, and respond to the coronavirus.
 - Activities benefitting low-income beneficiaries: Rent, mental health care, meal distribution, mortgage payments, internet access, utility assistance, childcare, etc.
 - Social Service Agencies & Public Health Support: Client remote access, vaccination activities, virtual service ability, exposure prevention - staff training, unmet hospital / public health needs, FEMA match, etc.
 - Provide public facility improvements funding to prevent, prepare for, and respond to the coronavirus. Priority needs have been identified in the City's Community Assessment Report, including, but not limited to:
 - Public Improvements & Facilities: Handwashing stations, additional public restrooms / cleaning, infrastructure, etc.
 - Social Service Agencies & Public Health Support: Client remote access, virtual service ability, unmet hospital / public health needs, FEMA match, facility social distancing, etc..

Actions planned to foster and maintain affordable housing

The City plans on maintaining affordable housing through the following:

- **Create, preserve, and expand affordable housing options:** Affordable Housing Development; Housing Rehabilitation; and First Time Home Buyer
- **Neighborhood Revitalization – Foreclosures:** Foreclosure Acquisition Rehabilitation
- **Impact Poverty:** Billings Metro VISTA Project

Actions planned to reduce lead-based paint hazards

The City continues to follow HUD's lead-based paint requirements as established in September of 2000. Projects involving structures built prior to 1978 are considered to have the potential for lead-based paint and consistent procedures have been developed to ensure compliance with federal regulations.

The City will continue diligence while undertaking rehabilitation and construction activities to maintain the safety of households participating in federal programs. Participants in the City's housing programs are made aware of the requirements the City must follow.. Education on the hazards of exposure to lead is provided for each rehabilitation project. The City currently offers risk assessments, through certified staff, paint inspections, clearance testing, and has access to lead-safe certified contractors to ensure compliance.

Actions planned to reduce the number of poverty-level families

As stated in the SP-70 Anti-Poverty Strategy section of the Consolidated Plan (www.BillingsMT.gov/ConPlan), the Needs Assessment contains comprehensive information on the lower income status of local households. All the Consolidated Plan strategies target the improvement of economic conditions of lower income households in the community, including housing development, financing home repair, continuing partnerships, and funding public service activities. The City proposes to support the following specific activities in this Consolidated Plan to address economic conditions of low-income households in Billings:

- Continue to work with nonprofit organizations to help address the human service needs of lower income residents of the community in general and of our lower income neighborhoods. This would be achieved primarily through supporting capacity building efforts of social service agencies through implementation of the **Billings Metro VISTA Project**.
- Continue to apply for the AmeriCorps VISTA project status to bring full-time and summer associate volunteers to work on poverty-impact programs.

AmeriCorps VISTA is a national anti-poverty initiative that places full-year and Summer Associate volunteers with local projects. Full-year VISTA members are recruited locally and nationally, are college graduates, and commit to at least a year of service with a project. Summer Associates are at least 18 years old and commit to ten weeks of service.

Actions planned to develop institutional structure

As described in the SP-40 Institutional Delivery Structure section of the [Consolidated Plan](#), the City of Billings maintains strong partnerships with housing and social service agencies. The only gaps in the institutional structure relate to funding limitations and the City's inability to dedicate time and resources to additional projects outside of the current funding structure.

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

The City will continue coordinating with public, private, and social service agencies to further activities and projects identified herein, including participation in the following groups and initiatives:

- Nonprofit Organizations
- Neighborhood Task Forces
- Community Innovations Initiatives
- Resource Map and Notepad
- Veteran's Resource Map
- Coronavirus (COVID-19) Resource Guide
- Billings Metro VISTA Project

Introduction

The City of Billings has programmed all available revenues in current programs identified herein.

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

1. Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.	\$0
2. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed.	\$0
3. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	\$0
4. The amount of surplus funds from urban renewal settlements.	\$0
5. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.	\$0
6. The amount of income from float-funded activities.	\$0
Total Program Income:	\$0

Other CDBG Requirements

1. The amount of urgent need activities.	\$0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low- and moderate-income. Overall Benefit - A consecutive period of one, two, or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specific the years covered that include this Annual Action Plan.	100%
Years Covered are 2021-2022	

Reference 24 CFR 91.220(l)(2)

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

The above-noted regulation refers to the use of HOME funds for eligible activities. The City of Billings will not utilize HOME funds outside of the following allowable investments:

- Equity investments, interest-bearing loans or advances, non-interest-bearing loans or advances, interest subsidies consistent with the purposes of this part, deferred payment loans, grants, or other forms of assistance that HUD determines to be consistent with the purposes of this part. Each participating jurisdiction has the right to establish the terms of assistance, subject to the requirements of this part.
- Guarantee loans made by lenders and, if required, the participating jurisdiction may establish a loan guarantee account with HOME funds. The HOME funds may be used to guarantee the timely payment of principal and interest or payment of the outstanding principal and interest upon foreclosure of the loan. The amount of the loan guarantee account must be based on a reasonable estimate of the default rate on the guaranteed loans, but under no circumstances may the amount on deposit exceed 20% of the total outstanding principal amount guaranteed; except that the account may include a reasonable minimum balance. While loan funds guaranteed with HOME funds are subject to all HOME requirements, funds which are used to repay the guaranteed loans are not.

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

Recapture provisions permit the original homebuyer to sell the assisted property to any willing buyer during the period of affordability while the City can recapture all, or a portion of the HOME assistance provided to the original homebuyer. The City utilizes recapture provisions exclusively when assisting homeowners and the provisions are enforced via a Promissory Note (not recorded), the use of a Deed Restriction Agreement and a Montana Trust Indenture that are both recorded at the Yellowstone County Clerk and Recorder's office. These written, legal documents contain language outlining the recapture provisions as established herein. The City does not use subrecipients or other grantees to carry out these activities.

Homebuyer Requirements: For homeownership housing to qualify as affordable housing eligible for HOME funding, it must be single-family; considered modest housing; be acquired by a low-income household for their principal residence; and meet affordability requirements for a single period as determined by the amount of assistance provided. The City utilizes HUD's 95% of the median purchase price limit set forth by 24 CFR 92.254(a)(2)(iii); single family mortgage limits under Section 203(b) of the National Housing Act.

Direct HOME Subsidy: The amount of HOME assistance that enabled the homebuyer to buy the unit. The direct subsidy includes down payment and closing costs provided directly to the homebuyer, which resulted in a reduced purchase price from the fair market value of the home to an affordable price. The entire amount of HOME assistance is subject to recapture.

Net Proceeds: The sales price, less the superior loan repayment and any closing costs. The City will only recapture the net proceeds from a sale. Any loans or improvements made to the property after

the time of the HOME assistance will be paid after the City is repaid the amount owed under its recapture provisions. If the net proceeds are not sufficient to recapture the full HOME investment, the City will accept the available net proceeds as full payment.

Recapture Model - City Recaptures Entire HOME Assistance Amount: The City allows the assisted homebuyer to retain all appreciation and the City expects to recapture the entire direct HOME subsidy invested in the project. Therefore, the homeowner will retain any value of the appreciation of the property after the City's HOME assistance has been recaptured / repaid. The homeowner's down payment, principal payments, and any capital improvement investment made in the property after the HOME assistance was provided will be returned to the homeowner at closing after the City's HOME assistance is recaptured and repaid from the net proceeds as described above.

Subordination: The City does not subordinate loans in the First Time Homebuyer program and other homeowner-assisted projects without City Council approval. Therefore, if an assisted homeowner refinances the property, the City will need to be repaid the full amount of HOME assistance provided. Assisted homeowners wishing to pursue City Council approval may write a letter explaining the need for the subordination and submit it to the Community Development Division. Staff will then prepare a memo and place the subordination on the Community Development Board agenda for recommendation to the City Council.

Use of Recaptured Funds: Recaptured HOME funds will be used to assist other first-time homebuyers to purchase property in Billings or other HOME-eligible activities to be determined through the City's budget allocation process in accordance with the Citizen Participation Plan. Homebuyers must be low-income and must use the assisted property with the recaptured funds as their principal residence. Low-income and first-time homebuyer status will be determined based on HOME program regulations.

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

Long Term Affordability: Under the recapture provision, there is no requirement that the original HOME-assisted homebuyer sell the unit to another low-income homebuyer.

Affordability Periods: For City-assisted homebuyer units under the recapture provision, the period of affordability is based upon the direct HOME subsidy provided to the homebuyer that enabled the homebuyer to purchase the unit. Any program income used to provide direct assistance to the homebuyer is included when determining the period of affordability. Recapture provisions for the First Time Home Buyer program are either five or ten years for each assisted property beginning after the transfer of the property to the property owner as evidenced by the Deed Restriction Agreement, Montana Trust Indenture and Promissory Note.

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

The City of Billings does not propose the use of HOME funds to refinance existing debt secured by multi-family housing that is being rehabilitated with HOME funds.

Section IV: Appendix

Appendix A: CDBG Application for Federal Assistance (SF-424)

OMB Number: 4040-0004
Expiration Date: 12/31/2022

Application for Federal Assistance SF-424			
* 1. Type of Submission:	* 2. Type of Application:	* If Revision, select appropriate letter(s):	
<input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	<input type="checkbox"/> New <input checked="" type="checkbox"/> Continuation <input type="checkbox"/> Revision	<input type="text"/> * Other (Specify): <input type="text"/>	
* 3. Date Received:	4. Applicant Identifier:		
05/10/2021	CDBG Entitlement Funding		
5a. Federal Entity Identifier:		5b. Federal Award Identifier:	
MT300066 Billings		B-21-MC-30-0001	
State Use Only:			
6. Date Received by State:		7. State Application Identifier:	
8. APPLICANT INFORMATION:			
* a. Legal Name: City of Billings			
* b. Employer/Taxpayer Identification Number (EIN/TIN):		* c. Organizational DUNS:	
81-6001237		1947827800000	
d. Address:			
* Street1:	PO Box 1178		
Street2:			
* City:	Billings		
County/Parish:			
* State:	MT: Montana		
Province:			
* Country:	USA: UNITED STATES		
* Zip / Postal Code:	59103-1178		
e. Organizational Unit:			
Department Name:	Division Name:		
Planning & Community Services	Community Development Division		
f. Name and contact information of person to be contacted on matters involving this application:			
Prefix:	* First Name:		Brenda
Middle Name:			
* Last Name:	Beckett		
Suffix:			
Title:	Community Development Manager		
Organizational Affiliation:			
* Telephone Number:	406-657-8286	Fax Number:	
* Email:	beckettb@BillingsMT.gov		

Application for Federal Assistance SF-424*** 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

United States Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.218

CFDA Title:

CDBG Entitlement Grant

*** 12. Funding Opportunity Number:**

FY2021

* Title:

Community Development Block Grant Program - Entitlement

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

[Add Attachment](#)

[Delete Attachment](#)

[View Attachment](#)

*** 15. Descriptive Title of Applicant's Project:**

City of Billings, Montana

Activities for approved use through the CDBG program, as indicated in the FY2021-2022 Annual Action Plan.

Attach supporting documents as specified in agency instructions.

[Add Attachments](#)

[Delete Attachments](#)

[View Attachments](#)

Application for Federal Assistance SF-424**16. Congressional Districts Of:*** a. Applicant * b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:* a. Start Date: * b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="654,649.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="654,649.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?** a. This application was made available to the State under the Executive Order 12372 Process for review on b. Program is subject to E.O. 12372 but has not been selected by the State for review. c. Program is not covered by E.O. 12372.*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)** Yes No

If "Yes", provide explanation and attach

21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

 ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:Prefix: * First Name: Middle Name: * Last Name: Suffix: * Title: * Telephone Number: Fax Number: * Email:

* Signature of Authorized Representative:

* Date Signed:

Appendix B: HOME Application for Federal Assistance (SF-424)

OMB Number: 4040-0004
Expiration Date: 12/31/2022

Application for Federal Assistance SF-424			
* 1. Type of Submission:	* 2. Type of Application:	* If Revision, select appropriate letter(s):	
<input type="checkbox"/> Preapplication	<input type="checkbox"/> New	<input type="checkbox"/>	
<input checked="" type="checkbox"/> Application	<input checked="" type="checkbox"/> Continuation	* Other (Specify): <input type="text"/>	
<input type="checkbox"/> Changed/Corrected Application	<input type="checkbox"/> Revision	<input type="text"/>	
* 3. Date Received:	4. Applicant Identifier:		
<input type="text"/> 05/10/2021	<input type="text"/> HOME Entitlement Funding		
5a. Federal Entity Identifier:	5b. Federal Award Identifier:		
<input type="text"/> MT300066 Billings	<input type="text"/> M-21-MC-30-0213		
State Use Only:			
6. Date Received by State:	7. State Application Identifier:		
<input type="text"/>	<input type="text"/>		
8. APPLICANT INFORMATION:			
* a. Legal Name: <input type="text"/> City of Billings			
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text"/> 81-6001237		* c. Organizational DUNS: <input type="text"/> 1947827800000	
d. Address:			
* Street1:	<input type="text"/> PO Box 1178		
Street2:	<input type="text"/>		
* City:	<input type="text"/> Billings		
County/Parish:	<input type="text"/>		
* State:	<input type="text"/> MT: Montana		
Province:	<input type="text"/>		
* Country:	<input type="text"/> USA: UNITED STATES		
* Zip / Postal Code:	<input type="text"/> 59103-1178		
e. Organizational Unit:			
Department Name:	Division Name:		
<input type="text"/> Planning & Community Services	<input type="text"/> Community Development Division		
f. Name and contact information of person to be contacted on matters involving this application:			
Prefix:	<input type="text"/>	* First Name:	<input type="text"/> Brenda
Middle Name:	<input type="text"/>	<input type="text"/>	
* Last Name:	<input type="text"/> Beckett		
Suffix:	<input type="text"/>		
Title:	<input type="text"/> Community Development Manager		
Organizational Affiliation: <input type="text"/>			
* Telephone Number:	<input type="text"/> 406-657-8286	Fax Number:	<input type="text"/>
* Email:	<input type="text"/> beckettb@BillingsNT.gov		

Application for Federal Assistance SF-424*** 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

United States Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

HOME Investment Partnerships Program - Entitlement

*** 12. Funding Opportunity Number:**

FY2021

* Title:

HOME Investment Partnerships Program - Entitlement to Cities

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

[Add Attachment](#)

[Delete Attachment](#)

[View Attachment](#)

*** 15. Descriptive Title of Applicant's Project:**

City of Billings, Montana

Activities for approved use through the HOME program, as indicated in the FY2021-2022 Annual Action Plan.

Attach supporting documents as specified in agency instructions.

[Add Attachments](#)

[Delete Attachments](#)

[View Attachments](#)

Application for Federal Assistance SF-424**16. Congressional Districts Of:*** a. Applicant * b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

 17. Proposed Project:* a. Start Date: * b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="334,548.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="334,548.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

a. This application was made available to the State under the Executive Order 12372 Process for review on .

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)** Yes No

If "Yes", provide explanation and attach

 21. "By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)** ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:Prefix: * First Name: Middle Name: * Last Name: Suffix: * Title: * Telephone Number: Fax Number: * Email:

* Signature of Authorized Representative:

* Date Signed:

Appendix C: Local Government Certifications

Updated September 2021

CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing.

Uniform Relocation Act and Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.


Signature of Authorized Official

9-13-21
Date

City Administrator
Title

Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Following a Plan -- It is following a current consolidated plan that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2021 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

Specific HOME Certifications

The HOME participating jurisdiction certifies that:

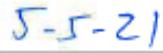
Tenant Based Rental Assistance — If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

Eligible Activities and Costs — It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

Subsidy layering — Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;



Signature of Authorized Official



Date



Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Appendix D: CDBG Construction Assurances (SF-424D)

CD76

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681, 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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Standard Form 424D (Rev. 7-97)
Prescribed by OMB Circular A-102

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL		TITLE	
		City Administrator	
APPLICANT ORGANIZATION		DATE SUBMITTED	
City of Billings		5-5-2021	

SF-424D (Rev. 7-97) Back

Appendix E: HOME Construction Assurances (SF-424D)

HOME

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1685 and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

Previous Edition Usable

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Standard Form 424D (Rev. 7-97)
Prescribed by OMB Circular A-102

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.

12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.

14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.

15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).

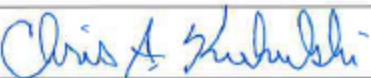
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.

17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).

18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."

19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL		TITLE	
		City Administrator	
APPLICANT ORGANIZATION		DATE SUBMITTED	
City of Billings		5-5-2021	

SF-424D (Rev. 7-97) Back

Appendix F: Citizen Participation Plan

Citizen participation is the foundation of housing and community development programs. The Citizen Participation Plan for the City of Billings is designed to ensure citizen involvement in the planning and reporting on the City's programs covered under the HUD Consolidated Plan requirements. The purpose of the Citizen Participation Plan is to ensure that citizens, nonprofit organizations, and other interested parties are afforded adequate opportunity to review and comment on plans, programs, activities and reports regarding the City's federally funded housing and community development programs. Citizen participation pertains to the following documents herein referred to as "plans and reports":

- Consolidated Plan
- Annual Action Plans
- Citizen Participation Plan
- Limited English Proficiency Plan
- Comprehensive Annual Performance and Evaluation Reports
- Analysis of Impediments to Fair Housing Choice

Citizen Participation Plan Objectives

The primary objectives of the City's participation plan are to:

- Encourage citizen participation in the development of the City's plans and reports with emphasis on participation from individuals and households identified as:
 - Low / moderate income
 - Residents of blighted areas
 - Minorities and all protected class members
 - Those with limited English proficiency
 - Elderly
 - Disabled
 - Those with HIV / AIDS diagnoses
 - Homeless
 - Families with children
 - Those residing in areas where funding will be utilized
- Provide citizens with reasonable and timely access to meetings, information and records relating to the City's plan for utilizing funding in addition to allowing reasonable opportunity to comment on the above-noted plans and reports. All records regarding these activities are maintained according to the City Record Retention Schedule and as required by federal regulations.
- Consult with the local Public Housing Authority (Housing Authority of Billings) on the development and implementation of the above noted plans and reports, which includes input from residents of public and assisted housing.
- The City's Planning and Community Services Department will also continue to support the activities for the Adjacent Neighborhood Committee, which is comprised of Task Force Officers who meet bi-monthly to collaborate and exchange information regarding the lower-income neighborhood task force areas. The Community Development Division staff attends meetings of

lower-income task force neighborhoods when requested for specific presentations. The lower-income neighborhoods are comprised of higher concentrations of ethnic and racial minority populations.

- Facilitate public hearings to obtain citizen views and to respond to proposals and questions at all stages in developing and implementing activities as outlined in the City's plans and reports. All hearings and meetings shall be provided in areas where accommodations for the disabled can be provided.
- Consult with public and private agencies and organizations during the development of the City's plans and reports:
 - Assisted housing
 - Health and social services
 - Regional and local government agencies
 - Public Housing Authority
 - Fair Housing education and enforcement agencies
 - Continuum of Care organizations
 - Businesses
 - Housing developers
 - Nonprofit organizations
 - Philanthropic agencies
 - Faith-based communities

HUD Data

The City of Billings will share any HUD-provided data and other supplemental information relative to the City's plans and reports. HUD-provided data is also currently provided on the City's website at www.BillingsMT.gov/HUDdata.

Public Access and Engagement

The City of Billings takes the following actions to ensure public access to drafted / proposed plans and reports are published and accessible to ensure the public has reasonable opportunities to examine content and to submit comments.

- **Public Comment Periods:**

- The City will publish and accept public comment on drafted Consolidated Plans, Annual Action Plans, Citizen Participation Plans, Limited English Proficiency Plans, and the Analysis of Impediments to Fair Housing Choice for a period of at least 30 days. The same timeline applies to amendments to the aforementioned documents.
- The City will publish and accept public comment on drafted Comprehensive Annual Performance Evaluation Reports (CAPER) for a period of at least 15 days. The same timeline applies to amendments to the CAPER.

- The City may request public comment for one or more plans / reports during the same public comment period for efficiency.
- Staff will consider citizen comments and views made prior to document finalization and comment summaries will also be included or attached to the document.
- The City will strive to provide written responses to all written complaints and grievances related to the City's housing and community development programs within 15 working days of receipt of the complaint or grievance where practical.
- In the event of a pandemic or other infectious disease, the City may alter public participation to include social distancing, virtual attendance, and other forms of virtual participation in lieu of or in addition to efforts described herein. The City may also implement shorter public comment periods as allowed by HUD. As per federal regulation, the City of Billings may publish its application for CDBG-CV funds for no less than five calendar days to solicit public comments.

- **Public Hearings:**
 - City staff will facilitate a public hearing during a Billings City Council business meeting to accept public comment prior to adoption or approval of the City's plans and reports.
 - Public hearings will be scheduled during a routine and televised Billings City Council business meeting to ensure and promote community access and participation. The hearings are also published on social media through the community's public television channel.
 - The City may facilitate one public hearing to accept public comment on one or more plans / reports for efficiency.
 - Staff will consider public hearing comments made prior to document finalization and comment summaries will also be included or attached to the document.
 - All public hearings are accessible to disabled individuals, publicized as required by State law and allow for accommodation of individuals with hearing, visual, or mobility impairments.
- **Published Notices:**
 - City staff will issue notices via widely-circulated print press in advance of public comment periods.
 - Notices will include the purpose of the document, a summary of the document contents, and instructions on how to access documents in their entirety.
 - Statements are included in notices of public hearings and service brochures indicating that office, meeting, and public hearing locations are accessible to persons with disabilities and they include the Montana Relay phone number 711.
- **Online Access:**
 - City staff will post drafted / proposed reports and plans online for free download at www.BillingsMT.gov/CDreports.

- **Hard Copy Access:**
 - City staff will make available free hard copies of drafted / proposed documents to the public including residents, groups, and organizations upon request at the City's Community Development office.
 - City staff will provide reasonable and timely access to information and records relating to all plans and reports, including the use of assistance under the programs managed by the Community Development Division. Those requesting records can complete a [Public Records Request](#) and submit it to the City's Legal Department.
- **Access for the Disabled and Limited English Proficiency:**
 - The City will provide accommodations for individuals with disabilities in public meetings, public hearings and in written documentation regarding programs and services available from the Division.
 - Community Development offices and City Hall are accessible to those with disabilities.
 - Statements are included in notices of public hearings and service brochures indicating that office and hearing locations are accessible to persons with disabilities. Accommodations can be made for other disabilities as well.
 - Special arrangements for participation by individuals with hearing, speech, or vision impairment may be made upon request with three business days advanced notice.
 - Non-English speaking persons wishing to participate will also be accommodated through translation and / or interpretation in accordance with the City's Language Assistance Plan.

Public Decision-Making Processes

The *Community Development Board* is a citizen's advisory board consisting of nine members who are appointed by the Mayor of Billings with the consent of the City Council. Six members are appointed from lower-income neighborhoods of the City as defined by federal regulations for the Community Development Block Grant (CDBG) program and three members represent the community at large. Staff is available to provide technical assistance to the Board in all aspects of planning and reporting processes.

This board serves in an advisory capacity to the City Council for the purpose of providing citizen input on policy decisions to the City Council. The primary responsibilities of the board are to review existing and proposed City policies and to review the Community Development Division's activities to ensure policies are being implemented and carried out. As six of the nine Board positions are held by low income area representatives, board composition meets basic federal requirements for low income citizen input and engagement.

The Community Development Board makes recommendations to the City Council relative to all plans and reports. In addition, the Community Development Board reviews applications submitted for CDBG and HOME funding in order to make funding recommendations to the City Council for approval.

The *Billings City Council* is the final citizen policy body that reviews and takes action on plans and reports. The Community Development Board presents recommendations to the City Council during a scheduled work session preceding the public hearing in April in order to deliver information on decisions made

regarding recommendations. After receipt and consideration of public comments, the City Council approves reports / plans and proposed funding allocations.

Public notices announcing Community Development Board and City Council meetings are published in a widely-circulated newspaper prior to the meeting date. These notices are designed to provide reasonable and timely access to local meetings consistent with accessibility and reasonable accommodation requirements.

Plans and reports on the City's housing and community development activities are made available for review by citizens, public agencies, and other interested parties. These documents are available at the Community Development Division and posted on its website at www.BillingsMT.gov.

Criteria for amending the Consolidated Plan

24 CFR part 91.105(c) of the Final Rule requires grantees of CDBG and HOME programs make public the criteria the City will use for determining what changes in planned or actual activities constitute a substantial amendment to the five-year Consolidated Plan and the Analysis of Impediments to Fair Housing Choice.

Substantial changes to the Consolidated Plan are defined as *the creation of any new program, project, or activity to be funded or carried out under the City's CDBG and / or HOME programs*. All substantial changes to the Consolidated Plan must meet demonstrated need substantiated by HUD-approved data sources. Minor amendments include the *expansion of an existing program, project, or activity funded or carried out under the City's CDBG and / or HOME programs*. Minor changes must also meet demonstrated need by HUD-approved data sources.

Prior to the submission of any substantial change in the proposed use of federal housing and community development funds or to the Analysis of Impediments to Fair Housing Choice, the City will hold a public hearing to allow citizens reasonable notice of, and opportunity to comment on, proposed amendments. Public comment periods will not be less than thirty (30) days unless otherwise allowed by HUD.

Routine revenues including program income, recaptured / repaid funds, and re-programmed monies will be utilized for existing and previously approved programs as it is received during each fiscal year. Routine revenues are allocated on a close- and shovel-ready basis to ensure timely commitment and expenditure. These changes are customary and facilitate funding allocations to projects and activities most in demand and do not require a substantial or minor amendment to the Consolidated Plan.

City staff cannot predict annual HUD entitlement allocation amounts or repayment revenues for CDBG or HOME. Therefore, five-year Consolidated Plan numerical goals are established as estimates that may fluctuate during the five-year period based on funding received and demand for the City's programs. These changes are customary and do not require a substantial or minor amendment to the Consolidated Plan.

Technical Assistance

The Community Development Division provides technical assistance, as requested and as staff time allows, to lower income groups to develop proposals for the Division's housing and community development activities in the City limits. Technical assistance is offered any time proposals for the use of funding are requested, and is offered routinely in January prior to application deadlines for CDBG / HOME funding allocations.

Nondiscrimination, Accommodations & Grievances

The Community Development Division receives federal funding to support housing acquisition, repair, development and poverty impact programs and is required to adhere to the Americans with Disabilities Act, Section 504 of the Rehabilitation Act, the Fair Housing Act, the Montana Human Rights Act, and other equal opportunity regulations. These regulations are designed to protect individuals with disabilities with equal access to employment opportunities and the services, programs and activities the City offers.

It is essential that all individuals have equal access to the Community Development Division's communication, open meetings, programs and services including: First Time Home Buyer; Home Repair; Housing Development; and the Billings Metro VISTA Project.

- **Federally Protected Classes:** Disability, including people with HIV / AIDS and people in recovery from alcohol / drugs; Race / Color; Religion; Sex, includes protection against sexual harassment; Familial Status, includes the presence of children under the age of 18 and / or pregnancy; and National Origin.
- **HUD Protected Classes:** Sexual Orientation; Gender Identity; and Marital Status.
- **Montana's Protected Classes:** Marital Status; Creed; and Age.

Accommodations: Auxiliary aids and services are available to facilitate effective communication to individuals with disabilities to ensure equal participation. Such aids and services are free to the public and may include sign-language interpreters, large print formats, and other aids to make information and communications accessible to individuals with speech, hearing or vision impairments.

Public Notices: The City of Billings - Community Development Division encourages all members of the community to participate. Special arrangements for participation by individuals with hearing, speech, vision impairment or physical disabilities can be made upon request. Non-English speaking persons wishing to participate will also be accommodated through translation and / or interpretation in accordance the City's Language Assistance Plan. Fair Housing Equal Opportunity.

Grievance Procedure: If a citizen feels they have been denied equal access to Community Development programs, services or activities, they may file a written complaint including their contact information and a description of the alleged act(s) of discrimination, including the date and place of the act(s). The written complaint may be submitted to any Community Development employee or specifically directed to the Community Development Manager by phone at 406.657.8286 (Montana Relay 711), email beckettb@billingsmt.gov, in person (appointment recommended) or U.S. Postal Service at 2825 3rd Avenue North, 6th Floor, Billings, MT 59101. City staff will provide a timely, substantive written response to written citizen complaints as soon as practicable. Complaints may also be filed with the Denver HUD FHEO Office at 1670 Broadway, Denver, CO 80202.

Program Eligibility: If a citizen disagrees with a staff decision relative to program eligibility unrelated to discrimination, they may submit a written appeal to the Community Development Division. The letter must be received at least two weeks prior to the Community Development Board meeting when the appeal would be reviewed. If the Community Development Board upholds the staff decision, the citizen has the option to have the appeal reviewed during the next City Council meeting.

ADA / 504 Coordinator: The City of Billings ADA Coordinator is responsible for the City's overall Grievance Procedure and is also available to ensure compliance with the physical and general program accessibility requirements of the ADA for other City Departments and Divisions. Please call 406.237.6294 (Montana Relay 711) with any questions.

Fair Housing Complaints: Please see the City's [fair housing webpages](#) for information on how to file a fair housing compliant.

Appendix G: Public Notices

CDBG & HOME Applications Available

Affidavit of Publication

STATE OF MONTANA
County of Yellowstone

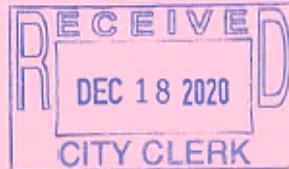
Jonathan McNiven

Being duly sworn, deposes and says:

That he is the Legal Advertising Clerk of Yellowstone County News, a newspaper of general circulation published weekly in the town of Huntley, in the County of Yellowstone, State of Montana, and that the (3) folio Legal Public Notice, a true copy of which is hereto Included, was published in said newspaper on the following dates:

December 11, 2020; December 18, 2020;

making in all (2) publication(s).



PUBLIC NOTICE

Housing & Community Development
Funding Requests

As a part of the City of Billings' Consolidated Planning process, the City is accepting loan applications for FY2021-2022 Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) funding. The City of Billings anticipates allocating an estimated \$650,000 in new CDBG funding for community development activities, which primarily benefit lower income neighborhoods or households. The City of Billings also anticipates allocating an estimated \$300,000 in new HOME funding for activities to preserve or increase the supply of affordable housing for lower income households in Billings. Actual allocation figures are not available as of publication date. Applications and an application guidebook may be downloaded from the City's website at www.BillingsMT.gov/allocations. Requests for funding must be submitted to the Community Development Office by 5:00 p.m., Wednesday, January 27, 2021.

For further information on eligible activities or to obtain the application materials via email, please call Brenda Beckett, Community Development Manager, at 406-657-4286 (TTY 711) or contact via email beckett@billingsmt.gov or write to:

Community Development Division
City of Billings
P.O. Box 1178
Billings, MT 59103

Technical assistance is available upon request to interested parties through the Community Development Office. The City of Billings encourages all members of the community to participate in the Consolidated Planning process. Special arrangements for participation by individuals with hearing, speech, vision impairment or physical disabilities can be made upon request. Non-English speaking persons wishing to participate will also be accommodated through translation and / or interpretation in accordance with the City's Language Assistance Plan. Fair Housing Equal Opportunity.

Denise R. Bohlman
Billings City Clerk
P.O. Box 1178
Billings, MT 59103

12/11, 12/18 2020
MNAZLP

STATE OF MONTANA
County of Yellowstone

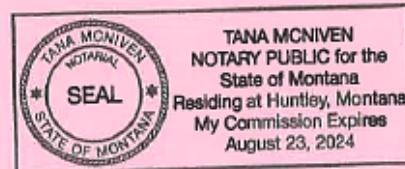
On this 18th day of December 2020, before me, the undersigned, a Notary Public for the State of Montana, personally appeared Jonathan McNiven, known to me to be the person whose name is subscribed to the within instrument and acknowledged to me that he executed same.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my notarial seal that day and year first above written.

Tana McNiven

NOTARY PUBLIC for the State of Montana, residing at Huntley, MT.

My commission expires: August 23, 2024



Request for AmeriCorps VISTA Proposals

Affidavit of Publication

STATE OF MONTANA
County of Yellowstone

Jonathan McNiven

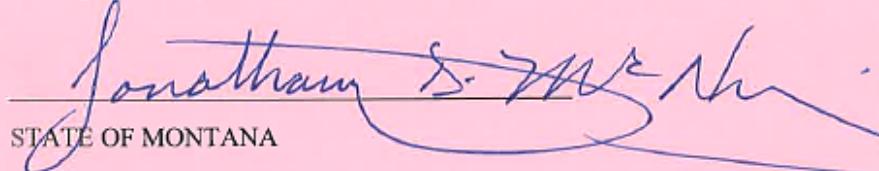
Being duly sworn, deposes and says:

That he is the Legal Advertising Clerk of Yellowstone County News, a newspaper of general circulation published weekly in the town of Huntley, in the County of Yellowstone, State of Montana, and that the (3) folio Legal

Opportunity for Partnership & Request for Proposals, a true copy of which is hereto **Included**, was published in said newspaper on the following dates:

December 11, 2020; December 18, 2020;

making in all (2) publication(s).


STATE OF MONTANA
County of Yellowstone

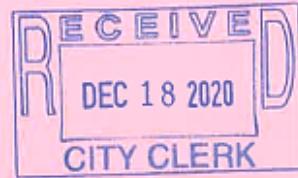
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Tana McNiven

NOTARY PUBLIC for the State of Montana, residing
at Huntley, MT.

My commission expires: August 23, 2024



OPPORTUNITY
FOR PARTNERSHIP &
REQUEST FOR PROPOSALS
BILLINGS METRO VISTA PROJECT
FY2020-2021

The Billings Metro VISTA Project (B-MVP) has been an AmeriCorps Volunteers in Service To America (VISTA) site since 2009. The B-MVP is sponsored by the Corporation for National and Community Service and is facilitated by the City of Billings - Community Development Division. In order to prepare an application to continue the BMVP through FY2020-2021, the Community Development Division is seeking partnerships with non-profit organizations and government agencies in acquiring Host Site status through a Request for Proposals process.

AmeriCorps VISTA is a national anti-poverty initiative placing volunteers with local projects through local and national recruitment efforts. The B-MVP supports community projects that address the following priority programming areas: Military Members, Veterans and their families; Housing; Employment & Workforce Development; Bridging the Digital Divide; Access to Health Care; Food Security; School Readiness; Success in School; Career & Technical Education, College Access & Success; and STEM Education. Full-year VISTA members typically begin in July or January and are college graduates.

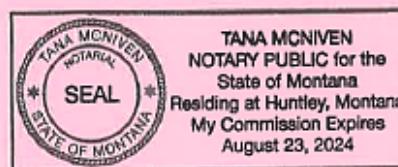
More information on becoming a Host Site is available online at www.BillingsMT.gov/hostsite. A Request for Proposals Guide Book and proposal form are available by request to Carly Collins via phone 406.247.8875 (TTY 711); email collinsc@billingsmt.gov. Technical assistance can also be provided via virtual meeting.

Proposals received by 5:00 pm on January 27, 2021 will be prioritized for July member placement consideration. However, proposals will be accepted throughout the year.

Technical assistance is available, upon request, to interested parties through the Community Development Division. Special arrangements for participation by individuals with hearing, speech, vision impairment or physical disabilities can be made upon request. Non-English speaking persons wishing to participate will also be accommodated through translation and / or interpretation in accordance the City's Language Assistance Plan: Fair Housing Equal Opportunity.

Denise R. Bohman
Billings City Clerk
P.O. Box 1178
Billings, MT 59103

12/11, 12/18 2020
MNAALP



Public Hearing Notice

Affidavit of Publication

STATE OF MONTANA

County of Yellowstone

Jonathan McNiven

Being duly sworn, deposes and says:

That he is the Legal Advertising Clerk of Yellowstone County News, a newspaper of general circulation published weekly in the town of Huntley, in the County of Yellowstone, State of Montana, and that the (9) folio Legal Notice of Public Hearing, a true copy of which is hereto **Attached**, was published in said newspaper on the following dates:

March 26, 2021; April 2, 2021; April 9, 2021;

making in all (3) publication(s).

STATE OF MONTANA

County of Yellowstone

On this 9th day of April 2021, before me, the undersigned, a Notary Public for the State of Montana, personally appeared Jonathan McNiven, known to me to be the person whose name is subscribed to the within instrument and acknowledged to me that he executed same.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my notarial seal that day and year first above written.

Tana McNiven

NOTARY PUBLIC for the State of Montana, residing
at Huntley, MT.

My commission expires: August 23, 2024



TANA MCNIVEN
NOTARY PUBLIC for the
State of Montana
Residing at Huntley, Montana
My Commission Expires
August 23, 2024

NOTICE OF PUBLIC HEARING

City of Billings, FY2021-2022 Annual Action Plan
Community Development Block Grant (CDBG) and HOME Investment Partnership
Programs (HOME) and Citizen Participation Plan Update

The City of Billings will hold a PUBLIC HEARING on its FY2021-2022 Annual Action Plan on Monday, April 26, 2021 at 5:30 p.m. at the City Council meeting in Billings, Montana. The purpose of the public hearing is to obtain public comment on local housing and community development needs relative to proposed CDBG and HOME funding recommendations a proposed update to the Citizen Participation Plan.

ANNUAL ACTION PLAN

The FY2021-2022 Annual Action Plan covers projects to be undertaken from July 1, 2021 to June 30, 2022. The Annual Action Plan will be available for public comment from March 27 through April 26, 2021. The plan will then be revised, as required, and submitted to the U.S. Department of Housing and Urban Development on or before May 15, 2021.

The City of Billings anticipates allocating \$645,143 in new CDBG and \$334,548 in new HOME funding for the upcoming fiscal year. The City's proposed Annual Action Plan will be available on March 27, 2021 for review on the City's website at www.BillingsMT.gov/CDeports. Detailed information about the rules and regulations governing CDBG and HOME programs, proposed projects, and the upcoming public hearing can be requested via email at beckettb@billingsmt.gov or calling 406-657-8286 or 711 for TTY.

CITIZEN PARTICIPATION PLAN

The City's Citizen Participation Plan will be updated to include a reference to the specific number of days the U.S. Department of Housing and Urban Development stipulated as a minimum public comment period for CARES Act funding allocated through CDBG-CV. The following sentence will be added, "As per federal regulation, the City of Billings may publish its application for CDBG-CV funds for no less than five calendar days to solicit public comment."

PUBLIC PARTICIPATION

The City of Billings encourages all members of the community to participate in the Consolidated Planning process. The public hearing is accessible to individuals with physical disabilities. Special arrangements for participation in the public hearings by individuals with hearing, speech, or vision impairment may be made upon request at least three days prior to the hearing. Non-English speaking persons wishing to participate will also be accommodated through translation and / or interpretation in accordance with the City's Language Assistance Plan.

Due to COVID-19 health concerns, the format of the City Council meeting will be held in a partial virtual videoconferencing environment. In order to honor the Right of Participation and the Right to Know in Article II, sections 8 and 9, of the Montana Constitution, the City of Billings and City Council are making every effort to meet the requirements of the open meeting laws:

- **Agenda Packet:** Available for viewing on the City's website www.BillingsMT.gov/councilagendas.
- **Councilmember Participation:** Councilmembers may attend the meeting in-person or remotely using a virtual meeting method.
- **Viewing the Meeting:** The Public may attend the meeting; in person, via a remote location or view the meeting on the Community 7 TV - Channel 7 or Channel 507 - Spectrum Cable. The Public may also view online at www.comm7tv.com and click on the "Watch Live" icon. Community 7 also has links to their Facebook page and YouTube channel in which to view the meeting. On the City's website at <https://e.billingsmt.gov> and click on "Watch Meetings Online". Meeting recordings are also available after the meeting for viewing online via the Community 7 TV website, Facebook page, or www.BillingsMT.gov.

• **Public Participation:** Verbal comments are taken only during the Public Comment periods as indicated on the agenda and during the Public Hearings under the regular agenda. Written communication can be submitted any time prior to or during the public comment period.

o **In-Person:** The public may attend the meeting in person at the Billings Public Library Community Room, 510 North Broadway, Billings, MT.

o **Zoom:** Members of the public wishing to participate virtually via Zoom can register from a PC, Mac, iPad, iPhone or Android device:

To join, visit: Zoom.us: Webinar ID: 830 8466 5815, Passcode: 345420

Or join by phone: US: +1 253 215 8782

If you would like to provide public comment, you can use the "raise your hand" function during the appropriate time and be allowed to speak.

o **Email:** Emails can be sent to the City Council before 3:00 pm on the date of the Public Hearing at council@BillingsMT.gov.

o **Viewing Council Emails:** All emails sent to the City Council can be viewed online at www.BillingsMT.gov/council@mails. Emails received after 3:00 pm and prior to 5:00 pm, may be read during the meeting.

Additional information regarding the public hearing can be obtained by contacting the Community Development office at 406-657-8286 (Montana Relay 711), or via email at beckettb@billingsmt.gov or City Clerk at bohlman@billingsmt.gov or by calling 406-657-8210.

The public is also encouraged to participate via the following:

- Email comments to beckettb@BillingsMT.gov
- Leave a voice mail message by calling 406-657-8286
- Send a written letter to Community Development, P.O. Box 1178, Billings, MT 59103

• Community Seven Television also provides the following options to view City Council meetings:

o Streamed live or video on demand: www.comm7tv.com

o Facebook: www.facebook.com/comm7tv

Fair Housing Equal Opportunity.

Published on March 26, April 2 and 9, 2021.

03/26, 04/02, 04/09 2021
MNAXLP

Denise R. Bohlman
Billings City Clerk
P.O. Box 1178
Billings, MT 59103

Appendix H: Public Comments - Summarized

Councilmember Ronning: “What an amazing amount of really great energy you bring to your job, so thank you so much. I have been so privileged to...work...closely with the [AmeriCorps] VISTAs. I have been so privileged to have been a Casa advocate at the time that the [Indian Child Welfare Act] Court was formed and that was formed as result of a VISTA in our community. We have so much to be proud of with that and the same with the food forest and Yellowstone Substance Abuse Connect Coalition. We now have a VISTA that [became] a [Billings] police officer. I just really want to compliment you in the work that you've done and really credit your Board and entire team. You're doing really great work in Billings.” She indicated she is ready to work with CM Yakawich on resolving landlord issues.

Councilmember Neese: The programs reviewed help individuals and families, but is there anything that is actually working to help low-income, either larger scale or faster pace, as far as developers assistance to build low-income housing? Maybe the [AmeriCorps] VISTAs can look into this. What can we do to take this programming and make it grow exponentially in ways to help more people with low-income housing?

Staff Response: The Billings Metro VISTA Project provided several VISTA members to bring the YWCA’s Gateway Vista affordable housing project into fruition. This housing project was actually named “Gateway Vista” to honor the AmeriCorps VISTA members that helped get the project underway. If there are any organizations interested in housing development, staff would be happy to work with them to get an educated, full-time volunteers in place for several years to make housing happen.

The City also accepts applications anytime through the Affordable Housing Development program. While there is not a current revenue set-aside for development, the moment the City receives an application, repayment revenues are identified and existing programs are evaluated for expenditure timeliness. The City functions on a close- and shovel-ready basis, so the projects and programs that are most in demand and meeting current needs are funded rapidly.

After application and funding availability is evaluated, the project would be brought before the Community Development Board for a recommendation, and then go on to the City Council for a funding allocation decision. This has occurred for the local public housing authority (HomeFront), and other organizations like NeighborWorks Montana and Homeword. For example, last year the City funded infrastructure development for C & C Community, a resident owned, manufactured home community.

Councilmember Yakawich: He thanked staff for all of their hard work and noted that Jim Corson was appointed to the City’s Community Development Board - and that is all the City needs. He said the Community Development staff is “awesome with housing” and revealed that he was a First Time Home Buyer recipient a long time ago and he is so grateful for the program. The Councilmember said he had a “big question” for staff. “We got slumlords and...what can we do about that?” While there are great landlords here, there are also those who allow residences to deteriorate. This creates blight and is counter to the City’s homeownership and even rentals.

Staff Response: In order to assign an AmeriCorps VISTA member to this type of project, a Host Site would need to be willing to dedicate staff time and resources to carry it out. On a smaller scale, the City could start an initiative to purchase properties on that come on the market and then solidify deed restrictions to ensure homeownership occupation, rather than rental occupation. With less than \$1 million in CDBG and HOME funding annually, this approach is not very effective.

While there are some nonprofits working on neighborhood revitalization, like Community Development Leadership, Inc., the City could design an effective initiative. It would need to begin as part of a neighborhood-driven strategy involving other City departments: Billings Police; Public Works; Planning; Code Enforcement; along with Community Development. It would also take dedication of considerable resources outside of CDBG and HOME, but with involvement and funding, staff could make it happen.

Councilmember Neese: What are staff's efforts to let the neighborhood task forces know about the programs? He encouraged staff to continue to connect with task forces to spread the word about the programs.

Staff Response: Community Development staff and Board members attended the neighborhood task force meetings every year for housing and neighborhood project rankings. After the City prioritized projects that would recoup funding investments, applications from outside organizations diminished. Staff continued to attend neighborhood task force meetings for several more years, but the task force members lost interest in rankings. The results were always the same with the core housing programs, so they asked us to discontinue. Staff continued to make diligent effort to attend and present at the meetings, although interest continued to decline and agenda time was limited to a few minutes, particularly with larger groups.

Currently, city staff presents CDBG and HOME goals, strategies, and programs annually to the Adjacent Neighborhood Task Force which is a quarterly meeting involving task force leadership members. Staff informs the task forces that they can request a presentation any time. The City's core programs have been reviewed and designed by the neighborhood task forces and the Community Development Board for over three decades; program quality is linked to their input and guidance.

Appendix I: Substantial Amendment Overview, Public Notice, Public Hearing, and Comments

Overview

The Billings City Council held a public hearing on Monday, October 25, 2021 to take comments on using Community Development Block Grant (CDBG) funding for future coronavirus impact projects; and approve a 15-year, \$450,000 CDBG loan to HAB Development for the Off The Streets project.

Please note: The Affordable Housing Development program is already included in the City's FY2021-2022 Annual Action Plan (IDIS Project 2021-3), so a substantial amendment is not required.

The Community Development Board recommended allocating \$450,000 in Community Development Block Grant (CDBG) funding to the HAB Development's Off The Streets property to repair the current boiler, install new heating / air conditioning units, and to make necessary repairs to damaged units.



On September 16, 2021, an Affordable Housing Development Program application was submitted by HAB Development, an instrumentality of the Housing Authority of Billings (also known as HomeFront), requesting \$450,000. Funding would be used to replace a nonoperating boiler system and rehabilitate four rooms that were damaged when the boiler malfunctioned.

Background

Application: On September 16, 2021, an Affordable Housing Development Program application was submitted by HAB Development, an instrumentality of the Housing Authority of Billings (also known as HomeFront), requesting \$450,000. Funding would be used to replace a nonoperating boiler system and rehabilitate four rooms that were damaged when the boiler malfunctioned.



Project Site: Off the Streets is a 40-unit project located at **3311 2nd Avenue North**. HAB Development purchased the Western Inn Motel property for \$1.64 million in October 2020. Half of the units are used as a low-barrier shelter for those experiencing homelessness and the other 20 units are prioritized for pandemic response to provide necessary quarantine and isolation.

Availability of isolation units is paramount to lessening the burden on healthcare providers and hospitals in the community. Individuals and families using these units must be referred by a healthcare organization.

Project Utilization and Beneficiaries: Off The Streets provided quarantine / isolation services to 95 unique individuals from October 2020 through August 2021, and the combined stay for these units totals 605 days. The low-barrier shelter served 358 unique individuals from November 2020 through August 2021, and the combined stay for these guests totaled 11,746. Individuals are screened for physical /mental health by qualified health professionals at the Community Crisis Center and diverted to the most

appropriate shelter for the evening. No one is allowed to self-present, they can only be referred by the Community Crisis Center.

Funding investments in this project will benefit low-income individuals and families long-term. When isolation units are no longer needed, the project will continue serving low-income, qualifying populations. Housing types include, but are not limited to overnight shelter, interim, short-term transitional, long-term, permanent supportive housing, transitional / bridge housing, etc. The applicant is willing to secure the City's funding award through deed restrictions and a trust indenture, assuring the City will be repaid the full award if the project no longer serves the intended population or is sold.

Procedural History

- **October 7, 2020:** The Western Inn was purchased by HAB Development to be used as a low-barrier shelter.
- **October 14, 2020:** Neighborhood / stakeholder meeting was held at Tumbleweed.
- **October 28 and 30, 2020:** Neighborhood meetings were facilitated through Zoom and information on the project was hand-delivered to neighboring properties within a three-block radius.
- **Winter 2020:** The boiler began leaking and caused significant damage to four units.
- **June and July 2020:** Two public community meetings were held to gauge the need for continued low-barrier shelter. Many elected officials also attended the meetings. The need for continued low-barrier shelter was evident.
- **September 16, 2021:** HAB Development submitted an Affordable Housing Development Program application to the City's Community Development Division requesting \$450,000 for heating source replacement and rehabilitation of four units.
- **September 22, 2021:** Staff sent a memo detailing the project to the Community Development Board.
- **October 5, 2021:** HAB Development staff reviewed the project with the Community Development Board during their regular monthly meeting. The Board took a tour of the project right after the meeting. A recommendation must be made on this project to prepare documents for City Council.
- **October 25, 2021:** The Billings City Council reviewed the project and approved a \$450,000 allocation.

Project Review

Proximity: The property is in the downtown area and within the Billings city limits. As part of the environmental review process, Division staff reviews locations for proximity to amenities, transportation, employment opportunities, food sources, education resources, etc.



The property is near greenspace at Founders Park and Community Park. It is also close to the YMCA, downtown employment opportunities, a children's museum, Dress for Success, childcare options, downtown grocery stores, and thrift stores. Public transportation routes are located along 2nd Avenue North and several additional routes are located within one or two blocks. RiverStone Health is within walking distance (0.8 miles) and the closest hospital is 1.1 miles away from the project.

Project Management, Developer Qualifications, and Portfolio Assessment

Management: HAB Development is the property owner, and the Continuum of Care Executive Committee has taken responsibility for engaging a contractor to manage the shelter on-site. The Executive Committee is comprised of HomeFront (formerly known as the Housing Authority of Billings), Kari Boiter (Continuum of Care Director), District 7 HRDC, Tumbleweed, Besaw Integrity Consulting, United Way of Yellowstone County, and RiverStone Health. Several of the organizations listed have managed funding through direct federal allocations and a long history of federal project management.

Qualifications: The applicant's staff has significant experience in affordable housing development, construction, maintenance, and oversight. The City of Billings previously awarded \$1,543,101 to the Housing Authority of Billings for affordable housing development, resulting in 75 new affordable housing units, and tenant-based rental assistance. City staff reports excellent compliance in all areas of project and service implementation and strict adherence to federal regulations. Projects include Spring Gardens, Old Town Square, Westchester Square, Sioux Lane infrastructure for Whitetail Run Apartments, and Pheasant Home.

Beneficiary Involvement: The organization also seeks beneficiary involvement and utilizes feedback in project and program development. Two commissioner positions are reserved for residents representing elderly, disabled, and family populations. Both resident commissioners voted to purchase the hotel for its current use and future intended use.

Market Analysis

For this type of shelter and isolation project, the only market analysis required is to determine community need and utilization of the project to date. The project opened in October 2020 and has been continually and actively utilized, illustrating current shelter options for this population are limited. The project has served many more individuals and families than those involved with the project originally planned.

Alignment with Consolidated / Annual Action Plan: As noted in the FY21-22 Annual Action Plan, there were over 5,500 households on waiting lists for public housing. In addition, over 2,000 people were waiting for single-person housing. The project addresses all the City's Consolidated Plan goals:

- Create, preserve, and expand affordable housing options
- Neighborhood Revitalization
- Impact Poverty
- Prevent, prepare for, and respond to coronavirus

Financial Analysis

Leveraging: Over \$2.2 million has been committed and invested in the project to date. The funding request (\$450,000) is 20% of the total leveraged amount and 17% of total project costs, including boiler repair and rehabilitation.

LEVERAGED FUNDING	
Item	Leveraged Resources
Purchase price for 40-unit hotel	\$1,640,635
CARES Act - Emergency Shelter Grant through District 7 HRDC	\$625,000
Donated Value of Vehicle	\$6,500
TOTAL	\$2,272,135

Fiscal Health: Funding has been secured to date for shelter operations and the building is owned by HAB Development. A proforma is not necessary for this project as tenants are unable to pay rent. Post pandemic quarantine and isolation, the City recommends utilizing project-based assistance, multi-use design, and / or tenant income strategies to maximize longevity and fiscal health. HAB Development has not received any administrative funding or reimbursement for initiating and carrying out this project.

Previous City Awards: The project is in alignment with previous awards granted by the City. The cost per unit for improvements is \$7,500 per unit.

AFFORDABLE HOUSING PROJECTS		
Project	# Units	City Award
Pheasant Home	16	\$554,191
Southern Lights	20	\$500,000
C & C Community	60	\$540,000
Off The Streets	40	\$450,000
Sioux Lane – Infrastructure	32	\$262,000
Old Town Square	8	\$242,000
Spring Gardens	16	\$240,000
Westchester Square	3	\$200,000
YWCA Gateway House	10	\$182,400
Sage Towers	20	\$175,000
Acme Hotel	19	\$143,400

Stakeholders

- This project serves the most vulnerable populations in Billings: those experiencing homelessness; at-risk of homelessness; low-income individuals and households awaiting COVID-19 test results; and low-income individuals and households needing isolation after a positive coronavirus test result. Most of the individuals and families served by the project have incomes under 30 percent of the area median income.
- Local hospitals and health care providers can make referrals for isolation units. Hospitals are over capacity due to the pandemic and additional isolation options can lessen this burden.
- The Unified Health Command (RiverStone Health, Billings Clinic, St. Vincent Healthcare, and Yellowstone County Disaster and Emergency Services) has also identified the need for shelter and isolation units.
- Several nonprofit organizations are engaged and participating in this project: Community Crisis Center; Family Promise of Yellowstone Valley; Healthcare for the Homeless; The Salvation Army; St. Vincent DePaul; Tumbleweed; RiverStone Health; and United Way of Yellowstone County.

Summary

An overall review of the application reveals the project is consistent with similar projects the City has funded in the past and is in alignment with the City's Consolidated Plan. There is a demonstrated need for a safe and warm place for our homeless population to spend the night, as evidenced through data from the City's recent Consolidated Plan, including the Housing Needs Assessment, Market Analysis and the Analysis of Impediments to Fair Housing Choice. Individuals who utilize one of the low-barrier shelter units must be referred to Off The Streets by the Community Crisis Center. A referral from a local health organization must be provided to utilize one of the twenty units set aside for those needing isolation. The applicant also has extensive experience, both in developing and managing affordable housing projects, and they are knowledgeable about federal program requirements.

Public Hearing & Comments

Councilmember Ronning: Noted Chief St. John attended a workshop that Off the Streets put on this year and the Chief was one of the people who spoke at the workshop. The councilmember asked the chief to talk about this diversion program and where he has seen crime lowered because of the program.

Rich St. John, Police Chief: He went back and looked at the crime data over the past 365 days on the number of police response calls to Off the Streets. The top three complaints were disturbances, suspicious activity, and trespassing. The majority of the callers were the same people - Off the Streets staff. This staff is paying attention and holding there tenants accountable. On average, the police received about one call for service per week to the property. A couple of the incidents attributed to this location were actually traffic stops and people used the Off the Streets parking lot when they pulled over.

When looking at other facilities with “semi-similar” services and clientele and service structure, those facilities were responsible for 312 and 361 calls in the same time period. From a purely selfish point of view, from the Police Department, Off The Streets is doing a great job deflecting, deferring, and keeping problematic individuals off the streets and cared for.

Councilmember Purinton: Asked about the replacement of the heating units, and if there were pipes that need to be included and was that cost included.

Patti Webster, Executive Director of HomeFront and HAB Development, notes that the estimates are preliminary and they are engaging the services of an architect. Craig Bartel, shelter Director, noted that getting bids was done fairly quickly.

The councilmember asked about the value going back into the facility, and Off The Streets is doing a great job, she wants to go back to the business about this property. Why invest nearly half a million dollars in a \$1.6 million property and how is the business plan going?

Patti Webster said that HAB Development did not have a business plan when getting into this project, as the City Council is aware. It was a direct response to the pandemic as the number of people living on the streets increased and were overflowing from the shelters.

Here we are, a year later, and the numbers are worse than ever [with the pandemic surge]. Off The Streets was actually closed for isolation services from April through August. The Unified Health Command asked them to reopen isolation units and they reopened on September 12, 2021. Thirty-six people, who tested positive for the coronavirus, were served in isolation during the month of October. For comparison sake, the Metra served five individuals [during the initial pandemic event]. They are running very efficiently and are managing on a very low budget at \$80,000 a month.

Ms . Webster said they do not have a business plan. They are using Emergency Shelter Grant money from the CARES Act to pay for some services.

She also notes that the 50 police calls for service involve people who are actively using substances, compared to the other facilities [that do not care for those under the influence of drugs / alcohol] have nearly one police call per day.

Councilmember Ewalt: About the heating / air conditioning units, if you do that and the boiler is not working, how are you heating the common areas? Mr. Bartel responded, saying they have a “band-aid” on the boiler now. They have heat in the building now. But the building was built in the 1960s and the HVAC company has been recommending the move to individual HVAC units. Councilmember Ewalt notes they will need more money to heat the common areas. Ms. Webster notes that there is a plan for heating the common areas.

Mayor Cole: If the City approves putting \$450,000 into the building, and if there is no business plan, no guaranteed money for operations long-term, if the property is sold, is there any chance that the organization would flip the property and “pocket that change”. Is there any way to see the money get back to another user for something else?

Ms. Webster notes that they are “housers” and if you saw the hotel, there is not a lot of money to be made if resold. They have had people offer to purchase the hotel already. Initially the hotel was going to be used as a shelter temporarily and this was made public. Who knew we would be in this same situation [with the pandemic]?

The numbers of people being served is just incredible. If the Community Crisis Center makes the determination that the best place for one of their intake clients is Off The Streets, they make the referral and shelter staff go and pick them up.

She has no plans to continue running a shelter long-term. She is interested in creating permanent affordable housing and bridge housing an option with these units long-term.

Councilmember Ewalt: Asked for a clarification on people testing positive - if they have to stay in their rooms. Ms. Webster notes the isolation rooms have a television, a microwave, and a refrigerator and three meals a day are provided to these rooms by The Salvation Army. They also have staff available all the time.

Councilmember Ronning: Asked about restrictions on the property for affordable housing use. Ms. Webster noted that the property was purchased with nonfederal funding and she has received no other revenue from the property to date. They have requested FEMA funding for the isolation units during the state of emergency.

Chris Kukulski, City Administrator: Clarifies the terms of the loan. If the property is sold or not used for low-income affordable housing within the first 15 years, the City will be paid back in full. After 15 years, the loan is forgiven.

Councilmember Purinton: Asked about reading that the organization is willing to a Trust Indenture, and what is that. The mayor notes that the Trust Indenture is like a mortgage. Wyeth Friday, Director of the Planning and Community Services Department, said that the loan would be secured with a Trust Indenture to assure repayment in the first 15 years.

Rebecca Noell, Community Development Board Chair: The Board recommends funding this project because it was very apparent, after touring the facility and reading the information presented in the application. The services they provide are greatly needed, the utilization numbers demonstrate community need. Funding this project will help the board with timely expenditures as they have more revenue than expected due to loan repayments. She urges the Council to approve the award.

Travis Diamond: The review and analysis slide illustrates that this project addresses many community concerns (public health and safety, COVID response, fewer people sleeping on the streets, lessens service demands for police and fire, extends the Community Crisis Center capacity, overall goal of the project is to provide affordable housing long-term (shelter now, other housing options later). The track record for the project speaks for itself. He heartily encourages the Council’s positive vote.

Shawn Hines, RiverStone Health: She is making a passionate plea from the healthcare community. This COVID-19 response has been incredible. We have partners who have come together to align resources that they have never seen before in our community. The project meets a need that has been apparent for over a year. She encourages the Council to strongly support this CDBG funding.

Councilmember Boyett: He was very skeptical about this project when it first started. He went with a few other councilmembers to see the Community Crisis Center and then visited the Off The Streets property. He was totally taken aback, he was amazed. It is a great facility. If we didn't have this before, we needed it anyway. He encourages everyone to vote for this, period.

Councilmember Ronning: Wanted to “echo” councilmember Boyett’s comments. During their tour, they were also partnered with the guests of the facility, it was remarkable. They got to spend a number of hours with them, learned how they became homeless, listened to their journey of homelessness, and hear about the mountains and challenges they face every single day. It is very very very expensive to be poor and hard to live a daily life when you do not have resources to pay for conveniences. It was a real eye-opener. The council talks about prevention and diversion, and this is one of those true success stories. They hear from the public that Billings is not doing enough to address the homeless situation or the crime situation. She commends all of the partners that came together to make this happen. It was not a solo entity, it was a group effort of many organizations across the community. She thanks them for all of their hard work and she also thanks City staff who put time into this project as well.

The motion to approve funding passed, unanimously.

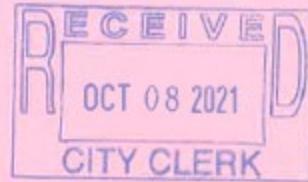
Public Notice

Affidavit of Publication

STATE OF MONTANA

County of Yellowstone

Jonathan McNiven



Being duly sworn, deposes and says:

That he is the Legal Advertising Clerk of Yellowstone County News, a newspaper of general circulation published weekly in the town of Huntley, in the County of Yellowstone, State of Montana, and that the (8) folio Legal **Notice of Public Hearing**, a true copy of which is hereto **Attached**, was published in said newspaper on the following dates:

September 24, 2021; October 1, 2021; October 8, 2021;

making in all (3) publication(s).

STATE OF MONTANA

County of Yellowstone

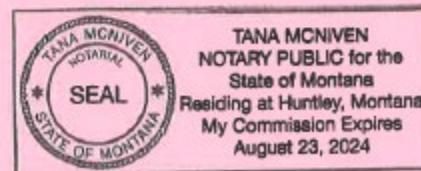
On this 8th day of October 2021, before me, the undersigned, a Notary Public for the State of Montana, personally appeared Jonathan McNiven, known to me to be the person whose name is subscribed to the within instrument and acknowledged to me that he executed same.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my notarial seal that day and year first above written.

Jonathan D. McNiven
Tana McNiven

NOTARY PUBLIC for the State of Montana, residing
at Huntley, MT.

My commission expires: August 23, 2024



NOTICE OF PUBLIC HEARING

City of Billings, FY2021-2022 Annual Action Plan
Community Development Block Grant (CDBG) Amendment - Coronavirus Response

The City currently has \$554,586 in unallocated CDBG-CV (CARES Act) funding to commit and this amount may be insufficient to meet evolving community needs. In response to the COVID-19 variant surge, the City of Billings is proposing to utilize any and all available CDBG funds to prevent, prepare for, and respond to the coronavirus. Detailed information about the rules and regulations governing CDBG-CV program, proposed projects, and the upcoming public hearing can be requested via email at beckettb@BillingsMT.gov or calling 406-657-5266 or 711 for TTY.

PROPOSED PROJECTS & ACTIVITIES: All activities must benefit low-income individuals and / or households and can be used to prevent, prepare for, and respond to the coronavirus. Examples include:

- **Public Facility Improvements:** Handwashing stations, public restrooms improvements, infrastructure, accessibility, small-scale rehabilitation, public facility systems, rehabilitation for social distancing, touchless / nonporous surfaces, etc.
 - The City also received an Affordable Housing Development program application for a boiler and room rehabilitation for a local quarantine / isolation and shelter facility. This project is already eligible for a CDBG-CV allocation through the previously-approved CDBG-CV Consolidated Plan amendment. Program guidelines can be viewed online at www.BillingsMT.gov/cho.
- **Public Service Activities:** Rent, mental health care, meal distribution, mortgage payments, internet access, utility assistance, childcare, client remote access, vaccination activities, virtual service ability, exposure prevention - staff training, additional cleaning, unmet hospital / public health needs, FEMA match, etc.

AVAILABLE FUNDING: The City manages federal resources on a shovel- and close-ready basis. Therefore, FY2021-2022 CDBG routine programs may also be reallocated including, but not limited to: Housing Rehabilitation (\$75,000); Foreclosure Acquisition / Rehabilitation (\$250,000); and First Time Home Buyer (\$173,718). Reallocations to specific projects and programs will undergo public processes and reviews through the Community Development Board and the City Council, as per usual. The City also has \$359,807 in prior year CDBG revenues to allocate, in addition to \$110,000+ in CDBG revenues received throughout this fiscal year.

PUBLIC COMMENT PERIOD: The public comment period will be open from September 25, 2021 to October 25, 2021. The City's proposed amendment is available online at www.BillingsMT.gov/CDBGcv.

PUBLIC HEARING: The City Council will hold a public hearing on the FY2021-2022 Annual Action Plan amendment on Monday, October 25, 2021 at 5:30 p.m. at the City Council meeting in Billings, Montana. The purpose of the public hearing is to obtain public comment on local housing and community development needs relative to proposed CDBG funding recommendations.

PUBLIC PARTICIPATION: The City of Billings encourages all members of the community to participate in the City's decision-making process. Meetings are accessible to individuals with physical disabilities. Special arrangements for participation in meetings by individuals with hearing, speech, or vision impairment may be made upon request at least three days prior to the meeting. Non-English speaking persons wishing to participate will also be accommodated through translation and / or interpretation in accordance with the City's Language Assistance Plan.

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 - In-Person: The public may attend the meeting in person at City Hall, 220 North 27th Street, Billings, MT.
 - Email: Emails can be sent to the City Council before 3:00 pm on the date of the Public Hearing at council@BillingsMT.gov.
 - Viewing Council Emails: All emails sent to the City Council can be viewed online at www.BillingsMT.gov/council-emails. Emails received after 3:00 pm and prior to 5:00 pm, may be read during the meeting.

The public is also encouraged to participate via the following:

- Email comments to beckettb@BillingsMT.gov
- Leave a voice mail message by calling 406-657-8288, TTY 711
- Send a written letter to Community Development, P.O. Box 1178, Billings, MT 59103

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09/24, 10/01, 10/08 2021
MNAxLP

Denise R. Bohlman
Billings City Clerk
P.O. Box 1178
Billings, Montana 59103

NOTICE OF PUBLIC HEARING
City of Billings
FY2021-2022 Annual Action Plan
Community Development Block Grant (CDBG) Amendment - Coronavirus Response

The City currently has \$554,586 in unallocated CDBG-CV (CARES Act) funding to commit and this amount may be insufficient to meet evolving community needs. In response to the COVID-19 variant surge, the City of Billings is proposing to utilize any and all available CDBG funds to prevent, prepare for, and respond to the coronavirus. Detailed information about the rules and regulations governing CDBG-CV program, proposed projects, and the upcoming public hearing can be requested via email at beckettb@BillingsMT.gov or calling 406-657-8286 or 711 for TTY.

PROPOSED PROJECTS & ACTIVITIES: All activities must benefit low-income individuals and / or households and can be used to prevent, prepare for, and respond to the coronavirus. Examples include:

- **Public Facility Improvements:** Handwashing stations, public restrooms improvements, infrastructure, accessibility, small-scale rehabilitation, public facility systems, rehabilitation for social distancing, touchless / nonporous surfacing, etc.
 - The City also received an Affordable Housing Development program application for a boiler and room rehabilitation for a local quarantine / isolation and shelter facility. This project is already eligible for a CDBG allocation and CDBG-CV allocation through the previously-approved CDBG-CV Consolidated Plan amendment. Program guidelines can be viewed online at www.BillingsMT.gov/chdo.
- **Public Service Activities:** Rent, mental health care, meal distribution, mortgage payments, internet access, utility assistance, childcare, client remote access, vaccination activities, virtual service ability, exposure prevention - staff training, additional cleaning, unmet hospital / public health needs, FEMA match, etc.

AVAILABLE FUNDING: The City manages federal resources on a shovel- and close-ready basis. Therefore, FY2021-2022 CDBG routine programs may also be reallocated including, but not limited to: Housing Rehabilitation (\$75,000); Foreclosure Acquisition / Rehabilitation (\$250,000); and First Time Home Buyer (\$173,719). Reallocations to specific projects and programs will undergo public processes and reviews through the Community Development Board and the City Council, as per usual. The City also has \$359,867 in prior year CDBG revenues to allocate, in addition to \$110,000+ in CDBG revenues received throughout this fiscal year.

PUBLIC COMMENT PERIOD: The public comment period will be open from September 25, 2021 to October 25, 2021. The City's proposed amendment is available online at www.BillingsMT.gov/CDBGcv.

PUBLIC HEARING: The City Council will hold a public hearing on the FY2021-2022 Annual Action Plan amendment on **Monday, October 25, 2021 at 5:30 p.m.** at the City Council meeting in Billings, Montana. The purpose of the public hearing is to obtain public comment on local housing and community development needs relative to proposed CDBG funding recommendations.

PUBLIC PARTICIPATION: The City of Billings encourages all members of the community to participate in the City's decision-making process. Meetings are accessible to individuals with physical disabilities. Special arrangements for participation in meetings by individuals with hearing, speech, or vision impairment may be made upon request at least three days prior to the meeting. Non-English speaking persons wishing to

participate will also be accommodated through translation and / or interpretation in accordance with the City's Language Assistance Plan.

There are several ways the public can participate:

- **Agenda Packet:** Available for viewing on the City's website www.BillingsMT.gov/councilagendas.
- **Viewing the Meeting:** The public may view the meeting on the Community 7 TV - Channel 7 or Channel 507 – Spectrum Cable. The public may also view online at www.comm7tv.com and click the *Watch Live* icon. Meeting recordings are also available after the meeting for viewing online via the Community 7 TV website.
- **Public Hearing Participation:** Verbal comments are taken only during the Public Comment periods as indicated on the agenda and during the Public Hearings under the regular agenda. Written communication can be submitted any time prior to or during the public comment period.
 - **In-Person:** The public may attend the meeting in person at City Hall, 210 North 27th Street, Billings, MT.
 - **Email:** Emails can be sent to the City Council before 3:00 pm on the date of the Public Hearing at council@BillingsMT.gov.
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