
Appendix A – Montana’s Housing and Community Development Citizen Participation Plan For Plan Year April 1, 2014 – March 31, 2015

INTRODUCTION

The U.S. Department of Housing and Urban Development (HUD) consolidated several formula grant programs in 1994. The programs include the Community Development Block Grant (CDBG), Home Investment Partnerships (HOME), Emergency Solutions Grant (ESG), and Housing Opportunities for People with AIDS (HOPWA) Programs. These programs are used in Montana and are covered by the Consolidated Plan.

The state is the recipient of a competitive HOPWA grant, covering Montana, North Dakota, and South Dakota, which is administered by the Intergovernmental Human Services Bureau of the Montana Department of Public Health and Human Services (MDPHHS). The funds are part of competitively awarded grants for housing, services and technical assistance, primarily for programs in rural areas that do not qualify for federal block grant funding.

The Consolidated Plan brings together the planning, application, reporting, and citizen participation components for the three formula programs and HOPWA. The purpose of this narrative is to present the Citizen Participation Plan prepared by the Montana Department of Commerce (MDOC) Community Development Division, a fundamental piece of the consolidated planning process.

The objectives of the plan are to ensure that the citizens of Montana, particularly low- and moderate-income persons, low-income households living in slum and blight areas, units of local government, statewide and regional institutions and other organizations, including businesses, developers, and community and faith-based organizations; public and private agencies that provide assisted housing, health services, and social services; public housing agencies; and other interested parties are provided the opportunity to and are encouraged to participate in planning for and preparing the Five-Year Consolidated Plan, Annual Action Plan, amendments to the Plan, and Annual Performance Report. In doing so, this narrative lays out the general guidelines around which the Consolidated Plan will be developed, sets dates and milestones along which the process will proceed, and outlines methods for citizens to guide and assist the state in formulating the plan.

THE CONSOLIDATED PLAN

The Consolidated Plan combines the planning, application, public involvement, and reporting requirements of Montana’s three formula grant programs and HOPWA into one complete process. It promotes unifying opportunities for units of local government, the state, and others, thus laying the foundation for development of cohesive, attractive, safe, and economically vibrant communities. The consolidated planning process encourages all citizens, especially low-income residents, to take part in shaping their own future.

The Consolidated Plan will provide the following information to citizens, public agencies, and other interested parties:

- The amount of federal funding and other assistance the state expects to receive during the upcoming plan year;
- The range of activities that may be undertaken; and
- The general program activities that will be planned in addressing the priority needs outlined in the plan.

The plan presents details on analysis and evaluation of priority needs for housing, economic development, infrastructure, public facilities, and other community development statewide. In addition, it offers guidance on providing affordable housing, economic development, infrastructure, public facilities, and other community development. The plan also contains HUD mandated certifications that statutory guidelines have been followed.

THE PLANNING PROCESS

The Consolidated Plan is developed through public input solicited at onsite meetings throughout the state and/or through web-based meetings. Some meetings occur before development of the draft report, thereby collecting distinct issue input and aiding policy formation. Others will be held after releasing the draft report, allowing interested parties an opportunity to review how the strategy has been designed and presented. Meetings, whether in-person or web-based, will be open to the public and offer additional opportunities for participation in the development of the Consolidated Plan to units of local government and other organizational representatives. Meetings may also be held in conjunction with other scheduled meetings, workshops, or conferences being held by the Housing, Community Development, or Business Resources Divisions and other organizations.

All citizens are encouraged to participate, including minorities and non-English speaking persons, as well as persons with disabilities. Upon request, the state will make all necessary accommodations to further the participation of these individuals. All public meetings are held in facilities that are accessible to persons with disabilities.

HUD’s formula programs, alone and with other HUD-funded programs, have three basic goals pertinent to the Consolidated Plan: provide decent housing; provide a suitable living environment; and expand economic opportunities. Providing decent housing may involve increasing the availability of permanent affordable housing for low-income households (without discrimination), assisting homeless people in obtaining appropriate housing, maintaining the affordable housing stock, and increasing supportive housing to assist persons with special needs. Providing a suitable living environment means improving the safety and livability of neighborhoods; deconcentrating housing opportunities and revitalizing neighborhoods; restoring and preserving natural and physical features with historic, architectural, and aesthetic value; and conserving energy resources. To expand economic opportunities, the comprehensive approach emphasizes the creation of accessible jobs, access to credit for community development, and assistance to low-income persons to achieve self-sufficiency in federally-assisted and public housing.

Within our society, the complexity of development problems has risen significantly. Assessing and solving the difficulties has outgrown what narrow, functional programs offer. Montana’s priority need problems demand links between human, economic, physical, environmental, and design concerns to

build communities of opportunity. In order to gain this comprehension of development complexities, the consolidated planning process must collect the knowledge that exists in the community from citizens, local governments, private business, community-based organizations, and universities.

PUBLIC INPUT TO THE PLAN

At the end of May 2015, the Montana Department of Commerce advertised the availability of the CAPER and announcement of the public comment period beginning to maximize public input. The public comment period was open beginning June 8, 2015 and ended June 23, 2015. During the public comment period Commerce provided a forum for citizens to comment on the draft CAPER, a public hearing was held on June 10, 2015 from 7:30 – 9:00 a.m. at the Statewide Housing Partnerships Conference in Bozeman MT. Interested citizens, especially low- and moderate-income citizens; local government officials; statewide and regional institutions and other organizations, including businesses, developers, and community and faith-based organizations; and public and private agencies that provide assisted housing, health services, and social services throughout Montana were notified and encouraged to participate in the public comment process. Public comment was solicited through a variety of means listed below:

- Posting dates, times and locations on the *Discovering Montana* Calendar of Events at: <https://app.mt.gov/cal/html/event?eventCollectionCode=comm>;
- Posting the draft CAPER and appendices on the Department of Commerce’s website at <http://housing.mt.gov/CP> before the public hearing and during the comment period. In addition, the Department’s Housing, Community Development Division, and the Business Resource Divisions have links to the Consolidated Plan website, giving the public several ways to access the Consolidated Plan site.
- Publishing large display ads in nine major daily and/or weekly newspapers across the state. The newspaper notices summarized the contents and purpose of the plan and contained the web address where the full document was available. Complete contact information was provided to assist those persons otherwise unable to locate the complete copies of the draft CAPER.
- E-mailing or mailing notices to public officials and other interested parties using the Consolidated Plan mailing list. The mailing list comprises contacts from city, county, and state officials; housing organizations and advocacy groups; economic development organizations; and members of the public who have asked to receive email notices. The email distribution list contains approximately 1,600 contacts.
- Notices about the public hearing and availability of the CAPER was announced and distributed to the following organizations: Montana Economic Developers Association (MEDA), Montana Association of Counties (MACo), NeighborWorks Montana, and Homeward, Inc.

One hundred and one people attended the June hearing that took place at the Statewide Housing Partnerships Conference where approximately 300 attendees were invited to participate and general public attended. The public hearing was included in the Conference brochure and a webinar was also available for interested persons that could not attend in-person.

PUBLIC COMMENT ON THE DRAFT CAPER

The public comment period concluded June 23, 2015. Commerce is providing the summary of comments provided by the public below, as part of the final report for submission to HUD. Comments received

during the public comment period and the response to those comments is provided in Appendix B of this document.

RELEASE OF THE CONSOLIDATED PLAN

Citizens, public agencies, and other interested parties will be notified of the availability of the Annual Action Plan and Consolidated Plan as adopted, amendments to the plan, and the Annual Performance Report. Citizens will be given the opportunity to examine the contents of these reports for a minimum of 30 days for the Annual Action Plan and Consolidated Plan, unless otherwise modified by HUD, and 15 days for the Annual Performance Report.

When practicable, written comments or complaints regarding the Consolidated Plan, plan amendments, and Annual Performance Report will be responded to within 15 working days. For those who wish to comment about any of the documents, written comments can be submitted to Consolidated Plan, MT Department of Commerce, Community Development Division, P.O. Box 200523, Helena, Montana 59620-0505. Emails can also be sent to MDOC’s dedicated Consolidated Plan address at DOCConPlan@mt.gov.

OTHER CITIZEN PARTICIPATION

Citizen participation responsibilities are also placed on program applicants and recipients at the local level. Applicants must provide citizens, especially low and moderate-income residents, adequate notice and opportunity for meaningful involvement in the planning and development of applications. All hearings must be held at times and locations convenient to potential beneficiaries and in facilities that are physically accessible for persons with disabilities.

CDBG Program Requirements:

Unless re-applying for the same CDBG project submitted unsuccessfully in the previous year, the applicant must hold a minimum of two public hearings; one early in the process of preparing the application and one later in the process of a resolution by the governing body authorizing the submission of the application. The first public hearing should be held not more than 12 months before the date of application. The second public hearing should be held not more than three months before the date of application. A written record of the required hearings must be submitted with the application for CDBG funds, along with copies of the public notices for the hearings or affidavits of publication for the notices. A verbatim record is not necessary; a list of the names of persons who attended and a summary of comments and responses by local officials and citizens is sufficient.

Applicants reapplying for the same project submitted unsuccessfully in the previous year must hold at least one public hearing before passage of a resolution by the governing body authorizing the submission of the application. The public hearing should be held not more than three months before the date of application.

The purpose of the first hearing is to give citizens an opportunity to identify and discuss their community’s overall community development, public facilities, economic development, housing needs and priorities, including the needs of low and moderate income persons, and to propose possible projects before the local government decides for which project it will seek CDBG assistance. The first

hearing should cover the estimated amount of State CDBG funds available and provide a description of the activities eligible for CDBG assistance.

The purpose of the second hearing is to give citizens and other potential beneficiaries (especially low and moderate income persons) or residents of the proposed project area adequate opportunity to consider the potential impacts and benefits of the community’s proposed project and to comment on it before it is submitted.

HOME Program Requirements:

HOME Program applicants must provide citizens adequate notice and opportunity for involvement in the planning and development of HOME applications. Applicants must:

- Hold a minimum of one public hearing or meeting before submission of the application. The purpose of the public hearing or meeting is to solicit public comment on community housing needs and priorities and to discuss the HOME Program as a potential source of funding. A public hearing gives citizens and potential beneficiaries of the proposed project adequate opportunity to review and comment on the community’s HOME application before it is submitted. The applicant should give due consideration to all comments before the determination of a proposed project. The public hearing must be held within two months of the deadline date of the application.
- Submit a record of any public hearings or meetings and copies of the public notices for the hearings or affidavits of publication for the notices, held in relation to the application for HOME funds. A verbatim record is not necessary; the names of persons who attended and a summary of comments by local officials and citizens are sufficient.

ESG Program requirements:

Prior citizen participation is not required.

AMENDING THE CONSOLIDATED PLAN

Possible amendments include changes in use of funds from one eligible activity to another, changes in the method of distribution of such funds, new activities, or alteration of the existing activities or budget. MDOC will make a determination as to whether the change is substantial enough to necessitate issuing an amendment to the plan. If so, MDOC will conduct a public review process with a minimum of one public review meeting and following the guidelines set forth above, present the amendment to the public for their review and comment. Other specific issues related to individual program guidelines are to be presented in the respective program application guidelines.

Alternative accessible formats of this document will be provided upon request. If you need this document in an alternative format, please contact the Montana Department of Commerce Community Development Division at (406) 841-2770, TDD 1-800-841-2702 or the Montana Relay Services number, 711.