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FY2014-2015 Year Five

*of the FY2010-2014
Consolidated Plan*

City of Billings Comprehensive Annual Performance Evaluation Report



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TABLE OF CONTENTS

Section I - Executive Summary 3

 Introduction 3

 Summary of FY2010-2014 Consolidated Plan 4

 Significant Aspects of the Process 4

 Consolidated Plan Strategies 5

 Major Initiatives & Highlights 7

Section II - Funding Resources & Distribution Summary 8

 CDBG & HOME Funding, Expenditure Limits 8

 CDBG & HOME Administration / Public Service Activities 9

 CDBG & HOME Program Allocations 9

 Substantial Amendment to the Consolidated Plan 10

 Funding Status of CDBG & HOME Accounts 11

 CDBG & HOME Revenue 11

 Neighborhood Stabilization Program Resources 12

 Neighborhood Stabilization Program Income 12

 Billings City Council – Loan Program Allocation 12

 Geographic Area 13

 Lower-Income Household Concentration 13

 Race / Minority Concentration 14

 Geographic Investments 15

 Geographic Distribution for CDBG Public Service & HOME Multifamily Activities (Map) 15

 Geographic Distribution for CDBG Activities by Count 16

 CDBG Activities Funding (Map) 17

 HOME Activities Funding (Map) 18

 Median Household Income - 2010 Census Tracts (Map) 19

 Poverty Rate – 2010 Census Tracts 20

Section III - Overall Accomplishments 21

 Table 3A: Summary of Specific Objectives & Accomplishments (Chart) 22

 Five-Year Consolidated Plan Goals / Objectives Assessment 27

 Table 3A: Accomplishments / Recommendations (Chart) 30

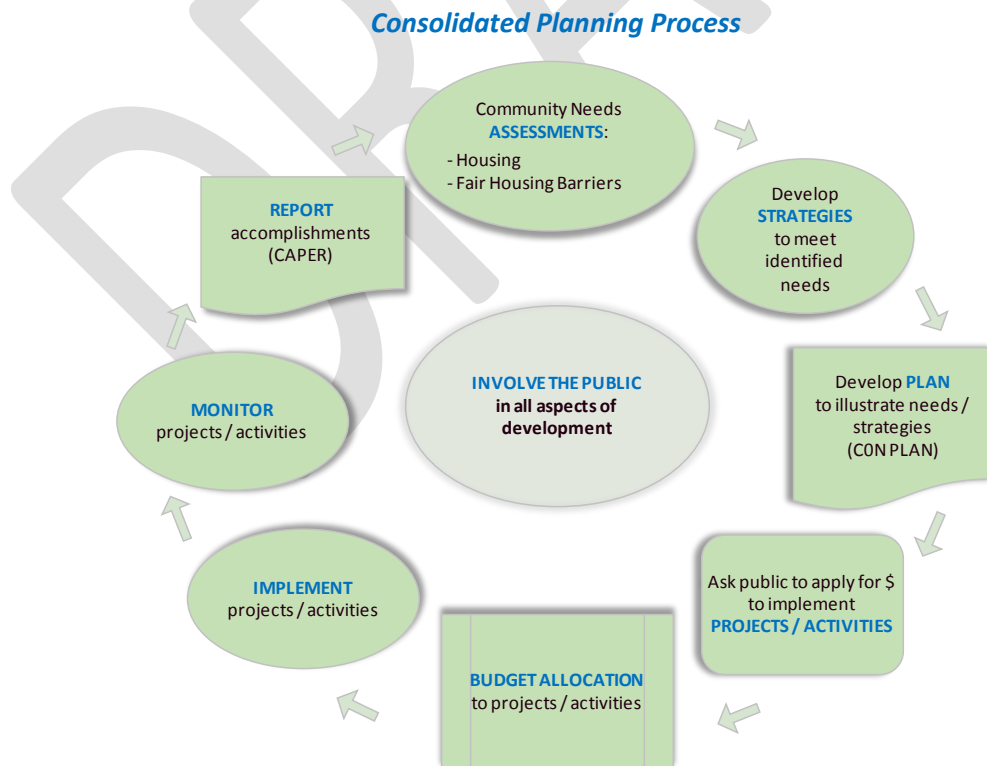
SECTION I - Executive Summary

Introduction

Presented herein is the City of Billings FY2014-2015 Comprehensive Annual Performance and Evaluation Report (CAPER) for the City's federally funded Community Development Block Grant (CDBG) and HOME Investment Partnership Programs (HOME). The FY2014-2015 CAPER covers the period from July 1 to June 30 and reports on the City of Billings' progress in meeting the goals established in the [FY2010-2014 Consolidated Plan](#) and the [City's Annual Action Plan](#). Reports utilized to develop the City's Consolidated Plan are also online, including the [Billings Housing Needs Assessment](#) and the [Analysis of Impediments to Fair Housing Choice](#). The City's general website address is www.ci.billings.mt.us.

The City's Consolidated Plan is a strategic planning document that identifies housing and community development needs and proposes strategies to address those needs with available resources. The Consolidated Plan initiative of the U.S. Department of Housing & Urban Development (HUD) combines the planning, application and reporting requirements of CDBG and HOME programs. Consolidated Plans and CAPERs are also submitted by the cities of Great Falls and Missoula and by the State of Montana. The State's Plan covers areas of Montana, outside Billings, Great Falls, and Missoula.

CDBG and HOME programs covered by the Consolidated Plan must primarily benefit low income persons and are intended nationally to provide decent housing, a suitable living environment, and expand economic opportunities for lower-income individuals. The needs and strategies described in the City's Consolidated Plan outline a specific course of action for the community's housing and community development activities. The City's plan sets forth goals and objectives that are used to measure progress in achieving the strategies described in the plan. The CAPER provides a report on the City's progress in meeting established goals and objectives.



The consolidation of the submission and reporting requirements for the CDBG and HOME programs allows the City of Billings to report on its various housing and community development activities in an effective and coordinated manner. It also reduces the duplication of effort for planning and reporting for these programs and affords the opportunity for citizen participation on the CDBG and HOME programs to take place in a comprehensive context.

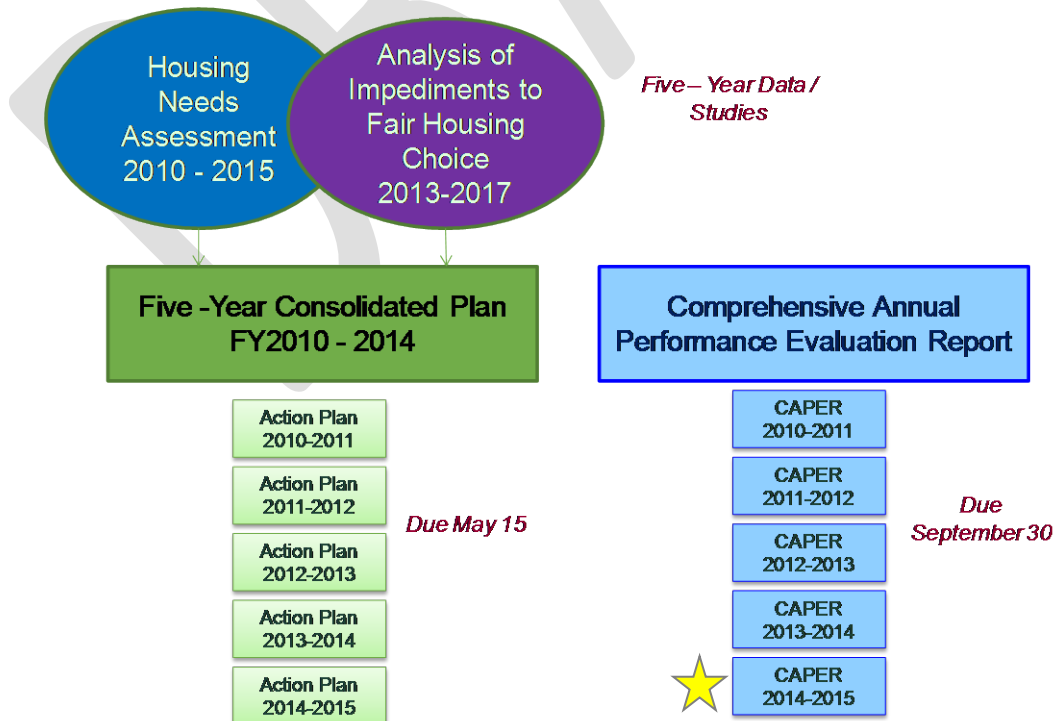
The structure and content of the Consolidated Plan and this CAPER are based on specific HUD requirements. Many terms used in this document are specific to the CAPER process and HUD programs, and the reader may consult the City of Billings Community Development office for assistance with interpretation. Although the Consolidated Plan initiative also covers the Emergency Shelter Grant program (ESG) and Housing Opportunities for Persons with AIDS program (HOPWA), the City of Billings is not an Entitlement City or Participating Jurisdiction for these programs and, as such, strategies for these programs are not included in the City’s Consolidated Plan or CAPER.

Summary of FY2010-2014 Consolidated Plan

The Billings City Council approved the FY2010-2014 Consolidated Plan on April 26, 2010. The development process included the completion of the *Billings Housing Needs Assessment* completed by City-County Planning Division and an *Analysis of Impediments to Fair Housing Choice (AI)* completed by Montana State University - Billings in 2007 and a subsequent AI was completed in 2013 by Planning / Communications.

Significant Aspects of the Process

The City utilizes significant public comment processes and coordinates input from various organizations and groups in order to maximize collaborative efforts while developing and implementing the Consolidated Plan. Both the *Housing Needs Assessment* and the *Analysis of Impediments to Fair Housing Choice* are utilized by City staff as **primary planning tools** for the development and implementation of Consolidated Plan activities.



Consolidated Plan Strategies

The following strategies were adopted by the City in its five-year Consolidated Plan to address Billings' housing and community development needs based on needs identified in the *Housing Needs Assessment and Analysis of Impediments to Fair Housing Choice*.

Strategy A. Promote the preservation of the existing supply of safe, affordable housing in the community:

- Provide direct, affordable financing and assistance to allow low and moderate-income homeowners to perform needed repairs to their homes.
 - Substantial housing rehabilitation for homeowner occupied, single-family units through the City's Housing Rehabilitation Program.
 - Emergency repairs and improvements to single-family and manufactured / mobile-home units through the City's Minor / Manufactured Home Repair program.
 - Provide lead-safe painting program for owner-occupied single-family and manufactured / mobile homes through the City's Painting Program.
- Provide affordable financing and assistance through partnerships to encourage developers and agencies to make needed repairs to existing housing stock for accessibility, safety and affordability, particularly for special needs populations.
 - Wheelchair and accessibility ramps for the disabled.
 - Rehabilitation for single and multi-family units serving special needs populations, including the homeless, the elderly and the disabled.

Strategy B. Promote new affordable housing opportunities:

- Encourage the development of new affordable single-family, multi-family, and special needs housing in the community through private developers and nonprofit organizations.
 - New construction and rehabilitation of housing units through the City's Affordable Housing Development Program.
 - Complete Kings Green Subdivision single-family development.
 - Support the efforts of the Housing Authority of Billings to increase and maintain the affordable housing stock in the community through the implementation of their five year plan.
 - Meet Community Housing Development Organization commitment and expenditure deadlines, as required by the HOME program.
- Providing affordable financing and support to increase access to homeownership and further homeownership opportunities.
 - Facilitate access to homeownership through the City's First Time Homebuyer Program.
 - Facilitate affordable financing through the use of the Montana Board of Housing mortgage program.
 - Encourage homeowner education throughout the community and specifically for participants of the First Time Homebuyer Program.
 - Support the efforts of the Billings Partners for American Indian Homeownership to increase homeownership opportunities for American Indians in Billings.

Strategy C. Work as an active partner with nonprofits, neighborhood groups, and others to address housing and community development specific to lower income and special needs households:

- Support partnerships and regular meetings to facilitate community participation and collaboration.
 - Provide staff support and facilitation for the following focus / community needs groups:
 - Affordable Housing Task Force.
 - Adjacent Neighborhood Committee.
 - Billings Partners for American Indian Homeownership.
 - Complete the *Analysis of Impediments to Fair Housing Choice* by December 2012 to implement activities for 2014-2019.
- Support task force newsletters and further capacity-building for self-sustainability.
- Encourage activities that promote fair housing and increase awareness of the rights of protected classes.
 - Continue to support organizations with an interest in fair housing in applying for the Fair Housing Initiatives Program grant and facilitate the application if necessary to ensure an application is submitted to HUD annually on behalf of the citizens of Billings.
- Encourage housing, community development organizations, social service agencies and businesses to work together to build strong community structures to better address needs and to respond to opportunities.
 - Provide staff support and facilitation for the Mayor's Committee on Homelessness.
 - Assist in the implementation of Welcome Home Billings, the City's ten-year plan to impact homelessness.

Strategy D. Promote the preservation and revitalization of the community's older neighborhoods:

- Preserve the housing stock in older lower income neighborhoods.
- Encourage infill development of vacant lots and redevelopment of substandard properties in lower income neighborhoods:
 - Provide financing through the Affordable Housing Development Program.
 - Promote the redevelopment of the 27th Street Corridor for remaining properties purchased through the CDBG and Tax Increment District programs.
 - Support activities that provide amenities, neighborhood stabilization and maintain infrastructure needs of older lower income neighborhoods.

Strategy E. Provide assistance to agencies serving lower income households and special needs populations to assist the homeless, the elderly, and those with disabilities.

- Provide CDBG Public Service funding to nonprofit organizations to provide basic needs assistance, job training and employment opportunities.
 - Provide CDBG Public Service funding allocation for basic needs assistance and supportive services.

Major Initiatives & Highlights

The City made significant strides in meeting the needs established through the Consolidated Plan through various strategies identified below.

Strategies	FY2014-2015 Accomplishments	Five-Year Accomplishments
A: Promote the preservation of the existing supply of safe, affordable housing in the community.	10 units were rehabilitated through City-supported programs, including to one home through the Foreclosure Acquisition / Rehabilitation program (see below).	118 total units have been rehabilitated through City-funded programs.
	Of these units, 10 received energy-efficiency improvements.	Energy-efficiency improvements were made in 80 of the units.
	3 units resulted in accessibility improvements for the disabled.	43 units were upgraded to increase accessibility.
B: Promote new affordable housing opportunities.	48 households achieved home ownership through the City's HOME First Time Homebuyer program.	207 households achieved homeownership. The City has assisted a total of 691 households achieve homeownership since the mid-1990s.
	104 households participated in eight hours of pre-purchase homebuyer education.	A total of 827 households have received homebuyer education supported by the City of Billings.
C: Active partnerships with non-profits, neighborhood groups and others to address housing and community development specific to lower income and special needs households.	City staff facilitated the following partnerships: <ul style="list-style-type: none"> - Affordable Housing Task Force - Billings Partners for American Indian Homeownership - Mayor's Committee on Homelessness 	
	33 AmeriCorps VISTA members were placed in Billings to support poverty / homelessness impact initiatives: 15 in July / August 2014; 14 in January 2015; and four Summer Associate members.	130 VISTA members have served in Billings over the past five years. A total of 140 members have been placed in Billings since 2007 and total project financial impact is valued at \$5.2 million.
D: Promote the preservation and revitalization of the community's older neighborhoods.	Five homes have been purchased through the foreclosure acquisition rehabilitation program to date.	
E: Provide assistance to agencies serving lower income and special needs populations, particularly the homeless, the elderly, minorities and those with disabilities.	3,153 individuals were served through the VISTA program this fiscal year and noted assistance through newly developed anti-poverty programs.	Over the past five years, the VISTA program has served 5,680 new clients and other Public Service activities have assisted over 11,500 clients.

SECTION II - Funding Resources & Distribution Summary

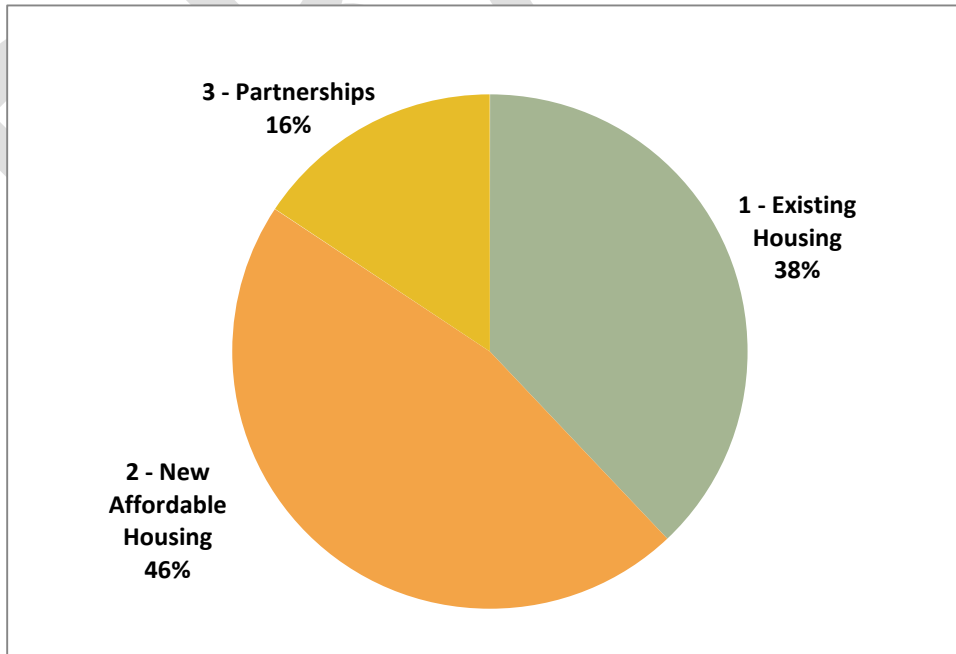
CDBG & HOME Funding, Expenditure Limits

The Community Development Division received funding from CDBG and HOME based on Federal formula grants as an entitlement. All funding has been committed and City staff has drawn \$1,309,619 for all eligible expenditures for activities conducted within the City of Billings limits.

Source		Amount	Committed	Expenditures in FY2014-2015		
				Previous Year Allocations	FY14-15 Allocations	Total Expenditures
CDBG	New Entitlement	\$556,352	100%	\$230,070	\$343,370	\$573,440
	Program Income	\$34,525				
	Reprogrammed Funding	\$2,474				
	TOTAL BUDGET:	\$593,351				
HOME	New Entitlement	\$301,712	100%	\$15,165	\$721,014	\$736,179
	Program Income	\$0				
	Recaptured / Repayment	\$370,724				
	TOTAL BUDGET:	\$672,436				

Totals include amounts spent during the current fiscal year, including expenditures from previous year allocations.

Funding Commitments for CDBG and HOME by Consolidated Plan Strategy



Please refer to previous page for Consolidated Plan Strategies

CDBG & HOME Administration / Public Service Allocations

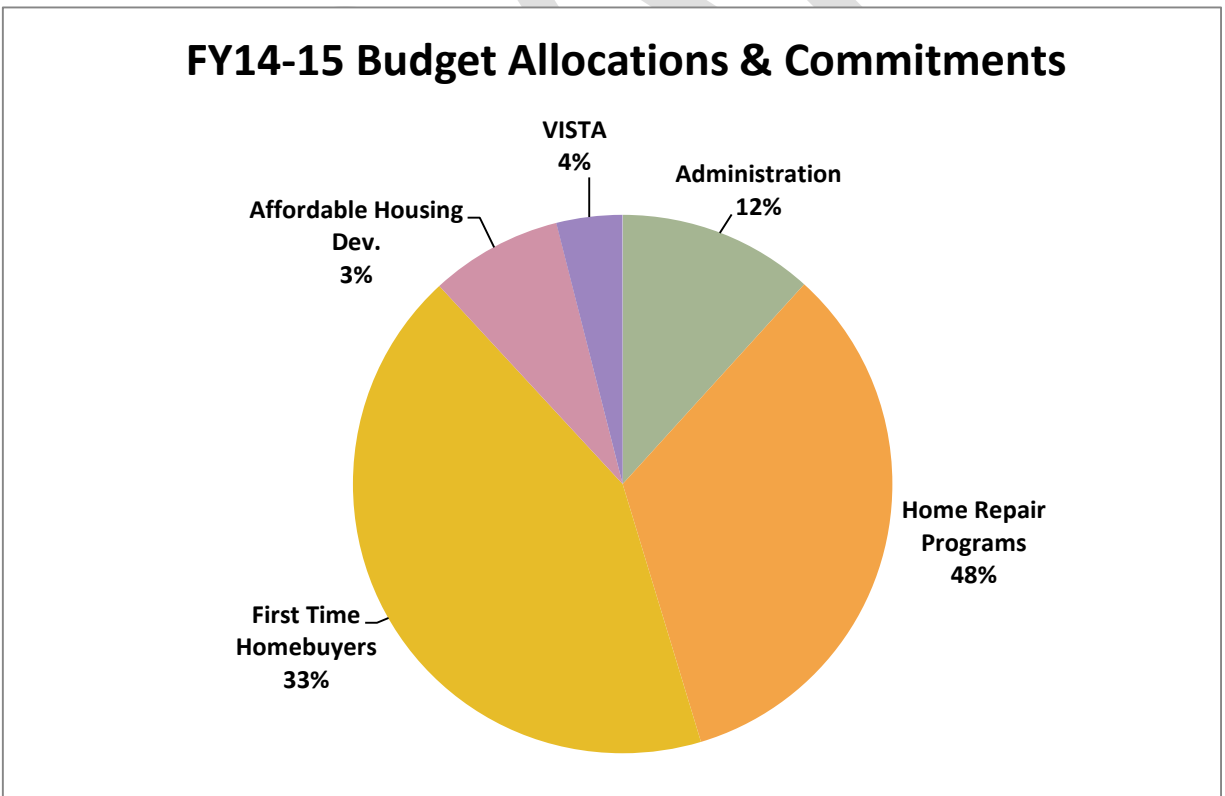
CDBG administration and planning activities were budgeted at \$118,175 which is 20% of the new CDBG allocation in addition to eligible program income left over from the previous year and including income from the current year (see previous page). The budget also included funding in projects which were cancelled or completed and reimbursements from the Minor Home Repair program, which cannot be included in administration cost calculations. One hundred percent of available funding was targeted to benefit the low to moderate income households.

HOME administration activities were budgeted \$30,171 which includes 10% of new HOME revenue (see previous page). As First Time Homebuyer funding returned to the City prior to the affordability period expiring is considered “recaptured” funding, no additional “program income” has been received and considered eligible for additional administration expenses.

A total of \$50,000 was allocated to CDBG Public Service Activities, which is well below the \$95,915 Public Service Cap. An additional \$1,200 was budgeted from reprogramming Public Service prior year commitments.

CDBG & HOME Program Allocations

The majority of funding received from CDBG and HOME was allocated to the City’s Housing Rehabilitation and Manufactured Home Repair loan programs. The First Time Homebuyer program for down payment and closing cost assistance was also highly funded. The Affordable Housing Development program funding was reserved for allocation and commitment prior to June 30, 2016.



Allocation recommendations conform to pre-determined spending requirements on several categories including: CDBG and HOME Administration caps (maximum of 20% and 10% of new funding prospectively); Public Service Caps (up to 15% of new CDBG funding); and Community Housing Development Organizations (at least 15% of new HOME funding).

CDBG:

- **Administration, \$118,175:** General administration expenditures, salary and benefits to support staff managing CDBG funding and activities.
- **Housing Rehabilitation Loan Program, \$375,176:** Housing rehabilitation financing to support low-income homeowners to make needed repairs to their homes. Loans are 0% interest, no-payments due until the house is sold / refinanced.
- **Foreclosure Acquisition / Rehabilitation Loan Program, Original Allocation \$0:** Funding to support the purchase of vacant and foreclosed properties for the purpose of rehabilitation and direct homeownership assistance to income qualified homebuyers as their primary residence. The purpose of the program is to stabilize neighborhoods, stem the decline of house values of neighboring homes due to foreclosure, and to preserve decent affordable housing.
- **Manufactured Home Repair Loan Program, \$50,000:** This loan program supports low-income manufactured home owners and provides affordable financing to make needed improvements. This program is intended to revitalize established neighborhoods and preserve the existing affordable housing stock through the completion of repairs to manufactured housing.
- **VISTA Support, \$50,000:** This public service activity would support costs to implement the Billings Metro VISTA Project. These AmeriCorps members work on poverty impact issues in the community including hunger, homelessness, education, and veterans / military family support.

HOME:

- **Administration, \$30,171:** General administration expenditures, salary and benefits to support staff managing HOME funding and activities.
- **Community Housing Development Organization, \$45,257:** Support is allocated to Homeward's Pheasant Home affordable rental housing project. A minimum of 15% of the HOME annual allocation is required by HUD to be reserved for Community Housing Development Organizations (CHDOs) for new housing development activities.
- **First Time Homebuyer Loan Program, \$542,008:** This program provides financial resources to support low-income first time homebuyers with down payment and closing costs. Assistance is based on household size and income. Loans are 0% interest, no-payments due until the home is sold / refinanced.

Substantial Amendment to the Consolidated Plan

A substantial amendment to the FY2014-2015 Annual Action Plan / Consolidated Plan was completed in January 2015 to allocate both repaid funds and program income received during the current fiscal year to previously approved activities.

Program Income: Following HUD's review of the City's FY2013-2014 Comprehensive Annual Performance Evaluation Report, staff was tasked to immediately utilize program income received in both the CDBG and HOME programs. In previous years, City staff has allocated actual program income received during a calendar year to the following fiscal year to rely solely on actual income received. HUD is now requiring the City to

estimate and allocate program income in advance of receipt to expeditiously utilize funding as it becomes available to the City.

HOME Program: The City is in receipt of \$130,436 in HOME funds which was to be repaid to HUD due to an unsuccessful affordable housing project. HUD representatives indicated approval of the City’s request to deposit these funds in the City’s line of credit to be utilized for eligible HOME activities. In addition, the City amended the FY2014-2015 Annual Action Plan to include the use of an estimated \$250,000 in HOME program income received from July 1, 2014 to June 30, 2015 for eligible activities including First Time Homebuyer and Affordable Housing Development programs.

CDBG Program: The City also proposed to allocate an estimated \$150,000 in CDBG program income received from July 1, 2014 to June 30, 2015 for previously approved and eligible activities as described in the FY2014-2015 Annual Action Plan including Administration, Housing Rehabilitation, Manufactured Home Repair, First Time Homebuyer, Foreclosure Acquisition Rehabilitation, Affordable Housing Development and the Billings Metro VISTA Project.

Funding Status of CDBG & HOME Program Accounts

<i>Fiscal Year</i>	<i>CDBG</i>	<i>As of June 30, 2015</i>
2013-2014	First Time Home Buyer	\$32,370
2014-2015	Billings Metro VISTA Program	\$15,816
	Housing Rehabilitation Loan Program	\$151,736
	Manufactured Home Loan Program	\$30,833
	Foreclosure Acquisition / Rehabilitation Program	\$24,988
<i>Fiscal Year</i>	<i>HOME</i>	<i>As of June 30, 2015</i>
2014-2015	Affordable Housing Development	\$25,860
	Community Housing Development Organization Reserve	\$45,257

CDBG & HOME Revenue

Revenue received for the completed FY2014-2015 includes:

CDBG	
Housing Rehabilitation Repayment	\$120,334
Rental Rehabilitation Repayment	\$30,000
Interest on Deferred Loans	\$48
TOTAL FY2014-2015 CDBG Revenue	\$150,382
HOME	
First Time Homebuyer Recaptured Funds	\$179,908
Other Income	\$1,023
TOTAL FY2014-2015 HOME Revenue	\$180,931

Neighborhood Stabilization Program Resources

The Billings City Council approved a Substantial Amendment to the City of Billings' Annual Action Plan for FY2008-2009 on January 26, 2009 to utilize funds provided under the Housing and Economic Recovery Act of 2008 (HERA) (Pub. L. 110-289, 122 Stat. 2654, enacted July 30, 2008) through the HUD Neighborhood Stabilization Program (NSP). The geographic area covered in the Action Plan and amendment is the City of Billings municipal boundaries, with priority emphasis on areas with a high foreclosure risk in low income task force areas.

The NSP provided \$19.6 million in CDBG funds to the Montana Department of Commerce (MDOC) to acquire and redevelop foreclosed properties that might otherwise become sources of abandonment and blight within communities. In addition, the funds could also be used to purchase foreclosed or abandoned homes and to rehabilitate, resell, or redevelop these homes in order to stabilize neighborhoods and stem the decline of house values of neighboring homes.

The City of Billings was awarded \$569,314 from MDOC and has utilized program funding in a manner that complies with regulations established by HUD. This includes obligating funding via contract for service within 18 months of HUD's approval of the MDOC's Action Plan Amendment and full expenditure of obligated funds within 48 months of HUD's approval date.

Neighborhood Stabilization Program Income

Approximately \$100,000 in program income was anticipated from the sale of vacant and foreclosed homes to low income households as acquisition funds are repaid to the City. The City received \$90,242 from the sale of one properties (North Park homes) during FY2014-2015. Funding was utilized to further the goals of the NSP program and an additional property was purchased this fiscal year for rehabilitation and sale to a low income household.

Billings City Council - Loan Program Allocation

On March 25, 2013 the Billings City Council voted to allocate a total of \$250,000 in non-federal funding to support a *Home Reinvestment Loan Program*. Funds have been dedicated to the City's First Time Homebuyer program and the program was opened for beneficiary allocation on May 1, 2013. The program has been managed in the same manner as HOME funds have been utilized in order to preserve the integrity of the program. This allocation marks the first significant financial investment the Billings City Council has made to Community Development programs. A total of \$200,000 has been expended in this fund to date. An additional \$50,000 remains for allocation to eligible projects.

Geographic Area

91.220(d)

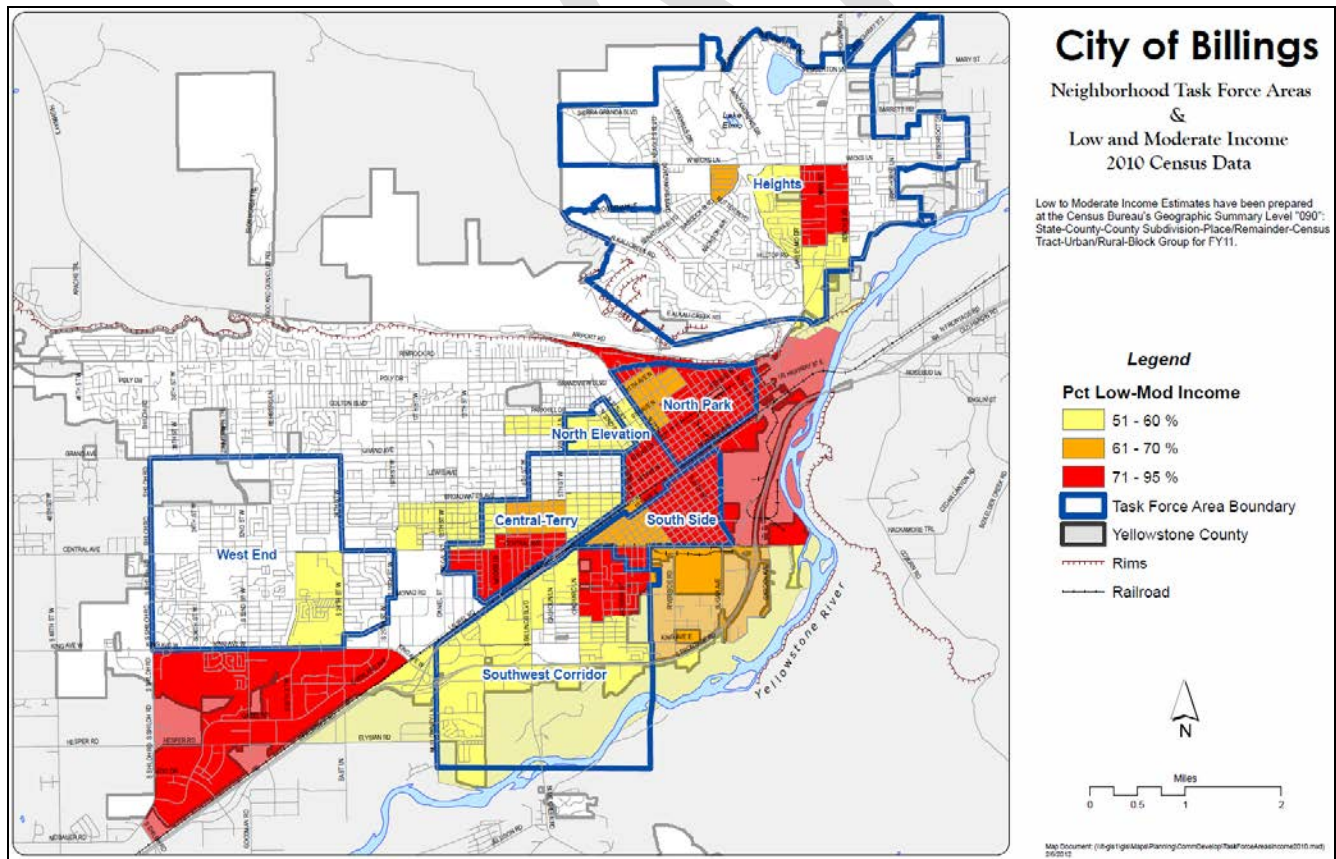
The geographic area served by the Consolidated Plan is defined by the current City of Billings limits. The City has focused distribution of investments on a citywide basis in order to support diversity and mixed-income development across the community. The City's performance in serving predominantly low income households is clear via Integrated Distribution Information System reporting; nearly 100%.

Neighborhood Revitalization Strategy areas **have not been established** in Billings and there is no specific amount of funding allocated for a target area in the City's geographic distribution of resources. **Therefore, the City has dedicated 0% of funding to target areas in favor of supporting a citywide approach to further fair housing, equal opportunity and anti-segregation efforts.**

Lower-Income Household Concentration

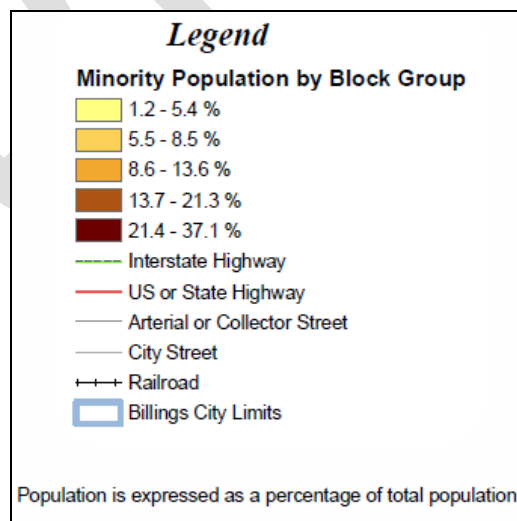
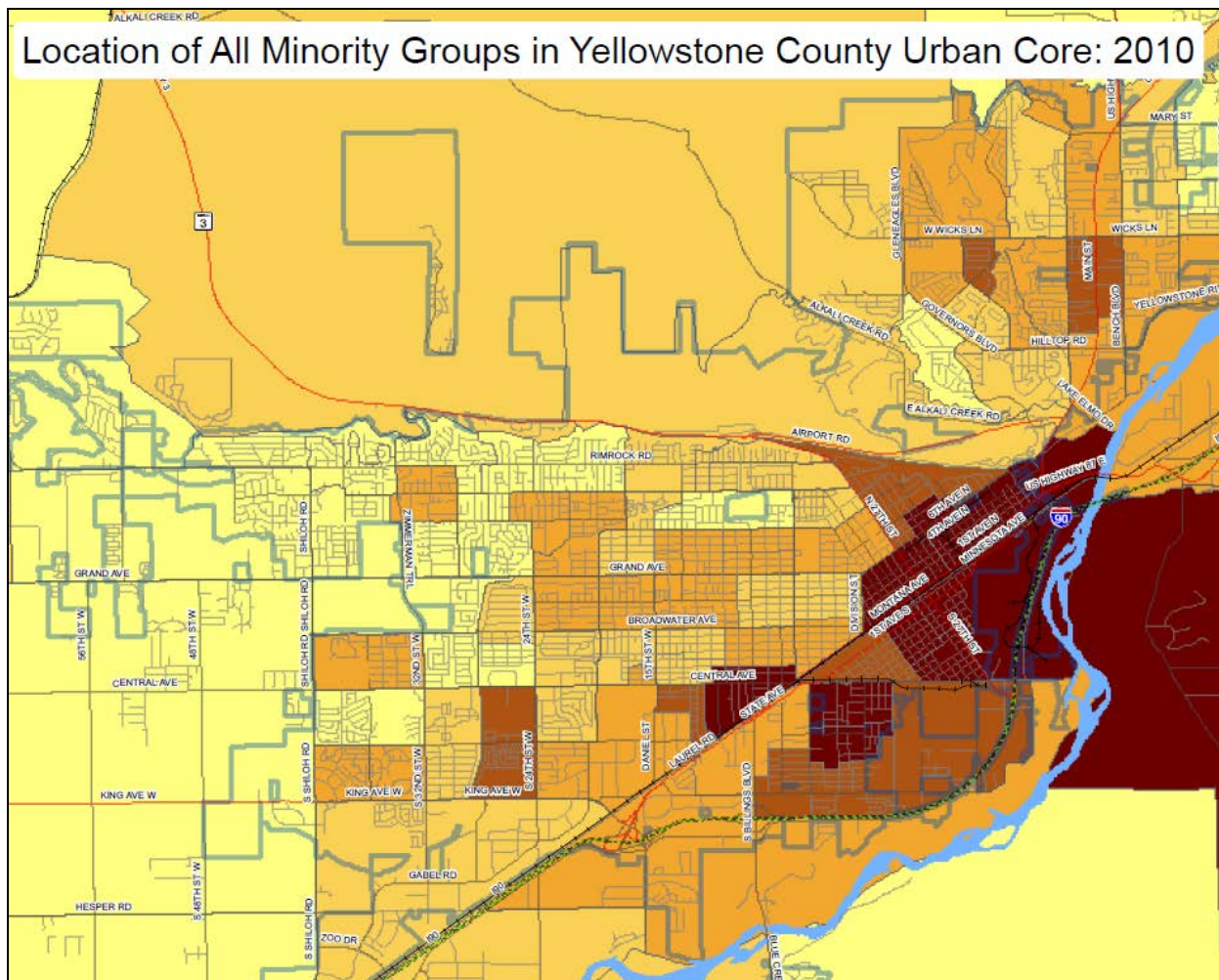
The strategies identified in the Consolidated Plan will be addressed on a citywide basis to encourage the distribution of low-income affordable housing and other assistance to lower income households throughout the community. Strategy D targets assistance provided through CDBG and related programs to lower income neighborhoods of the communities where the majority of the City's affordable housing stock is located. The map below identifies areas of the community with lower income population concentrations to allow further prioritization of limited resources. The low income areas identified on the map maintain the presumption of affordability for the purposes of affordable housing development, recapture / resale and federal investment.

Lower Income Areas in Billings



Racial / Minority Concentration

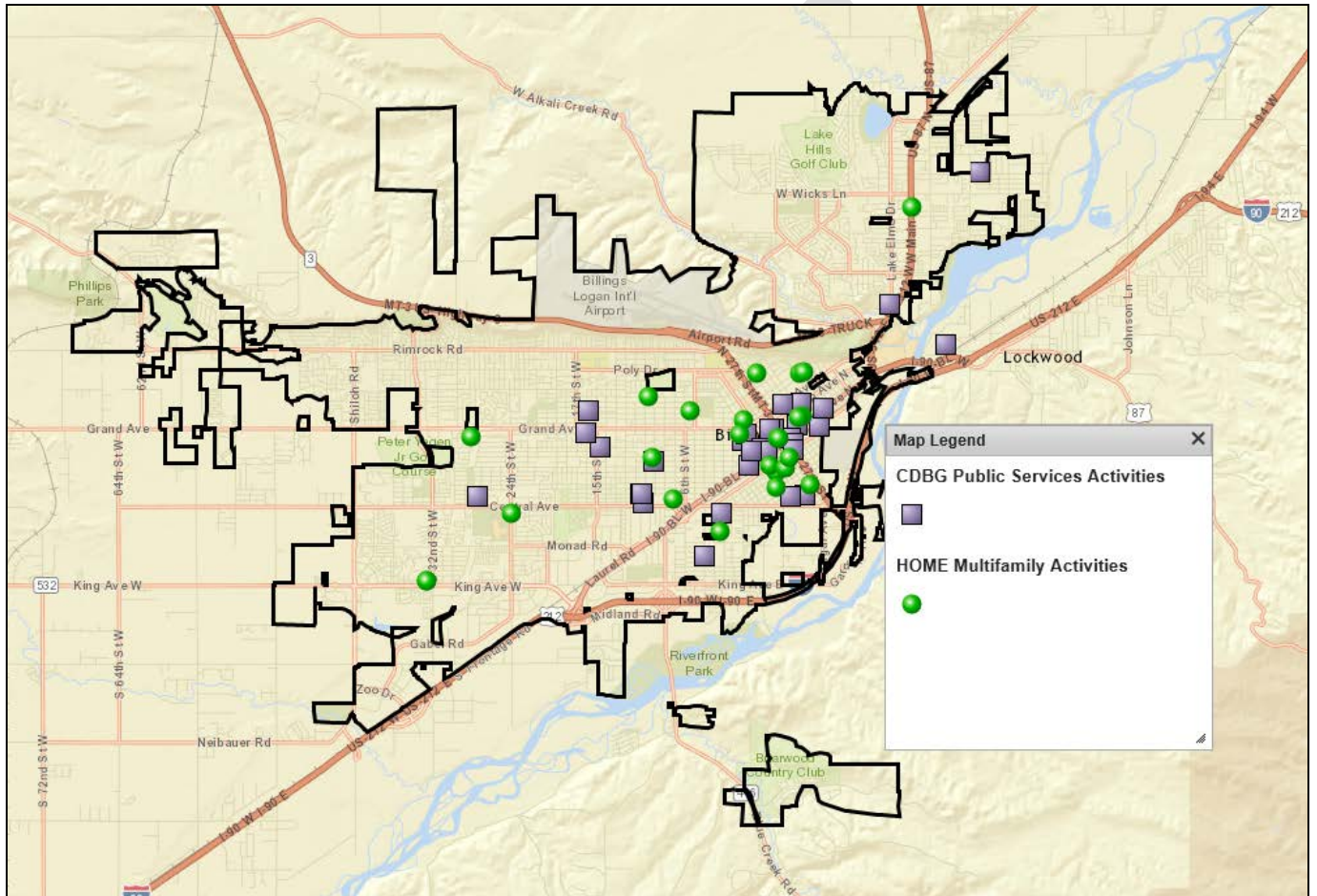
In 2012, the City generated a map illustrating the results of the 2010 Census relating to concentrations of racial / ethnic minorities. The resulting map below shows the highest concentration of protected class residents in Billings.



Geographic Investments

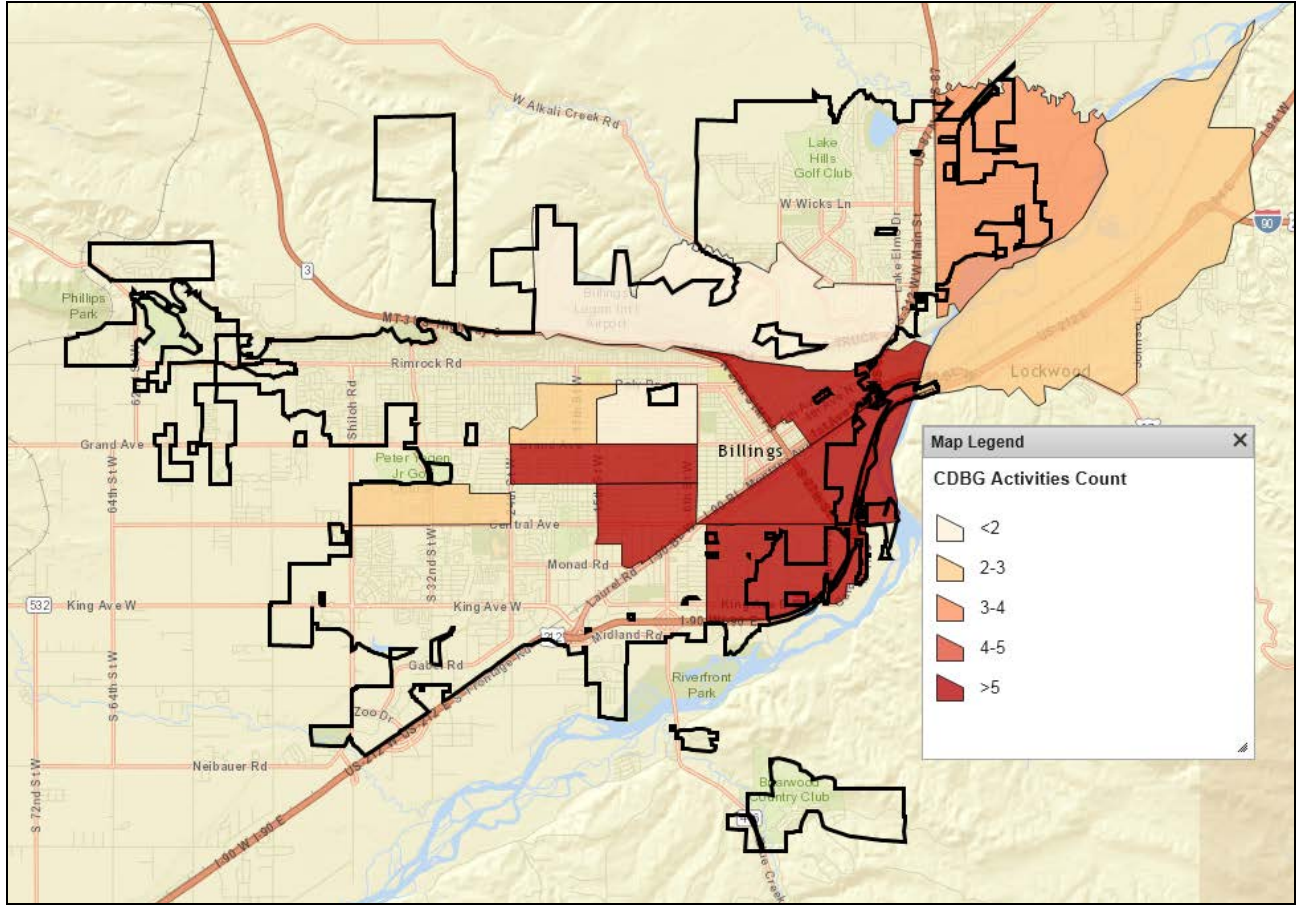
The City of Billings is the largest city with the highest population in the state. However, the city only has an estimated population of nearly 104,000 in 2008, according to the 2010 Billings *Housing Needs Assessment*. Billings would be classified as a smaller city on a national scale. **Therefore, the City focuses distribution of investments on a citywide basis in order to support diversity, equal opportunity, integrated living patterns and mixed-income development across the community.**

Geographic Distribution for CDBG Public Service & HOME Multifamily Activities



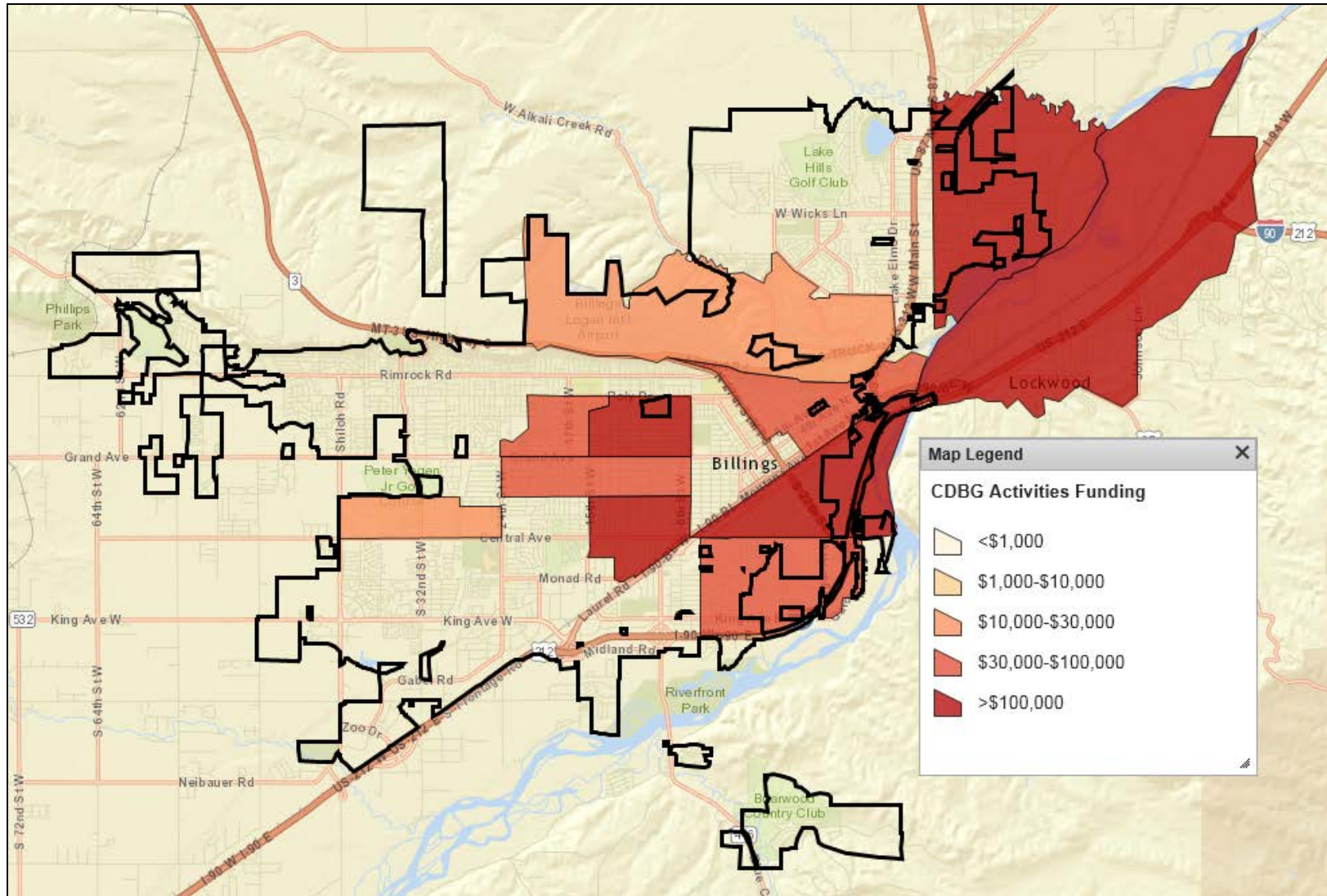
Retrieved August 21, 2015: <http://eqis.hud.gov/cpdmaps>

Geographic Distribution for CDBG Activities by Count



Retrieved August 21, 2015: <http://egis.hud.gov/cpdmmaps>

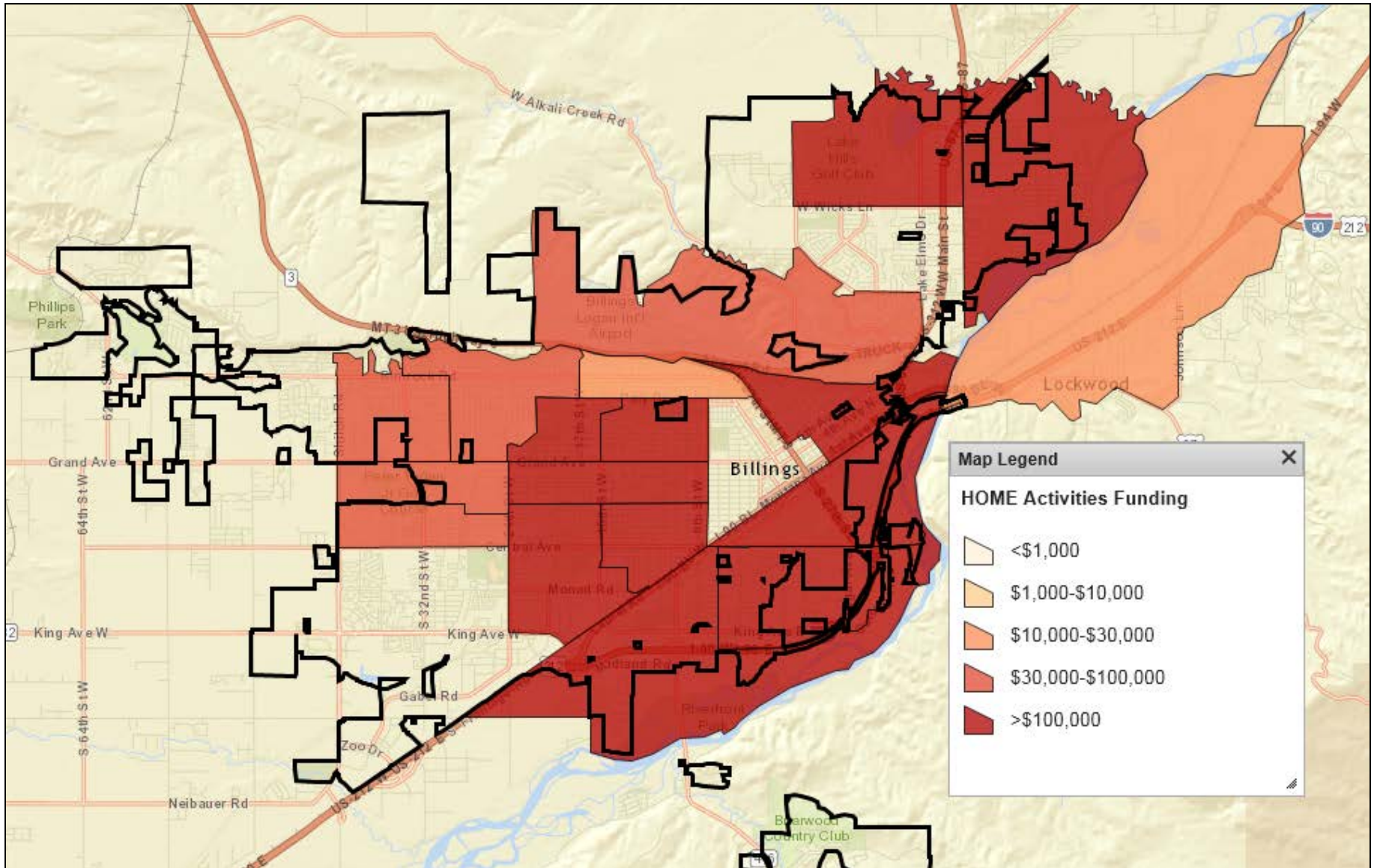
CDBG Activities Funding



Retrieved August 21, 2015: <http://eqis.hud.gov/cpdmaps>

Projects in the Lockwood area (eastern section of map) were not funded through the City of Billings.

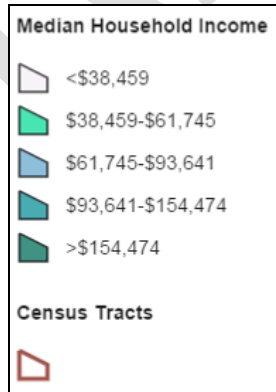
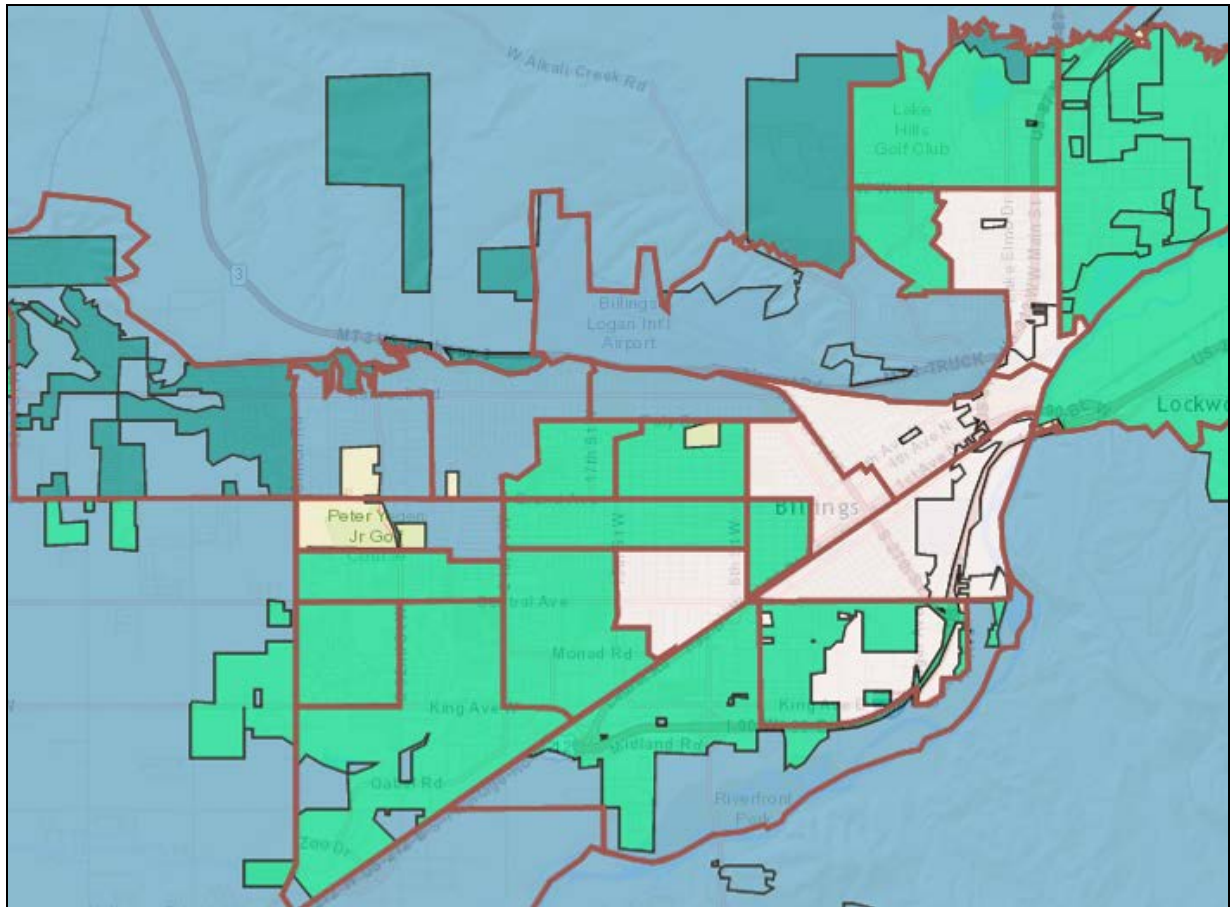
HOME Activities Funding



Retrieved August 21, 2015: <http://eqis.hud.gov/cpdmaps>

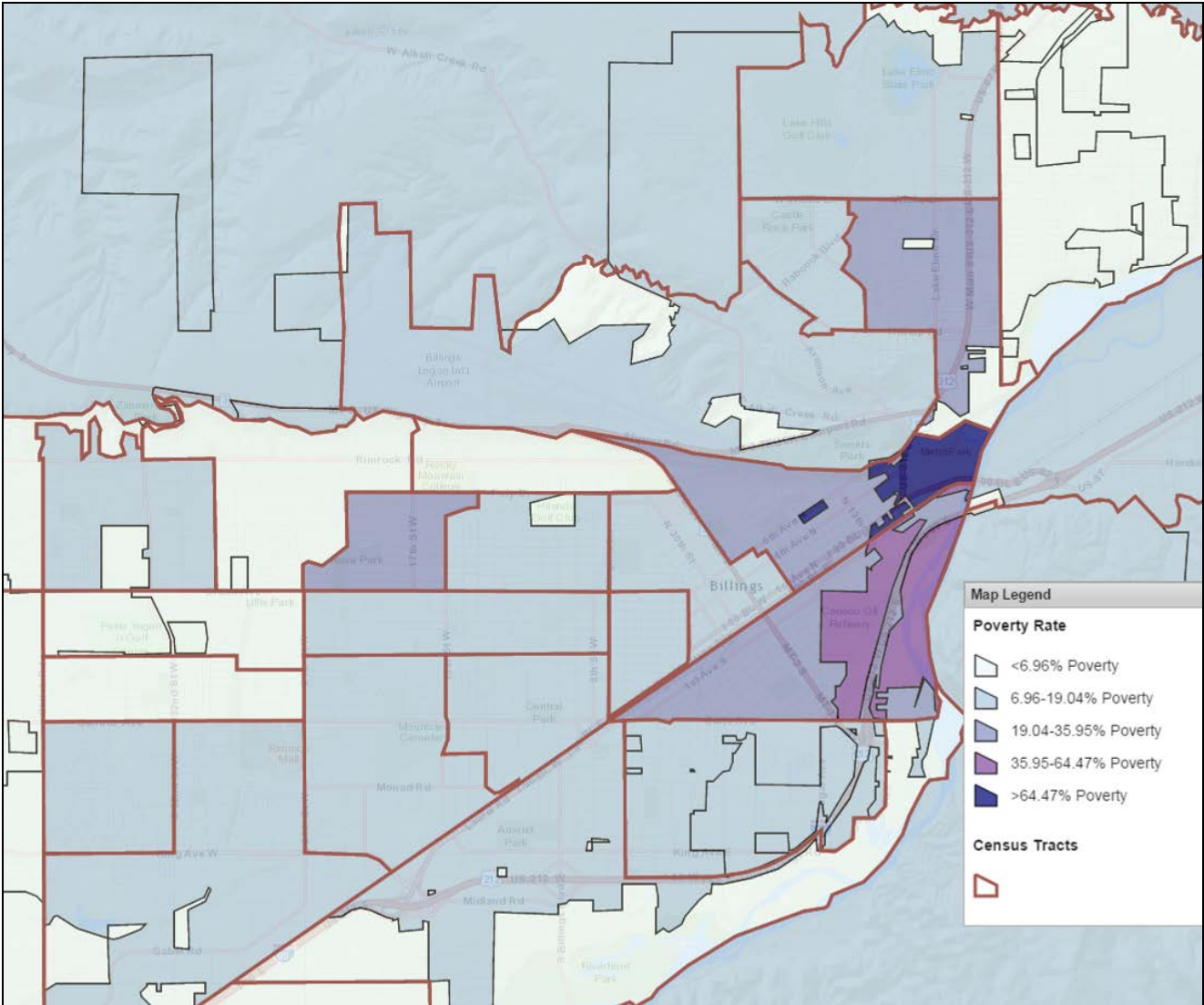
Median Household Income - 2010 Census Tracts

Median Household Income is \$59,500 for a household of four individuals as of May 1, 2014



Retrieved August 21, 2015: <http://eqis.hud.gov/cpdmaps>

Poverty Rate - 2010 Census Tracts



Retrieved August 21, 2015: <http://eqis.hud.gov/cpdmaps>

SECTION III - Overall Accomplishments

HUD has developed specific tables to assist in clarifying reporting for activities undertaken by jurisdictions receiving CDBG and HOME funding. HUD’s **Table 3A, Version One**, *Summary of Specific Annual Objectives*, is a summary of specific annual objectives which organizes objectives by type, including rental housing, owner housing, special needs, community development, public facilities, public services, and economic development. The table identifies sources of funds, performance indicators, expected numbers, actual numbers and the identification of HUD’s established outcomes / objectives.

HUD has developed specific performance measurements for each activity undertaken utilizing CDBG and / or HOME funding. The City’s application process for funding through these programs includes identification of HUD objectives and outcomes to ensure compliance with activity requirements. HUD’s **Table 3A, Version Two** is a summary of specific annual objectives which organizes objectives by HUD’s established outcomes / objectives, including:

- Availability / accessibility of decent housing (DH-1)
- Affordability of decent housing (DH-2)
- Sustainability of decent housing (DH-3)
- Availability / accessibility of suitable living environment (SL-1)
- Affordability of suitable living environment (SL-2)
- Sustainability of suitable living environment (SL-3)

HUD OBJECTIVES / OUTCOMES MATRIX			
	<i>Availability / Accessibility</i>	<i>Affordability</i>	<i>Sustainability</i>
<i>Decent Housing</i>	DH-1	DH-2	DH-3
<i>Suitable Living Environment</i>	SL-1	SL-2	SL-3
<i>Economic Opportunity</i>	EO-1	EO-2	EO-3

Version Two also identifies sources of funds, performance indicators, expected number, actual number and percent completed.

The Table 3A provided herein meets the requirements of both versions (One and Two, described above). Goals related to capacity-building for non-profit organizations and administrative support tasks such as newsletter distribution for low-income neighborhood task forces do not relate well to the established HUD Outcomes / Objectives matrix, and are therefore identified in the table as “Admin” for respective programs.

SUMMARY OF SPECIFIC OBJECTIVES & ACCOMPLISHMENTS - TABLE 3A

July 1, 2014 through June 30, 2015

Strategy	Objective	Activity	HUD Objective Category	Measurement Type	Five-Year Goals	FY14-15 Goals	FY14-15 Outcomes	# 5-Yr Goal Met	% 5-Yr Goal Met	HUD Objectives / Outcomes	Funding Source
A: Promote the preservation of the existing supply of safe, affordable housing in the community.	Provide direct, affordable financing and assistance to low-income homeowners for the completion of needed repairs.	Housing Rehabilitation Loan Program	Owner Housing	Housing Units	50	15	6	52	104%	SL-2	CDBG
		Acquisition / Weatherization	Owner Housing	Housing Units	1	Program Ended	-	1	100%	SL-3	CDBG-R
		Manufactured Home Repair Program	Owner Housing	Housing Units	100	5	4	44	44%	SL-2	CDBG
		Foreclosure Acquisition / Rehabilitation	Owner Housing	Housing Units	4	1	0	5	50%	EO-2	NSP & CDBG
		Painting Program	Owner Housing	Housing Units	10	-	5	50%	SL-2	CDBG	
	Provide financing and assistance through partnerships to facilitate needed repairs for special needs populations.	Wheelchair and accessibility ramps	Rental & Owner Housing	Ramps - Housing Units	30	Needs to be met through above loan programs due to low funding	-	17	57%	DH-1	CDBG
		Rehabilitation for special needs populations	Owner Housing	Housing Units	15		-	9	60%	DH-2	CDBG
	Benchmark Performance Measures	# units rehabilitated through City programs:					-	10	-	-	-
		# units rehabilitated through partnership programs:					-	0	-	-	-
		% of total funding allocated to enhance existing housing:					-	38%	-	-	-
# units resulting in energy-efficiency improvements:					-	10	80	-	-		
# units resulting in ADA improvements:					2	3	43	-	-		

Strategy	Objective	Activity	HUD Objective Category	Measurement Type	Five-Year Goals	FY14-15 Goals	FY14-15 Outcomes	# 5-Yr Goal Met	% 5-Yr Goal Met	HUD Objectives / Outcomes	Funding Source
B: Promote new affordable housing opportunities.	Encourage the development of new affordable single-family, multi-family and special needs housing in the community through private developers and non-profit organizations.	Affordable Housing Development Program	Rental & Owner Housing	Housing Units	100 Renter 14 Owner	16 Total / 4 CHDO Units	16 / 4	16 / 4 Renter 14 Owner	16% 100%	SL-2	CDBG & HOME
		Support the efforts of the Housing Authority of Billings	Rental & Owner Housing	Five-Year Plan Implemented	1	1	1	1	100%	DH-2	CDBG & HOME Admin
		Meet CHDO commitment / expenditure deadlines	Rental & Owner Housing	Years in compliance	5	1	1	5	100%	SL-2	HOME
	Provide affordable financing and support to promote homeownership opportunities.	First Time Homebuyer Program	Owner Housing	Households	175	40	48	207	118%	SL-2	CDBG & HOME
			Owner Housing	Cumulative Households (June 1, 2009: 484)	659	-	691	-	-	-	-
		First Time Homebuyers - MBOH Loan Use	Owner Housing	Households	35	3	21	69	197%	DH-2	-
			Owner Housing	Leveraged Funding	\$4M	\$0.3M	\$2,820,548	\$8,660,868	217%	-	-
		Homebuyer Education	Rental & Owner Housing	Households	1,000	100	104	827	83%	EO-3	CDBG & HOME
		Billings Partners American Indian Homeownership	Rental & Owner Housing	Homeownership Rate (1992 benchmark: 22%)	40%	.08	35%	-	-	EO-1	CDBG & HOME Admin
	Benchmark Performance Measures	% of total funding allocated to promote new housing opportunity:					-	46%			-

Strategy	Objective	Activity	HUD Objective Category	Measurement Type	Five-Year Goals	FY14-15 Goals	FY14-15 Outcomes	# 5-Yr Goal Met	% 5-Yr Goal Met	HUD Objectives / Outcomes	Funding Source
C: Active partnerships with non-profits, neighborhood groups and others to address housing and community development specific to lower income and special needs households.	Support partnerships and regular meetings to facilitate community participation and collaboration.	Affordable Housing Task Force	Rental & Owner Housing	Monthly Meetings	50	4	4	31	62%	DH-2	CDBG & HOME Admin
		Billings Partners American Indian Homeownership	Community Development, Special Needs	Monthly Meetings	50	4	4	32	64%	EO-1	CDBG & HOME Admin
		Analysis of Impediments to Fair Housing Choice completed in December 2012 to implement activities	Community Development, Special Needs	Analysis / Plan completed	1	1	1	1	100%	SL-1	CDBG & HOME Admin
	Support task force newsletters and further capacity-building for self-sustainability.	Task Force newsletter support	Community Development, Special Needs	Newsletters / Post Cards	50,000	Inadequate Funding	-	13,812	28%	SL-1	CDBG Admin
	Encourage activities that promote fair housing and increase awareness of the rights of protected classes.	Continue to support organizations with an interest in fair housing to apply for FHIP, facilitate application if necessary	Community Development, Special Needs	Annual submission of FHIP grant representing residents of Billings	5	0 or 1	0	1	20%	SL-1	CDBG Admin
	Encourage collaboration to better address needs and to respond to opportunities for special needs populations.	Mayor's Committee on Homelessness	Community Development, Special Needs	Meetings	50	6	6	42	84%	EO-3	CDBG Admin
		Assist in the implementation of Welcome Home Billings, the City's ten-year plan to impact homelessness.	Community Development, Special Needs	Completed Annual Action Plans	5	1	1	5	100%	SL-1	CDBG Admin
			Community Development, Special Needs	Completed Annual Performance Reports	5	1	1	5	100%	SL-3	CDBG Admin
		Facilitate AmeriCorps VISTA application and pursue project status	Community Development, Special Needs	Annual submission of VISTA grant application / VISTA member placements	5	1 100 Clients	1 3,215 Clients	5 5742 Clients	100%	EO-1	CDBG and VISTA Admin
	Benchmark Performance Measures	% of total funding allocated to support partnerships:					-	16%	-	-	-

Strategy	Objective	Activity	HUD Objective Category	Measurement Type	Five-Year Goals	FY14-15 Goals	FY14-15 Outcomes	# 5-Yr Goal Met	% 5-Yr Goal Met	HUD Objectives / Outcomes	Funding Source	
D: Promote the preservation and revitalization of the community's older neighborhoods.	Preserve housing stock in older, lower-income neighborhoods.	See objectives / activities / goals outlined in Strategy A				-	-	-	-	-	SL-1	-
	Infill development of vacant lots and redevelopment of substandard properties.	Affordable Housing Development Program	Rental & Owner Housing	See goals for Strategy B		-	-	-	-	-	SL-3	CDBG & HOME
		Redevelopment 27th Street Corridor	Neighborhood Revitalization	Redevelopment Projects	1	No Longer In Com Dev	-	3	300%	SL-3	CDBG Admin	
	Support activities that provide amenities, neighborhood stabilization and maintain infrastructure needs.	Tree Program	Owner Housing	Individuals	50	Inadequate Funding	-	-	-	SL-3	CDBG	
		Neighborhood improvements through the Capital Improvement Plan (CIP)	Infrastructure, Neighborhood Revitalization, Public Facilities	CIP Years Implemented	5	1	1	5	100%	SL-3	-	
		Special Assessment Grants	Owner Housing, Infrastructure	Housing Units	20	Inadequate Funding	-	5	25%	SL-2	CDBG	
	Benchmark Performance Measures	% of total funding allocated to preserving older neighborhoods:				Inadequate Funding	-	-	-	-	-	
E: Provide assistance to agencies serving lower income and special needs populations, particularly the homeless, the elderly, minorities and those with disabilities.	Provide CDBG Public Service funding and HOME Tenant-Based Rental Assistance (TBRA) for deposits to non-profit organizations and provide assistance for supportive services, including job creation.	CDBG Public Service and HOME TBRA funding allocations for basic needs assistance and supportive services	Economic Development, Special Needs, Public Services	Years Funding Committed	5	Inadequate Funding	-	2	40%	EO-1	CDBG & HOME	
			Economic Development, Special Needs, Public Services	Organizations	20	Inadequate Funding	-	8	40%	EO-3	CDBG & HOME	
	Benchmark Performance Measures	% of total funding to support basic needs of special and lower-income populations:				3%	3%	-	-	-	CDBG & HOME	

Benchmarks		Five-Year Goals	FY14-15 Goals	FY14-15 Outcomes
Overall Benchmark Performance Measures	Total Budget Allocated	-	-	\$1,265,787
	Leveraging & Leveraging Ratio for Reporting Year Only	-	-	\$13,073,587 1:10
	CDBG Timeliness Compliance	< 1.5	< 1.5	0.93
	# active CHDOs	-	-	1
	# of faith-based organizations funded	-	-	-
	% of previous year's HOME funding committed (for FY13-14, measure FY12-13), as of June 30	-	-	95.83%
	% of HOME CHDO funding reserved, two years ago (for FY13-14, measure FY11-12), as of June 30	-	-	
	% of completed HOME rental disbursements to all rental commitments, benchmark subject to HUD adjustment	> 85.5%	> 95.86%	100%
	% of completed CHDO disbursements to all CHDO reservations, benchmark subject to HUD adjustment	> 60.4%	> 80.92%	99.94%
	% of renters below 50% of the area median income	> 70%	> 70%	91.04%
	<i>Note: 90% of rental and TBRA units must assist households less than 60% of the area median income</i>			
	% of occupied HOME rental units to all rental units, benchmark subject to HUD adjustment	> 92.15%	> 95.85%	100%
	Allocation years not distributed for HOME, benchmark subject to HUD adjustment	< 2.98	< 4.050	0.79
	# of minority, disabled, elderly and female-headed households served	-	-	732

Five-Year Consolidated Plan Goals / Objectives Assessment

The City of Billings is required to assess efforts to carry out planned actions described in the Annual Action Plan for the most recent completed year, in addition to reporting on overall progress made on the five year Consolidated Plan. The City of Billings has met many of the goals established in the five year Consolidated Plan. Projects funded with CDBG and HOME resources can be viewed in this section.

Challenges faced by the City in achieving established goals in FY2014-2015 continue to include limited federal funding and housing costs in Billings. The local availability of affordable housing for lower-income households, particularly rentals, has decreased. The affordable housing goals have also been impacted by redevelopment activities that have resulted in the loss of affordable housing in our community. Policy recommendations following the analysis of achievements are stated below and are based on *Table 3A - Summary of Specific Objectives and Accomplishments* (following page).

Focus funding and staff efforts on strong, core programs: The City of Billings has had many programs which were underutilized over the past decade and very strong core programs, which should be continued and strengthened. Staff recommends planning to match capacity with an emphasis on core programs, including:

- Housing Rehabilitation
- Manufactured Home Repair
- First Time Homebuyer
- Affordable Housing Development

Priority budgeting to eliminate non-funded initiatives: Unfortunately, continued funding decreases has limited staff availability to provide support for organizational efforts which do not provide funding for administration. Therefore, staff recommends continued evaluation of funding sources, initiative review and priority-based budgeting to ensure effectiveness and cost management.

Adjust Action Plan goals to reflect limited funding and eliminated programs: Several programs planned for funding during the five-year Consolidated Plan process have not come into fruition due to historically low funding levels. Therefore, staff recommends annual adjustment of Action Plan goals to adequately plan for fluctuations in federal funding levels.

Continue to seek alternative funding sources to further the goals of the Consolidated Plan: The City has been fortunate to secure additional funding sources to supplement CDBG and HOME funding, including (but not limited to): NSP; HUD Economic Development Initiative grants; AmeriCorps VISTA administrative funding; and Fair Housing Initiatives Program (FHIP) funding. Careful evaluation of staff availability to manage multiple grant activity and reporting requirements must be completed prior to application.

ACCOMPLISHMENTS & RECOMMENDATIONS - **TABLE 3A**

July 1, 2014 through June 30, 2015

Strategy	Activity	Measurement Type	Five-Year Goals	FY14-15 Goals	FY14-15 Outcomes	# & % 5-Yr Goal Met	Notes / Recommendations for Next Action Plan
A: Promote the preservation of the existing supply of safe, affordable housing in the community.	Housing Rehabilitation Loan	Housing Units	50	15	6	52 104%	Goal exceeded. No alterations needed.
	Minor / Manufactured Home Repair Program	Housing Units	100	5	4	44 44%	Reconsider program for funding next fiscal year. Program design continually monitored for effectiveness.
	Neighborhood Stabilization / Foreclosure Acquisition & Rehabilitation	Housing Units	4	1	0	5 125%	City has exceeded this five-year goal. No alterations needed.
B: Promote new affordable housing opportunities.	Affordable Housing Development Program	Housing Units	100 Renter 14 Owner	16 Units / 4 CHDO	16 / 4 CHDO	16 Renter 16% 14 Owner 100%	Project completion in 2015; total 16 units. No alterations needed.
	Support the efforts of the Housing Authority of Billings	Five-Year Plan Implemented	5	1	1	5 100%	Met five-year goal. No alterations needed.
	Meet CHDO commitment / expenditure deadlines	Years in compliance	5	1	1	5 100%	Met five-year goal. No alterations needed.
	First Time Homebuyer Program	Households	175	40	48	207 118%	Exceeded 5-year goals. No alterations needed.
	First Time Homebuyers - MBOH Loan Use	Households Leveraged Funding	35 \$4M	3 \$0.3	21 \$2,820,548	69 197% \$8,660,868 217%	
	Homebuyer Education	Households	1,000	100	104	827 83%	No alterations required.
	Billings Partners American Indian Homeownership	Homeownership Rate	40%	0.08	35%	-	Data is not available. No changes required.
C: Active partnerships with non-profits, neighborhood groups and others to address housing and community development specific to lower income and special needs households.	Affordable Housing Task Force	Monthly Meetings	50	4	4	31 62%	Number of meetings reduced due to lower funding levels. No changes required.
	Billings Partners American Indian Homeownership	Monthly Meetings	50	4	4	32 64%	
	Analysis of Impediments completed in December 2012	Analysis / Plan completed	1	1	0	1 100%	Goal met. No changes required.
	Support fair housing organizations w/FHIP	Annual grant submission	5	0 or 1	0	1 20%	No changes required.
	Mayor's Committee on Homelessness	Monthly Meetings	50	6	6	42 84%	Number of meetings reduced due to lower funding levels. No changes required.
	Assist in the implementation of Welcome Home Billings, the City's ten-year plan to impact homelessness.	Completed Action Plans	5	1	1	5 100%	Goal has been met. No changes required.
		Completed Performance Reports	5	1	1	5 100%	
	Facilitate AmeriCorps VISTA application and pursue project status	Annual Application	5	1	1	5 100%	
Redevelopment 27th Street Corridor	Redevelopment Projects	1	CDBG lands fully transferred		Transferred	No changes required.	
D: Promote preservation and revitalization of the community's older neighborhoods.	Neighborhood improvements through the Capital Improvement Plan (CIP)	CIP Years Implemented	5	1	1	5 100%	Adequate progress meeting 5-year goals. No alterations needed for CIP. Special Assessment Grants were eliminated due to low funding and low usage.
	Special Assessment Grants	Housing Units	20	Inadequate Funding		5 25%	

SECTION IV - Fair Housing & Equal Opportunity

Affirmatively Furthering Fair Housing

In order to affirmatively further fair housing, the City of Billings is required to:

- Conduct an analysis to identify impediments to fair housing choice in the public and private sector.
- Take appropriate actions to overcome the effects of impediments identified.
- Maintain records reflecting the analysis and actions taken to impact impediments.

The City also supports efforts to eliminate housing discrimination in Billings, promoting fair housing choice for all persons, providing equal opportunities for inclusive patterns of housing occupancy, promoting accessible housing for all persons, particularly those with disabilities. The City supports creating housing that can be visited by a person with a disability (“visit-able”), therefore having an accessible bathroom and front entry way.

Fair Housing Needs

As the City conducts *Housing Needs Assessment* and *Analysis of Impediments to Fair Housing Choice (AI)* studies on different timelines, City staff must clarify that an earlier AI was utilized to develop strategies for the City’s five-year Consolidated Plan. The City’s most recent AI was completed in March 2013 to plan for FY2014-2015 activities by Planning / Communications. The study can be found online at www.ci.billings.mt.us/comdev on the Reports and Planning page, or the entire document can be downloaded [here](#).

The previous AI was completed five years ago by Montana State University-Billings and listed the following impediments in order of severity - the most critical issues are therefore at the top of the list:

1. Many members of protected classes do not appear to understand their housing rights under fair housing regulations.
2. Some landlords, property owners, and realtors do not act consistent with knowledge of fair housing regulations.
3. Income, credit, and housing affordability issues are tied to fair housing issues.
4. Lack of funding hampers the effectiveness of local services working on behalf of fair housing protected classes.
5. The lack of hard data concerning the effectiveness of specific fair housing programs hampers the goal of improving the delivery of fair housing services.

Initial Strategy Response to Fair Housing Needs

The City’s five-year Consolidated Plan strategies were developed to address the fair housing needs identified in the previous AI and are identified following each objective, also found in Section I.

1. Assist in the production and dissemination of consumer education on fair housing issues. *(Strategy C)*
2. Re-evaluate the effectiveness of existing fair housing educational materials. *(Strategy C)*
3. Plan for increasing significance of age-related disabilities. *(Strategy C)*
4. Assist in the education of landlords, property owners and realtors on Fair Housing responsibilities. *(Strategy C)*
5. Increase awareness among American Indians and other protected classes regarding the location of available housing units. *(Strategy C)*
6. Improve housing affordability. *(Strategies A, B, and E)*
7. Provide credit education. *(Strategy E)*
8. Revise existing fund model for fair housing education. *(Strategies C and E)*
9. All fair housing outreach and education efforts should include measureable goals. *(Strategy E)*

Actions Taken to Overcome Impediments

Routine Fair Housing Activities: The Community Development Division staff is dedicated to supporting fair housing efforts and initiatives in Billings to address the impediments listed above. Further, the City has identified a plan to further address impediments with the results of the new AI. This includes ensuring that activities, projects and programs funded utilizing CDBG and HOME funding are carried out without discrimination, directly or indirectly, on the basis of race, color, religion, gender, national origin, age, familial status, sexual orientation, gender identity, disability or creed. This also includes efforts to affirmatively further fair housing, such as:

- Staff facilitation and administration of fair housing initiatives.
- Facilitating capacity-building efforts for organizations with an interest in fair housing issues.
- Facilitating specific grant-writing activities to further local educational efforts.
- Promoting fair housing choice and equal opportunity for all persons.
- Ensuring equal opportunity and choice, including reasonable accommodation, for clients with a desire to receive assistance through City programs.
- Working to alleviate housing discrimination in Billings.
- Promoting housing that is accessible / usable by persons with disabilities.
- Providing opportunities for all persons to live in any given housing development.
- Ensuring fair housing educational materials are on-site and staff members are trained in fair housing rights and responsibilities to support clients and community stakeholders.
- Ensuring advertisements include fair housing and equal opportunity information.
- Supporting non-English speaking persons with actions outlined in the City's Language Assistance Plan.
- Ensuring access to Montana's Relay phone number (711) on all materials produced.
- Ensure the City's website and physical office site is accessible for those with disabilities.
- Implementing record-keeping activities to document compliance and efforts to affirmatively further fair housing choice and inclusivity.
- Implementing standards for accessibility in affordable housing development.

Integrated Living Patterns: The City of Billings supports program development in a manner that targets affordable housing stock for investment on a city-wide basis in order to further inclusion and integrated living patterns. Please refer to maps indicating geographic distribution of investments in Section II. This illustrates a city-wide approach to funding and integrated living patterns for those served with federal funds.

Annual Action Plan: The City facilitated an extensive process to garner a new AI and developed a plan to undertake fair housing activities designed to impact impediments to fair housing choice. Please see the City's FY2014-2015 Annual Action Plan for additional information located at www.ci.billings.mt.us/cdreports.

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Action Plan

Selected Impediments	Strategies	FY2014-2015 Actions & Outcomes
<p>A. Concentrations of minorities that would not exist in a free market not distorted by discrimination suggest that Billings has a dual housing market; one for non-Hispanics, whites and Asians and another for all other minorities.</p>	<p>A1: Produce and disseminate consumer education on Fair Housing issues through ongoing publicity campaigns to make people aware that they can move anywhere in the area they can afford.</p> <p>A2: Work to expand housing choices of existing and potential new residents beyond neighborhoods identified by their own race or ethnicity.</p>	<p>Staff utilized the City’s website to provide education to the public on fair housing issues, how to file a discrimination complaint, housing resources, etc.</p> <p>Hard copy materials on fair housing issues are available on-site at the Community Development office.</p> <p>Staff program development efforts focused on activities ensuring diversity and citywide benefit: home repair; acquisition; and development. Programs are implemented on a city-wide basis to avoid segregation. Programs administered by the City of Billings contain proper non-discrimination notifications.</p> <p>Staff support has been offered to further capacity-building efforts for organizations with an interest in fair housing education.</p> <p>Staff pursued a partnership with NeighborWorks Montana and co-sponsored a VISTA position to develop a Housing Center. Staff created a VISTA Assignment Description and garnered approval for the project via the Corporation for National and Community Service. Sophie DeMartine began as a VISTA member dedicated to this initiative in August 2013 and worked through August 2014.</p> <p>A strategic plan has been developed and approved by organizations promoting the Housing Center and fundraising is underway. The Home Center officially opened its doors in July 2015.</p>
<p>B. Discriminatory real estate industry practices such as racial and ethnic steering distort the free market in housing.</p>	<p>B1: Continue to partner with enforcement agencies providing testing of the real estate industry practitioners to identify discriminatory practices in rental and for-sale housing.</p>	<p>Montana Fair Housing conducts routine testing of real estate industry practitioners in the Billings area.</p>
<p>C. Discrimination against Latinos in issuing government-backed mortgage and refinancing loans continues unabated in Billings as it does throughout the nation.</p>	<p>C1: Support the efforts of local housing counseling agencies, especially to Latinos, before they apply for a mortgage.</p> <p>C2: Continue to provide brochures containing information apprising potential home buyers of the availability of housing counseling and how to spot / report discriminatory lending practices.</p>	<p>Local housing counseling is provided by District 7 HRDC, Rural Dynamics and Homeward. All organizations have been invited to participate in the development of a Housing Center in Billings.</p> <p>See above notes on the provision of fair housing information.</p> <p>Fair housing education is also provided during home buyer education classes; sponsored and attended by the City of Billings staff.</p>
<p>D. The relatively high cost of housing continues to pose a barrier to fair housing choice in Billings.</p>	<p>D1: Continue to work toward the provision of affordable housing through Community Development programs.</p>	<p>The City’s Affordable Housing Development program has funded a 16 unit affordable rental housing project that was completed this fiscal year. The program will continue to be offered to further the development of affordable housing options.</p>

Selected Impediments	Strategies	FY2014-2015 Actions
<p>E. Review Unified Zoning Regulations and review requirements to foster compliance with fair housing law and to promote inclusionary zoning.</p>	<p>E1: Support the efforts of the Planning Division in reviewing:</p>	<p>Attempted in 2008 revision of the Growth Policy and was met with considerable opposition. The next revision process has begun and staff will include best practices for inclusionary zoning.</p>
	<p>(a) Minimum percentage of affordable housing units per development with five or more units.</p>	
	<p>(b) Housing Authority of Billings first right of refusal for inclusionary units.</p>	
	<p>(c) Amendments for neighborhood plans to promote stable, socio-economically diverse neighborhoods throughout Billings.</p>	<p>Funding to support a Neighborhood Planner has been suspended due to budget issues. No current plans are in process. All recent neighborhood plans represent a comprehensive approach for stable and diverse neighborhoods.</p>
	<p>(d) Affirmative marketing and billboard advertising requirements.</p>	<p>The City of Billings does not currently include requirements or review of billboard content, with the exception of obscene material.</p>
	<p>(e) Developer brochure distribution requirements.</p>	<p>Zoning and subdivision codes must be enforceable by the Planning Division. The distribution of brochures is not an enforceable activity within the City's jurisdiction.</p>
	<p>(f) Fair Housing logo / language requirements for agreements.</p>	<p>Staff will review the possibility of including a standard special review condition statement to include equal opportunity housing.</p>
	<p>(g) Occupancy requirements and equal treatment for group living for the disabled.</p>	<p>Community residential facilities are a protected group per State law. Montana Code Annotated stipulates community residential facilities for 8 or fewer residents under 24 hour care can be located in any residential zoning district. The Code cannot be construed to prohibit the city from requiring a conditional use permit.</p> <p>Zoning requirements must be enforceable. Complaints relative to over-crowding are checked against available public records, which does not include square footage of bedrooms. The City's Legal Department has reviewed occupancy standards and the current regulation aligns with State law.</p>
	<p>(h) Accessory dwelling units / cottage cluster homes.</p>	<p>Two attached or detached units are currently allowed in lots of 7,000 square feet or greater, depending on zoning. Additional dwelling units can be covered in the regulations.</p>
<p>F. There is a serious shortage of housing affordable to holders of Housing Choice Vouchers in the areas of Billings where the proportion of public school students from low-income neighborhoods is relatively low.</p>	<p>F1: Support efforts promote economic diversity in all schools to ensure every school has a majority of pupils coming from middle-class / higher-income households.</p>	<p>The Billings Livability Partnership is currently utilizing the Smart School Siting Tool from the Environmental Protection Agency as a product of Smart Growth Implementation Assistance. A major component of this tool involves balancing diversity (race, ethnicity, and socioeconomic status) with walkability when choosing school locations.</p>
	<p>F2: Support the Housing Authority's efforts to expand the geographic range where holders of Housing Choice Vouchers look for housing.</p>	<p>During eligibility briefing meetings, the Housing Authority of Billings (HAB) provides a census map of the City, a list of property management companies with listings all over the City and a list of accessible units is provided when a voucher is issued. Staff encourages renters to consider all areas of the City for residency. HAB performs outreach activities by attending Landlord Association and Yellowstone Property Managers Association meetings throughout the year. HAB advertises to recruit landlords in the Billings Gazette once a year. The HAB also plans on revising the flyer, <i>Advantages of Moving to Areas that are Not High Poverty Areas for Housing Choice Voucher Program Families</i>, to include the Montana protected classes. Counseling is provided to facilitate housing opportunities Citywide.</p>