
Appendix B

Summary of Public Comments

PUBLIC INPUT TO THE CAPER

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 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 are provided below.

Summary of Public Comments

Comments were received during the June 10, 2015 public hearing. A court reporter was present to document the public comments received.

Public Comment:

Jim Morton, HRDC XI, 6-10-2015

In the Missoula area, we have folks that are meeting routinely about the lack of housing for folks coming out of correctional systems. That adds to our concern about homelessness. And then that gets us into questions about the State's approach to maybe funding or interacting with that need, as well as maybe some education on who is eligible for certain kinds of housing. For instance, does a violent offender automatically get rejected for an application?

So that's one of the things some of us have been talking about quite a bit. Because there's conflicting rules with the HUD programs, whether it's Section 8, HOME, CDBG. So I guess I would encourage you to maybe consider that kind of outreach and assistance, even educational.

And then finally, the CDBG non-competitive loan program for occupied rehab, we support that. We're actually looking forward to our application being reviewed from Missoula County and submitted back. I think there's a lot of need. And it's gone maybe slower than what you would have thought, but we haven't forgotten, those of us in communities. We are working on it and we hear a lot of positive remarks about it. Thank you.

Agency Response:

Homeless activities funded through ESG, CDBG and HOME are reported on in the CAPER. The eligible activities established in the Consolidated Plan do include assistance to homeless populations. Improvements to the implementation of these eligible activities will be carried out through the Consolidated Plan process or grant administration guideline process to provide assistance to applicants interested in applying for projects that assist homeless populations.

Maureen Rude, NeighborWorks Montana, 6-10-2015

We do the non-competitive homeownership, down payment, and closing cost assistance program. What I really like about that program is it allows people who think they could never possibly be a homeowner to get into homeownership. And because of the amount and being able to use it as a deferred mortgage, we're able to serve a pretty high percentage of people with disabilities or who have a family member with a disability.

And I was struck a little bit, in going back through our statistics, that because of that program, overall, NeighborWorks was able to serve – over 20% of our customers that get our loans have a family member with a disability or have a disability. And I think that's a really important area, given the hospital and everything that's going on and all the changes in the discussion we had yesterday about health and housing and all that. So for somebody to get into a really stable homeownership situation, in many cases for at or less than what they were paying for rent, that program is really helpful.

So I'd just encourage you to continue doing that and working with those of us who are participating in that program.

Agency Response:

Thank you for your comment

Sheila Rice, NeighborWorks Montana, 6-10-2015

I want to compliment the Department on their work with us on resident-owned communities. This is the greatest source of unsubsidized housing in the United States, and preservation of manufactured housing communities is very critical. We see deferred maintenance, and we need to get that maintenance done or we'll see people displaced. So I want to thank the Department for their support of those kind of infrastructure projects.

Agency Response:

Thank you for your comment

Bob Maffit, Montana Independent Living Project, 6-10-2015

I want to compliment the Department and all those involved at lending an ear to the issues of accessibility, most specifically and recently to my knowledge, that being visitability principals, so that we start building accessible homes whether they're needed today or in the future.

I believe the statistics say that there's a 24% chance most of us who own homes will be, at some point in our life, needing to be institutionalized or transitioned from a hospital to a more institutional care, whether it be permanent and, most importantly, short term, because of an illness or disability. And thus had accessible homes that had no steps, et cetera, et cetera, we could have convalesced there rather than at \$50,000 to \$70,000 a year. I compliment you for considering that.

I actually challenge that – in all programs, the issues of rehabilitation, a lot of programs and standards, expectations are that you undoubtedly need certain electrical, certain common standards, plumbing, et cetera. I would start recommending that serious consideration be given to minimal accessibility features being built in all rehabilitation projects, from the roof on down. And should anybody need technical assistance, the Independent Living Networks in Montana would be very supportive of doing that.

It's a proactive approach, not unlike considering some of the issues of poverty, the health implications. I'm actually asserting the let's start using public funds, using standards so that we eliminate barriers that will happen to use either immediately or in the future.

Thank you.

Agency Response:

Improvements to the implementation of program activities will be carried out through the development of the Consolidated Plan or grant administration guideline process to provide assistance to applicants interested in applying for projects that assist homeless populations.

Shyla Patera, North Central Independent Living, 6-10-2015

I would like to echo some of the comments heard this morning, particularly Maureen Rude and Bob Maffit, but I also would want to add that we in Montana Independent Living definitely support HUD 811 funds, and we hope in Montana those are used to help people with disabilities transition out more actively into the community. We at NCILS would hope that CDBG funds and other funds could be used to promote community accessibility, as Mr. Maffit said. And we definitely support accessibility for neighborhood shelters and emergency assistance funding. I will submit written comments as well, but these are my comments for today.

Agency Response:

Thank you for your comment

Nancy Harte, City and County of Missoula, 6-10-2015

I work with the City and County of Missoula. We are a combined city-county office. As an entitlement city, we often find the focus is on things within the city limits, but there's a vast amount of Missoula that's outside the city limits, and we're happy to work with those programs as well.

Before I even start talking about anything specific about the CAPER, I just want to congratulate you on doing the CAPER. Having done the consolidated plan, actions plans, and CAPER since 1996 for the City of Missoula, I applaud whoever writes them, and you have my deepest sympathies. I know it's very, very difficult. And I have passed that duty on happily this year, so I'm enjoying myself right now.

At any rate, I do want to echo what Sheila Rice had mentioned about the resident-owned communities. NeighborWorks has worked to establish two of them in Missoula outside the city limits, and we currently are working with one that was recently funded by a DRNC grant, or partially funded anyway. We're working on that one. And the change in the spirit of the community is so much when a resident-owned community becomes in the sense of ownership that people have with their units, and it's just amazing the spirit that those people have.

We are now applying for a CDBG grant to complete the first project, which is connecting them to the city sewer. And the community now is really interested in upgrading and replacing homes. Their mobile homes are really old. And we'll be hopefully coming to the State a number of times in the future to get that, and we appreciate the support the State has been able to provide to these kind of projects and other projects that we've had in Missoula County.

Agency Response:

Thank you for your comment

Heather McMilin, Homeword, 6-10-2015

I wanted to also echo a lot of the visitability and accessibility comments by the group. We all work on different spectrums of housing and issues and needs around the state. And I just appreciate the work that everybody in the room does, as well as how the State supports us. I'm also wanting to point out, again, as usual, the sustainability being important. Because we've been talking about operations and the difference between property management and asset management, and doing things the right way where they directly benefit our residents or homeowners is important. That's the standard statements that we usually talk about.

But I also wanted to point out, during this last calendar year, I really appreciate the Department of Commerce's working with us as we developed a partnership with the City of Billings and with the Housing Authority of Billings. I had two very strong personalities and developers in the room, and we worked through a lot of complicated who does what and what contract entity should be with who for Pheasant Home in Billings. And so while that project has been a challenge on some fronts, it's been really wonderful to explore that and try to meet a need in Billings. Because it is one of the highest need communities in the state. And so we thank you for working through the hiccups with that as we worked through things and would also encourage you to continue to work with the PJs in our entitlement cities so that we can do good projects together there as well as the rest of the state.

Some of the pieces that we are looking at and wanted to talk about – as Jim mentioned, there's conversations happening in Missoula, as I am sure there are all around the state, but we are also looking at the chronic homeless issue in Missoula and talking about wet housing and that concept. And as soon as we explore that, I'd like to encourage you guys to hear us out and try to help us navigate some of the nuances that come with just the different slices of the homeless issue – because they're not all the same – and that come with some other complications that we need to work through. So we appreciate that consideration.

And also, I congratulate you because I think it's a really great idea that all of the CDBG is under one roof and planning grants are under one roof. So we look forward to walking through that process with you.

Thank you.

Agency Response:

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Patty Kent, Western Montana Mental Health Center, 6-10-2015

We've been working with you for a really long time. I think our first grant was in 1996, a HOME grant that was homeownership for the mentally ill. And everyone said it could not be done, and we did it. And I think since then we've had 14 grants, between HOME and CDBG, and you guys have been an awesome partner. So I want to say thank you. And we have, together, transformed the landscape for housing for the mentally ill in western Montana. However, there are a few blips on the screen. As a CHDO, we can no longer be a CHDO because the \$40 million Western Montana Mental Health Center doesn't have a CHDO with staff. We just have 913 people and a board of directors that's defined by statute. So we can't qualify as a CHDO and we are no longer a CHDO. So that's something that I have

mentioned to HUD before, and it seems kind of silly. And so I don't know if there's a way to work on a waiver or some help through the State. I know we can always go through local government. But it's important work, and it's been getting done. We've targeted a group of people who are otherwise overlooked.

And secondly, along the lines of the chronic homeless issue, what it really boils down to is, does anybody have any income to pay rent and how are we going to maintain that building? And project basing Section 8 or Shelter Plus Care is a tool in the box that we really need to explore and we really need to, I think, commit to. And we know that the State has some of that. So we'd like to have that discussion and figure out how to make it work and how to allocate some of the resources we have, whether it's pilot projects or on a permanent basis. But it will again transform that landscape, because we know once people are in housing they will stabilize.

And our second project with you was the Bridge Apartments in 1998. And that was from the streets to permanent housing. We are almost 20 years into it, and I think we have 75% of the same residents, so it's been a tremendous project. And I just want to thank you all for being a great partner and look forward to working with you in the future.

Agency Response:

HUD established the CHDO certification requirements and, in 2013, HUD clarified the process via the new HOME rule. These comments will be included in our CAPER submission to HUD to inform policy guidance at the federal level.

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Lori Davidson, Missoula Housing Authority, 6-10-2015

We've been a recipient of an NSP grant, which was wonderful. We did 115 units at the Silvertip Apartments in Missoula. That was new construction. And we've just received another grant for a six-plex on some land that the City donated to us. So thank you for that. We're very appreciative.

But I do want to echo what Patty and Heather said as we struggle with the Housing First issue in Missoula, where there's a very active committee working on that right now. And the vouchers in Missoula that run through the housing authority are 100% utilized. We have a waiting list of 1,800 to 2,000 people almost all the time still waiting for those.

We have done project basing of our tenant-based vouchers, and it's, it's a little bit of a cumbersome process, but it's certainly doable and, and very helpful. The project basing of vouchers is a wonderful way to do new construction and to commit to preservation of housing. So I would echo Patty's recommendation that the State look at project basing some vouchers, if we could bring some of those into Missoula. I know that HRDC administers those vouchers. That could be just an invaluable resource for us to actually make the homeless project that we're trying to do their work. Because as we've heard, at this conference and in other places, you simply can't do that without the housing subsidies.

So, thank you.

Agency Response:

Thank you for your comment

Jean Harte, Missoula City-County Department of Grants and Community Programs, 6-10-2015

I want to echo the thanks from our department to the State of Montana. It was a couple years ago when Missoula worked with – Missoula’s participating jurisdiction, which is the CDBG program, worked in conjunction with the State of Montana for the very first time to bring those two funds together, and fund the construction of the Poverello Center, which was our ancient – an ancient, decrepit facility. Which we now have a new facility that provides almost 30% housing to veterans as well as additional money from the VA.

So things are moving along smoothly with that project, and I do want to echo the thanks of the rest of the community. Without out partnership with the State, we would not have been able to do that. So I want to thank you very much for that.

Agency Response:

Thank you for your comment