Appendix B: Public Engagement Record

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

Comments Received and Responses Thereto

Andrew Chanania, Principal, North Fork Development

Comment #1:
This is Andrew Chanania, and I represent North Fork Development. First, I just want to say thank you to all of the staff who have had quite a year in putting all of this together, and many other things. You do so much for the State, and I cannot thank you enough for all of that. I also just want to indicate that I certainly support especially the changes to the rehab standards that are proposed to be part of the 2021-2022 AAP. I think that those will definitely make it easier to administer the HTF funds as we look at all of the various requirements that we have for various funding sources, building officials and others. So definitely thank you for that. With regard to the 2019-2020 Amendment, certainly there are lots of specific rules that aren’t typical, that we don’t typically see because of the nature of this. I would like to just put out there and encourage Commerce to think about housing as certainly a critical component of meeting needs in general in Montana, and I would say on par with public infrastructure and economic development and homelessness. So I would encourage the State to think about allocating funding equally to housing as it does public infrastructure. And then thinking about the homelessness. I think keeping that level of investment where it is appropriate, especially in light of the HOME ARP funds that we expect to come out here hopefully later this year. One more consideration for the 2019-2020 AAP is allowing a single local government to have more than one open CDBG CARES application at a time, seeing as local governments and everybody else is facing just a myriad of challenges. I think for CDBG CARES funds, lifting that limitation of one grant per local government would best help Montanans meet our needs. With regard to the 2021-2022 AAP, a couple of comments, thinking about funding allocations; again, encouraging the State to think of housing on par as far as priority with public infrastructure, and balancing that investment a little bit more equally. One item also, thinking about upcoming grant applications and funding rounds, a lot of fantastic projects were funded last year, and due to circumstances beyond our control, practitioners are facing -- many are facing some significant budget shortfalls, given the costs of some materials and labor just going through the roof. I would encourage the State to consider prioritizing last, credits that were awarded last year, making sure that those projects are whole and able to move forward in a successful manner, perhaps with a truncated and expedited application and award process. A lot of projects would be ready to go this summer or this fall but for some of these budget shortfalls that certainly were not predictable. And one more item I guess is to consider communication and collaboration with the Montana housing folks who are in charge of the significant rewrite of the Qualified Allocation Plan for low income housing tax credits. They are certainly undergoing a significant effort, and I would encourage folks who are in charge of the CDBG, HTF, and HOME funds, to openly and often communicate with the tax credit folks over there, just to help facilitate successful projects, and all of the various competing requirements. One more item,
thinking about the CDBG funds in particular for 2021-2022 AAP, I would encourage the State to lift the $450,000 per project cap, like HOME did several years ago. We certainly, I think as part of that as a result of that, saw an increased use in HOME funds, and a more effective series of projects that were able to meet housing needs, and I guess additionally more investment in housing with the regular CDBG funds. And so those are the comments that I have. I will also be submitting written comments. I appreciate everybody’s time and all your efforts. Thank you so much.

Response to Comment #1:
Regarding allocations under the 2021-2022 AAP, the State of Montana strives to balance program flexibility with administrative considerations. If additional program flexibilities are needed and are not provided for in the State’s Consolidated Plan and Annual Action Plans (AAPs), Montana will consider amendments as needed. Some flexibility for funding allocations is already provided for in existing planning documents. Under CDBG, HOME, and HTF, the Director of Commerce is authorized to reallocate up to 15% of each program’s planned total allocation among grant categories. A reallocation of more than 15% of a program’s total allocation or the creation or elimination of a grant category within a program would necessitate an amendment to the applicable AAP and may require an amendment to the corresponding Consolidated Plan as well. Commerce is considering increasing this 15% reallocation cap to provide CDBG, HOME, and HTF with more flexibility to respond to the applications received among each program; this adjustment would occur this fall. In the interim, Montana encourages prospective and current grantees to communicate both community and project-specific needs as they arise.

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

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

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

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

Heather McMilin, Project Development Director, Homeword

Comment #2:
This is Heather McMilin with Homeword. I’m assuming you guys can hear me all right. Excellent. I just hit the unmute indication four times. I didn’t know if I was turning things on and off. So thank you. Again, Heather McMilin with Homeword, and I want to echo a lot of what Andrew testified to. There’s been
nothing simple about the last 16 months, and all the work that you all have done and we have done on our end to implement projects, and so thank you for coming to the point we are today, and working with us, and taking testimony, and basically surviving the last year. One of the things I’d also like to echo is considering housing infrastructure with any of these funds. The even distribution to housing across the board with infrastructure is important, but also considering, if you are allocating to jurisdictions for infrastructure expansion, that certainly helps promote housing development. And maybe there’s a way to give priority points for infrastructure projects that are helping to promote the construction, and preservation, and rehabilitation of housing as infrastructure, because we certainly have always had an issue, and there’s been a need, but I would say over the last year we’ve had more impacts and will have decades worth of impacts from the COVID, people moving here, and buying our housing stock, and driving up prices. And so any way we can support proper infrastructure development and housing development, whether it be market rate or affordably bound would be great. Specifically we thank -- We are working on projects that have been funded by some of the funds discussed today, and for funds moving forward. So an area of need, I think, and very specifically with the Housing Trust Fund, one thing may be not allowed currently but we should consider allowing, is the Housing Trust Funds to be used for operational support. And I say that because in a project in the nature of permanent supportive housing, we have one, a project we’re constructing now, and hope to close the financing package here in Missoula. We are also working with NeighborWorks Montana in Great Falls in a permanent supportive housing project serve the chronically homeless with wrap around services. The one that is critical on both those projects is setting up a service reserve within the project to ensure those wrap around services that are so critical for those types of projects, have a back stop with a loan and tax credit investor. We have to have all the risks taken care of. And these projects operate, they’re just more expensive to operate because of those services, and having that reserve, being able to back stop operations will be critical. So if we could open up any and all funding sources, not just the Housing Trust Fund, but CDBG and HOME, and these COVID assistance dollars coming in, to allow the maximum. I don’t have all of the rules on the federal funds, but as soon as they come out, we keep them as flexible as possible, and at the federal level of kind of the rules, so that we can get creative and fund projects like the NeighborWorks Great Falls project in Great Falls, and other needs around the communities in Montana, because I just don’t know what we don’t know yet. And so maximum flexibility within those funding sources would be good. I do support also multiple applications for different jurisdictions. There’s definitely different needs in communities, and having multiple applications open would help us, especially with the amount of funds coming in that are above normal, and getting those allocated in the projects right away would be important. I also echo the participating with Montana Housing in their very much needed rewrite of the QAP in the process we’re going through this year on that, and pairing these funds with the loan for housing tax credits, in the variety of projects that could be funded by that program. If we’re all in concert together, we can simply get more done, and meet more need. The other piece would be around the cost. We’ve all, as we’ve developed and tried to put homes over people’s heads, roofs over people’s heads, we have survived cost impacts and timing impacts that are also cost impacts to projects at an unprecedented level. We’re facing tax credit pricing that’s worse than it was when the IRS basically bought the credits back and paid the states their credits to be sold for equity. They were just paid and used as funds during that 2008-2009. Really just talking to developers as a way to do a truncated kind of correction or addition to contracts, anything. Just consider having those conversations. We’re all very creative, and we have survived the projects, at least we’re trying to at this point, but any way we can be creative to help support these one time various impacts that we’ve seen due to the global pandemic would be helpful. I think pretty much that’s all I have for today. Thank you, Andrew, for setting the stage for at length testimony.
Response to Comment #2:
As mentioned above, some flexibility for reallocating funds across CDBG, HOME, and HTF grant categories is already provided for in existing planning documents. Under CDBG, HOME, and HTF, the Director of Commerce is authorized to reallocate up to 15% of each program’s planned total allocation among grant categories. Commerce is considering increasing this 15% reallocation cap this fall. The State of Montana strives to balance program flexibility with administrative considerations. If additional program flexibilities are needed and are not provided for in the Consolidated Plan and Annual Action Plans (AAPs), Montana will consider amendments as needed.

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

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

Sindie Kennedy, Grants Administrator, Missoula County

Comment #3:
Hi, this is Sindie Kennedy... with Missoula County. I, too, would like to echo what has already been said, and express my gratitude for all of the work that Commerce has done to make this all happen. It has been a challenging year for all of us. I also want to reinforce some of the things that have been said. Definitely would really appreciate an open CDBG application process, so it’s similar to HOME, so that we’re not tied down to a deadline. Projects just kind of land in our laps throughout the entire year, and we’ve had to say no to many that were really good eligible projects because, one, we already had an application or project underway; and two, the timing wasn’t right. So that would be really beneficial. Being able to increase the amount of award above $450,000 would also be very beneficial; and balancing the housing with public infrastructure would be helpful. And I will be providing some written comments as well. Thank you.

Response to Comment #3:
Regarding an open CDBG application process, CDBG Economic Development and CDBG Housing (specifically, single-family housing rehabilitation activities) currently use an open application process, and eligible applicants may apply on a rolling basis. However, applications for CDBG Housing (specifically, affordable housing development and rehabilitation) and CDBG Public and Community Facilities are due once a year in the fall, and applications for CDBG Planning are due twice a year. Because applications for these CDBG programs tend to outpace the funds available, having a set deadline ensures that all applicants have access to these CDBG funds.
As mentioned above, for the 2021-2022 plan year, Commerce intends to increase the award amount for CDBG Public and Community Facilities and CDBG Affordable Housing Development and Rehabilitation. Further information on the maximum award amount will soon be available in the applications and guidelines on the CDBG website: [https://comdev.mt.gov/Programs-and-Boards/Community-Development-Block-Grant-Program/](https://comdev.mt.gov/Programs-and-Boards/Community-Development-Block-Grant-Program/).

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

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

Jim Morton, Executive Director, District XI Human Resource Council

Comment #4:
Good morning. So, I want to echo what others have said in terms of appreciation for all the work that staff has put into the documents we have before us. Just quickly, I wanted to support allowing applications, more than one application from a local government for CDBG. As it has been said, it’s been a tough two years. Also, with support of allowing the services component of CDBG to include multiple applications from jurisdictions. I think the entitlement cities, and entitlement areas, and the code is reasonable. So, by allowing multiple applications, both for services and for CDBG, should not disadvantage the non-entitlement areas. And I just echo what both Heather and Andrew have said in terms of the housing component being much in need of consideration, in terms of coordination with other services and expanded amounts allocated. And we will provide from Human Resource Council written comments.

Response to Comment #4:
As mentioned above, some flexibility for reallocating funds across CDBG, HOME, and HTF grant categories is already provided for in existing planning documents. Under CDBG, HOME, and HTF, the Director of Commerce is authorized to reallocate up to 15% of each program’s planned total allocation among grant categories. Commerce is considering increasing this 15% reallocation cap this fall. The State of Montana strives to balance program flexibility with administrative considerations. If additional program flexibilities are needed and are not provided for in the Consolidated Plan and Annual Action Plans (AAPs), Montana will consider amendments as needed.

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

Sherrie Arey, Executive Director, NeighborWorks Great Falls
Comment #5:
This is Sherrie Arey from NeighborWorks, Great Falls. I’m going to just hit on a few topics that have already been hit on, just to double down on them. The multiple applications allowed for the local governments is critical to the success for those. The Housing Trust Fund dollars being allowed to use for operational support. In order to use all of the tools in our tool box to help with the homelessness issue, that could become a make or break for a project, and so strongly advocate for that. And as Heather McMilin said, housing is infrastructure. The more ability to tie those two things together and help with the infrastructure needs in our community is essential to being able to provide affordable housing. Thank you all for everything that you do, and all the information you provided, and best of luck. Thank you.

Response to Comment #5:
As mentioned above, no state is currently using HTF for operations support, and there are parameters instituted by HUD on using HTF for operations support. The small size of Montana’s HTF allocation, the limitations of operating cost assistance, and the demand to add to or retain the affordable housing stock has informed Commerce’s decision to allocate its HTF to construction or rehabilitation of rental housing.

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

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

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

Comment #6:
Good morning, MBOH and Community Development Division staff. For the record, my name is Shyla Patera with North Central Independent Living Services in Black Eagle, and the Montana Community Living Task Force. I’m really happy to participate in this hearing today, and I am really supportive of Montana’s QAP efforts are moving forward, and looking at the different funding sources, such as the Housing Trust Fund and different things being utilized for operation and different points, different points of work, as some of the developers and other housers have talked about. Some of the things that again, NCILS and the Independent Living Community for Montanans with Disabilities espouse is making sure that we have accessible access to both services in sidewalk and infrastructure, but also in Home and Housing Trust Fund. Some of the things that have impacted us through COVID are making sure that we also can house our homeless, and some of the things that I’ve thought of are looking at like accessible tiny homes -- one in particular is based out of Emmett, Idaho that I’ve been beginning to research -- and hopefully will look at our zoning opportunities, both for single family and multi-family, and different things as well. Just making sure that our people with disabilities have access to HOME, Mainstream, and 811 if needed, and working with HUD and others to make sure that people with disabilities aren’t moving from one house to another, but making sure that they have stable opportunities that deal with
their funding sources that they are using. I’d also like to encourage some funding for accessible rehabbing of housing. We encourage, of course, visible and accessible new construction, and the universal design options, but a lot of calls that we get are also, “How do I rehab my house to make it so that I can age in place?” “How do I, as a long term homeowner, get to stay in our community as well, and with my house that I already are owning, or paying on, or working with?” And that’s a big thing. And infrastructure, we also encourage communities to work on accessible pathways, pedestrian crosses, contiguous sidewalks, timing of things, development of accessible pathways for walking, rolling, parking, biking, anything a person with a disability needs. And I will be submitting written comments to follow my disjointed verbal ones. Everyone have a great day. Thank you for all your hard work.

Response to Comment #6:
Commerce, through its housing and community development programs, gives preference to applications that benefit extremely low-income, homeless, disabled, elderly, and other disadvantaged individuals and families in accordance with its Consolidated Plan. Under these programs, housing development can result in either single family or multifamily activities and may include new construction, redevelopment, or rehabilitation. Commerce strongly encourages all applicants (regardless of program or activity), to the maximum extent possible, to incorporate both accessibility and visitability features into their projects. (The three basic visitability features that increase access to friends and family with disabilities include a zero-step entrance, doors with 32 inches of clear passage space, and a wheelchair-accessible half bathroom on the main floor). Whether a project serves disabled persons and meets accessibility, visitability, and universal design requirements is considered during application ranking, which is Commerce’s process for prioritizing and funding projects. HOME can be used to fund the development of newly constructed homes that are accessible and visitable while CDBG can be used to fund the rehabilitation of existing homes for accessibility and visitability.

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

Heather McMilin, Project Development Director, Homeword

Comment #7:
Thank you. I will amend my previous testimony. Again, Heather McMilin, Homeword, Missoula, Montana. I would be remiss if I did not comment, and appropriate or not. If there’s any way this department and the individuals on this call can support the work that will go into the next round of the state housing credit work at the legislative level. It’s something that made it off the floor and to the Governor’s desk, and unfortunately was not signed. And that would help, probably double the production of homes, rehabilitations, preservation, within the state. And so I wanted to go on the record to say if there’s a way to support or participate, let us know. That would be great. Thanks.

Response to Comment #7:
Commerce’s role in the legislative session is primarily as an informational witness, lending subject matter expertise on proposed legislation. Montana Housing with the Department of Commerce has historically served in this information role on proposed state / workforce housing tax credit bills (SB 18 during the 66th legislative session and HB 397 during the 67th legislative session). This role includes preparing fiscal notes upon request, serving as an information witness during bill hearings and responding to questions on proposed legislation from elected offices, the legislative fiscal division, budget office and Governor’s office.
**Shyla Patera, IL Specialist, North Central Independent Living Services and Montana Community Living Task Force**

Comment #8:

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

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

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

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

Montana needs also to ensure that those who are living with disabilities in homeless shelters are congregate settings have appropriate supports to do so. NCILS hopes that Montana will encourage those who assist our homeless populations and homeless citizens will have access to Medicaid services and supports if needed and wanted! Montana definitely needs to maintain and upgrade both our youth housing services as well as our homeless substance abuse utilization opportunities!
I am also advocating for ADA accessible funding for housing rehabilitation and community sidewalks as well as curb ramps at the same time! I believe that we need to study pedestrian and traffic safety and measure how beneficial the current traffic timing and crosswalk systems are to those who use mobility devices and our pedestrians in Montana! Does each community have in their repertoire of plans and ADA transition plan?

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

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

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

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

Response to Comment #8:
As mentioned above, Commerce, through its housing and community development programs, gives preference to applications that benefit extremely low-income, homeless, disabled, elderly, and other disadvantaged individuals and families in accordance with its Consolidated Plan. Commerce strongly encourages all applicants (regardless of program or activity), to the maximum extent possible, to incorporate both accessibility and visitability features into their projects. Whether a project serves disabled persons and meets accessibility, visitability, and universal design requirements is considered during application ranking, which is Commerce’s process for prioritizing and funding projects. HOME can be used to fund the development of newly constructed homes that are accessible and visitable while CDBG can be used to fund the rehabilitation of existing homes for accessibility and visitability.

Commerce, Montana Housing, is partnering with the Montana Legal Services Association to form the Montana Eviction Intervention Project to provide civil legal assistance for Montanans facing evictions as a result of the COVID-19 pandemic. As noted in a recent Associated Press article (https://www.usnews.com/news/best-states/montana/articles/2021-06-25/explainer-how-montana-will-use-funds-to-limit-evictions) “Beginning last October, the state created the Montana Eviction Intervention Project, in partnership with the Montana Legal Services Association, to provide legal help to low-income renters facing eviction. Since then, attorneys have helped with 264 evictions statewide,
helping 608 clients and their family members... No clients assisted under the Montana Eviction Intervention Project have moved to a shelter or became homeless, the Montana Legal Services Association said.”

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

Andrew Chanania, Principal, North Fork Development

Comment #9:
2021-2022 AAP Comments

1. Leverage Other Resources, Page 31
The AAP states, “The HOME Program requires 5% match funding for projects. Local match sources include local costs of infrastructure installation to serve HOME-assisted units, proceeds from bond financing, private grants, deferred or waived state or local taxes or fees, cash, and the value of donated land.” This list of eligible sources of HOME match does not specifically include certain eligible sources found in 24 CFR § 92.220, which is referenced in a footnote in the AAP. Allowing developers and grantees as much flexibility as possible makes the administration of HOME funds simpler and the projects more effective; accepting all forms of match included in the federal regulations gives practitioners more tools to successfully deploy HOME funds and realize successful projects.

2. Annual Goals and Objectives, Page 31, et. seq.
Table 6, Table 7, and other places specify the amount of CDBG funds allocated to finance eligible activities. In practice, the importance of preserving and constructing new affordable housing is equal to infrastructure as Montana moves to recover from the myriad impacts of COVID-19 and as we move forward once we have recovered. Without sufficient quantities of affordable housing, jobs will remain unfilled and would-be employees will be unable to enter or reenter the workforce. This is particularly true in the historically low-paying sectors of the labor market that have been hit the hardest: hospitality, tourism, and similar sectors of our economy. The CDBG program should recognize housing on par with infrastructure as one of the primary necessary recover and prosper. Allocating resources equally between the goal to Preserve and Construct Affordable Housing, Improve and Sustain Public Infrastructure, and Revitalize Local Economies is the most effective use of this resource. The Lewis and Clark County Public Health recently conducted a survey in preparation for the forthcoming Community Health Assessment report, which included the following question about housing. "What 3 items that you believe are most important for a healthy community?" (Community defined as Lewis and Clark County. Respondents indicated affordable housing is of significant concern, as 32% said access to affordable housing is of greatest importance. Access to healthcare services 49%; Good jobs and a healthy economy 47%; Access to affordable housing 32% (Data Source: COVID-19 Post Vaccination Survey (N=2,106), March-June, 2021. Lewis and Clark Public Health, Montana. Community defined as Lewis and Clark County). The funding allocation priorities percentages (Table 7 – Funding Allocation Priorities in the 2021-2022 AAP) organized as follows would best meet Montana’s needs.

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

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<tr>
<th>Affordable Housing</th>
<th>Public Infrastructure</th>
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4. Distribution Methods - Page 38 CDBG Affordable Housing Development and Rehabilitation
The 2019-2020 AAP Amendment adding CDBG-CARES authority recognizes the fact that a project’s demonstrated need should govern the amount of funds invested in any given project rather than an arbitrary grant ceiling. We are experiencing a climate of economic uncertainties and increasing prices for basic supplies and labor. Limiting the size of the grant to the same amount it has been for more than a
decade (regardless of a project’s demonstrated need and today’s circumstances) undermines our ability to deliver successful projects and respond to growing need for quality, affordable housing. More often than not, a maximum of $450,000 does not cover the increased project costs and workload complications affordable multifamily housing projects grapple with when using CDBG Housing funds. Several years ago, the State’s per project limit on HOME funds was lifted and the result was an increased use of that resource and an increase in the production & preservation of affordable housing available for Montanans. Furthermore, in a time with spiking materials and labor costs, financing gaps CDBG could fill have grown and I encourage the State to give practitioners the tools necessary to fill those gaps. Lifting the CDBG Affordable Housing Development and Rehabilitation’s $450,000 per project limit and increasing the funds available for this category would allow practitioners to more effectively utilize this resource and deliver a greater number of successful projects.

5. Distribution Methods - Page 38 CDBG Housing Stabilization Program

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

Response to Comment #9:

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

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

As mentioned above, the State of Montana is actively assessing options for supporting existing projects that are facing budget shortfalls and other challenges resulting from the COVID-19 pandemic. Grantees with concerns related to funded projects should work with their program specialists and Commerce leadership directly to ensure continued project feasibility. Additionally, grantees are encouraged to review application guidelines for upcoming application cycles for further direction.
As mentioned above, Commerce staff has been actively collaborating in rewriting Montana Housing’s Qualified Action Plan (QAP), and they will continue to be involved in the future. Commerce staff will ensure that there is open communication between the Low Income Housing Tax Credits (LIHTC) and HUD-funded programs such as CDBG, HOME, and HTF.

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

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

Jim Morton, Executive Director, District XI Human Resource Council

Comment #10: Leverage Other Resources, Page 31

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

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

Annual Goals and Objectives, starting on Page 31

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

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

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*On Page 38 CDBG Affordable Housing Development and Rehabilitation*

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

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

*Page 38 CDBG Housing Stabilization Program*

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

*Other Comments*

The set aside for entitlement and participating jurisdictions should be held to twenty-five percent (25%) of the total funds awarded to the Montana Department of Commerce.
Response to Comment #10:
As mentioned above, the 2021-2022 AAP will be amended to clarify that HOME match is not limited to the eligible sources enumerated in the document. It will also refer the public to all eligible sources of match as outlined in 24 CFR 92.220.

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

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

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

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

Comment #11:
Leverage Other Resources, Page 31

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

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

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

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

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

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

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

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

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

As partners we all are invested in successful outcomes and these projects are in need of continued support, without which some of these projects may not be able to deliver the promised public benefits. Many of last year’s projects are (or will be this summer) ready to break ground but for the sudden increase in prices and budget shortfalls. To address budget shortfalls in projects awarded last year due
to these unique, COVID-19-caused market conditions, Montana should consider prioritizing CDBG, HOME and HTF funds for projects awarded 2020 so these projects can be made whole and achieve successful completion. A truncated application, review, and award process outside the standard process for projects funded in 2020 would be most advantageous and ensure projects with existing financial commitments are successful.

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

Page 38 CDBG Affordable Housing Development and Rehabilitation

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

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

Page 38 CDBG Housing Stabilization Program

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

I appreciate the opportunity to give public comment on this very important topic and am looking forward to seeing the outcome and the final version of the Annual Allocation Plan. Please let me know if you have any comments or questions, you can reach me at 406-254-167
Response to Comment #11:
As mentioned above, the 2021-2022 AAP was amended to clarify that HOME match is not limited to the eligible sources enumerated in the document. It will also refer the public to all eligible sources of match as outlined in 24 CFR 92.220.

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

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

Comment #12:
DRAFT 2021-2022 AAP Comments:

Leverage Other Resources, Page 31

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**CDBG Housing Stabilization Program, Page 39**

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Tuesday, June 22, 2021
11:00 a.m. – 12:00 p.m.

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

The Department of Commerce will make reasonable accommodations for persons with disabilities or who have a Limited English Proficiency and who wish to participate in this process or need an alternative accessible format of this. Presentation materials will be provided in advance of the meeting.
2021-2022 AAP and 2019-2020 AAP
Public Participation Process

The State of Montana, through the Departments of Commerce and Public Health and Human Services, develops a 5-year plan to guide policy and investment for housing, economic, and other community development. The 5-year plan, also known as the “Consolidated Plan for Housing and Community Development” is required by the U.S. Department of Housing and Urban Development (HUD) to assess Montana’s needs and current conditions as well as to determine priorities and allocate HUD funding.
2021-2022 AAP and 2019-2020 AAP Public Participation Process

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

• The objectives of Montana’s Consolidated Plan include:
  – Provide decent housing
  – Provide a suitable living environment
  – Expand economic opportunities

• The goals of Montana’s Consolidated Plan are:
  – Goal 1 – Preserve and Construct Affordable Housing
  – Goal 2 – Plan for Communities
  – Goal 3 – Improve and Sustain Public Infrastructure
  – Goal 4 – Revitalize Local Economies
  – Goal 5 – Reduce Homelessness
2020-2024 Consolidated Plan

Programs

- Community Development Block Grant (CDBG)
  - Housing (Rental Development / Single Family Rehabilitation)
  - Public Facilities
  - Community Facilities
  - Planning
  - Economic Development

- Emergency Solutions Grant (ESG)

- HOME Investment Partnerships Program (HOME)
  - Rental Development / Single Family Development / Rental Rehabilitation
  - Homebuyer Assistance

- Housing Trust Fund (HTF)
  - Rental Development / Single Family Development / Rental Rehabilitation

- Housing Opportunities for Persons with AIDS (HOPWA)

For more information on Montana’s competitive HOPWA grant, contact Julianna Crowley JCrowley@mt.gov
2020-2024 Consolidated Plan Documents

- 5-Year Consolidated Plan for Housing and Community Development
  - Consolidated Plans are strategic plans that guide housing and community investments. **Montana is currently operating under the 2020-2024 Consolidated Plan.**

- Annual Action Plan (AAP)
  - AAPs are prepared each year of the Consolidated Plan and outline specific activities, goals, objectives, etc., for the given program year (not cumulative). **Montana’s 2021-2022 AAP outlines activities that are planned for Program Year 2 of the 2020-2024 Consolidated Plan, which runs from April 1, 2021, to March 31, 2022.**

- Consolidated Annual Performance and Evaluation Report (CAPER)
  - CAPERs are annual reports that detail use of funds and progress towards meeting goals and objectives for AAPs.
2021-2022 AAP and 2019-2020 AAP
Components of the AAP

• The Setup
  – Administrative details

• The Process ("PR")
  – Public participation elements

• Annual Action Plan ("AP")
  – Expected resources, goals, priorities, and how funds will be distributed by program
2021-2022 AAP
Resources by Program – Plan Year 2

• Community Development Block Grant (CDBG) $6,982,827
• HOME Investment Partnerships Program (HOME) $3,590,456
• Emergency Solutions Grant (ESG) $743,529
• Housing Trust Fund (HTF) $3,401,884
2021-2022 AAP
Goal Summary: Preserve and Construct Affordable Housing

• $750,000 in CDBG, $2,131,411 in HOME, and $2,041,696 in HTF
  – Rental Units Constructed: 12
  – Rental Units Rehabilitated: 26
  – Homeowner Housing Added: 2
  – Homeowner Housing Rehabilitated: 3
  – Direct Financial Assistance to Homebuyers: 50 households
2021-2022 AAP  
Goal Summary: Plan for Communities  

- **$500,000** in CDBG  
  - 15 Local Governments Assisted
2021-2022 AAP
Goal Summary: Improve and Sustain Public Infrastructure

• $2,787,190 in CDBG
  – 1,000 Persons Assisted
  – 20 Households Assisted
2021-2022 AAP
Goal Summary: Revitalize Local Economies

• $2,000,000 in CDBG
  – Jobs Created/Retained: 80
  – Businesses Assisted: 3
2021-2022 AAP
Goal Summary: Reduce Homelessness

- $450,000 in CDBG, $650,000 in HOME, $750,000 in HTF, and $677,159 in ESG
  - Tenant-Based Rental Assistance/Rapid Rehousing: 200 households
  - Homeless Person Overnight Shelter: 80 persons
  - Homelessness Prevention: 480 persons
  - Housing for Homeless Added: 20 households/housing units
### 2021-2022 AAP

Resources by Goal – Plan Year 2

<table>
<thead>
<tr>
<th>Program</th>
<th>Goal</th>
<th>Admin</th>
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<tbody>
<tr>
<td></td>
<td>Preserve and Construct Affordable Housing</td>
<td></td>
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<tr>
<td></td>
<td>Plan for Communities</td>
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<tr>
<td></td>
<td>Improve and Sustain Vital Public Infrastructure</td>
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<td>Revitalize Local Economies</td>
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<td>Reduce Homelessness</td>
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<table>
<thead>
<tr>
<th>Program</th>
<th>CDBG</th>
<th>HOME</th>
<th>ESG</th>
<th>HTF</th>
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<tr>
<td></td>
<td>$750,000</td>
<td>$2,131,411</td>
<td>$0</td>
<td>$2,041,696</td>
</tr>
<tr>
<td>Goal</td>
<td>11%</td>
<td>69%</td>
<td>0%</td>
<td>66%</td>
</tr>
<tr>
<td></td>
<td>$500,000</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>Admin</td>
<td>7%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
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| Goal    | $2,787,190 | $0 | $0 | $0 |
| Admin   | 41%   | 0%  | 0%  | 0%  |

| Goal    | $2,000,000 | $0 | $0 | $0 |
| Admin   | 29%   | 0%  | 0%  | 0%  |

| Goal    | $450,000 | $650,000 | $687,765 | $750,000 |
| Admin   | 7%   | 21%  | 93%  | 24%  |

CDBG: $750,000 11% $500,000 7% $2,787,190 41% $2,000,000 29% $450,000 7% $303,727 4%
HOME: $2,131,411 69% $0 0% $0 0% $650,000 21% $309,045 10%
ESG: $0 0% $0 0% $0 0% $687,765 93% $55,764 7%
HTF: $2,041,696 66% $0 0% $0 0% $750,000 24% $310,188 10%
2019-2020 AAP Amendment
CDBG CARES

• CDBG CARES funds must be used for CDBG-eligible activities to prevent, prepare for, and respond to COVID-19
• CDBG CARES funds must primarily benefit low and moderate income Montanans
• Montana’s allocation for CDBG CARES (CDBG-CV1, CDBG-CV 2, and CDBG-CV 3) is $10,174,175
2019-2020 AAP Amendment
CDBG CARES

- Montana will use CDBG CARES to fund projects within these Consolidated Plan goals:
  - Preserve and Construct Affordable Housing (20%)
  - Improve and Sustain Public Facilities (50%)
  - Reduce Homelessness (10%)
  - *The remaining funds will go towards state and local government administration and technical assistance*
2019-2020 AAP Amendment
CDBG CARES

- Eligible applicants:
  - Towns, Cities and Counties

- Eligible uses:
  - Public Facilities: improvements to HVAC for ventilation; expansion to allow for social distancing
  - Public Services: support, including equipment, for senior centers, head start centers, shelters, health clinics
  - Housing/Homelessness: acquire or develop non-congregate shelter

- Must ensure CDBG CARES funds do not duplicate benefits of other sources of funds
2021-2022 AAP and 2019-2020 AAP Document Review

• Available:
  – On Commerce’s website at https://commerce.mt.gov/Consolidated-Plan/Documents
  – Several depositories throughout the state (see website for list)
  – By request
2021-2022 AAP and 2019-2020 AAP
Contact Information

Commerce  301 S Park Ave Helena, MT 59601
           PO Box 200523 Helena, MT 59620-0523

Interim Administrator: Cheryl Cohen
Interim Operations Manager: Becky Anseth
Phone:  406-841-2770
TDD:  406-841-2702
Fax:  406-841-2771
Email:  DOCConPlan@mt.gov
Website:  https://commerce.mt.gov/Consolidated-Plan
2021-2022 AAP and 2019-2020 AAP
Contact Information

DPHHS  
1400 Carter Drive Helena, MT 59601  
PO Box 202956 Helena, MT 59620-2956

Interim Administrator: Morgan Taylor  
Bureau Chief: Sara Loewen  
Phone: 406-447-4265  
Fax: 406-447-4287  
Website: www.dphhs.mt.gov
2021-2022 AAP and 2019-2020 AAP Comments

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

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

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

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

Montana Department of Commerce
Community Development Division
Attn: Con Plan
PO Box 200523
Helena, MT 59620-0523
[DOCConPlan@mt.gov](mailto:DOCConPlan@mt.gov)
1 PUBLIC HEARING FOR 2021-2022 AAP
2 SPONSORED BY MONTANA DEPARTMENT OF COMMERCE
3 2021-2022 ANNUAL ACTION PLAN AND
4 2019-2020 ANNUAL ACTION PLAN AMENDMENT

TRANSCRIPT OF THE PROCEEDINGS

Taylor Crowl, Facilitator

Via Zoom

June 22nd, 2021

11:00 a.m.

REPORTED BY: LAURIE CRUTCHER, RPR
LESOFSKI COURT REPORTING
7 WEST SIXTH AVENUE, Suite 2C

PARTICIPANTS

Panelists:
Taylor Crowell
Julie Flynn
Janelle Egli
Julianna Crowley
Becky Anseth
Sara Loewen

Participants:
Erin Kautz
Andrew Chanania
Julie Stiteler
Ruth Burke
Ashleigh Byers
Heather McMilin
Annie Zimmerman
Jim Morton
Sindie Kennedy
Sherrie Arey
Shyla Patera
Katie Batterbee

WHEREUPON, the following proceedings were had and testimony taken, to-wit:

** * * * *

MS. CROWELL: I wanted to start out by thanking everybody for joining us today for the public hearing for the 2021-2022 Annual Action Plan, and 2019-2020 Annual Action Plan Amendment. As you'll probably notice, this webinar is being recorded, so go ahead and accept that on your screen if that pops up.

We would love everybody to use the question and answer feature. If you have any technical issues that pop up during the webinar for you, such as having trouble hearing us, need someone to speak louder, something like that. That way we can keep track of those and make sure that we're answering everybody's questions that pop up.

And then before we get started, it would be great to have all of the attendees just pop their name and the organization that you're connected to in the chat, just so we can have a sense of who is in the room. I'll pause there so everybody has a chance to do that.

Great. Thank you guys so much. It is just helpful for us to have a sense of who we're speaking with, and so you guys all have a sense of who else is on the webinar. Okay.

And just so you know, we'll accept comments and questions at the end of the presentation, and so everybody should be muted until then, but there will certainly be an opportunity for you to unmute yourself at the end. But again, in the interim, if there's any questions that come up that need to be immediately answered, feel free to pop them in the question and answer.

So before diving into the specifics of both of the Annual Action Plans, we wanted to provide some context on the Consolidated Plan process, which this is a part of.

So the State of Montana, through the Departments of Commerce and Public Health and Human Services, develop a five year plan to guide policy investment for housing, economic, and other community development activities throughout the state. This five year plan, also known as the Consolidated Plan for Housing and Community Development, is required by the US Department of Housing and Urban Development to assess Montana's
### Affordable Housing Focus Group

**2021-2022 AAP and 2019-2020 AAP Amendment**

**June 22, 2021**

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<td>1. needs and current conditions, as well as to determine priorities and allocate HUD funding. And so the 2021-2022 AAP and the 2019-2020 AAP Amendment are pieces of this kind of broader Consolidated Plan process. And this public hearing plays a critical role in developing each Annual Action Plan. The perspectives and opinions shared by participants of this public hearing will help Commerce and DPHHS to edit and finalize the draft 2021-2022 Annual Action Plan which falls under the 2020-2024 Consolidated Plan, and then also the draft 2019-2020 Annual Action Plan Amendment, which falls under the 2015-2019 Consolidated Plan. We hope that with your input we can improve Montana's housing and community development needs across Montana are both identified and addressed. So first we're going to turn to the 2021-2022 Annual Action Plan, which as I mentioned, lives underneath the 2020-2224 Consolidated Plan, so we'll provide some context on its goals and objectives. And the 2019-2020 AAP lives under the 2015-2019 Consolidated Plan, but many of these goals and objectives are similar between the two. So for the 2020-2024 Consolidated Plan, the objectives include providing decent housing, ensuring housing and community development needs across Montana are both identified and addressed. And in order to achieve these objectives, the State of Montana will fund projects that fall within five goals. The first goal is preserving and constructing affordable housing; the second goal is planning for single family development, rental rehabilitation, and then also home buyer assistance. The second HUD funded program is the Emergency Solution Grant, known as ESG, which is housed within the Department of Commerce, and assists people to regain permanent housing after experiencing housing crises and/or homelessness. The third program is the Home Investment Partnerships Program, known as HOME, which is housed within the Department of Commerce, and aims to produce and ensure housing and community investments. The fourth program is the Housing Trust Fund, known as HTF, which is housed within the Department of Commerce, and aims to produce and preserve affordable housing for extremely low and very low income households, and it lives within the HUD1 Program that focuses on rental development, single family development, and rental rehabilitation. And there's a fifth program that in certain states can be funded as part of the CPD, known as HOPWA; but within the State of Montana, Montana receives a competitive HOPWA grant, so it's not enumerated and explained in the AAP's. So if anybody needs further information on Montana's competitive HOPWA grant, they can contact Julianna Crowley at <a href="mailto:jcrowley@mt.gov">jcrowley@mt.gov</a>. So as I mentioned earlier, both of these AAP's are part of this larger Consolidated Plan process, and there are a variety of documents that make up this Consolidated Plan process. First, there's the Five Year Consolidated Plan for Housing and Community Development, and these Consolidated Plans are done every five years, and are strategic plans that guide housing and community investments. Currently the State of Montana is operating under the 2020-2024 Consolidated Plan. Then there are the Annual Action Plans, known as AAP's, which is what we're discussing today, and the AAP's are prepared each year of the Consolidated Plan, and outline specific activities, goals, objectives, etc., for the given program year. And Montana’s 2021-2022 AAP outlined activities that are planned for program year two of the 2020-2024 Consolidated Plan, and this:</td>
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| 2. The second HUD funded program is the Emergency Solution Grant, known as ESG, which is housed within the Department of Public Health and Human Services, and assists people to regain permanent housing after experiencing housing crises and/or homelessness. |
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Affordable Housing Focus Group
2021-2022 AAP and 2019-2020 AAP Amendment

1 program year to run from April 1st, 2021 to March 31st, 2022.
2 And then the third type of document is the Consolidated Annual Performance and Evaluation Report, known as the CAPER. CAPER's are annual reports that contain use of funds and progress towards meeting goals and objectives for AAP's.
3 We won't be discussing CAPER's today, but we do have another public hearing on our CAPER tomorrow, so hope to see some of you there.
4 Both the 2021-2022 AAP and the 2019-2020 AAP have various components. The three major components are the setup, the process, and the Annual Action Plan. So the setup details various administrative details. The process has public participation elements, and then the Annual Action Plan itself is kind of the meat of the document. That's where we explain expected resources, goals, priorities, and how funds will be distributed by program.
5 So now diving into the 2021-2022 Annual Action Plan, the State of Montana receives the following allocations from HUD by program. So for CDBG, the State of Montana received $6,982,827; for HOME, the State of Montana received $6,131,411 in HOME; and $2,041,696 in HTF; and $677,159 in ESG to the fifth goal, which is reducing homelessness; and four percent of our five, reduce homelessness; and four percent of our funds will be retained for admin.
6 State of Montana will tackle the five goals that are explained in our Consolidated Plan. And so for the first goal, which is preserving and constructing affordable housing; and then 21 percent of our funds will go towards goal one, which is preserving and constructing affordable housing; 7 percent of our funds to goal two, which is plan for communities; 41 percent of our funds to goal three, which is improve and sustain vital public infrastructure; 29 percent of our funds to goal four, revitalize local economies; 7 percent of our funds to goal five, reduce homelessness; and four percent of our funds will be retained for admin.
7 For HOME, 69 percent of our funds will go towards goal one, preserve and construct affordable housing; 7 percent of our funds to goal two, which is plan for communities; 41 percent of our funds to goal three, which is improve and sustain vital public infrastructure; 29 percent of our funds to goal four, revitalize local economies; 7 percent of our funds to goal five, reduce homelessness; and four percent of our funds will be retained for admin.
8 For ESG, 93 percent of the funds will go towards goal five, which is reduce homelessness; and 7 percent of the funds will be retained for admin.
9 For Housing Trust Fund, 66 percent of the funds will go towards goal one, preserve and construct affordable housing; and then 21 percent of our funds will go towards goal five, reduce homelessness; and 10 percent will be retained for admin.
10 So both the 2021-2022 AAP and the 2019-2020 AAP have various components. The three major components are the setup, the process, and the Annual Action Plan. So the setup details various administrative details. The process has public participation elements, and then the Annual Action Plan itself is kind of the meat of the document. That's where we explain expected resources, goals, priorities, and how funds will be distributed by program.
11 This table provides some of the same information that was on the previous slides, but breaks it down by program as well. So you can see, if you read across the table left to right, for CDBG, we're allocating 11 percent of our CDBG funds to goal one, which is preserving and constructing affordable housing; 7 percent of our funds to goal two, which is plan for communities; 41 percent of our funds to goal three, which is improve and sustain vital public infrastructure; 29 percent of our funds to goal four, revitalize local economies; 7 percent of our funds to goal five, reduce homelessness; and four percent of our funds will be retained for admin.
12 And then now we're going to turn our attention to the next goal, which is improving and sustaining public infrastructure. Through this program we anticipate that 1,000 persons will be assisted and 20 households will be assisted.
13 The State of Montana is proposing to allocate $2 million in CDBG to goal four, which is revitalizing local economies, and through this program, we anticipate that 80 jobs will be created or retained, and three businesses will be assisted.
14 The State of Montana is proposing to allocate $2,787,190 in CDBG funds onto the third goal, which is improving and sustaining public infrastructure. Through this program we anticipate that 1,000 persons will be assisted and 20 households will be assisted.
15 The State of Montana is proposing to allocate $750,000 in HTF; and $677,159 in ESG to the fifth goal, which is reducing homelessness; and through these programs we anticipate that 200 households will be assisted with tenant based rental assistance or rapid rehousing; 80 persons will be assisted with homeless persons overnight shelter; 480 persons will be assisted with homeless prevention; and 20 households or housing units will be added for the homeless.
16 For ESG, 93 percent of the funds will go towards goal five, which is reduce homelessness; and 7 percent of the funds will be retained for admin.
17 For Housing Trust Fund, 66 percent of the funds will go towards goal one, preserve and construct affordable housing; and then 21 percent of our funds will go towards goal five, reduce homelessness; and 10 percent will be retained for admin.
18 And then now we're going to turn our
Affordable Housing Focus Group 2021-2022 AAP and 2019-2020 AAP Amendment

Transcript of Proceedings June 22, 2021

1. attention to the 2019-2020 Annual Action Plan Amendment. So the 2019-2020 Annual Action Plan was previously drafted, and we had a separate public hearing for that document; and then it was also previously amended for ESG CARES. And so if anybody is looking for further information on either of those previous public hearings, that can be found on our website. So really our discussion today is limited to the 2019-2020 AAP amendment as it relates to CDBG CARES.

1. So CDBG CARES funds must be used for CDBG eligible activities to prevent, prepare for, and respond to COVID-19. CDBG CARES funds must primarily benefit low and moderate income Montanans. And then Montana's allocation for CDBG CARES, which came in three allocations -- CDBG-CV1, CDBG-CV2, and CDBG-CV3 -- is $10,174,175. Montana is proposing to use CDBG CARES funds to fund projects within these Consolidated Plan goals, so we're proposing to use 20 percent of these CDBG CARES dollars to go towards preserving and constructing affordable housing; 50 percent towards improving and sustaining public facilities; 10 percent towards reducing homelessness; and then the remaining funds will go towards state and local government administration costs and technical assistance.

1. For CDBG CARES, eligible applications are town, cities, and counties, and eligible uses include public facility projects, so this could be improvements to HVAC systems for ventilation, expansion to allow for social distancing in these types of public facilities. It could be public service projects, support including equipment for senior centers, Head Start centers, shelters, and health clinics; or it could be housing or homelessness projects, which could include acquiring or developing non-congregate shelters.

1. And for CDBG CARES, it's really important to ensure that these funds do not duplicate benefits of other funding sources. So both of these documents -- the 2021-2022 AAP and 2019-2020 AAP Amendment -- are available on Commerce's website, which is commerce.mt.gov/consolidatedplans. There are also several depositories throughout the state. We have a list on our website for all of these depositories, and we can certainly get that to anybody on request, and we can also get the documents to anybody on request as well.

1. So if there is any questions about any of these programs, the programs housed within Commerce again are CDBG, HTF, and HOME, and Commerce can be reached at 301 South Park Avenue, in Helena, Montana 59601. That's our physical address. And then for mail, it's P.O. Box 200523, Helena, Montana 59620-0523.

9. Our Interim Administrator for the Community Development Division is Cheryl Cohen; and our Interim Operations Manager is Becky Anseth. Our phone is 406-841-2770, and our fax is 406-841-2771. Our email is DOCConPlan@mt.gov; and again, our website is commerce.mt.gov/consolidatedplans.

16. If there are further questions about ESG, DPHHS can be reached at their physical location at 1400 Carter Drive, Helena, Montana 59601; or by mail at P.O. Box 202956, Helena, Montana 59620-2956. The Interim Administrator is Morgan Taylor; the Bureau Chief is Sara Loewen. Their phone is 406-447-4265; the fax is 406-447-4287; and their website is dphhs.mt.gov.

24. So with that, we're going to turn to the comment section or portion of our presentation.

1. public hearing. So Commerce and DPHHS will consider and provide written responses to all comments received, and all comments received and responses provided will be documented in the final 2021-2022 Annual Action Plan, and then in the 2019-2020 Annual Action Plan Amendment. Commerce and DPHHS may respond verbally to comments received in order to provide clarification or further information.

10. So with that, we're going to open up comments regarding both the draft 2021-2022 AAP, and draft 2019-2020 AAP Amendment. So if you have a comment and are joining via webinar, please raise your hand so we can unmute you. If you're joining via phone, please press star nine to indicate you have a comment, and then press star six to unmute and remute yourself.

18. And then when providing a public comment, it would be helpful for us if you please state and spell your name, and then please state the organization you represent, if applicable.

22. And right before we get started, I just wanted to note that written comments can be addressed to the address or email below, and will be accepted from 5:00 p.m. on June 24th, 2021 -- Excuse me. My
So I would encourage the State to think development and homelessness. I think keeping that level of investment where it is is appropriate, especially in light of the HOME AAP funds that we expect to come out here hopefully later this year. One more consideration for the 2019-2020 AAP is allowing a single local government to have more than one open CDBG CARES application at a time, seeing as local governments and everybody else is facing just a myriad of challenges. I think for CDBG CARES funds, lifting that limitation of one grant per local government would best help Montanans meet our needs.

With regard to the 2021-2022 AAP, a couple of comments, thinking about funding allocations; again, encouraging the State to think of housing on par as far as priority with public infrastructure, and balancing that investment a little bit more equally.

One item also, thinking about upcoming grant applications and funding rounds, a lot of fantastic projects were funded last year, and due to circumstances beyond our control, practitioners are facing -- many are facing some significant budget shortfalls, given the costs of some materials and labor just going through the roof.

I would encourage the State to consider prioritizing last, credits that were awarded last year, making sure that those projects are whole and able to move forward in a successful manner, perhaps with a truncated and expedited application and award process. A lot of projects would be ready to go this summer or this fall but for some of these budget shortfalls that certainly were not predictable.

And one more item I guess is to consider communication and collaboration with the Montana housing folks who are in charge of the significant rewrite of the Qualified Allocation Plan for low income housing tax credits. They're certainly undergoing a significant effort, and I would encourage folks who are in charge of the CDBG, HTF, and HOME funds, to openly and often communicate with the tax credit folks over there, just to help facilitate successful projects, and all of the various competing requirements.

One more item, thinking about the CDBG funds in particular for 2021-2022 AAP, I would encourage the State to lift the $450,000 per project cap, like HOME did several years ago. We
And so any way we can support proper
infrastructure development and housing
and driving up prices.

people moving here, and buying our housing stock,
will have decades worth of impacts from the COVID,
say over the last year we've had more impacts and
had an issue, and there's been a need, but I would
consider allowing, is the Housing Trust Funds to
11 be used for operational support.

infrastructure, because we certainly have always
15 projects like the Neighborworks Great Falls
14 project in Great Falls, and other needs around the
13 communities in Montana, because I just don't know
12 what we don't know yet.  And so maximum
11 flexibility within those funding sources would be
10 good.

19 I do support also multiple applications
20 for different jurisdictions. There's definitely
19 different needs in communities, and having
21 multiple applications open would help us,
especially with the amount of funds coming in that
22 are above normal, and getting those allocated in
21 the projects right away would be important.

And so those are the comments that I
8 have. I will also be submitting written comments.
9 I appreciate everybody's time and all your
efforts. Thank you so much.

MS. CROWELL: Thank you so much for
12 those comments, Andrew. I'll pause right there,
13 just in case any of the panelists want to jump in.
14 But we really appreciate all of that.

MS. EGLI: I think that Heather McMilin
15 was the next to have her hand raised.

MS. McMILIN: This is Heather McMilin
18 with Homeward, last name is spelled M-C-M-I-L-I-N.
19 I'm assuming you guys can hear me all right.

MS. CROWELL: We can hear you well,
21 Heather. Thank you.

MS. McMILIN: Excellent. I just hit the
23 unmute indication four times. I didn't know if I
24 was turning things on and off. So thank you.

Again, Heather McMilin with Homeward,
25 investor. We have to have all the risks taken

and I want to echo a lot of what Andrew testified
1 to. There's been nothing simple about the last 16
3 months, and all the work that you all have done
4 and we have done on our end to implement projects,
5 and so thank you for coming to the point we are
6 today, and working with us, and taking testimony,
7 and basically surviving the last year.

One of the things I'd also like to echo
9 is considering housing infrastructure with any of
10 these funds. The even distribution to housing
11 across the board with infrastructure is important,
12 but also considering, if you are allocating to
13 jurisdictions for infrastructure expansion, that
14 certainly helps promote housing development.
15 And maybe there's a way to give priority
16 points for infrastructure projects that are
17 helping to promote the construction, and
18 preservation, and rehabilitation of housing as
19 infrastructure, because we certainly have always
20 had an issue, and there's been a need, but I would
21 say over the last year we've had more impacts and
22 will have decades worth of impacts from the COVID,
23 people moving here, and buying our housing stock,
24 and driving up prices.
25 And so any way we can support proper
I also echo the participating jurisdictions.

Montana Housing in their very much needed rewrite of the QAP in the process we're going through this year on that, and pairing these funds with the loan for housing tax credits, in the variety of projects that could be funded by that program. If we're all in concert together, we can simply get more done, and meet more need.

The other piece would be around the cost. We've all, as we've developed and tried to put homes over people's heads, roofs over people's heads, we have survived cost impacts and timing impacts that are also cost impacts to projects at an unprecedented level. We're facing tax credit pricing that's worse than it was when the IRS basically bought the credits back and paid the states their credits to be sold for equity. They were just paid and used as funds during that 2008-2009.

Really just talking to developers as a way to do a truncated kind of correction or addition to contracts, anything. Just consider having those conversations. We're all very creative, and we have survived the projects, at least we're trying to at this point, but any way we can be creative to help support these one time various impacts that we've seen due to the global pandemic would be helpful.

I think pretty much that's all I have for today. Thank you, Andrew, for setting the stage for at length testimony.

MS. AREY: Thank you so much, Heather. It looks like I don't see any other hands raised. I think, Shyla, you've had your --

Okay. We have some more. Okay. I saw Jim at the top of my list.

MR. MORTON: Good morning. Can you hear me?

MS. CROWELL: Yes, we can hear you, Jim.

MR. MORTON: So I want to echo what others have said in terms of appreciation for all the work that staff has put into the documents we have before us.

Just quickly, I wanted to support allowing applications, more than one application from a local government for CDBG. As it has been said, it's been a tough two years. Also with support of allowing the services component of CDBG to include multiple applications from jurisdictions.

I think the entitlement cities, and entitlement areas, and the code is reasonable. So by allowing multiple applications, both for services and for CDBG, should not disadvantage the non-entitlement areas.

And I just echo what both Heather and Andrew have said in terms of the housing component being much in need of consideration, in terms of coordination with other services and expanded amounts allocated. And we will provide from Human Resource Council written comments.

MS. CROWELL: Thank you so much, Jim.

Next I have Sindie on my list.

MS. KENNEDY: Hi, this is Sindie Kennedy. Can you hear me?

MS. CROWELL: Yes, I can hear you, Sindie. Thanks so much.


I, too, would like to echo what has already been said, and express my gratitude for all of the work that Commerce has done to make this all happen. It has been a challenging year for all of us.

I also want to reinforce some of the things that have been said. Definitely would really appreciate an open CDBG application process, so it's similar to HOME, so that we're not tied down to a deadline. Projects just kind of land in our laps throughout the entire year, and we've had to say no to many that were really good eligible projects because, one, we already had an application or project underway; and two, the timing wasn't right. So that would be really beneficial.

Being able to increase the amount of award above $450,000 would also be very beneficial; and balancing the housing with public infrastructure would be helpful. And I will be providing some written comments as well. Thank you.

MS. CROWELL: Thank you so much, Sindie.

Next I have Sherrie.

MS. AREY: This is Sherrie Arey from Neighborworks, Great Falls. I'm going to just hit on a few topics that have already been hit on, just to double down on them.

The multiple applications allowed for the local governments is critical to the success of the QAP in the process we're going through this year on that, and pairing these funds with the loan for housing tax credits, in the variety of projects that could be funded by that program. If we're all in concert together, we can simply get more done, and meet more need.

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1 for those. The Housing Trust Fund dollars being
2 allowed to use for operational support. In order
3 to use all of the tools in our tool box to help
4 with the homelessness issue, that could become a
5 make or break for a project, and so strongly
6 advocate for that.
7 And as Heather McMillin said, housing is
8 infrastructure. The more ability to tie those two
9 things together and help with the infrastructure
10 needs in our community is essential to being able
11 to provide affordable housing.
12 Thank you all for everything that you
13 do, and all the information you provided, and best
14 of luck. Thank you.
15 **MS. CROWELL:** Thank you so much,
16 Sherrie. Next on my list is Shyla. I'm going to
17 unmute you.
18 **MS. PATERA:** Good morning, MBOH and
19 Community Development Division staff. For the
20 record, my name is Shyla Patera, spelled S-H-Y-L-A
21 P-A-T-E-R-A, with North Central Independent Living
22 Services in Black Eagle, and the Montana Community
23 Living Task Force.
24 I'm really happy to participate in this
25 hearing today, and I am really supportive of

1 Montana's QAP efforts are moving forward, and
2 looking at the different funding sources, such as
3 the Housing Trust Fund and different things being
4 utilized for operation and different points,
5 different points of work, as some of the
6 developers and other housers have talked about.
7 Some of the things that again, NCILS and
8 the Independent Living Community for Montanans
9 with Disabilities espouse is making sure that we
10 have accessible access to both services in
11 sidewalk and infrastructure, but also in Home and
12 Housing Trust Fund.
13 Some of the things that have impacted us
14 through COVID are making sure that we also can
15 house our homeless, and some of the things that
16 I've thought of are looking at like accessible
17 tiny homes -- one in particular is based out of
18 Emmett, Idaho that I've been beginning to research
19 and hopefully will look at our zoning
20 opportunities, both for single family and
21 multi-family, and different things as well.
22 Just making sure that our people with
23 disabilities have access to HOME, Mainstream, and
24 811 if needed, and working with HUD and others to
25 make sure that people with disabilities aren't

1 moving from one house to another, but making sure
2 that they have stable opportunities that deal with
3 their funding sources that they are using.
4 I'd also like to encourage some funding
5 for accessible rehabbing of housing. We
6 encourage, of course, visible and accessible new
7 construction, and the universal design options,
8 but a lot of calls that we get are also, "How do I
9 rehab my house to make it so that I can age in
10 place?" "How do I, as a long term homeowner, get
11 to stay in our community as well, and with my
12 house that I already are owning, or paying on, or
13 working with?" And that's a big thing.
14 And infrastructure, we also encourage
15 communities to work on accessible pathways,
16 pedestrian crosses, contiguous sidewalks, timing
17 of things, development of accessible pathways for
18 walking, rolling, parking, biking, anything a
19 person with a disability needs.
20 And I will be submitting written
21 comments to follow my disjointed verbal ones.
22 Everyone have a great day. Thank you for all your
23 hard work.
24 **MS. CROWELL:** Thank you so much, Shyla.
25 They were not disjointed. We understood it all.

1 It looks like Heather had her hand up again, so
2 I'm going to unmute you.
3 **MS. McMILIN:** Thank you. I will amend
4 my previous testimony. Again, Heather McMilin,
5 Homeward, Missoula, Montana, M-C-M-I-L-I-N.
6 I would be remiss if I did not comment,
7 and appropriate or not. If there's any way this
8 department and the individuals on this call can
9 support the work that will go into the next round
10 of the state housing credit work at the
11 legislative level. It's something that made it
12 off the floor and to the Governor's desk, and
13 unfortunately was not signed. And that would
14 help, probably double the production of homes,
15 rehabilitations, preservation, within the state.
16 And so I wanted to go on the record to
17 say if there's a way to support or participate,
18 let us know. That would be great. Thanks.
19 **MS. CROWELL:** Thank you so much,
20 Heather. If there's any further comments, just
21 feel free to raise your hand. Again, if you're
22 joining us via phone, you can do that by pressing
23 star nine to indicate that you have a comment, and
24 then star six to unmute or remute yourself.
25 (No response)
MS. CROWELL: It doesn't look like we have any other comments, so we will keep this screen up for a couple of more seconds, just in case anybody needs to jot down where written comments can be sent. Again, it's at the bottom of this screen. It's the Montana Department of Commerce, Community Development Division, Attention: Con Plan, P.O. Box 200523, Helena, Montana, 59620-0523, or DOCConplan@mt.gov.

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

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

(No response)

MS. CROWELL: Okay. Thank you guys.

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

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CERTIFICATE

STATE OF MONTANA )
: SS.
COUNTY OF LEWIS & CLARK )

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

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

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

[Signature]

LAURIE C. CRUTCHER
NOTARY PUBLIC for the State of Montana
Residing at Helena, Montana
My Commission Expires March 9, 2024
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| 10 (3) | 12:14,23:13:25 |
| 11 (1) | 11:25 |
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| 27:24:28:6 |
| years (3) | 8:13:20:25:26:22 |

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| Zimmerman (1) | 2:18 |
| zoning (1) | 30:19 |
| Zoom (1) | 1:16 |

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| 1,000 (1) | 11:2 |
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| 16 (1) | 22:2 |
| 1st (1) | 15:23 |
The Montana Departments of Commerce and Public Health and Human Services Announce the Public Comment Periods for the 2019-2020 Annual Action Plan (AAP) Amendment, 2020-2021 Consolidated Annual Performance and Evaluation Report (CAPER), and 2021-2022 AAP

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

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

All documents are available electronically at

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

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

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

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

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

[https://commerce.mt.gov/Consolidated-Plan/Updates](https://commerce.mt.gov/Consolidated-Plan/Updates)
The Department of Commerce will make reasonable accommodations for persons with disabilities or persons with limited English proficiency who wish to participate in this process or need an alternative accessible format of this notice or presentation materials. Presentation materials will be provided in advance of the hearing. If you require an accommodation, please contact the Department of Commerce no later than 5:00 p.m. on June 16, 2021, to advise us on the nature of the accommodation that you need. Please contact Bonnie Martello or email DOCConPlan@mt.gov.

Have questions? Email DOCConPlan@mt.gov
June 3, 2021

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

Greetings,


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

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Community Development Division
Attention: Con Plan
301 S. Park Avenue
P.O. Box 200523
Helena, MT 59620-0523
DOCConPlan@mt.gov

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

Sincerely,

Cheryl Cohen, Acting Administrator
Community Development Division
301 S Park Avenue
Helena, MT 59601
June 3, 2021

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

Greetings,


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

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

Sincerely,

Cheryl Cohen, Acting Administrator
Community Development Division
301 S Park Avenue
Helena, MT 59601
June 3, 2021

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

Greetings,


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Sincerely,

Cheryl Cohen, Acting Administrator
Community Development Division
301 S Park Avenue
Helena, MT 59601
June 3, 2021

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

Greetings,


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

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

Sincerely,

Cheryl Cohen, Acting Administrator
Community Development Division
301 S Park Avenue
Helena, MT 59601
June 3, 2021

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

Greetings,


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Sincerely,

Cheryl Cohen, Acting Administrator
Community Development Division
301 S Park Avenue
Helena, MT 59601
June 3, 2021

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

Greetings,


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Sincerely,

Cheryl Cohen, Acting Administrator
Community Development Division
301 S Park Avenue
Helena, MT 59601
June 3, 2021

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

Greetings,


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

Sincerely,

Cheryl Cohen, Acting Administrator
Community Development Division
301 S Park Avenue
Helena, MT 59601
June 3, 2021

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

Greetings,


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

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Sincerely,

Cheryl Cohen, Acting Administrator
Community Development Division
301 S Park Avenue
Helena, MT 59601
June 3, 2021

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

Greetings,


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Sincerely,

Cheryl Cohen, Acting Administrator
Community Development Division
301 S Park Avenue
Helena, MT 59601
June 3, 2021

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

Greetings,


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Sincerely,

Cheryl Cohen, Acting Administrator
Community Development Division
301 S Park Avenue
Helena, MT 59601
June 3, 2021

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

Greetings,


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Sincerely,

Cheryl Cohen, Acting Administrator
Community Development Division
301 S Park Avenue
Helena, MT 59601
June 3, 2021

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

Greetings,


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

Sincerely,

Cheryl Cohen, Acting Administrator
Community Development Division
301 S Park Avenue
Helena, MT 59601
June 3, 2021

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

Greetings,


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Sincerely,

Cheryl Cohen, Acting Administrator
Community Development Division
301 S Park Avenue
Helena, MT 59601
June 3, 2021

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

Greetings,


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Sincerely,

Cheryl Cohen, Acting Administrator
Community Development Division
301 S Park Avenue
Helena, MT 59601
June 3, 2021

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

Greetings,


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Sincerely,

Cheryl Cohen, Acting Administrator
Community Development Division
301 S Park Avenue
Helena, MT 59601
June 3, 2021

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

Greetings,


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Sincerely,

Cheryl Cohen, Acting Administrator
Community Development Division
301 S Park Avenue
Helena, MT 59601
June 3, 2021

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

Greetings,


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Sincerely,

Cheryl Cohen, Acting Administrator
Community Development Division
301 S Park Avenue
Helena, MT 59601
June 3, 2021

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

Greetings,


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Sincerely,

Cheryl Cohen, Acting Administrator
Community Development Division
301 S Park Avenue
Helena, MT 59601
June 3, 2021

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

Greetings,


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Sincerely,

Cheryl Cohen, Acting Administrator
Community Development Division
301 S Park Avenue
Helena, MT 59601
June 3, 2021

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

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Cheryl Cohen, Acting Administrator
Community Development Division
301 S Park Avenue
Helena, MT 59601
June 3, 2021

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

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Sincerely,

Cheryl Cohen, Acting Administrator
Community Development Division
301 S Park Avenue
Helena, MT 59601
June 3, 2021

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

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Sincerely,

Cheryl Cohen, Acting Administrator
Community Development Division
301 S Park Avenue
Helena, MT 59601
Affidavit of Publication for the Newspaper Advertisements for the 2021-2022 AAP Public Hearing

Montana
NEwspaper AssociAtion

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

AFFIDAVIT OF INSERTION

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

ryan stavnes
Ryan Stavnés Member Relations
Date __________
6/29/2021

Subscribed and sworn to before me this 29th day of June __________ 2021.

Notary Public for the State of Montana
Residing at Helena, Montana
My commission expires __________.

My commission expires __________.
20_
Gaza’s bereaved civilians await justice

22 members of family killed in Israeli attacks

BY AFGHAN NEWS SERVICE

AFP PHOTO/MAHMOUD Hlothi

The besieged Gaza Strip is reeling from the worst violence in years, as Israeli air strikes and ground invasions killed scores of civilians and forced thousands to flee their homes. The Palestinian Health Ministry said at least 22 members of the same family were killed in an Israeli air strike on a residential building in Gaza City early on Wednesday.

The Israeli military confirmed the strike, which it said was in response to rockets fired from Gaza. It said the strike was hitting what it described as a Hamas military site.

The attack came after a week of intense fighting between Israel and Hamas, with both sides blaming each other for the collapse of a truce that ended a 10-day conflict in May.

A Gaza-based activist group for human rights said the family was killed when a rocket was fired from a distance of about 500 meters from their home.

The group said the family had been living in the building for more than 30 years and that there were several children among the victims.

The Israeli army said it was targeting Hamas military sites and that it had launched a widespread air campaign in response to rocket fire from Gaza.

The Israeli military said it had hit 120 targets in Gaza, including fighters and command posts.

The Palestinian Health Ministry said the attack had killed at least 22 members of the same family, including six children.

The Israeli military said it had launched a large-scale campaign to target Hamas infrastructure in response to rocket fire from Gaza.

The Israeli army said it had targeted Hamas command centers, fighters and weapons stores.

The campaign, which is the largest and most extensive in years, was aimed at neutralizing the threat posed by Hamas, the group that controls Gaza.

The Israeli military said it had destroyed dozens of tunnels and training camps used by Hamas fighters.