



Five Year Consolidated Plan

FY2025-2029

DRAFT

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Section I: Executive Summary

Preface

Engagement, Accuracy, Completeness, and Data Limitations

Hundreds of organizations, businesses, individuals and families have participated in the development of this Consolidated Plan. Despite our best efforts to ensure the accuracy and completeness of the information provided, there may still be unintentional errors or omissions. Local services for those in need are extensive and complex, making it challenging to comprehensively capture them within the constraints of the required HUD submission system.

COVID-19 significantly altered Billings' market conditions, housing affordability, and overall community dynamics. It began with an initial economic shock in early 2020 and a protracted housing affordability crisis has been spurred by increased demand and limited supply in the following years. This multifaceted impact continues to shape local economic planning and housing policy today.

The data provided by HUD for this Consolidated Plan is outdated and does not capture the substantial long-term shifts in economic conditions, housing market trends, workforce and supply shortages, or the evolving responses at the local, state, and federal levels. The primary HUD datasets used herein are the American Community Survey (ACS) and the Comprehensive Housing Affordability Strategy (CHAS) covering 2016–2020. Although a dataset from 2017–2021 was released in September 2024, it does not capture the significant long-term shifts in local conditions.

Community Development staff have expanded their research to include additional data sources such as the latest ACS and CHAS datasets, the U.S. Census Bureau, the Bureau of Labor Statistics, FEMA, and the U.S. Departments of Veterans Affairs, Agriculture, and Justice. They have also utilized data from Montana State Departments - including Commerce, Justice, Health and Human Services, and Labor and Industry - various national indices, news articles, and inputs from local agencies and organizations, among others.

The draft plan will be open for public comment from March 15 to April 15, 2025. It will be broadly circulated within the community to gather further feedback and insights. Any errors or omissions are unintentional.

ES-05 Executive Summary

24 CFR 91.200(c), 91.220(b)

Introduction

The U.S. Department of Housing and Urban Development (HUD) requires both a five-year Consolidated Plan and a one-year action plan for the City of Billings to qualify for funding under the Community Development Block Grant (CDBG) and HOME Investment Partnerships programs. The City's five-year Consolidated Plan for FY2025–2029 outlines activities scheduled from July 1, 2025 through June 30, 2030 to address community priorities and serves as the strategic framework for utilizing CDBG and HOME funds. This plan is supported by an Annual Action Plan for FY2025–2026.

As an entitlement community, the City of Billings, through its Community Development Division, will continue to lead and manage the administration of its CDBG and HOME program activities, ensuring that all initiatives primarily benefit low-income individuals. The Consolidated and Annual Action Plans integrate

both planning and application requirements for these programs, aligning all activities with the community's prioritized needs.

The CDBG and HOME programs covered by the Consolidated Plan must address three basic HUD goals:

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

Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview.

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

The City's goals are to: effectively manage the implementation of HUD-funded programs; create, preserve, and expand affordable housing options; ensure that vulnerable populations have reliable access to support services; and foster suitable living environments. The city's strategies aim to improve the safety and livability of neighborhoods, enhance access to quality facilities and services, and expand economic opportunities for lower-income residents. The City will continue to offer programs on a citywide basis to ensure equal opportunity in all Billings neighborhoods.

Administration

Goal: Efficiently manage the implementation of objectives, strategies, and initiatives for HUD-funded programs and projects and ensuring federal regulatory compliance.

Affordable Housing

Goal: Create, preserve, and expand decent, affordable housing options for low-income residents citywide. Community Development aims to enhance and broaden housing access, availability, physical quality, economic value, and longevity across the city for Billings' low-income residents including seniors, individuals with disabilities, minority groups, and other special populations.

Strategy: Increase affordable housing opportunities by implementing financing initiatives, including housing development loans to drive construction and rehabilitation, first-time homebuyer loans to support sustainable ownership, and home repair financing to preserve and upgrade existing low-income homes.

Key Initiatives

- **Affordable Housing Development:** Promote citywide development of affordable single-family, multi-family, and special needs housing by offering loan financing to private developers and nonprofit organizations for new construction, rehabilitation, and infrastructure improvements.

- **First Time Home Buyer:** Offer accessible loan financing to foster first-time homeownership opportunities that support long-term financial stability, build generational wealth, and stabilize neighborhoods.
- **Home Repair:** Offer loan financing to agencies that assist low-income homeowners in completing essential repairs - such as major systems upgrades, weatherization, energy/water efficiency, and lead water service line replacements - to enhance and preserve the quality of Billings' affordable housing stock.
- **Foreclosure:** Mitigate the adverse effects of vacant, foreclosed properties by acquiring, rehabilitating, and selling these homes to low-income households - thereby combating urban decay, reducing crime, stabilizing property values, and stimulating the local economy.

Services for Vulnerable Populations

Goal: Ensure that vulnerable populations have reliable access to comprehensive supportive services that enhance stability, self-sufficiency, and overall well-being.

Strategy: Provide resources to nonprofit organizations to address poverty and provide supportive services to low-income individuals and families to provide stable housing, promote self-sufficiency, and promote overall well-being:

Key Initiatives

- **Public Facilities:** Provide financing to develop public facilities to serve as accessible, community-based hubs where individuals and families facing economic, social, or health-related challenges can find help.
- **Billings Metro VISTA Project:** Allocate AmeriCorps resources to nonprofit organizations to undertake poverty impact activities and to support the low income individuals and families they serve. Federal AmeriCorps Volunteers in Service to America (VISTA) focus areas include: education, healthcare, food security, economic opportunity, housing, financial literacy, and others.
- **HOME-ARP:** Provide grant funding to nonprofit organizations delivering supportive services to: prevent homelessness; unhoused individuals and families; those at-risk of becoming unhoused; and people fleeing domestic violence / trafficking. Federal service categories include case management, housing counseling, rent/utilities/deposit assistance, mental health , healthcare, substance misuse treatment, job training, employment, financial literacy, assistance with benefits enrollment, childcare, and transportation.

Neighborhood Revitalization

Goal: Foster suitable living environment and quality of life through the improvement of physical conditions in lower-income neighborhoods.

Strategy: Integrate environmental design, infrastructure improvements, and public safety measures to revitalize neighborhoods, prevent crime, and enhance quality of life for residents.

Key Initiatives

- **Crime Prevention Through Environmental Design:** Reduce crime by making infrastructure improvements in low-income neighborhoods (parks, adding street lights, etc.) while: creating more attractive and secure environments; stimulating local investment; encouraging residents to use public spaces more freely; and improve quality of life for low-income residents.

- **Lead-Pipe Water Line Replacement:** Provide affordable loan financing to low-income homeowners to remove lead pipes from the property line to residences to prevent lead poisoning, improve water quality, and promote neighborhood health and public safety.

Evaluation of past performance.

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

Overall, the City of Billings demonstrates a commitment to utilizing CDBG and HOME funds effectively, focusing on affordable housing development, community engagement, and strategic planning to meet the evolving needs of its residents.

The City of Billings has been receiving CDBG funds since the 1970s and began receiving HOME funds in the mid-1990s. Performance on past goals and projects has been adequate, given declining resources. As a result, City staff have consolidated smaller programs focused on meeting priority needs, including affordable housing preservation and the provision of new housing opportunities. Community Development staff have:

- Successfully carried out additional activities to respond to, prepare for, and prevent the spread of the coronavirus. As of January 2025, City staff has completed all CDBG-CV projects and drawn down over \$900,000 in additional federal funding allocated for coronavirus projects.
- Developed a HOME-ARP Allocation Plan and recently funded supportive services to assist those experiencing homelessness, those at risk of becoming unhoused, and other qualifying populations.
- Maintained core loan programs such as Affordable Housing Development, First Time Home Buyer, Foreclosure Acquisition / Rehabilitation, and the Billings Metro VISTA Project to meet timely expenditure deadlines.
- Facilitated financing for a \$1.2 million Affordable Housing Development project to create 32 new rental units to benefit low-income households.

Summary of citizen participation process and consultation process.

Summary from citizen participation section of plan.

To foster broad community involvement, the City of Billings has implemented a Citizen Participation Plan during the Consolidated Plan process, ensuring active engagement by residents and affiliated organizations. Additionally, a Language Assistance Plan has been adopted to guarantee that all individuals, including those with hearing impairments and limited English proficiency, have meaningful access to program information and equal opportunities to participate.

Several local organizations active in affordable housing and the community have been invited to review and comment on the Consolidated Plan. Their ongoing collaboration is essential for meeting the plan's affordable housing goals. The consultation process involved both public and private agencies including those providing health care, social services, and fair housing education. Staff also sought to gather input from residents of low-income neighborhoods and from agencies serving children, the elderly, individuals with disabilities, minorities, persons with HIV/AIDS and their families, as well as homeless individuals and families. Both plans can be found online at www.BillingsMT.gov/CDreports.

- Community Development staff began citizen participation and outreach efforts in August 2024 with a presentation to the City Council to describe HUD programs and processes and garner understanding of the Council's funding priorities for the 2025-2029 Consolidated Plan.
- The Billings City Council held a public hearing on Monday, September 23, 2024 to obtain public comment on current community needs to assist the Community Development Board in designing the application process for the upcoming program year, before the publication of the drafted Consolidated / Annual Action Plan.
- Community Development staff presented during a City Council Work Session meeting on November 18, 2024. Topics included: prior work session material, recent challenges Community Development is navigating to move the Consolidated Plan forward, seek clarity on the Council's goals for the new Consolidated Plan, schedule review, public engagement, etc.
- City Council regular meetings and Work Sessions are streamed live and video is available on demand at www.comm7tv.com. Meetings are also streamed live and video is available on demand at www.facebook.com/comm7tv. Public notices are published in the Yellowstone County news for public meetings and hearings including the monthly public Community Development Board meeting.
- Staff and the Community Development Board made presentations to low-income neighborhood task forces to present information on the Division and to identify community needs to address with CDBG and HOME.
- Hard copy and online surveys were distributed via email and in-person to hundreds of individuals and organizations to seek public input on community needs and funding priorities. A QR code was also included in the [Planning and Community Services Department's annual report](#), which was widely distributed.
- Four weekly ads, with a QR code to the survey, were published in the Yellowstone County News (February 14 – March 7, 2025).
- Social media was utilized to garner CDBG, HOME, and AmeriCorps VISTA applications for funding and resources. Social media was also utilized to distribute the Consolidated Plan survey on community needs and funding priorities.

- Email listservs were utilized to garner input on various sections of the Consolidated Plan, to distribute surveys, and to garner information relative to community needs and funding priorities.
- Another public hearing was held on February 4, 2025 at the Community Development Board meeting to garner public comment on community need and for organizations interested in funding to present information on applications submitted.
- A City Council work session was held March 17, 2025, to discuss the Consolidated Plan Goals and Strategies.
- The City Council held a public hearing regarding the Draft 2025-2029 Consolidated Plan at their April 14, 2025, meeting.

Summary of public comments.

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

Public comments are included in the Appendix.

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

All feedback was carefully reviewed and incorporated into the Consolidated Plan prior to submission, with only those comments containing defamatory or discriminatory language being excluded from the appendices.

Section II: The Process

PR-05 Lead & Responsible Agencies

24 CFR 91.200(b)

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

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	BILLINGS	Community Development Division
HOME Administrator	BILLINGS	Community Development Division

HUD Table 1 – Responsible Agencies

Consolidated Plan Public Contact Information

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Introduction

A number of organizations in the community are invited to participate in planning affordable housing and community development-related activities in Billings and are asked to comment on the Consolidated and Annual Action Plans. Consultations include review of the plan with public and private agencies that provide health care, social services and fair housing education. Populations targeted for consultation include agencies that provide services for children, the elderly, the disabled, minorities, persons with HIV / AIDS and their families, and homeless individuals and families.

The Consolidated Plan is distributed widely during the public comment period and interested persons are invited to attend a number of staff-facilitated, regularly scheduled meetings to find out more about Community Development initiatives. Routine meetings are facilitated through staff for the Community Development Board and the majority of Board members represent lower income neighborhoods.

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

91.215(l)

The City of Billings, Montana actively fosters collaboration between public and assisted housing providers and private and governmental health, mental health, and service agencies.

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

91.100(a)(4)

Public Housing: The City's local public housing authority, HomeFront, is dedicated to providing affordable housing and promoting self-sufficiency for moderate and lower-income families. HomeFront is primarily responsible for administration of the public housing and Section 8 programs for the community. The organization also collaborates with local experts to address critical community needs, including combating homelessness, ending domestic violence, and supporting physical and mental health. HomeFront is an independent organization established under the laws of the State of Montana. Board members for the Housing Authority are appointed by the Mayor for the City of Billings.

91.100(c)

Housing Opportunities for Persons with AIDS: Public and private agencies have assisted the City in reviewing the Consolidated Plan. Local organizations providing housing, health services, and social services have been involved in planning processes for the homeless and chronically homeless. The City does not receive Housing Opportunities for Persons with AIDS (HOPWA) funding directly, but supports the Human Resources Development Council District 7 in their implementation of HOPWA goals and objectives.

91.100(b)

Homeless Services: The Yellowstone County Continuum of Care (CoC) involves assessment, planning, and coordination to support homeless individuals who are high utilizers of local services. Funded through a grant from the Montana Healthcare Foundation, the CoC aims to reduce the burden on social and safety systems while saving money long-term. It values community collaboration and supports other coalitions.

Metropolitan Planning: The City of Billings - Community Development Division is included in the Planning and Community Services Department. The Department, overall, includes Code Enforcement, Planning /

Transportation (includes the City of Billings and Yellowstone County), and the Building Division. These Divisions work internally to implement the Growth Policy, Infill Policy, Transportation Plan and Neighborhood Plans collectively. All City-assisted projects are reviewed for residential access to public transportation and broadband infrastructure. *91.100(a)(5)*

Community Development Board: The [Community Development Board](#) is a citizen's advisory board consisting of nine members who are appointed by the Mayor of Billings with the consent of the City Council. Six members are appointed to represent low-income neighborhoods of the City as defined by federal regulations for the CDBG program and three members represent the community at large. This board serves in an advisory capacity to the City Council for the purpose of providing citizen input on policy decisions to the City Council. The Community Development Board makes recommendations to the City Council regarding the Consolidated Plan, the Annual Action Plan, the Citizen Participation Plan, and the Comprehensive Annual Performance Evaluation Report. In addition, the Community Development Board reviews applications submitted for CDBG and HOME funding to make funding recommendations to the City Council for approval.

Local Government: The [Billings City Council](#) is the final governmental policy body that reviews and takes action on the Annual Action Plan, including the Citizen Participation Plan. The Community Development Board presents recommendations to the City Council during a scheduled work session preceding the public hearing each April to deliver information on decisions made regarding recommendations. After receipt and consideration of public comments, the City Council has the opportunity to approve the Consolidated Plan and Annual Action Plan and proposed funding allocations. Following approval, the Consolidated Plan and Annual Action Plans are forwarded to HUD.

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

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

The City of Billings' efforts to address the needs of the unhoused, including those at risk of becoming unhoused, include the implementation of [HOME-ARP supportive services grants](#). The City has awarded \$300,000 to date to pay for housing costs, mental and substance misuse assistance, case management, credit repair, employment assistance / training, and transportation.

The City also continues to offer full-time human resources assistance to nonprofit organizations through the Billings Metro VISTA Project. Volunteers in Service to America (VISTA) is sponsored by the Corporation for National and Community Service as an AmeriCorps program. VISTA members work to create or expand community-based programs, services, and systems to prevent and provide interventions for the unhoused. VISTA members may be supervised by City staff for over-arching, community-wide programs and they can also be supervised by nonprofit organization staff that are spearheading efforts to impact poverty and homelessness.

Local Continuum of Care: In Billings, Montana, the Yellowstone County Continuum of Care (CoC), supported by the [United Way of Yellowstone County](#), leads a collaborative effort to address homelessness, focusing on vulnerable groups such as chronically homeless individuals and families, families with children, veterans, unaccompanied youth, and those at risk of homelessness. The CoC brings together over 20 organizations committed to creating sustainable pathways to safe and stable housing.

The CoC operates a [Coordinated Entry System](#) that maintains a "By-Name List" of individuals experiencing homelessness, prioritizing those facing significant barriers to housing. This system facilitates the efficient allocation of resources and services to those most in need, including targeted support for specific populations. Approximately 35% of homeless households in Billings include children and youth. The CoC collaborates with organizations like Tumbleweed, which provides crisis counseling and support services to runaway, homeless, and vulnerable youth and their families.

The CoC partners with the Veterans Administration's healthcare system to assist veterans facing homelessness or at risk thereof. Services include access to food, shelter, transitional and permanent housing, job training, and employment opportunities.

The CoC values community collaboration, supporting coalitions to address underlying issues contributing to homelessness. Additionally, the Montana Rescue Mission provides essential services, including food, shelter, clothing, education, and counseling, to address the mental, physical, and spiritual needs of individuals.

Billings Public Schools, in coordination with the CoC, ensures that homeless students have equal access to free and appropriate education. The district's program offers support through the Family Resource Center and community liaisons, aiming to remove educational barriers for homeless children and youth.

Through these coordinated efforts, the Yellowstone County Continuum of Care strives to provide comprehensive support to homeless individuals and families, addressing immediate needs and working towards long-term housing stability.

Statewide Continuum of Care: The Montana Continuum of Care Coalition is the statewide organization designed to bring homeless service providers together from across the state to identify needs, inventory resources, recognize gaps and prioritize HUD funding as part of a greater planning effort to eradicate homelessness in Montana.

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

In Billings, Montana, the allocation of Emergency Solutions Grant funds, development of performance standards, outcome evaluation, and administration of the Homeless Management Information System (HMIS) are coordinated through a collaborative partnership between the Montana Department of Public Health and Human Services (DPHHS) and the Montana Continuum of Care Coalition.

The City of Billings does not directly receive Emergency Solutions Grant funds as an entitlement; instead, these funds are distributed statewide by DPHHS through ten Human Resource Development Councils, with District 7 serving the Billings area.

DPHHS collaborates closely with the Montana Continuum of Care to determine the allocation of Emergency Solutions Grant funds across the state. This partnership involves regular monthly meetings where strategies are aligned to address homelessness effectively. A formal agreement between DPHHS and the Montana Continuum of Care outlines mutual guidance for the utilization of Emergency Solutions Grant funds in Montana. This agreement ensures that both entities work cohesively in planning and performance evaluation of Emergency Solutions Grant projects.

The Montana Continuum of Care Board is responsible for governing and operating the Homeless Management Information System (HMIS), with an Oversight Committee established as per the Montana Continuum of Care bylaws. This structure ensures that policies and procedures for HMIS administration are developed collaboratively, incorporating input from various stakeholders, including DPHHS. DPHHS actively participates in HMIS developments, providing training and engaging in regular data quality assessments. This involvement ensures that the HMIS operates efficiently and effectively, supporting the broader goals of the Emergency Solutions Grant program.

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

HUD Table 2 – Agencies, groups, organizations who participated

#	Agency/Group/Organization*	Type(s)	Consolidated Plan Section(s)	How Consulted / Outcomes
1	HomeFront, local public housing authority	Public Housing Authority; Services - Homeless	Housing Need Assessment; Public Housing Needs; Homeless Needs - Chronically Homeless, Families with Children, Veterans; Homelessness Strategy; Market Analysis; Anti-Poverty Strategy	Email / phone / web retrieval; data exchange for the development of relevant sections
2	Homeward	Housing	Housing Need Assessment; Market Analysis; Anti-Poverty Strategy	
3	Mental Health Center	Housing; Services - Persons with Disabilities	Housing Need Assessment; Non-Homeless Special Needs; Anti-Poverty Strategy	
4	Family Service, Inc.	Services - Housing	Housing Need Assessment; Market Analysis; Homeless Needs - Families with Children; Homelessness Strategy; Anti-Poverty Strategy	
5	District 7 HRDC	Housing; Services - Housing, Children, Persons with HIV/AIDs, Homeless	Housing Need Assessment; Homeless Needs - Chronically Homeless, Families with Children; Homelessness Strategy; HOPWA Strategy; Anti-Poverty Strategy	
6	YWCA Billings	Housing; Services - Domestic Violence, Children	Housing Needs Assessment; Market Analysis; Homeless Needs - Families with Children; Anti-Poverty Strategy	
7	Montana Continuum of Care	Housing; Services - Domestic Violence, Children	Housing Need Assessment; Homeless Needs - Chronically Homeless, Families with Children; Homelessness Strategy; HOPWA Strategy; Anti-Poverty Strategy	
8	NeighborWorks Montana	Housing	Housing Need Assessment; Market Analysis; Anti-Poverty Strategy	
9	The Alliance	Health Agency	Non-Homeless Special Needs; Anti-Poverty Strategy	
10	RiverStone Health	Health Agency; Services - Homeless	Non-Homeless Special Needs; Homeless Strategy; Lead-Based Paint Strategy; Anti-Poverty Strategy	

***The first ten agencies / organizations are listed in the main part of the Consolidated Plan. Additional agencies / organizations consulted and participated in the Consolidated Planning process are included in the Appendices.**

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

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

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

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

HUD Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan

91.215(l)

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

Summary of citizen participation process/Efforts made to broaden citizen participation.

Summarize citizen participation process and how it impacted goal-setting.

Public comments are requested at least 30 days prior to submission of reports required under HUD’s Consolidated Plan process. Staff utilizes data-driven analysis processes along with citizen and community participation to establish goals, strategies and funded activities.

City staff has considered all written comments by citizens, public agencies and other interested parties prior to submission of its final Consolidated Plan and related reports to HUD and attached a summary of each comment to the final submission. If written comments were not accepted for inclusion in the Plan, City staff has provided written explanation of why those comments were not accepted.

Citizen Participation Outreach

#	Mode of Outreach	Target of Outreach	Summary of response/attendance
Summary of comments not accepted and reasons: No comments were rejected.			
1	Public Meeting	Nonprofit and other organizations with an interest in CDBG and / or HOME funding opportunities	<p>Community Development staff made a presentation during a City Council Work Session on August 19, 2024. Topics included: assisting the City Council in understanding the current HUD programs and processes; and beginning the process for the new five-year Consolidated Plan by input and comments from the Council relative to Council priorities to help inform the 2025-2029 Consolidated Plan that will guide HUD programs in Billings for the next five years.</p> <p>Meeting was streamed live and video is available on demand at www.commm7tv.com. Streamed live and video is available on demand at www.facebook.com/commm7tv.</p>
	Public comments are included in the Appendices.		
2	Public Hearing	Nonprofit and other organizations with an interest in CDBG and / or HOME funding opportunities	<p>The Billings City Council held a public hearing on Monday, September 23, 2024 at 5:30 pm to obtain public comment on current community needs to assist the Community Development Board in designing the application process for the upcoming program year, before the publication of the drafted Annual Action Plan.</p> <p>Meeting was streamed live and video is available on demand at www.commm7tv.com. Streamed live and video is available on demand at www.facebook.com/commm7tv.</p>
	Public comments are included in the Appendices.		
3	Public Meeting	Nonprofit and other organizations with an interest in CDBG and / or HOME funding opportunities	<p>Community Development staff presented during a City Council Work Session meeting on November 18, 2024. Topics included: Brief Review of August Work Session topics and some recent challenges Community Development is navigating to move the Consolidated Plan forward; Check back and clarity on Council Goals/Priorities for the new Consolidated Plan; Preparation of program applications for first year of new Consolidated Plan; Review of Consolidated Plan schedule moving into 2025 - Council action points, public outreach and engagement, plan draft and review period, submittal to HUD; and Next Steps.</p> <p>Meeting was streamed live and video is available on demand at www.commm7tv.com. Streamed live and video is available on demand at www.facebook.com/commm7tv.</p>
	Public comments are included in the Appendices.		

#	Mode of Outreach	Target of Outreach	Summary of response/attendance
Summary of comments not accepted and reasons: No comments were rejected.			
4	Public Meeting	Minorities, Disabled, Broad Community, Public & Assisted Housing Residents, All Citizens	Staff made a presentation to the North Park Task Force on December 4, 2024 to present information on the Division and to identify community needs to address with CDBG and HOME.
	Over 25 neighborhood citizens attended the meeting.		
5	Public Notices & Email Notification	Nonprofit organizations with an interest in AmeriCorps VISTA funding opportunities	Public Notices regarding the availability of AmeriCorps VISTA resources were published through the Yellowstone County News on December 6, 13, 20, and 27, 2024. Email notification on December 6, 2024 .
	The City received numerous proposals for AmeriCorps VISTA placements for projects designed to impact poverty.		
6	Email Notification & Website	Nonprofit and other organizations with an interest in CDBG and / or HOME funding opportunities	Email sent on December 9, 2024 . The City is accepting applications for CDBG and HOME projects and activities. The application was also posted on the City's website .
	Public comments are included in the Appendices.		
7	Social Media Publication	Minorities, Disabled, Broad Community, Public & Assisted Housing Residents, All Citizens Nonprofit organizations with an interest in AmeriCorps VISTA funding opportunities	Applications for CDBG and HOME funding available, posted December 10, 2024 . Billings Planning & Community Services Department - Facebook
	No external applications were received. However, Community Development staff met with the YWCA Billings about a potential CDBG project on January 6 and 24, 2025 .		
8	Public Hearing	Minorities, Disabled, Broad Community, Public & Assisted Housing Residents, All Citizens Nonprofit organizations with an interest in AmeriCorps VISTA funding opportunities	A public hearing was held on February 4, 2025 at the Community Development Board meeting to garner public comment on community need and for organizations interested in funding to present information on applications submitted. Public notices were published on January 17, 24, and 31, 2025.
	Public comments are included in the Appendices.		
9	Social Media Publication	Minorities, Disabled, Broad Community, Public & Assisted Housing Residents, All Citizens Nonprofit organizations with an interest in AmeriCorps VISTA funding opportunities	Planning and Community Services Department's Annual Report distributed, and it includes a QR code to the Consolidated Plan survey, posted on February 6, 2025 . The report was also shared with the City's boards, councils, and distribution lists. Billings Planning & Community Services Department - Facebook
	The number of surveys and results are included in the Appendices.		
10	Email Notification	Minorities, Disabled, Broad Community, Public & Assisted Housing Residents, All Citizens Nonprofit and other organizations with an interest in CDBG and / or HOME funding opportunities	The City is distributing a survey to receive Billings residents' input on how the City of Billings should spend the federal funding received to assist low-income households and revitalize neighborhoods. Email sent on February 7, 2025 . Survey link is also posted on the City's website .
	The number of surveys and results are included in the Appendices.		

#	Mode of Outreach	Target of Outreach	Summary of response/attendance
Summary of comments not accepted and reasons: No comments were rejected.			
11	Newspaper Ad	Minorities, Disabled, Broad Community, Public & Assisted Housing Residents, All Citizens Nonprofit and other organizations with an interest in CDBG and / or HOME funding opportunities	An ad with a survey QR code was published in the Yellowstone County News on February 14, 21, 28 and March 7 .
12	Social Media Publication &	Minorities, Disabled, Broad Community, Public & Assisted Housing Residents, All Citizens Nonprofit and other organizations with an interest in CDBG and / or HOME funding opportunities	The City is distributing a survey to receive Billings residents' input on how the City of Billings should spend the federal funding received to assist low-income households and revitalize neighborhoods. Posted on February 18, 2025 . Billings Planning & Community Services Department - Facebook
The number of surveys and results are included in the Appendices.			
13	Hand & Email Distribution of Surveys	Minorities, Disabled, Broad Community, Public & Assisted Housing Residents, All Citizens	Community Development staff hand-delivered surveys to the following community resource and social service locations: YMCA, Billings Public Library, Family Service, Inc., Family Promise of Yellowstone County, Adult Resource. Surveys were also dropped off at local businesses: Rail Line Coffee, Ebon Coffee Collective, Mazevo (Grand Avenue and Central Avenue locations), and Rocket Burrito during the week of February 23, 2025 . Hardcopy surveys were available at the Community Development office along with a locked box to accept completed surveys. Emails were also sent to the Billings Association of Realtors, the social service provider listserv, neighborhood Task Force leadership, affordable housing development professionals, fair housing advocates, healthcare organizations, agencies representing those with disabilities, providers for the unhoused, employment agencies, mental health and substance misuse professionals, public benefits providers, agencies representing minorities, veterans groups, low-income citizens, public schools, colleges, and the Community Development Board on March 3, 2025 .
The number of surveys and results are included in the Appendices.			
14	Public Meeting	Minorities, Disabled, Broad Community, Public & Assisted Housing Residents, All Citizens Nonprofit and other organizations with an interest in CDBG and / or HOME funding opportunities	Community Development Board meeting on March 4, 2025 included a discussion of the Consolidated Plan structure, drafted findings, and recommended strategies and priorities. Public notices were published on January 24 and 31, 2025.
Public comments are included in the Appendices.			
15	Public Notices and Public Hearing	Minorities, Disabled, Broad Community, Public & Assisted Housing Residents, All Citizens Nonprofit and other organizations with an interest in CDBG and / or HOME funding opportunities	Public Notices regarding the publication of the drafted Consolidated Plan on the City's website, the public comment period from March 15 through April 14, 2025. The public hearing was held on April 14, 2025, at 5:30 p.m. at the City Council meeting at City Hall, 316 North 26th Street in Billings, Montana. Public notices were published in the Yellowstone County News on March 14, 21, and 28, 2025 . Meeting was streamed live and video is available on demand at www.com7tv.com . Streamed live and video is available on demand at www.facebook.com/com7tv .
Public comments are included in the Appendices.			

#	Mode of Outreach	Target of Outreach	Summary of response/attendance
Summary of comments not accepted and reasons: No comments were rejected.			
16	Website	Minorities, Disabled, Broad Community, Public & Assisted Housing Residents, All Citizens	The drafted Consolidated Plan was available online from March 15 through April 14, 2025 for public comment. Emails were also sent to Billings area nonprofit, healthcare, and housing organizations.
	Public comments are included in the Appendices.		
17	Public Meetings	Minorities, Disabled, Broad Community, Public & Assisted Housing Residents, All Citizens	Community Development staff and Board members attended neighborhood Task Force meetings to share information about the Consolidated Plan and distribute the survey: <ul style="list-style-type: none"> - North Park, March 5, 2025 - South Side, March 20, 2025 - Billings Heights, March 25, 2025
	Public comments are included in the Appendices.		
18	Public Meeting	Minorities, Disabled, Broad Community, Public & Assisted Housing Residents, All Citizens Nonprofit and other organizations with an interest in CDBG and / or HOME funding opportunities	Community Development staff made a presentation to the Billings City Council on March 17, 2025 to review drafted findings, strategies, priorities, and to receive public comment on the drafted Consolidated Plan, Meeting was streamed live and video is available on demand at www.comm7tv.com . Streamed live and video is available on demand at www.facebook.com/comm7tv .
	Public comments are included in the Appendices.		
19	Public Meetings	Minorities, Disabled, Broad Community, Public & Assisted Housing Residents, All Citizens	Information and survey shared at the Task Force Leadership meeting on April 3, 2025 with officers from all neighborhood task forces.
	Public comments are included in the Appendices.		

HUD Table 4 – Citizen Participation Outreach

Section III: Needs Assessment

NA-05 Overview

Needs Assessment Overview

The Needs Assessment is intended to provide a clear picture of the City's needs related to affordable housing, special needs housing, community development and homelessness. The overall intent of the Needs Assessment is to identify high priority needs that may be addressed by the Consolidated Plan.

NA-10 Housing Needs Assessment

24 CFR 91.205 (a,b,c)

Summary of Housing Needs

The City's Consolidated Plan must include a precise summary of the City's estimated housing needs projected for the duration of the Plan.

Population, Household, and Income Baselines and Changes

HUD Consolidated Plan Data				City of Billings Staff Research	
Demographics	Base Year: 2009	Most Recent Year: 2020	% Change	2023 Census	% Change
Data Source	2000 Census	2016-2020 ACS			
Population	108,135	109,710	1%	120,864	10%
Households	44,095	47,485	8%	50,340	6%
Median Income	\$51,012	\$60,032	18%	\$71,855	20%

HUD Table 5 - Housing Needs Assessment Demographics

By July 1, 2023, The [U.S. Census Bureau](#) estimated total population in Billings at 120,864 with a ten percent change from April 1, 2020, which is statistically significant. The number of households increased by six percent and median income increased by 20%.

Number of Households Table

	0-30% HAMFI	>30- 50% HAMFI	>50- 80% HAMFI	>80- 100% HAMFI	>100% HAMFI	Total	% of Total Households
Total Households*	5,145	6,055	8,345	5,495	22,445	47,485	
Small Family Households* (two to four members)	1,095	1,725	2,120	2,000	10,365	17,305	36%
Large Family Households* (five or more members)	165	279	620	394	1,775	3,233	7%
Household contains at least one person 62-74 years of age	1,164	1,170	1,679	1,120	4,975	10,108	21%
Household contains at least one person age 75 or older	970	1,505	1,189	634	1,805	6,103	13%
Households with one or more children 6 years old or younger*	539	840	1,435	854	2,270	5,938	13%
% of Total Households	11%	13%	18%	12%	47%		
	41%		59%				

*The highest income category for these family types is >80% HUD Area Median Family Income (HAMFI)

HUD Table 6 - Total Households

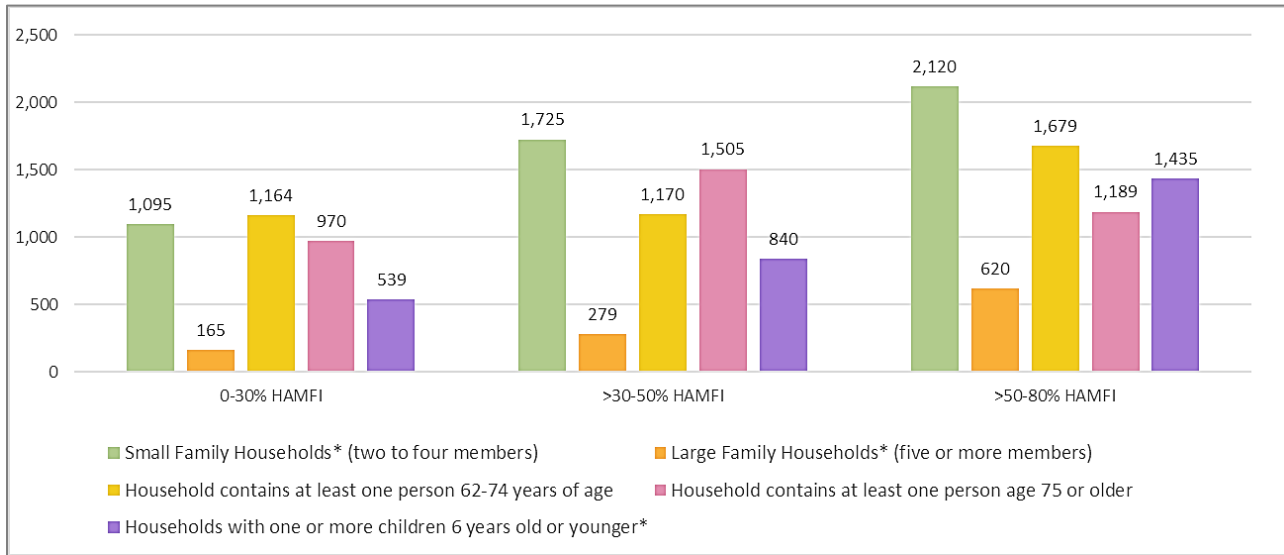
Data Source: 2016-2020 CHAS

Total and percentage columns have been added by City Staff

The HUD Area Median Family Income (HAMFI) analysis in the table above indicates the highest number of total households have incomes over 100% AMI (22,445 households, 47%), nearly half of which are small families with two to four members (10,365 households, 46%).

The largest cohort in the low-income household category are small family households (4,940 families), 30% of all low-income households. The next largest cohort are those with at least one person over the age of 62 to 74 (4,013 families, 24% of all low-income households).

Number of Low-Income Households by Family Type



City of Billings, Figure A - Available in PDF version, www.BillingsMT.gov/ConPlan

Housing Needs Summary Tables

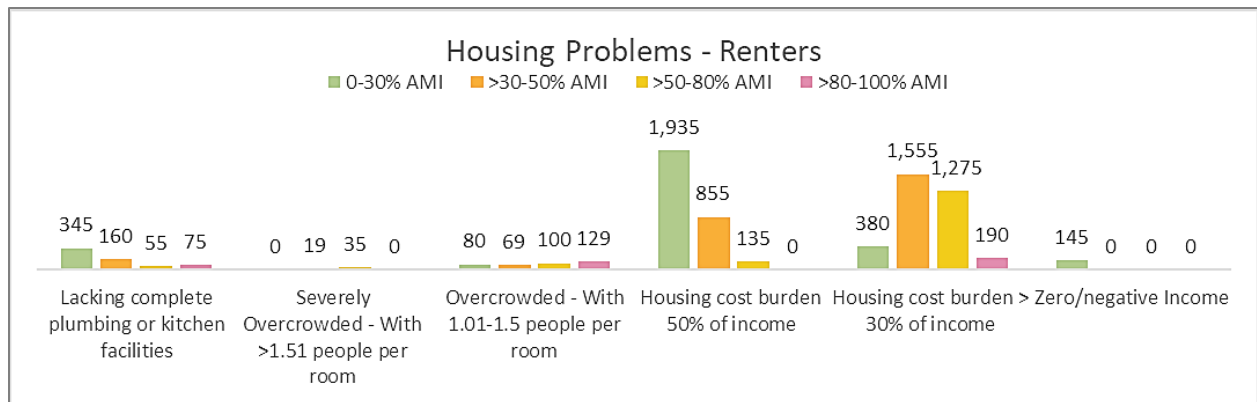
Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	345	160	55	75	635	15	10	45	70	140
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	0	19	35	0	54	0	0	10	0	10
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	80	69	100	129	378	0	25	15	20	60
Housing cost burden greater than 50% of income (and none of the above problems)	1,935	855	135	0	2,925	1,040	580	275	90	1,985
Housing cost burden greater than 30% of income (and none of the above problems)	380	1,555	1,275	190	3,400	410	680	1,280	615	2,985
Zero/negative Income (and none of the above problems)	145	0	0	0	145	139	0	0	0	139

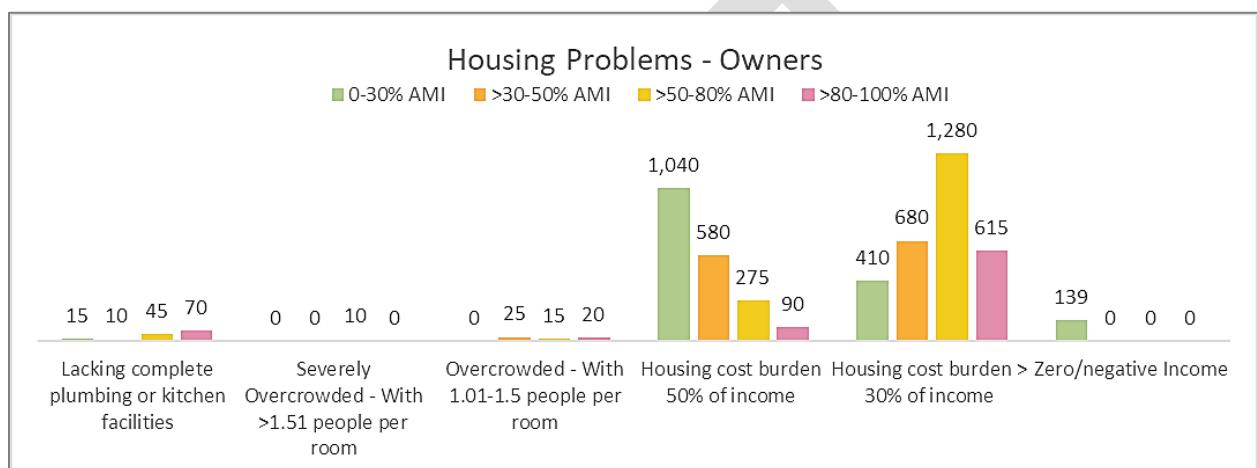
HUD Table 7 - Housing Problems

Data Source: 2016-2020 CHAS

Cost Burden: The most significant problem identified in the table above is housing cost burden, particularly for low-income renters. Over 3,000 renting households are paying more than 30% of their income for housing costs, and nearly 3,000 households are paying over 50% of their income for housing costs.



City of Billings, Figure B - Available in PDF version, www.BillingsMT.gov/ConPlan



City of Billings, Figure C - Available in PDF version, www.BillingsMT.gov/ConPlan

Housing Problems 2

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	2,360	1,110	325	205	4,000	1,055	620	340	180	2,195
Having none of four housing problems	920	2,555	3,680	1,873	9,028	809	1,770	4,005	3,245	9,829
Household has negative income, but none of the other housing problems	0	0	0	0	0	0	0	0	0	0

Households with One+ Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden

HUD Table 8 - Housing Problems 2

Data Source: 2016-2020 CHAS

Housing Problems: Thirty-five percent of low-income renters represented in the above table (3,795 households) and twenty-three percent of low-income owners (2,015 households) have one or more of the four housing problems (lacking complete plumbing / kitchen facilities, overcrowding, or housing cost burden). Cost burden is particularly challenging for the elderly, followed by small related households.

Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	555	789	320	1,664	425	450	619	1,494
Large Related	50	134	120	304	120	90	214	424
Elderly	930	1,000	374	2,304	680	470	469	1,619
All Other Households	1,200	660	660	2,520	235	280	285	800
Total need by income	2,735	2,583	1,474	6,792	1,460	1,290	1,587	4,337

HUD Table 9 - Cost Burden > 30%

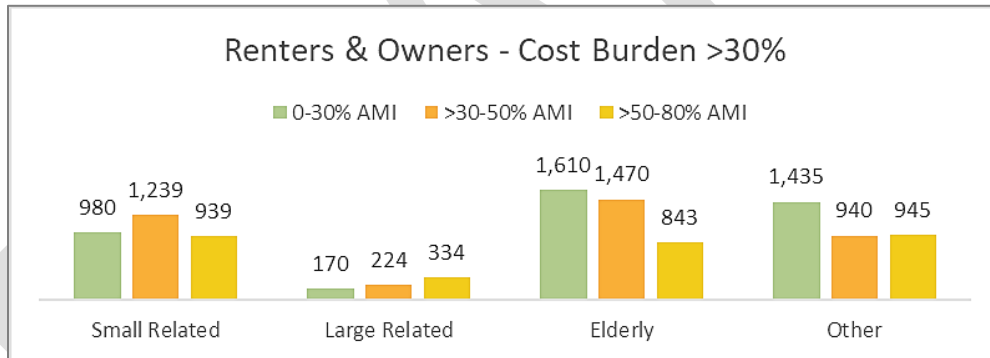
Data Source: 2016-2020 CHAS

Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	0	0	315	315	280	235	0	515
Large Related	0	0	0	0	80	20	4	104
Elderly	785	445	160	1,390	495	195	125	815
All Other Households	0	1,045	235	1,280	185	0	0	185
Total need by income	785	1,490	710	2,985	1,040	450	129	1,619

HUD Table 10 - Cost Burden > 50%

Data Source: 2016-2020 CHAS



City of Billings, Figure D - Available in PDF version, www.BillingsMT.gov/ConPlan

Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	80	73	125	119	397	0	25	10	20	55
Multiple, unrelated family households	0	0	10	15	25	0	0	15	0	15
Other, non-family households	0	15	0	0	15	0	0	0	0	0
Total need by income	80	88	135	134	437	0	25	25	20	70

HUD Table 11 - Crowding Information

Data Source: 2016-2020 CHAS

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
# Households with Children Present	21	24	36	81	0	7	7	14

HUD Table 12 - Crowding Information

Data Source: Statistical Atlas & 2016-2020 CHAS

Children – Crowding: For the table above, Community Development staff utilized [Statistical Atlas](#) to determine 26.8% of all households in Billings (18,015) have children under the age of 18 in residence. HUD data was utilized with this percentage to estimate crowding by tenancy and household income.

Describe the number and type of single person households in need of housing assistance.

As of December 2024, HomeFront, the local public housing authority, [reported a record-high waiting list](#) for affordable housing, with 8,096 individuals awaiting assistance. Notably, 3,688 of these applicants are seeking one-bedroom units. This represents a significant need for housing assistance and smaller unit size. [The average household](#) size in Billings is 2.29 persons, and non-family households, which often include single-person households, constitute just over [42% of all households](#).

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

Families with Disabilities: While specific numbers of families with disabilities in need of housing assistance in Billings are not readily available, broader data provides some context. According to the [U.S. Census Bureau](#), approximately 9.8% of Billings residents under the age of 65 have a disability. This statistic includes all individuals with disabilities, not just those in need of housing assistance. This suggests a significant portion of the population may face challenges related to disabilities, potentially impacting their housing needs.

Victims of Domestic Violence and Related Crimes: Data from local organizations sheds light on the prevalence of domestic violence in the area. Nearly [60% of reported crimes](#) in Billings are related to domestic violence. In 2023, the Billings Police Department documented [over 800](#) domestic violence cases, leading to more than 300 arrests.

As of February 2025, the YWCA Billings provided [over 9,000 nights](#) of emergency shelter to 157 adults and 105 children at their shelter. These figures highlight the substantial demand for housing assistance among victims and their families. [There are currently](#) four domestic violence and abuse shelters and programs in Billings, with two offering hotlines and one providing emergency shelter. While these services are crucial, the data indicates a persistent need for more comprehensive housing solutions to support affected families.

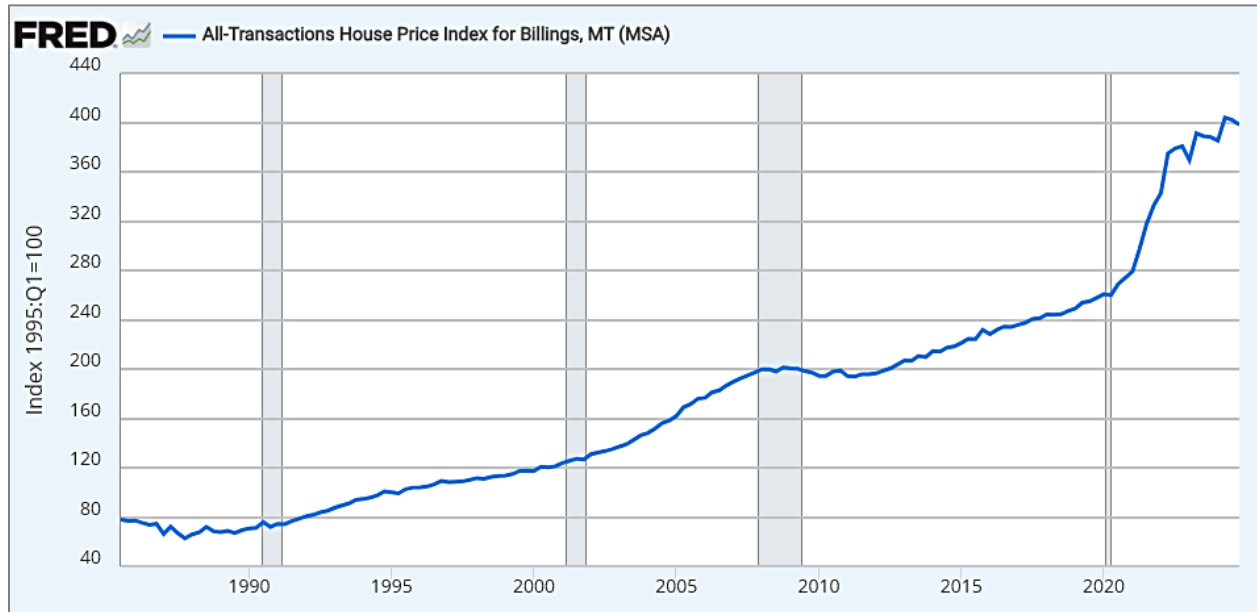
What are the most common housing problems?

The City of Billings faces several housing challenges, primarily centered around affordability, availability, pricing, lasting pandemic impacts, and the overall shortage of quality housing that meets the needs of its diverse community.

- **Housing Demand:** The demand for housing in Billings has led to increased property values and rental rates. In July 2020 and 2021, Billings was ranked as the number one emerging housing market by the [Wall Street Journal](#), with median home prices rising 20% year over year. This surge has made it challenging for many residents to afford homes, leading to a competitive market with limited options for lower-income individuals.

- Housing Prices:** In the latter half of the 2010s, Billings experienced accelerated price increases fueled by population growth and limited new construction. The COVID-19 pandemic further disrupted market conditions. Initially, there was a sharp economic shock in early 2020, but as remote work and migration patterns changed, demand for housing in Billings surged. Limited inventory combined with increased demand from out-of-state buyers led to rapid price escalations. By the second quarter of 2024, housing prices reached the highest level on record.

Housing Price Index for Billings, Montana



City of Billings, Figure E - FRED Economic Data, Retrieved March 2025

- Housing Availability:** The [2022 National Community Survey](#) indicated the variety and availability of affordable, quality housing is much lower than national benchmarks. Nearly 40% of respondents noted the variety of housing options is “Poor” and 64% indicated the availability of affordable, quality housing is “Poor.” There are just under 400 short-term rental housing units operating within the City limits, which effectively reduces the rental housing market.
- Property Tax Increases:** In 2023, the Montana Department of Revenue conducted a biennial reappraisal of all properties, resulting in an [average 49% increase](#) in home appraisals statewide. This significant rise in assessed property values directly led to higher property taxes for many homeowners.
- Property Insurance Premium Increases:** The combination of more frequent natural disasters and rising repair costs has led to a surge in insurance claims. To mitigate financial losses, insurers have raised premiums and, in some cases, reduced coverage options for homeowners.
- Cost Burden:** Over 3,000 renting households are paying more than 30% of their income for housing costs, and nearly 3,000 households are paying over 50% of their income for housing costs. Cost burden is particularly challenging for the elderly, followed by small related households.
- Housing Problems:** Thirty-five percent of renters (3,795 households) and twenty-three percent of

owners (2,015 households) have one or more of the following housing problems: lacking complete plumbing / kitchen facilities; overcrowding; or housing cost burden.

- The [Community Health Needs Assessment](#) notes most Yellowstone County residents live in healthy and safe housing. However, nearly ten percent report living in unhealthy or unsafe housing conditions. Over eight percent are very concerned and 37% are somewhat concerned about household hazards and safety.

Are any populations/household types more affected than others by these problems?

Certain populations and household types in Billings, Montana, are more affected by housing problems than others. Extremely low-income and small related renter households and elderly homeowners are most impacted by housing cost burden. Cost burden is particularly challenging for the elderly, followed by small related households. Many low-income households are experiencing housing cost burden and housing cost burden is an impediment to fair housing choice for this cohort.

Describe the characteristics and needs of low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered. Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance.

91.205(c), 91.305(c)

Families at risk of homelessness in Billings often struggle with high rent costs, low wages, and lack of affordable childcare or transportation. Without immediate intervention, they face the likelihood of losing stable housing and entering shelters or becoming unsheltered. Formerly homeless families and individuals who are receiving rapid rehousing assistance, through the Human Resources Development Council District 7, nearing the termination of that support face critical needs to ensure they remain stably housed and do not return to homelessness. Rental assistance, affordable housing, employment support, and social services are critical to preventing homelessness in these vulnerable groups.

Characteristics: Many spend 50% or more of their income on rent and utilities, leaving little for food, healthcare, transportation, and other necessities. Sudden expenses (e.g., medical bills, car repairs, or job loss) can push them into eviction or homelessness. Rising rental costs and a shortage of affordable housing units make it difficult to relocate after an eviction notice. Some landlords may decline lease renewals to convert units to short-term rentals or attract higher-income tenants.

They may work in low-wage jobs (e.g., retail, food service, caregiving) that offer inconsistent hours, seasonal employment, or no benefits. A job loss, reduction in hours, or unexpected expense can cause immediate financial crisis.

Harsh Montana winters lead to high heating bills, increasing financial strain. Lack of affordable public transportation makes it difficult to get to work, school, or services, further increasing expenses. Most live paycheck to paycheck, with no financial safety net. Some lack family or community support, leaving them with limited options if they lose housing.

Needs: Housing cost burden can be lessened through increased access to short-term financial aid for rent, utilities, and security deposits. Support for heating bills, transportation costs, essential home repairs, and expanded public transportation access for low-income families can promote stability.

Developing additional affordable housing units, more job training programs, higher-wage opportunities, access to social workers, financial counseling, and mental health services can also foster improved household wellness.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates.

The City of Billings has not estimated the at-risk population.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness.

Several housing characteristics in Billings, Montana, have been linked with instability and an increased risk of homelessness, particularly for low-income individuals and families. These factors contribute to housing precarity, making it difficult for at-risk populations to maintain stable housing.

High Rent Costs & Lack of Affordable Units: Rising rental prices have outpaced wages, leaving many renters spending more than 30-50% of their income on housing. Many renters live paycheck to paycheck, making them vulnerable to financial shocks (e.g., medical emergencies, car repairs, job loss). High utility costs during Montana’s harsh winters add to housing expenses. Billings has limited legal aid services for tenants facing eviction, making it easier for landlords to remove tenants without challenge. Market-driven rent increases and landlords converting long-term rentals into short-term rentals (e.g., Airbnb) reduce affordable housing supply.

Low Rental Vacancy Rates and Limited Housing Options: Billings has low rental vacancy rates, meaning tenants have few options if they need to relocate. Landlords have leverage to increase rents or be more selective about who they rent to, often disadvantaging low-income tenants. Families with eviction records, poor credit, or criminal histories struggle to find housing, pushing them closer to homelessness.

Discussion

In conclusion, cost burden is the most significant housing issue for low-income households. Smaller families and the elderly are the largest cohorts experiencing housing cost burden. The majority of low-income households have been paying greater than 30-50% of their income for housing costs. For renters, the cost burden is more significant with small related households followed by the elderly. With homeowners, cost burden is more significant with the elderly followed by small related households.

Homeownership housing pricing has outpaced income levels indicating a continued need for down payment and closing costs assistance to promote housing stability for low-income families. The current housing stock in Billings, characterized by [median home prices](#) around \$330,000 to \$419,900, appears to be unaffordable for many residents when evaluated independently of current occupants. The gap between housing costs and local incomes suggests that a significant portion of the population may struggle to purchase homes at these prices, underscoring the need for more affordable housing options in the area.

NA-15 Disproportionately Greater Need: Housing Problems

91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

For the purposes of data analysis, HUD has provided data from the 2016-2020 Comprehensive Housing Affordability Strategy (CHAS) to demonstrate the number of households with certain housing problems in each income strata. This data is derived from the American Community Survey (ACS).

0%-30% of Area Median Income

Housing Problems - Lacks complete kitchen facilities - Lacks complete plumbing facilities - More than one person per room - Cost burden > 30%	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	City Staff Data Analysis	
				Percentage in need and comparison to baseline data	
Jurisdiction as a whole	4,205	939	0	82%	Baseline
White	3,830	724	0	84%	Similar
Black / African American	15	0	0	100%	Higher
Asian	65	0	0	100%	Higher
American Indian, Alaska Native	70	85	0	45%	Lower
Pacific Islander	0	0	0	-	-
Hispanic	140	75	0	65%	Lower

HUD Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2016-2020 CHAS

30%-50% of Area Median Income

Housing Problems - Lacks complete kitchen facilities - Lacks complete plumbing facilities - More than one person per room - Cost burden > 30%	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	City Staff Data Analysis	
				Percentage in need and comparison to baseline data	
Jurisdiction as a whole	3,960	2,085	0	66%	Baseline
White	3,230	1,930	0	63%	Similar
Black / African American	150	25	0	86%	Higher
Asian	0	0	0	-	-
American Indian, Alaska Native	170	50	0	77%	Higher
Pacific Islander	0	0	0	-	-
Hispanic	345	65	0	84%	Higher

HUD Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data Source: 2016-2020 CHAS

50%-80% of Area Median Income

Housing Problems - Lacks complete kitchen facilities - Lacks complete plumbing facilities - More than one person per room - Cost burden > 30%	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	City Staff Data Analysis	
				Percentage in need and comparison to baseline data	
Jurisdiction as a whole	3,225	5,124	0	39%	Baseline
White	2,550	4,644	0	35%	Similar
Black / African American	50	10	0	83%	Higher
Asian	70	0	0	100%	Higher
American Indian, Alaska Native	150	85	0	64%	Higher
Pacific Islander	4	30	0	12%	Lower
Hispanic	263	170	0	61%	Higher

HUD Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data Source: 2016-2020 CHAS

80%-100% of Area Median Income

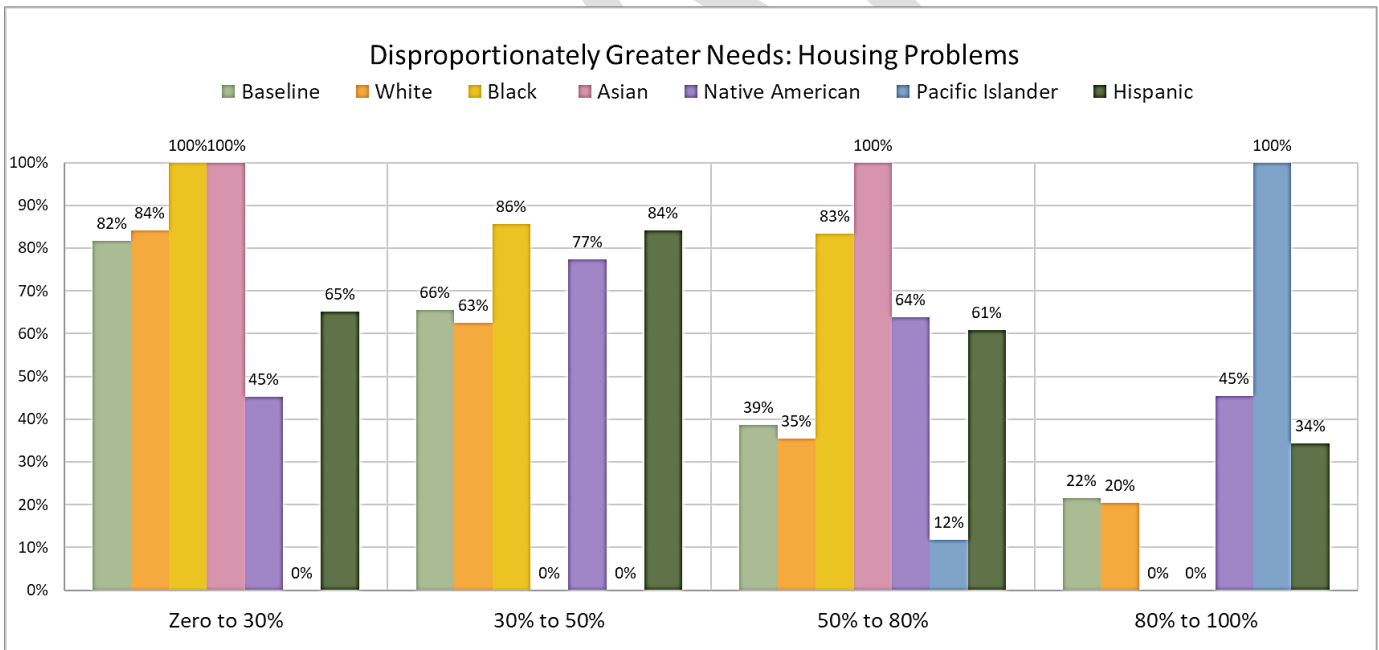
Housing Problems - Lacks complete kitchen facilities - Lacks complete plumbing facilities - More than one person per room - Cost burden > 30%	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	City Staff Data Analysis	
				Percentage in need and comparison to baseline data	
Jurisdiction as a whole	1,185	4,313	0	22%	Baseline
White	980	3,828	0	20%	Similar
Black / African American	0	70	0	0%	Lower
Asian	0	30	0	0%	Lower
American Indian, Alaska Native	25	30	0	45%	Higher
Pacific Islander	15	0	0	100%	Higher
Hispanic	125	240	0	34%	Higher

HUD Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data Source: 2016-2020 CHAS

Discussion

Community Development staff utilized the “jurisdiction as a whole” category to establish a baseline for the prevalence of housing problems by race / ethnicity. The White cohort is relatively similar to the baseline and represents the majority (86%) of overall population households identified in HUD Tables 13 through 16. Collectively, minorities comprise just under 11% of the overall population and nearly all minority cohorts are more likely to have one or more housing problems. The only exception is the Pacific Islander population, although this cohort represents around 0.2% of the population.



City of Billings, Figure F - Available in PDF version, www.BillingsMT.gov/ConPlan

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

For the purposes of data analysis, HUD has provided data from the 2016-2020 Comprehensive Housing Affordability Strategy (CHAS) to demonstrate the number of households with certain housing problems in each income strata. This data is derived from the American Community Survey (ACS).

0%-30% of Area Median Income

Severe Housing Problems - Lacks complete kitchen facilities - Lacks complete plumbing facilities - More than 1.5 persons per room - Cost burden > 50%	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	City Staff Data Analysis	
				Percentage in need and comparison to baseline data	
Jurisdiction as a whole	3,415	1,729	0	66%	Baseline
White	3,095	1,449	0	68%	Similar
Black / African American	15	0	0	100%	Higher
Asian	65	0	0	100%	Higher
American Indian, Alaska Native	55	100	0	35%	Lower
Pacific Islander	0	0	0	-	-
Hispanic	90	120	0	43%	Lower

HUD Table 17 - Severe Housing Problems 0 - 30% AMI

Data Source: 2016-2020 CHAS

30%-50% of Area Median Income

Severe Housing Problems - Lacks complete kitchen facilities - Lacks complete plumbing facilities - More than 1.5 persons per room - Cost burden > 50%	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	City Staff Data Analysis	
				Percentage in need and comparison to baseline data	
Jurisdiction as a whole	1,730	4,325	0	29%	Baseline
White	1,330	3,830	0	26%	Similar
Black / African American	50	125	0	29%	Similar
Asian	0	0	0	-	-
American Indian, Alaska Native	60	160	0	27%	Similar
Pacific Islander	0	0	0	-	-
Hispanic	215	195	0	52%	Higher

HUD Table 18 - Severe Housing Problems 30 - 50% AMI

Data Source: 2016-2020 CHAS

50%-80% of Area Median Income

Severe Housing Problems - Lacks complete kitchen facilities - Lacks complete plumbing facilities - More than 1.5 persons per room - Cost burden > 50%	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	City Staff Data Analysis	
				Percentage in need and comparison to baseline data	
Jurisdiction as a whole	665	7,685	0	8%	Baseline
White	585	6,615	0	8%	Same
Black / African American	30	30	0	50%	Higher
Asian	25	45	0	36%	Higher
American Indian, Alaska Native	30	210	0	13%	Higher
Pacific Islander	0	35	0	0%	Lower
Hispanic	4	434	0	1%	Lower

HUD Table 19 - Severe Housing Problems 50 - 80% AMI

Data Source: 2016-2020 CHAS

80%-100% of Area Median Income

Severe Housing Problems - Lacks complete kitchen facilities - Lacks complete plumbing facilities - More than 1.5 persons per room - Cost burden > 50%	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	City Staff Data Analysis	
				Percentage in need and comparison to baseline data	
Jurisdiction as a whole	385	5,118	0	7%	Baseline
White	370	4,438	0	8%	Similar
Black / African American	0	70	0	0%	Lower
Asian	0	30	0	0%	Lower
American Indian, Alaska Native	0	55	0	0%	Lower
Pacific Islander	15	0	0	100%	Higher
Hispanic	0	365	0	0%	Lower

HUD Table 20 - Severe Housing Problems 80 - 100% AMI

Data Source: 2016-2020 CHAS

Discussion

Comparable to the previous housing problems analysis, the White cohort is relatively similar to the baseline and represents the majority (86%) of overall population households identified in HUD Tables 17 through 20. Collectively, minorities comprise just under 11% of the overall 80% AMI population and nearly all minority cohorts are more likely to have one or more housing problems. The only exception is the Pacific Islander population, again this cohort represents around 0.2% of the population.

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

For the purposes of data analysis, HUD has provided data from the 2016-2020 Comprehensive Housing Affordability Strategy (CHAS) to demonstrate the number of households with certain housing problems in each income strata. This data is derived from the American Community Survey (ACS). The following HUD table displays the cost burden information for Billings and each racial / ethnic group, including:

- No cost burden for those paying less than 30% of household income for housing;
- Cost burden for those paying 30% to 50% of household income for housing; and
- Severe cost burden for those paying over 50% of household income for housing.

Housing Cost Burden

Housing Cost Burden	<=30% No Cost Burden	30-50% Cost Burden	>50% Severe Cost Burden	No / negative income (not computed)	City Staff Data Analysis	
					Percentage in need and comparison to baseline data	
Jurisdiction as a whole	34,375	7,240	5,570	284	27%	Baseline
White	31,490	5,995	4,810	199	25%	Similar
Black / African American	145	120	95	0	60%	Higher
Asian	240	45	90	0	36%	Similar
American Indian, Alaska Native	774	300	95	50	32%	Higher
Pacific Islander	45	4	0	0	8%	Lower
Hispanic	1,135	589	325	10	44%	Higher

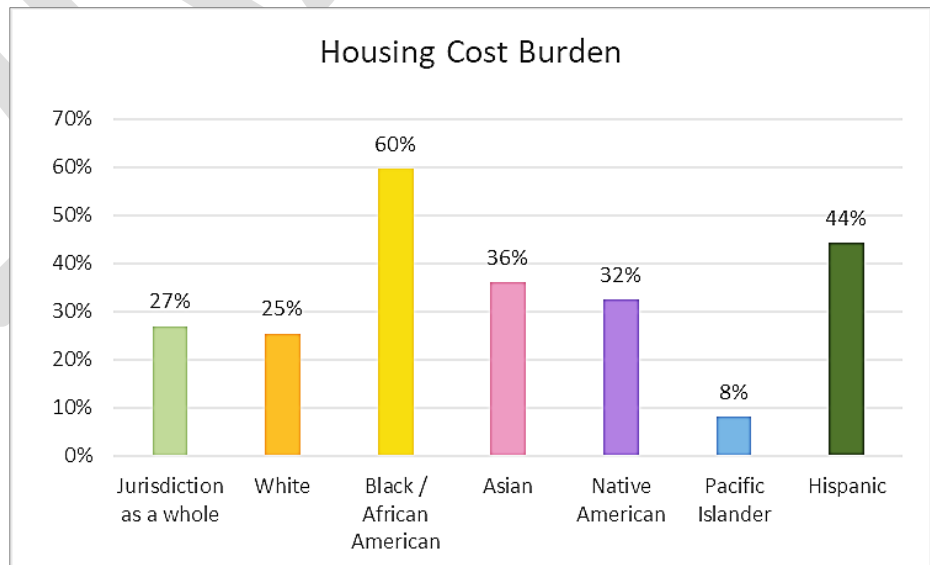
HUD Table 21 - Greater Need: Housing Cost Burdens AMI

Data Source: 2016-2020 CHAS

Discussion

Nearly 47,500 households are included in the table above. According to the data, the White population is experiencing housing cost burden similar to the jurisdiction as a whole. The Black cohort represents the most severe housing cost burden, followed by the Hispanic, Asian, and Native American groups.

Over 1,600 racial / ethnic minority households under 50% AMI are experiencing housing cost burden. Housing cost burden is an impediment to fair housing choice for these cohorts.



City of Billings, Figure G - Available in PDF version, www.BillingsMT.gov/ConPlan

Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

Yes, racial and ethnic disparities exist in housing needs across different income categories. Certain groups often experience disproportionately greater housing burdens compared to others within the same income brackets:

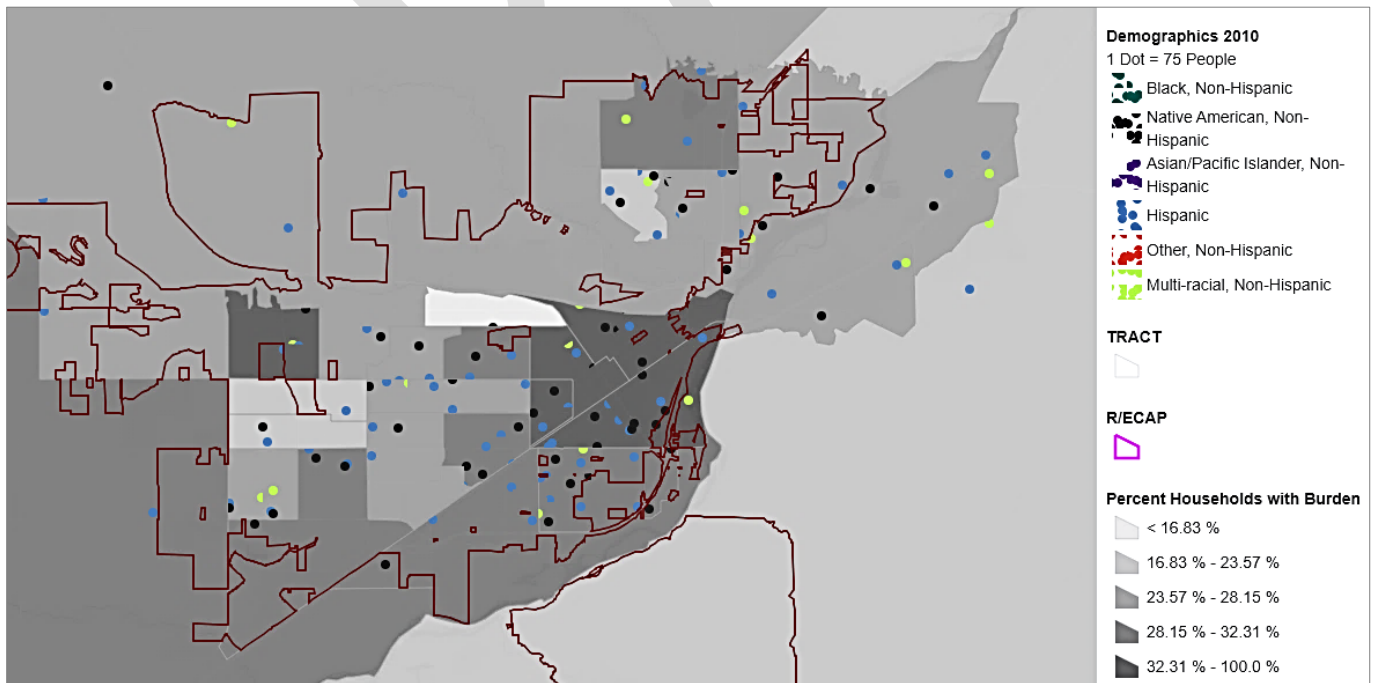
- All minority cohorts are more likely to have one or more housing problems.
- Over 1,600 racial / ethnic minority households under 50% AMI are experiencing housing cost burden. Housing cost burden is an impediment to fair housing choice for these cohorts.

If they have needs not identified above, what are those needs?

Low-income households experiencing housing cost burden and other housing problems would benefit from more subsidized housing, rental deposit assistance, down payment support, low-interest mortgages, and financial counseling. Other forms of assistance include: short-term relief to prevent eviction due to financial crises; help for homeowners struggling with high payments to avoid foreclosure, and programs to assist with rising energy costs and home repairs.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

In HUD’s mapping system, It appears as though minorities are residing across all areas of the City. The highest percentage of cost-burdened households is located in the North Park and Southside neighborhoods. Smaller neighborhoods in the West End and Billings Heights are also identified, followed by the southwest corridor neighborhood.



City of Billings, Figure H - HUD Mapping System, Retrieved February 28, 2025

Introduction

The HomeFront, the City’s local public housing authority, is responsible for the administration of the public housing and Section 8 programs for the community. HomeFront is a municipal organization established under the laws of the State of Montana. The City of Billings’ Mayor appoints Board members for the Housing Authority. HomeFront’s strategic plan describes specific goals and objectives and the plan is available for review at HomeFront office located at 2415 1st Avenue North, Billings, Montana.

HomeFront’s mission is to elevate the quality of life in our community by creating innovative, affordable, and sustainable neighborhoods. The vision statement is “Inspiring individuals and families, Promoting Partnerships, and Cultivating Change.”

Shelter Plus Care, Single Room Occupancy and Supportive Housing Program funding amounts are not included in the City’s Action Plan, as the funds are not available for allocation through the City’s Consolidated Plan process. Funding allocated to HomeFront is contained in their Annual Action Plan and the City is not duplicating the reporting requirements that already exist in the Public Housing Agency Plan.

City staff maintain a collaborative relationship with HomeFront for affordable housing and community development projects. The City provided HomeFront nearly \$2 million in CDBG and HOME funding from 1996 to 2015 to support affordable housing, including: family self-sufficiency; tenant-based rental assistance; low-income area infrastructure; and affordable housing development. This funding has aided in the development of 95 new affordable housing units (Spring Gardens, Old Town Square, Westchester Square, Lake Elmo Pre-Development / Phase One Infrastructure for Whitetail Run, and Pheasant Home).

Totals in Use

# of units vouchers in use	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
Data Source							Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
PIH Information Center	0	0	269	539	0	493	30	0	0
HomeFront	0	0	216	1,248	132	763	90	FYI 7	Mainstream 40

**includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-Year, and Nursing Home Transition*

HUD Table 22 - Public Housing by Program Type

HomeFront's Assistance Program Usage / Demand - February 2025

Assistance Programs	Vouchers / Units in Use	Current Waiting List
HAB Housing Choice Voucher / Section 8 (Certificate)	763	3,075
Montana Housing Moderate Rehabilitation Section 8 Voucher Managed through HAB	26	0
Public Housing (Income Eligibility)	216	5175
Section 8 Project-Based Vouchers	132	96
Montana Housing - Housing Choice Voucher Managed through HAB	650	29, wait list closed
Veterans Affairs Supportive Housing (VASH) Housing Choice Vouchers	90	50
HOME Units	35	100
Tax Credit Units	62	100
Total:	1,974	8,529

City of Billings, Figure I - Source: HomeFront- Entered as Table in IDIS

Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Total	Project-based	Tenant-based	Vouchers	
							Special Purpose Voucher	
						Veterans Affairs Supportive Housing	Family Unification Program	
Average Annual Income	0	0	12,898	10,761	0	10,715	8,585	0
Average length of stay	0	0	4	4	0	4	0	0
Average Household size	0	0	3	2	0	2	1	0
# Homeless at admission	0	0	0	0	0	0	0	0
# of Elderly Program Participants (>62)	0	0	18	90	0	83	6	0
# of Disabled Families	0	0	52	205	0	186	10	0
# of Families requesting accessibility features	0	0	269	N/A	N/A	N/A	N/A	N/A
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

HUD Table 23 - Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Total	Project-based	Tenant-based	Vouchers		
							Special Purpose Voucher		
Race						Veterans Affairs Supportive Housing	Family Unification Program	Disabled*	
White	0	0	162	430	0	390	25	0	0
Black/African American	0	0	6	19	0	18	1	0	0
Asian	0	0	0	4	0	4	0	0	0
American Indian/Alaska Native	0	0	100	84	0	80	3	0	0
Pacific Islander	0	0	1	2	0	1	1	0	0
Other	0	0	0	0	0	0	0	0	0

**includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-Year, and Nursing Home Transition*

HUD Table 24 - Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Ethnicity	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
			Veterans Affairs Supportive Housing				Family Unification Program	Disabled*	
Hispanic	0	0	9	47	0	41	5	0	0
Not Hispanic	0	0	260	492	0	452	25	0	0

**includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-Year, and Nursing Home Transition*

HUD Table 25 - Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units.

Public Housing Tenant Needs: Data provided in the Housing Authority’s Usage / Demand table represents the total number of vouchers and units available in the Billings area. The Public Housing program has a waiting list of over 5,000 households while only 216 units are available.

Waiting List for Accessible Units: HomeFront serves many households with a variety of special needs due to a disability. The Public Housing program has 37 handicap accessible units and HomeFront corporate subsidiary has 31 adaptable units. HomeFront has added several fully accessible and adaptable units of varying unit sizes to ensure accessibility for all applicant types including the vision impaired, hearing impaired or wheelchair accessible to accommodate the mobility impaired. When a wheelchair accessible unit becomes available, HomeFront staff spend several weeks trying to find an applicant with those needs ready to move, making the units sometimes difficult to fill.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders.

There are 5,175 households on the Public Housing waiting list and 3,075 households on the Section 8 tenant-based waiting list. This indicates a high need for application, deposit, rent, and mortgage assistance. Applicants currently on Public Housing waiting lists by unit size are as follows:

- One bedroom: 3,810
- Two bedroom: 960
- Three bedroom: 248
- Four bedroom: 157

This data supports the high need for smaller units, particularly one-bedroom rentals. HomeFront only has 32 one-bedroom public housing units, indicating a high need for access to affordable housing coupled with a need for housing assistance. The elderly and disabled are typically higher need and placed first, leaving the remaining households on the waiting list.

HomeFront can meet the needs of hundreds of households through the Housing Choice Voucher / Section 8 program while thousands of households remain on the waiting list. Section 8 clients often have a difficult time finding units they can rent in higher income areas. Many rental units in Billings are too expensive for prospective tenants to use their Section 8 voucher. HomeFront staff indicates many of those issued a voucher are unable to find a rental unit due to the low inventory of available rentals.

Voucher holders typically have less income, which makes daily life more challenging on most levels. Many need access to basic necessities such as education, literacy, transportation, employment, parenting skills, access to preschool, medical care / coverage and funds to support daycare expenses. They also need support to be able to follow through with program compliance and develop better skills to obtain higher paying jobs in the community.

How do these needs compare to the housing needs of the population at large.

The needs of voucher holders greatly exceed the housing needs of the population at large. Competition to secure housing often favors households who do not have credit barrier, can come up with required deposits and can pay premium rates for housing units. Additionally, the population at large is also able to access housing in a wide range of income areas, unlike voucher holders who are often unable to find affordable units in higher income areas that will accept their Section 8 voucher.

DRAFT

Introduction

Although current data on homelessness in Billings is limited, existing records and community insights suggest that there are critical gaps in shelter, healthcare, and social support services for those experiencing homelessness. Billings has a robust network of services, but like many communities, there is ongoing debate and effort around whether these services are sufficient given the scale of the problem.

The Montana point-in-time survey is an annual, unduplicated count of the people, both sheltered and unsheltered, in the community who are experiencing homelessness on a single night. While the survey provides vital information, the survey data only provides a snapshot of homelessness and does not count or include all individuals and households experiencing homelessness. According to the [2024 Montana Homeless Population](#) point-in-time count, 273 respondents were experiencing homelessness in Billings. Of these respondents, 42% were in transitional housing, 30% were sheltered and the remaining 28% were unsheltered. Respondents included 238 individuals, 30 family households and five child-only households. The 30 family households included four households with children aged zero to four years, 12 households with children aged five to 12 years, and eight households with children aged 13 to 17 years. The count identified 72 adult only respondents and eight households with children that were experiencing chronic homelessness.

The Homeless Management Information System (HMIS) is used by agencies in Billings to gather data about the community’s homeless population, identify strengths and gaps in the community’s homelessness assistance system and plan programs and services to address local needs. Data from Homeless Management Information System (HMIS) collected from January 1, 2024 to December 21, 2024 indicates that 1,533 total people were served by agencies in Billings. This figure represents 1,326 adults and 170 children, including 234 people served under 25 years of age. The data included 75 veterans and 144 chronically homeless persons. Additionally, data identified 427 “stayers”, which are individuals who remain in the homeless system for an extended period. This designation is used to identify clients who may be experiencing chronic homelessness or who require more intensive, long-term support to achieve housing stability. Many systems use specific thresholds (for example, remaining in shelter for 90 days or longer) to define someone as a “stayer.” Nearly 93% of “stayers” were adults. Data identified 1,106 “leavers”, which are individuals who exit the homeless system whether by moving into permanent housing, transitioning to another program, or no longer needing services. Essentially, *leavers* have successfully moved out of the homeless service system. Almost 84% of “leavers” were adults.

Homeless Needs Assessment

Data is statewide. Staff has asked for information specifically for Billings – pending future updates.

Population	Estimate # of persons experiencing homelessness on a given night		Estimate # experiencing homelessness each year	Estimate # becoming homeless each year	Estimate # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Unsheltered	Sheltered				
Persons in Households with Adult(s) and Child(ren)	14	152				
Persons in Households with Only Children	4	8				
Persons in Households with Only Adults	485	901				

Population	Estimate # of persons experiencing homelessness on a given night		Estimate # experiencing homelessness each year	Estimate # becoming homeless each year	Estimate # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Unsheltered	Sheltered				
Chronically Homeless Individuals	214	209				
Chronically Homeless Families	3	25				
Veterans	55	113				
Unaccompanied Youth	36	86				
Persons with HIV	0	0				

HUD Table 26 - Data Source: Montana Continuum of Care, March 2025

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth).

Chronically homeless individuals are often the most visible amongst the homeless population. HUD defines *chronic homelessness* as having a disability and either having been homeless for over a year or having experienced at least four episodes of homelessness within the past three years.

In Billings, 26% percent were chronically homeless individuals and an additional three percent of those counted were chronically homeless families. Eleven percent of those experiencing homelessness in Billings are households with adults and children. Veterans comprise fifteen percent of the overall homeless population and unaccompanied youth represent two percent of the total population.

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

Families with Children: According to the [2024 Montana Homeless Population point-in-time count](#), 30 family households were experiencing homelessness. Of the family households identified, 13% included households with children aged zero to four years, 40% included households with children aged five to 12 years and the remaining 27% included children aged 13 to 17 years. The [most recent local homeless assessment](#), completed in 2020, indicated that a substantial proportion of Billings’ low-income households with children are housing insecure. While exact numbers vary, data from the homeless point-in-time counts and local service agency reports suggest that hundreds of families with children are in need of stable, affordable housing. For example, a 2019 survey found that about 35% of homeless households in Billings include children. Billings Public Schools provided services for 600 unhoused children in Billings and the school district is working to form a [Family Resource Center](#) to combat family homelessness.

Veterans: The [2024 Montana Homeless Population](#) point-in-time count identified 40 veterans experiencing homelessness. However, the United States Department of Veterans Affairs (VA) [announced a significant decrease](#) (18.8%) in veteran homelessness across the state. The VA [also announced it housed 249 veterans](#) who were previously experiencing homelessness. Data is not available relative to the needs of families of veterans.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

The [2024 Montana Homeless Population](#) point-in-time count identified 273 individuals, nearly 50% were White, 41% were Native American, and nearly nine percent were listed as “other”. The Native American cohort is disproportionately represented in the unhoused population.

Nature and Extent of Homelessness

Data is statewide. Staff has asked for information specifically for Billings – pending future updates.

Race:	Sheltered	Unsheltered
White	829	382
Black or African American	58	20
Asian	8	3
American Indian	307	97
Pacific Islander	8	4
Ethnicity:	Sheltered	Unsheltered
Hispanic	90	29
Not Hispanic	78	33

HUD Table 27 - Data Montana Continuum of Care Coalition

Requested December 2024

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

Pursuant to the HEARTH Act, sheltered and unsheltered homeless are defined as follows:

- **Sheltered Homeless:** An individual or family living in a supervised publicly or privately operated shelter designed to provide temporary living arrangements, including congregated shelters, transitional housing, and hotels and motels paid for by charitable organization or by federal, state, or local government).
- **Unsheltered Homeless:** An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground.

Thirty percent of those represented in the charts above were sheltered, 42% were in transitional housing, and 28% were unsheltered.

Introduction

HUD requires the City to describe, to the greatest extent practicable, the level of housing need for persons who are not homeless but require supportive housing, including the elderly, frail elderly, persons with disabilities, persons with alcohol or other drug addiction, persons with HIV/AIDS and their families, and victims of domestic violence, dating violence, sexual assault and stalking.

American Community Survey and Census estimates may be useful at some level to determine overall disability rates. It is also important to note the margin of error for some data sets is quite large in many combined categories.

Describe the characteristics of special needs populations in your community.

Elderly (ages 62+): There are [120,864](#) living in Billings (2023 Census estimates) and 18.4% of the total population in Billings is aged 65 and older, totaling 22,239 people.

Frail Elderly (requires assistance with three or more activities of daily living, such as bathing, walking, and performing light housework): The 2023 five-year American Community Survey estimated 3,463 people between the ages of 65 and 74 with a disability (+/-884) and an additional 5,312 (+/- 1017) aged 75 years and older with a disability. The survey provided estimates for people over the age of 65 with the following difficulties: [hearing](#) (4,365 people, +/- 1076); [vision](#) (714 people, +/- 362); [self-care](#) (820 people, +/- 372); or independent living (2,534 people, +/- 774).

Persons with Disabilities: The [American Community Survey](#) estimates indicate a civilian non-institutionalized population of 118,517 individuals, of which, 17.1% / 20,313, have a disability. Just over 17% of the White population is identified as disabled and 17% of those reporting two or more races are reported as disabled.

Addiction: [Montana's Office of Epidemiology and Scientific Support](#) provides recent statistics on drug / alcohol use. The annual death rate from alcohol-related causes is much higher than the national rate (31 deaths per 100,000 people versus 17 in the nation). The [Community Health Needs Assessment](#) indicates just over 23% of area adults are excessive drinkers.

Mental Health: The [Office of Epidemiology and Scientific Support](#) states 270 Montana citizens die by suicide each year and in 2017, the suicide rate was two times higher than the national rate (29 deaths per 100,000 people versus 14 deaths per 100,000 people in the United States). Males account for 80% of suicide deaths in Montana. One in ten high school students reported having attempted suicide in the past twelve months.

Persons with HIV/AIDS: According to the [Montana Department of Health and Human Services](#), approximately 21 people are diagnosed with HIV each year. In 2020, 16 newly diagnosed HIV cases were reported in Montana. Data is not currently available relative to the number of cases in Billings.

The [Community Health Needs Assessment](#) indicates the prevalence of nearly 105 HIV cases per 100,000 population in Yellowstone County. In 2023, there were seven new cases identified. RiverStone Health, Billings Clinic and Planned Parenthood offer HIV/AIDS testing and resources. RiverStone Health is providing HIV services to about [170 people](#) through the federal Ryan White Act.

Similar to other special populations, low-income individuals living with HIV/AIDSs require additional resources to help keep them housed and stable. Healthcare and medication costs put more of a burden on low-income households that are already struggling with high housing cost burdens. Long-term, stigma-free housing and healthcare are necessities to support Billings residents living with HIV/AIDS.

Domestic Violence Victims: Over 23% of [Community Health Needs Assessment](#) survey respondents indicate they have been a victim of domestic violence at least one time in their life. This figure is higher than the nation's 13% data point.

What are the housing and supportive service needs of these populations and how are these needs determined?

One of the most significant housing problems in Billings for both owners and renters of all income levels and populations is housing cost burden. Single-person households with incomes less than 30% AMI are also a very high need as per HomeFront's waiting list. Nearly 1,500 minority households with incomes less than 80% AMI are experiencing one or more housing problems.

Elderly: Housing affordability continues to be a challenge for the elderly, particularly those who are homeowners. Nearly 500 elderly owner households with extremely low incomes are spending more than 50% of their income on housing costs. Households at 80% of the area median income are similarly cost-burdened.

Persons with Disabilities, HIV/AIDS and Domestic Violence Victims: Service providers indicate the continuous need for rental housing assistance and owner-occupied housing rehabilitation. Supportive services include linkage to transportation, medical / dental care, childcare, reliable and sustainable food sources, and case management.

Addicted Persons: The development of sober living housing options are in demand in Billings, along with behavioral / addiction health services. Additionally, a short-term sobering center with accelerated access to inpatient, detoxification treatment and long-term addiction treatment options would be helpful in serving addicted persons.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area.

The [Community Health Needs Assessment](#) indicates the prevalence of nearly 105 HIV cases per 100,000 population in Yellowstone County. In 2023, there were seven new cases identified. RiverStone Health is providing HIV services to about [170 people](#) through the federal Ryan White Act.

Most HIV cases occur in males [aged 25 to 36](#). The [Community Health Needs Assessment](#) reports higher HIV rates among African Americans and Hispanics. The most common risk factors for HIV among these patients are intercourse with men and injection of illicit substances.

Describe the jurisdiction’s need for Public Facilities.

Public facilities are the assets and institutions owned or operated by the government that provide services to residents—such as schools, libraries, parks, public transit stations, and community centers.

Domestic Violence Response / Intervention Services: The [2023 Community Health Needs Assessment](#) indicates over 23% of respondents in Yellowstone County have experienced intimate partner violence: much higher than the national percentage of just under 14%.

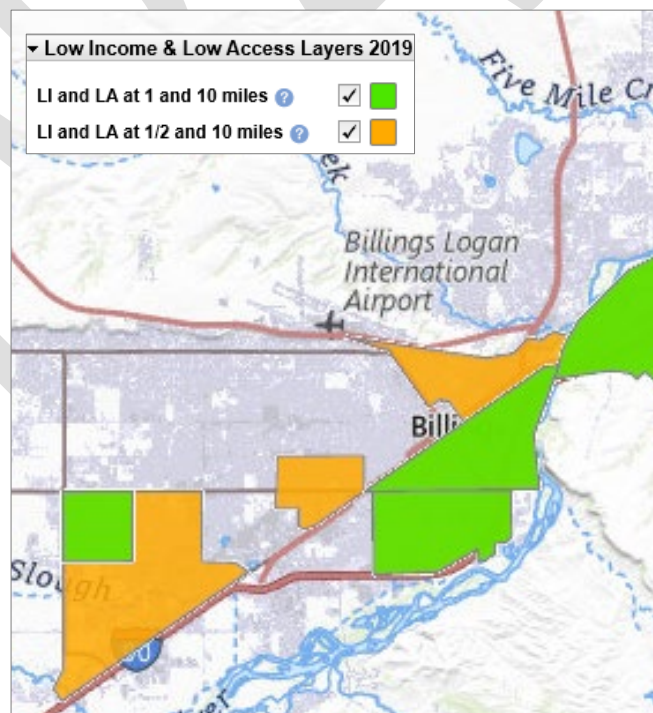
Nearly [60% of reported crimes](#) in Billings are related to domestic violence. The Billings Police Department responds to [over 600 non-aggravated Partner or Family Member Assaults](#) annually, the highest number of offenses in the state. This number doesn't include aggravated Partner or Family Member Assaults or other domestic violence-related crimes. Children exposed to domestic violence may experience life-long, chronic health conditions, engage in risky behavior, and may have a lower life expectancy.

Food Security: The [2023 Community Health Needs Assessment](#) indicates 22% of respondents are determined to be “food insecure” and report running out of food in the past year. Over 21% of the Yellowstone County population is food insecure. Over 27% find it “very / somewhat” difficult to purchase fresh produce: higher than the national percentage of 21%.

The [USDA ERS - Food Access Research Atlas](#) presents an overview of food access indicators for low-income and other census tracts using different measures of supermarket accessibility; Provides food access data for populations within census tracts; and offers census-tract-level data on food access that can be downloaded for community planning or research purposes.

Food Security: Low-Income and Low-Access Neighborhoods

Locations where a significant number or share of residents is more than one or one-half mile from the nearest supermarket.



City of Billings, Figure J- Food Access Research Atlas, Retrieved March 2025

Public Safety: Safety remains the top priority for Billings residents. Ratings for safety services tend to be below national benchmarks. The overall feeling of safety has decreased from 55% as reported by survey results in 2016 to 28% as reported by [survey results in 2022](#). Enhancing facilities and technology for police, fire, and emergency services may assist in meeting the needs of a growing and increasingly diverse population.

How were these needs determined?

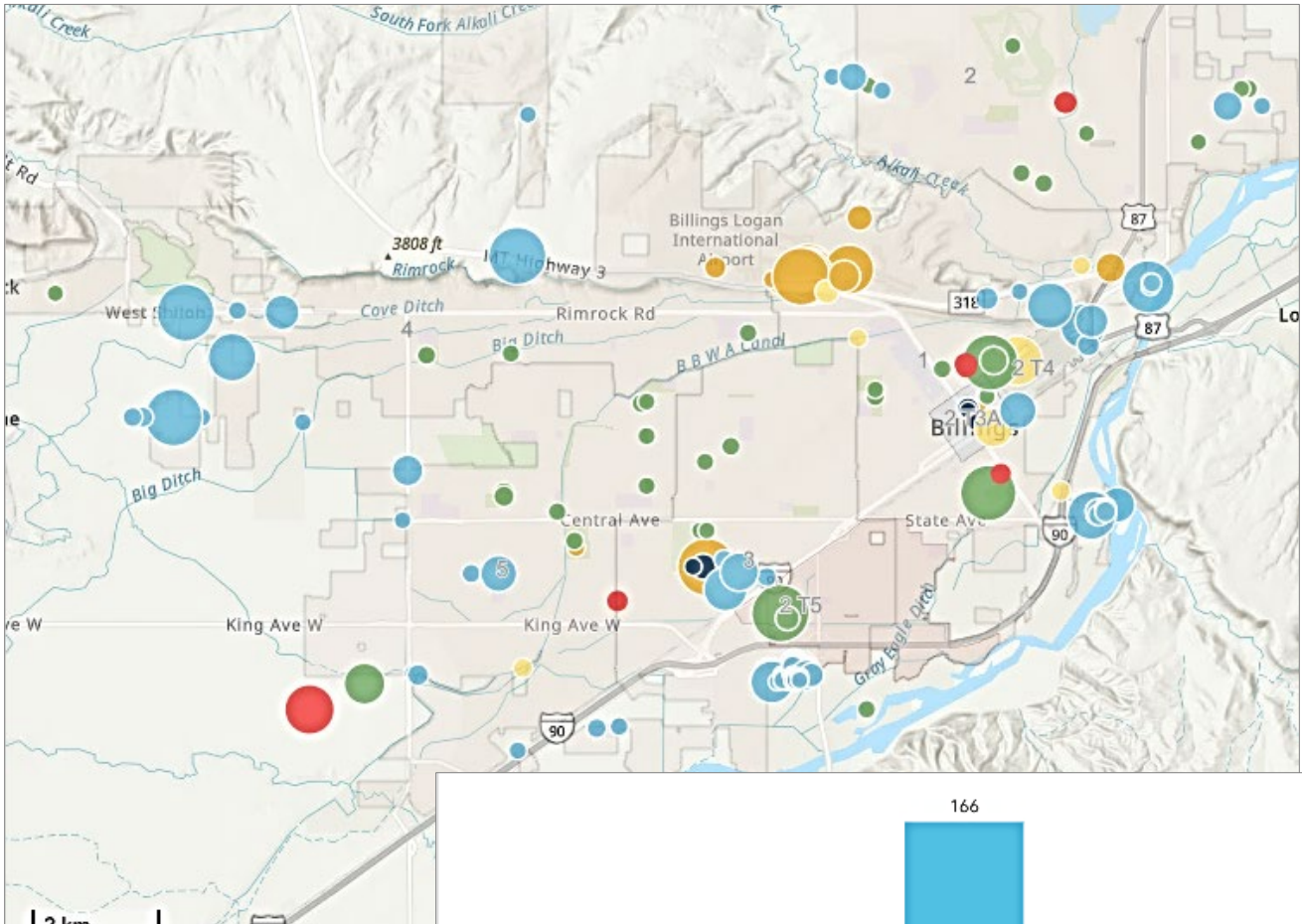
Needs were determined through consultation with the Public Works Department, the Billings City Council, social service providers, through public meetings and hearings, via survey respondents, and those identified in the citizen participation section of this Consolidated Plan. Results from the City's National Community Survey, Yellowstone County's Community Health Needs Assessment and the Community Development Division's five-year Consolidated Plan Survey were also utilized to determine needs.

Describe the jurisdiction's need for Public Improvements.

Public improvements refer to the enhancements, upgrades, or renovations made to public facilities and the broader public infrastructure (i.e. roads, bridges, utilities, and digital networks) to ensure they are modern, efficient, and capable of meeting current and future community needs.

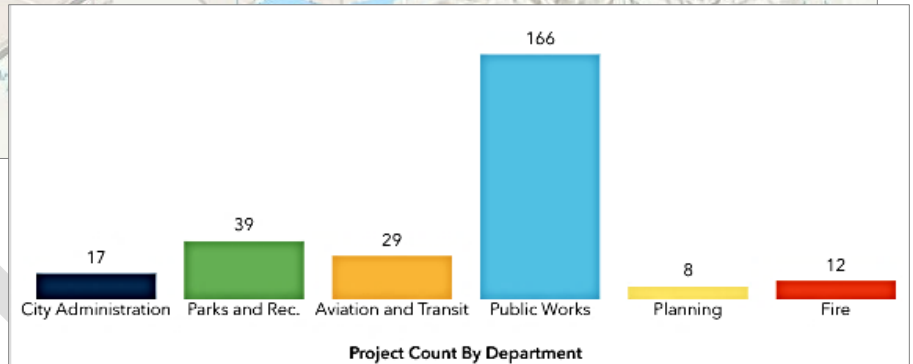
The Public Works Department spearheads a five-year [Capital Improvement Planning](#) process beginning each November. All City departments are given an opportunity to review past projects and proposed projects for the next five years. By mid-January, projects are prioritized based on input from the public during the year. Every two years in February, the Public Works Department holds two public hearings to review the Capital Improvement Plan to garner need and prioritize projects over the next five years.

Lead Water Service Lines: The Public Works Department is replacing lead water service lines from city mains to residential property lines. Staff estimates there are 200 residences needing these improvements and many are located in low-income neighborhoods and are older homes. It is the homeowner's responsibility to replace the lines from the property line to the residence and the cost per home is estimated at \$3,000 to \$10,000 per residence. Cost burden is a particularly concerning finding in this Consolidated Plan, therefore, assistance for low-income homeowners to replace these lines is a significant recommendation.



Billings Capital Project Dashboard

City of Billings - Figure K
 Billings Capital Project Dashboard
 Retrieved March 2025



Other Public Facilities: Low-income neighborhoods could also benefit from:

- Upgrading aging water, sewer, and electrical systems, as well as roads and bridges, to support current and future demand.
- Expanding and improving public transit, pedestrian pathways, and bike lanes to ensure safe and efficient movement throughout the city.
- Increasing investment in parks, community centers, and recreational facilities to promote quality of life and community engagement.
- Upgrading libraries, schools, and cultural institutions to support education, civic engagement, and economic development.

How were these needs determined?

Needs were determined through consultation with the Public Works Department, the Billings City Council, social service providers, through public meetings and hearings, via survey respondents, and those identified in the citizen participation section of this Consolidated Plan. Results from the City's National Community Survey, Yellowstone County's Community Health Needs Assessment and the Community Development Division's five-year Consolidated Plan Survey were also utilized to determine needs.

Describe the jurisdiction's need for Public Services.

As of March 13, 2025, key priorities identified by the City's Consolidated Plan survey include improved access to healthcare and mental health care, the First Time Home Buyer program, home repair programs, services for veterans and military families, K-12 education, and school readiness.

Public Safety: Safety remains the top priority for Billings residents. Ratings for safety services tend to be below national benchmarks. The overall feeling of safety has decreased from 55% as reported by survey results in 2016 to 28% as reported by [survey results in 2022](#).

The City's [Citizen Survey's](#) open-ended questions indicated a strong need for public safety including response to crime and safety services. The Billings Police Department's 2023 Annual Report indicates 1,095 violent crimes and 5,088 property crimes were investigated in 2022. This data represents a decrease in violent crimes of eight percent and a decrease in property crimes of four percent compared to data reported in 2021. However, data for the last five years indicates historic increases in violent crimes and property crimes. Crime rates are driven largely by addiction and mental illness. The Billings Police Department investigated 890 drug offenses in 2023.

The Billings Street Crimes Unit established in 2018 [reports success](#) in disrupting crime. The unit was expanded in 2020 and again in 2022 to include a sergeant, two detectives and four patrol officers. In addition to police staffing, staffing could be increased to support prosecutor caseloads. Special emphasis on crime prevention efforts and traffic safety have also been identified as jurisdictional public service needs.

The City of Billings can continue to implement Crime Prevention through Environmental Design concepts in local parks and throughout low-income neighborhoods. Consolidated Plan survey respondents indicated the need for added streetlights to deter crime and enhance public safety.

Food Security and Poverty-Impact: According to local social service providers, there is a demonstrated need for food security and poverty-impact initiatives in the Billings area. Many individuals are experiencing housing cost burden, which constrains household income available to meet other basic needs. Results of the [National Community Survey](#) also support the need for food security. Ratings for the availability of affordable, nutritious food has decreased 17% compared to results of the 2016 survey. Nearly 22% of residents are determined to be "food insecure" and report running out of food in the past year or report concerns about running out of food.

AmeriCorps VISTA members have played a pivotal role in promoting urban agriculture, enhancing food security, and fostering community engagement in Billings. Members have worked with host site organizations to enhance food security through the development of community, container, and backyard/assisted housing gardening programs including [HomeFront's](#) Whitetail Run, St. Johns, and Pleasantview apartments.

A VISTA member facilitated the development of the [Magic City Community Gardens Coalition](#) to coordinate resources, workshops, and expand gardening knowledge. VISTA members have also supported

community garden and urban food resource expansion with the Billings Parks and Recreation Department including [Amend Park](#), the [Parkland Gleaning Project](#), and mapping fruit trees and berry farming locations for public access.

[Healthy by Design](#) is a RiverStone health initiative that hosts a Gardener's Market each Thursday afternoon from June through early October in South Park. This unique market allows farmers and backyard gardeners to sell their produce without a vendor fee, ensuring fresh fruits and vegetables remain affordable for all. Shoppers can use WIC Vouchers, SNAP, double SNAP dollars, and senior coupons at the market. Beyond fresh, locally grown produce, the market also offers live entertainment and community resources, creating a vibrant and welcoming atmosphere for all. The Healthy by Design Gardeners' Market plays a significant role in enhancing food security and promoting healthy lifestyles within the Billings community.

The City of Billings can expand these initiatives by creating indoor winter markets to ensure year-round access to fresh food, support mobile markets to travel to food-insecure areas, and provide HOME-ARP funding to organizations feeding qualified populations, such as Billings Family Service, Saint Vincent de Paul, and The Salvation Army.

Mental and Physical Health Care: Lower income residents are experiencing poorer health due to lack of access to medical and dental care, mental and physical health issues, and unhealthy behaviors. They are also classified as having greater health risk and a higher prevalence of chronic conditions than higher income individuals. Access to healthcare coverage continues to be an issue for many low-income households.

The [Community Health Needs Assessment](#) indicates over 30% of low-income residents self-reported fair or poor health. Access to healthcare coverage continues to be an issue for many low-income households. Over 40% of low-income residents reported difficulties or delays in receiving healthcare in the past year, according to the Community Health Needs Assessment. Ratings for overall health and wellness opportunities have decreased almost 20% and ratings for the availability of affordable, nutritious food has decreased 17% compared to results of the 2016 survey.

- Over [15% of respondents](#) self-reported fair or poor health and over 30% of low-income residents self-reported fair or poor health. Over 20% of respondents self-reported fair or poor mental health and approximately 21% of low-income residents self-reported fair or poor mental health. Yellowstone County reports approximately 33% of adults have been diagnosed with a depressive disorder, which is higher than figures reported for Montana (22.6%) and the United States (20.6%).

In Yellowstone County, there were 26 suicides per 100,000 residents; the suicide rate in Yellowstone County is slightly higher than Montana (25.7) and much higher than the United States (13.9). Approximately 33% of low-income residents have considered attempting suicide. Nearly nine percent of Yellowstone County residents and nearly 17% of low-income residents report a time in the past year when they were unable to receive mental health services. Nearly 82% of respondents rated mental health as a major problem in the community citing lack of resources, access to mental health services for adults and children and access to ongoing psychiatric care as key challenges.

The City of Billings will continue to provide HOME-ARP funding to support the expansion of health/mental health care opportunities for low-income citizens. The City can also continue to invest in safe parks, trails, and recreation centers that encourage physical activity and social engagement. These environments not only improve physical health but also support mental well-being through community connection.

Homeownership and Repair: Homeownership for first-time homebuyers is a challenge for low-income households due to rising sale prices, increasing interest rates and economic hardships. These challenges also translate to increased cost burdens and financial constraints limiting the ability to make needed repairs like replacing furnaces, installing new roofing, completing electrical and plumbing work, and improving weatherization and energy efficiency by replacing windows and adding insulation. The [Community Health Needs Assessment](#) indicates nearly 50% of low-income residents and nearly nine percent of elderly residents experience housing insecurity and are concerned about paying their rent or mortgage.

Homeownership is vital in Billings for several key reasons that contribute to both individual financial stability and overall community well-being. When residents purchase homes, they build equity over time, wealth accumulates to provide financial security, serves as collateral for future investments, and contributes to long-term economic stability for families. A stable, homeownership population contributes to a consistent tax base, enabling better funding for schools, public safety, and infrastructure; benefits that enhance the overall quality of life.

Home repair programs retain and increase property values over time while helping low-income homeowners build equity and secure financial assets. Timely repairs prevent minor issues from evolving into major, more expensive problems, easing the financial burden on families and reducing potential displacement. Consistently maintained homes contribute to overall neighborhood appeal, fostering a sense of pride and encouraging further community investment. Repair programs also engage local contractors and suppliers which stimulates local economic activity and job creation.

Human Trafficking and Domestic Violence Services: According to the National Human Trafficking Hotline, [29 cases](#) of human trafficking involving 43 victims were identified in Montana in 2023. Of the cases identified, 23 cases involved adults, and six cases involved minors. Nearly three times more female victims were identified than male victims. Over 23% of [Community Health Needs Assessment](#) survey respondents indicate they have been a victim of domestic violence at least one time in their life. This figure is higher than the nation's 13% data point.

Federal and local authorities are [working to raise awareness](#) in the Billings community. Established in 2016, the [Yellowstone Human Trafficking Task Force](#) works to coordinate efforts among law enforcement, service providers, community groups, and volunteers in Yellowstone County, Montana, and surrounding areas. Its mission includes investigating and prosecuting traffickers and buyers, supporting victims of labor and sex trafficking, raising community awareness, and preventing future trafficking. The [HER Campaign](#), a former Billings Metro VISTA Project host site, provides immediate crisis intervention and programming includes a safe house, emergency shelter, long-term residential housing, transitional living, and group living accommodations.

The City of Billings continues providing human resources to nonprofit organizations to engage educated, highly motivated AmeriCorps VISTA members to volunteer for year-long, full-time service to expand service delivery, generate funding, and engage volunteers to combat human trafficking and domestic violence. The City can also provide HOME-ARP funding to support services to survivors to ensure long-term recovery.

Missing and Murdered Indigenous People: Native women face a [significantly higher risk of violence](#), with rates of rape or sexual assault 2.5 times higher than the national average. Murder is the third leading cause of death for Native women, yet these figures likely underestimate the true scope of the crisis due to systemic racism, underreporting, misclassification, and deep-seated distrust of law enforcement. Despite the urgency of this issue, there remains a critical gap in data and research on the experiences of Native women in urban areas, leaving many cases overlooked and unresolved.

Billings is located near the Crow Nation (Apsáalooke) and Northern Cheyenne Nations. Yellowstone County [has the highest number of unique individuals](#) missing, between 2017 and 2019, in Montana. While Billings itself is not on tribal land, it serves as a regional hub for many Indigenous people from surrounding reservations who travel there for work, education, healthcare, and other services. The city has a significant urban Native American population, which is why issues like Missing and Murdered Indigenous People are particularly relevant in the area.

Billings can play a vital role in addressing the crisis of missing and murdered Indigenous individuals by taking a multi-faceted, community-driven approach including: enhancing jurisdictional collaboration between local law enforcement, tribal police, and federal agencies (Federal Bureau of Investigations, Bureau of Indian Affairs) to eliminate gaps in investigations; expand the use of the [Ashanti Alert system](#); raise public awareness to inform the broader community; coordinate with authorities to garner volunteers for rapid response support for searches, providing food, transportation, financial support, distribute flyers and expand social media flyer and social media circulation.

How were these needs determined?

Needs were determined through consultation with the Public Works Department, conducting online research, the Billings City Council, the Billings Fire Department, social service providers, through public meetings and hearings, via survey respondents, and those identified in the citizen participation section of this Consolidated Plan. Results from the City's National Community Survey, Yellowstone County's Community Health Needs Assessment and the Community Development Division's five-year Consolidated Plan Survey were also utilized to determine needs. Priority results of the surveys and assessments as described above.

Section IV: Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview

Billings is the largest and most populated city in Montana. Billings has a population of around 120,000 people, making it the only city in the state to surpass the 100,000 mark. It serves as Montana’s economic hub, with strong industries in healthcare, energy, and trade. The City has prospered economically and has been able to withstand market changes. However, there are more significant housing issues that need to be addressed.

The majority of low-income households in Billings are experiencing housing cost burden. There are enough housing units to accommodate the population, however there is a significant deficit of affordable housing units available to extremely low and very low-income households. Minorities are disproportionately impacted by housing problems; lacking a complete kitchen or plumbing facilities; overcrowding; and/or housing cost burden. Housing problems are a significant impediment to fair housing choice for these cohorts.

MA-10 Number of Housing Units

91.210(a)&(b)(2)

Introduction

The American Community Survey identified over 50,000 housing units in Billings; the majority are single-family residences. Nearly 80% of the owner-occupied housing units have three or more bedrooms while rental units are slightly smaller; 42% of rental units have two bedrooms.

The City’s [Growth Policy](#) includes projections for several different growth scenarios in Billings, including anticipated costs and revenues for each. The City manages growth by encouraging development within and adjacent to the existing City limits, but preference will be given to areas where City infrastructure exists or can be extended within a fiscally constrained budget and with consideration given to increased tax revenue from development. The City will prosper with strong neighborhoods with their own unique character that are clean, safe, and provide a choice of housing and transportation options.

All residential properties by number of units

Property Type	Number	%
1-unit, detached structure	31,170	61%
1-unit, attached structure	3,605	7%
2-4 units	5,154	10%
5-19 units	3,845	8%
20 or more units	4,170	8%
Mobile Home, boat, RV, van, etc.	3,015	6%
Total	50,959	100%

HUD Table 28 - Residential Properties by Unit Number Data Source: 2016-2020 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	40	0%	930	5%
1 bedroom	595	2%	4,770	27%
2 bedrooms	5,735	19%	7,405	42%
3 or more bedrooms	23,620	79%	4,374	25%
Total	29,990	100%	17,479	99%

HUD Table 29 - Unit Size by Tenure

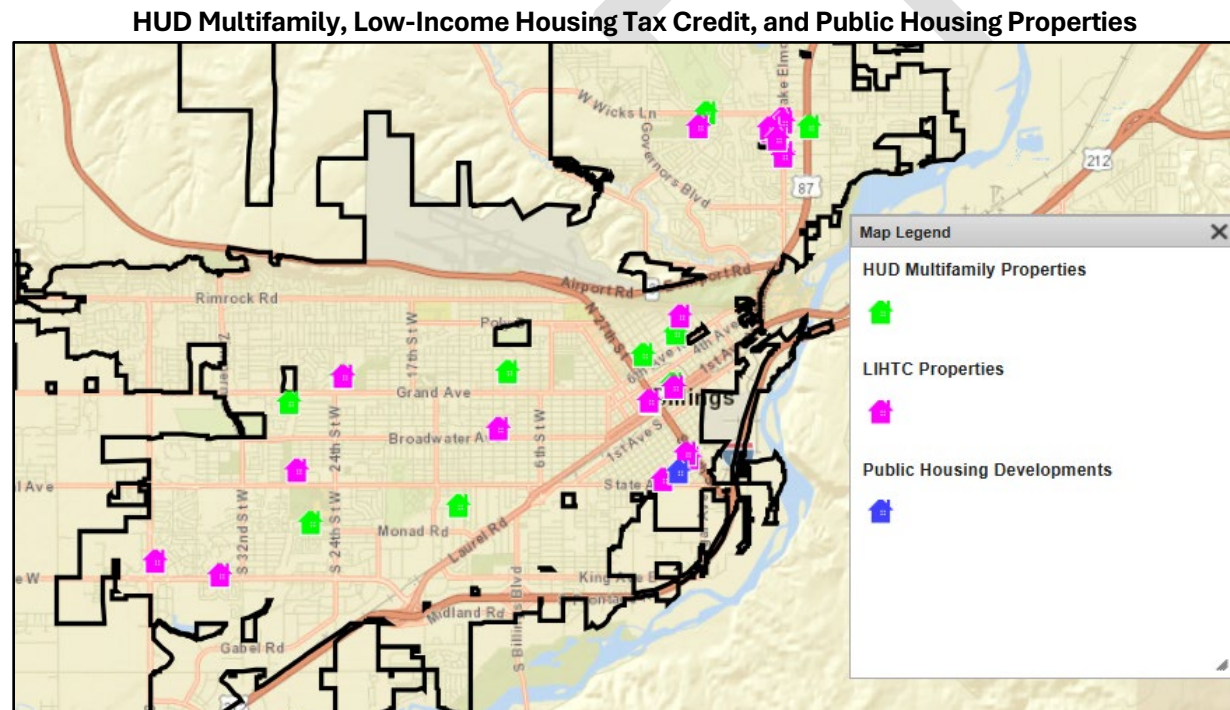
Data Source: 2016-2020 ACS

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

Local: The City’s First Time Home Buyer program assists low-income households under 80% AMI each year with down payment and closing costs. The City also manages the Foreclosure Acquisition / Rehabilitation program and has acquired, rehabilitated and sold homes for the past 15 years. Properties are sold to households with incomes less than 80% AMI. All of these homes have been sold to very low-income families or to households with disabled person(s).

The Billings Metro VISTA Project provides health, mental health, housing, and economic development activities for nonprofits working with those experiencing poverty. Over the past five years, the VISTA members assisted nonprofit organizations in assisting 2,000 low-income people with services.

HomeFront, the City’s local public housing authority, provides housing for over 1,700 families. Additional information regarding the services provided by the Housing Authority is located in the MA-25 section of this Consolidated Plan.



City of Billings, Figure L - CPD Maps, <https://egis.hud.gov/cpdmaps/>
Community Development Staff cannot confirm validity of mapping data.

The CPD Maps website identified 28 total federally-assisted affordable rental housing projects in Billings containing 1,726 units. The average number of units for affordable rentals is approximately 56 and the largest project is Ponderosa Acres at 120 total units. Affordable rentals in Billings assist elderly, low-income and moderate-income households.

Federal: [HUD Multifamily Properties](#) in Billings include (but are not limited to):

- Acme Hotel, 19 Units (13 Assisted)
- Volunteers of America, Aspen Grove, 64 Units
- Autumn Springs Assisted Living, 52 Units
- Volunteers of America, Magic City Terrace, 85 Units
- Big Sky Apartments, 80 Units
- Fraser Tower, 64 Units
- Grand View Apartments, 24 Units
- Highgate Senior Living, 90 Units
- Icon at Cardwell Ranch, pending
- Interpointe Apartment Homes, 160 Units
- InterUrban Apartment Homes, 214 Units
- InterUrban II, pending
- Pleasant View, 102 Units (100 Assisted)
- Ponderosa Acres, 120 Units
- Prairie Tower Apartments, 109 Units (108 Assisted)
- Rose Park Plaza, 112 Units
- Sage Tower, 81 Units (76 Assisted)
- Shiloh Commons, 144 Units
- South Forty Apartments, 101 Units (100 Assisted)
- Sunrise Manor, 24 Units
- VOA Billings, 85 Units (84 Assisted)
- West Park Village Senior Living Community, 181 Units
- Western View Apartments, 84 Units (34 Assisted)

State: Billings [Low-Income Housing Tax Credit \(LIHTC\) Projects](#) include (but are not limited to):

- 8th Avenue Apartments, 26 Units
- Acme Hotel, 19 Units
- Agape Housing, 9 Units
- Brush Meadow Apartments, 60 Units
- Central Court Village, 81 Units
- Chapel Court, 54 Units
- Edgewood Apartments, 63 Units
- Frasier Tower, 64 Units
- Heights Centennial Apartments, 11 Units
- Isaiah Housing, 10 Units
- Jackson Court, 38 Units
- Ponderosa Acres, 120 Units
- Red Fox Apartments, 30 Units
- Rose Park Plaza, 112 Units
- Sage Tower, 81 Units (76 Assisted)
- Shiloh Glen Apartments, 120 Units
- Southern Lights, 20 Units
- Spring Garden Apartments, 8 Units
- South Forty Apartments, 101 Units
- Starner Gardens Apartments, 101 Units
- YWCA Gateway VISTA Apartments, 24 Units
- Westchester Duplex, 2 Units
- Whitetail Run Apartments, 32 Units

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

City staff is unaware of any future Section 8 contract expirations. For detailed information on specific Low-Income Housing Tax Credit properties in Billings and their compliance periods, it would be advisable to contact the Montana Board of Housing or consult the Housing Preservation Page on the Montana Department of Commerce's website at commerce.mt.gov.

Does the availability of housing units meet the needs of the population?

Billings does not have enough housing to meet the needs of the current population. According to the recent report, [Accelerating Production of Attainable Housing](#), Billings has an annual deficit of 1,300 units and a current shortage of close to 10,000 units. The housing needs of extremely and very low-income households have been exacerbated by rising costs and there are not enough rental housing units affordable. The number of low-income renters outnumbers the supply of housing units they can afford. In

2022, local experts estimated a housing deficit of [14,412 units](#) and stated construction of 2,000 units per year is needed to meet current needs.

Describe the need for specific types of housing.

The City of Billings faces a multifaceted housing landscape shaped by various community needs and market dynamics. Data illustrates the necessity to support low-income households by maintaining and increasing the availability of affordable housing. This includes preserving existing affordable housing stock and assisting individuals and families to secure stable housing.

HomeFront, the local public housing authority, manages several federal housing programs and maintains a high-performance status. The waiting list for access to Housing Authority units is particularly concerning. Single-person households are the largest cohort on the waiting list, indicating a clear need for housing development or conversion to meet the needs of smaller households. Availability of housing affordable to very low-income households is also a significant issue.

A variety of housing types should be developed to meet current and future population needs. The [Accelerating Production of Attainable Housing](#) report recommends increasing housing density and building multi-story housing with smaller footprints:

- One-bedroom, 450-square-foot accessory dwelling units
- One-bedroom, two-story, 650-square-foot townhomes
- Three-bedroom, two-story, 800-square-foot single-family homes

Introduction

Data provided by HUD for this Consolidated Plan, the 2016-2020 American Community Survey, is not sufficient to illustrate the dramatic changes in the local housing market.

Cost of Housing

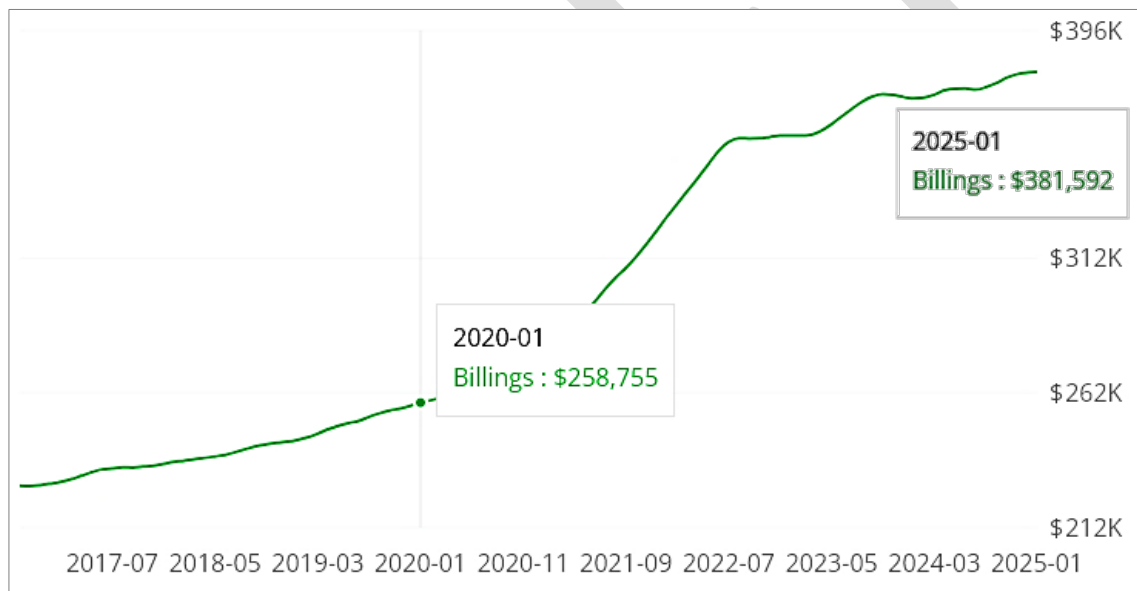
	Base Year: 2000	Most Recent Year: 2020	% Change
Median Home Value	191,200	233,700	22%
Median Contract Rent	677	827	22%

HUD Table 30 - Cost of Housing

Data Source: 2016-2020 ACS

Home values rapidly increased shortly after the coronavirus impacted Billings in early 2020. By the end of 2024, pricing was at the highest level in history. Pricing increased by 47% between 2020 and 2025.

Renters make up 35% of Billings' population, resulting in a homeownership rate of 65%, which is lower than Montana's statewide rate of 71% and the national average of 69%.



City of Billings, Figure M - Zillow Home Value Index, Retrieved March 2025

Rent Paid

Rent Paid	Number	%
Less than \$500	2,615	15.0%
\$500-999	9,324	53.4%
\$1,000-1,499	4,405	25.2%
\$1,500-1,999	594	3.4%
\$2,000 or more	554	3.2%
Total	16,370	100.0%

HUD Table 31 - Rent Paid, 16-20 CHAS

Housing Affordability

Number of units affordable to households earning	Renter	Owner
30% HAMFI	950	No Data
50% HAMFI	4,275	1,200
80% HAMFI	10,525	5,870
100% HAMFI	No Data	10,638
Total	15,750	17,708

HUD Table 32 - Housing Affordability 16-20 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	One Bedroom	Two Bedroom	Three Bedroom	Four Bedroom
Fair Market Rent	745	801	1,054	1,447	1,644
High HOME Rent	578	680	900	1,262	1,419
Low HOME Rent	578	680	881	1,018	1,136

HUD Table 33 - Monthly Rent

Data Source: HUD FMR and HOME Rents

The table above represents the most recent data HUD provided to Community Development staff for this analysis and represents rent limits in 2023. City staff recreated the above table with more recent data from 2024 and 2025.

Updated Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	One Bedroom	Two Bedroom	Three Bedroom	Four Bedroom
Fair Market Rent	904	948	1,226	1,685	1,897
High HOME Rent	837	874	1,108	1,280	1,428
Low HOME Rent	837	874	1,148	1,583	1,778

City of Billings, Figure N

2025 FMR, HUD User

2024 High and Low HOME Rents

Rent costs have outpaced household income levels. Limited inventory and increased demand has fueled rising rental costs and this has created a substantial affordability gap. Many low-income renters end up spending a high percentage of their income on housing, which can lead to financial strain and limit their ability to cover other essential expenses.

Is there sufficient housing for households at all income levels?

In the table below, data from the 2017-2021 American Community Survey CHAS data set relative to total rental households by income category is compared to the number of existing rental units affordable to various household income levels. This comparison estimates the difference between the number of affordable housing units and the number of households by income strata. There appears to be a disparity relative to the very low-income households as there is a 1,560 unit deficit. Contrarily, nearly 1,765 units are available for the 50% AMI group and 3,875 units available to 80% AMI households.

Number of Rental Units Available to Households with Varying Income Levels

Number of units affordable to households earning	Total # affordable rental units	Total rental households by income	Difference Between # Units and Households
30% HAMFI	1,750	3,310	(1,560)
50% HAMFI	5,255	3,490	1,765
80% HAMFI	7,815	3,940	3,875
Total	14,820	10,740	4,080

City of Billings, Figure N - Data Source: HUD IDIS, 2017-2021 CHAS

Rental Unit Housing Affordability

		Number of households in rental units by housing unit affordability				
		<i>Extremely Low-income Units</i>	<i>Very Low-income Units</i>	<i>Low-income Units</i>	<i>Moderate Income Units</i>	Total Households
Household Income	Extremely Low-income	795	1,030	1,095	80	3,000
	Very Low-income	420	1,510	1,070	325	3,325
	Low-income	255	1,405	1,940	290	3,890
	Moderate Income	65	535	1,050	160	1,810
	> Median Income	215	775	2,660	920	4,570
Total Housing Units		1,750	5,255	7,815	1,775	16,595

City of Billings, Figure O - Data Source: HUD IDIS, [2017-2021 CHAS](#)

How is affordability of housing likely to change considering changes to home values and/or rents?

[As of early 2025](#), the local housing market exhibits signs of moderation, with indicators suggesting a shift towards a more balanced environment. The number of homes for sale increased ten percent from December 2024 to January 2025, indicating a rise in available inventory.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

The Montana Department of Commerce recently conducted a [statewide comparison and evaluation](#) of the difference between HUD’s fair market rents and actual rent costs. Survey results determined the current 40th percentile rent is \$374 more than median state nonmetropolitan HUD fair market rent and \$634 more than the median national, nonmetropolitan fair market rent. They consider fair market rent and the area median rent to be “profoundly mismatched.” These results were submitted to HUD in January 2025.

When Community Development staff requested this survey data, they were informed that only limited information was allowed to be released for public consumption, pending HUD’s decision on fair market rent recalculations.

Introduction

The condition of homes in Billings, Montana, varies widely, influenced by factors such as age, maintenance, and location. The city offers a diverse housing inventory, ranging from historic properties to new constructions. While specific data on the general condition of homes isn't readily available, prospective buyers can expect to find both well-maintained residences and those requiring updates or repairs.

Describe the jurisdiction's definition of "standard condition" and "substandard condition but suitable for rehabilitation".

Substandard condition but suitable for rehabilitation would be those properties where 1) a \$25,000 investment to a rehabilitation project would address all safety hazard conditions associated with the house within primary systems ranging from electrical, plumbing, heating, roofing, and foundation repairs, or 2) the projected investment to Foreclosure Acquisition / Rehabilitation Project will bring the house up to Housing Quality Standards or Uniform Physical Condition Standards, and the cost is less than the purchase price of the property.

HUD defines housing condition problems as follows:

- Lacking a complete kitchen
- Lacking complete plumbing facilities
- Cost burdened - paying more than 30% of household income for housing costs.
- Overcrowded - more than one person per room, not including common spaces such as bathrooms, porches, hallways, etc.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	5,860	20%	7,074	40%
With two selected Conditions	115	0%	685	4%
With three selected Conditions	0	0%	20	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	24,020	80%	9,710	56%
Total	29,995	100%	17,489	100%

HUD Table 34 - Condition of Units

Year Housing Units Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	6,969	23%	3,880	22%
1980-1999	6,750	23%	4,275	24%
1950-1979	12,300	41%	6,680	38%
Before 1950	3,985	13%	2,650	15%
Total	30,004	100%	17,485	99%

HUD Table 35 - Year Unit Built

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	16,285	54%	9,330	53%
Housing Units build before 1980 with children present	3,194	11%	1,980	11%

HUD Table 36 - Risk of Lead-Based Paint

Data Sources: 2016-2020 ACS

Need for Owner and Rental Rehabilitation

According to data provided in the Condition of Units table, the majority of homes in Billings, both owner- and renter-occupied, do not have any of HUD’s defined housing condition problems. A total of 800 units have been identified with two housing condition problems; a very small portion of the overall housing inventory in Billings. Twenty housing units have been identified with three selected conditions.

Housing units with incomplete plumbing or kitchen facilities have been a small portion of the total housing units in the community. Despite their limited numbers, these units are of concern as some may be used by very low-income households. Housing units are described as lacking complete plumbing facilities if there is an absence of hot and cold piped water, or a flushing toilet, or a bathtub or shower. Units are described as lacking complete kitchen facilities if there is an absence of a sink with piped water, or range / stove, or a refrigerator.

Most of the owner-occupied units rehabilitated through the City’s programs have both complete kitchens and plumbing facilities. However, all of the units remodeled through the City’s programs have suffered from extensive deferred maintenance, causing overall property deterioration and neighborhood decline. The City also provides funding through the Affordable Housing Development program to support rental redevelopment and renovations.

Vacant Units: The City of Billings does not have access to HUD data on the number of vacant units suitable for rehabilitation, therefore, the Vacant Units table was not available in IDIS. The [rental vacancy rate](#) in Billings was just under six percent in November 2024. The vacancy rate has been relatively stable around five percent in recent years.

Estimated Number of Housing Units Occupied by Low- or Moderate-Income Families with Lead-Based Paint Hazards

Not all homes built prior to 1979 contain lead-based paint and lead hazards. However, projects involving structures built prior to 1978 are considered to have the potential for lead-based paint and consistent procedures have been developed to ensure compliance with federal regulations. Over 16,000 housing units in Billings were built before 1979 and are at risk of containing lead-based paint. Just over 3,000 of these units have children living in the home.

Introduction

HomeFront was created in 1973 and ceased new development in the mid-1990s. Thorough information regarding HomeFront has been noted previously in the Needs Assessment - Public Housing (NA-25) section of this plan.

Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
# of units vouchers available			274	618			271	0	0
# of accessible units									

**includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-Year, and Nursing Home Transition*

HUD Table 37 - Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments.

HomeFront offers affordable public housing rentals throughout Billings, ensuring convenient access to shopping, transportation, and community resources. Their properties are strategically located, with many situated near MET Transit bus routes. For instance, apartments in the Billings Heights area are close to schools, parks, and shopping centers. Prospective tenants can apply for public housing and will be placed on a waiting list until a suitable unit becomes available.

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

HomeFront owns and maintains many multi-family housing developments across the City of Billings, totaling 216 units; designed in a variety of configurations. Housing Authority staff note a city the size of Billings should have triple the number of public housing units in comparison to other communities who continued new housing development activities.

HomeFront owns and manages 216 scattered site units in good condition. Units are continually upgraded with new siding, efficient mechanical systems, new roofs, appliances, energy efficient windows, lighting, floor coverings, and interior / exterior painting. A new energy performance contracting effort is under way to reduce utility consumption to make the units more energy efficient.

Local public housing units must be inspected for adherence to quality standards on an annual basis. A score over 60 on a 100-point scale is generally considered “passing”. A score below 60 is usually indicates a “troubled property”.

Public Housing Condition

Public Housing Development	Average Inspection Score
MT001	71b
UPSC Inspection Date: April 25, 2022	Report Date April 19, 2024

HUD Table 38 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction.

HomeFront develops and implements preventative maintenance and capital improvement plans to maintain all of their units. HomeFront also plans to continue efforts to improve energy efficiency in lighting and water usage.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing.

HomeFront plans to continue providing prompt and efficient maintenance to maintain properties inside and out. The Housing Authority's standards are very high and this assists in maintaining tenant pride in their living environments. HomeFront also facilitates connections to community services that benefit tenants and encourages the development and support of whole and healthy families. HomeFront enforces lease provisions related to safe and drug-free living.

HomeFront continually encourages involvement in the Family Self-Sufficiency program, promotes the development of sustainable food sources, and provides linkage to literacy and education programs. The promotion of homeownership opportunities through the Section 8 program will continue, which assists two to five households per year achieve homeownership. HomeFront also promotes involvement and service opportunities to support the community at large. In 2024, there were 39 participants and three graduates in the Family Self-Sufficiency program with HomeFront and eight with the Montana Department of Commerce.

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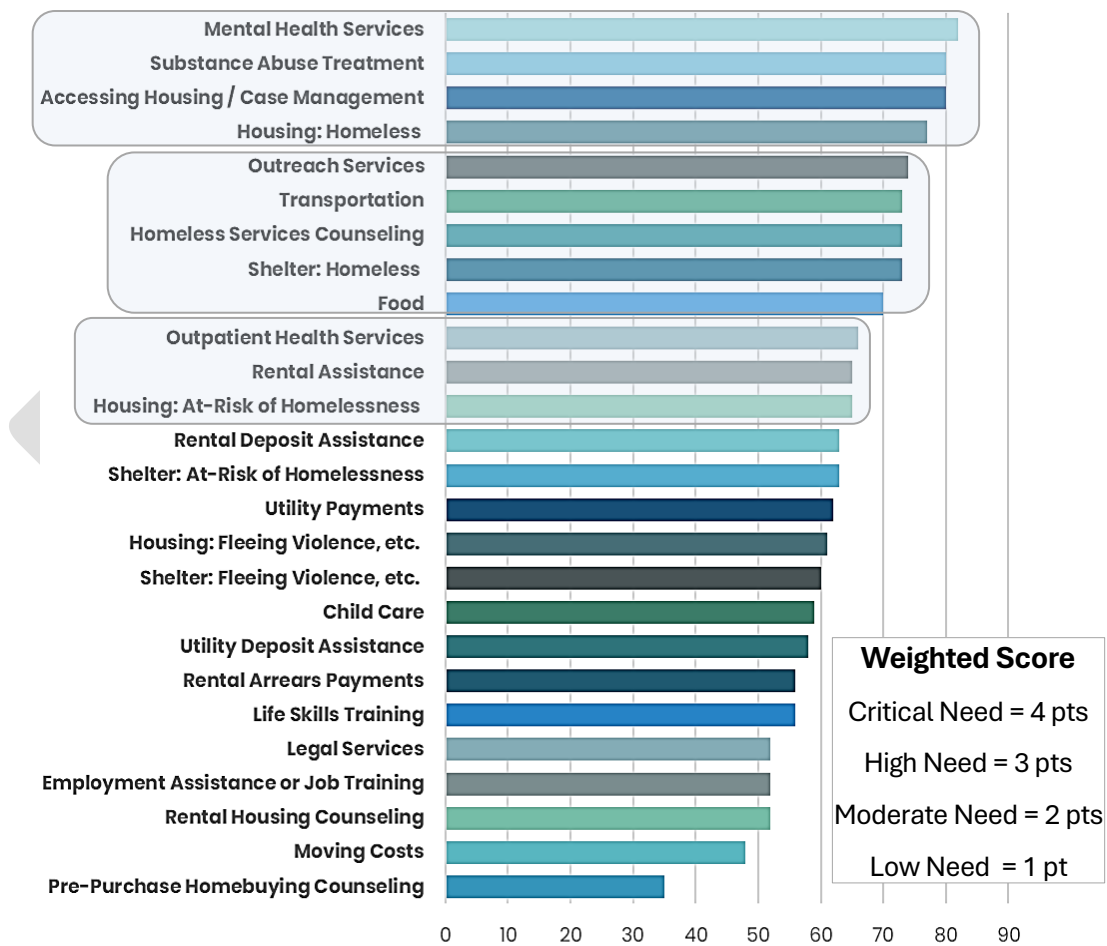
Introduction

A network of over 50 local service providers in the community strive to meet the diverse needs of those experiencing homelessness, those who are at-risk of homelessness, and people experiencing poverty. According to the [2024 Montana Homeless Population](#) point-in-time count, there are approximately 273 respondents experiencing homelessness in Billings.

Available resources in the community do not adequately meet the needs of the general unhoused population, particularly in regard to housing and temporary shelter beds. The current inventory of beds does not meet the needs of the approximate overall homeless individuals in Billings each night.

Service provider data was collected via the [City of Billings HOME-ARP Survey](#) to prioritize the expansive needs for the homeless population. Feedback illustrates a strong need for mental health services, substance abuse treatment, housing and case management. The need for outreach services, transportation, counseling and homeless shelter services were ranked highly.

Need for Services, Housing, Shelter by Population



City of Billings, Figure P

The following agencies assist in the provision of emergency housing in Billings:

- [Community Crisis Center](#) provides intervention services to individuals who are in crisis due to mental health, substance abuse or social service needs. Individuals who engage in mental health assessment and qualify for extended care may utilize stabilization service for up to 24 hours per visit.
- **Family Promise of Yellowstone Valley** provides emergency shelter to several families at a time in a network of church congregations. The organization also operates a transitional housing program that provides apartments for those who have graduated from the shelter program.
- [HRDC District 7](#) receives Emergency Shelter Grant funds and manages a rapid rehousing program to provide deposit and rent payment assistance to help families quickly regain stability into permanent housing.
- [Montana Rescue Mission](#) provides emergency shelter in 86 year-round beds. MRM is in the process of finishing a [Unified Campus Project](#), which will add an additional 50 beds for women and families, 76 beds for men and 29 affordable housing apartments. The **Women and Family Shelter** provides year-round beds and some of the beds are reserved for individuals without children.
- [Off the Streets](#) provides 24 year-round beds to chronically homeless individuals.
- [Tumbleweed](#) provides emergency services for youth and families including emergency shelter placement.
- [YWCA Billings](#) provides shelter and 24-hour help lines for survivors of domestic violence. Additional services provided include case management, legal advocacy, and assistance with benefits access. The organization also provides transitional housing and permanent supportive housing.
- [Volunteers of America Northern Rockies](#) manages a veterans transitional housing facility that offers case management, employment services, and life skills development.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Current & New Year-Round Beds	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	40	0	55	23	0
Households with Only Adults	161	0	142	146	0
Chronically Homeless Households	0	0	0	169	0
Veterans	9	0	17	0	0
Unaccompanied Youth	0	0	18	0	0

HUD Table 39 - Facilities and Housing Targeted to Homeless Households, Data Source: Montana Continuum of Care

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons.

Montana 211 is a **free, confidential, 24/7 service** that connects people to essential health and human services. It is a vital link between people with social service needs and organizations providing assistance. The following section highlights some, but not all, services available in the Billings area.

Health and Mental Health Services:

- Crisis intervention and mental health services are provided by the [Community Crisis Center](#), as previously mentioned.
- [South Central Montana Regional Mental Health Center](#) provides mental health services, substance use treatment, healthcare referrals, rehabilitation and outreach services to individuals with serious mental illness that are experiencing homelessness or are at imminent risk of becoming homeless.
- [Healthcare for the Homeless](#) provides health / mental health care and serves homeless adults and families who stay in emergency shelters, sleep in makeshift shelters and/or on the streets, temporarily live with friends or family members, eat in soup kitchens or visit drop-in centers or other sites providing temporary assistance.
- [Rimrock](#) is the largest drug and alcohol services provider in the region and the organization provides mental health and healthcare services for substance abuse and co-occurring disorders.
- [RiverStone Health](#) is an essential provider of personal and public health through medical and dental clinics.

Employment Services:

- [Dress for Success](#) and [Billings Family Service](#) provide education for better employment, job training, and interview apparel programs.
- **Family Promise of Yellowstone Valley** provides skills training in housing, employment, family and social relations, life skills, budgeting, and community involvement.
- [HRDC District 7](#) facilitates adult, youth and young adult employment opportunities and job training and retention services for those in need. The organization also assists families with transportation needs to and from work.
- Employment services can also be accessed through [Job Service, MontanaWorks](#).
- [Tumbleweed](#) provides life and skills development for youth and young adults.
- [YWCA Billings](#) provides services to support economic independency through employment counseling, job skills training, certificate programs, and college education.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

Chronically Homeless: YWCA Billings administers Shelter Plus Care units to house people experiencing chronic homelessness, mental illness, addiction issues, and co-occurring mental illness / addiction. The Community Crisis Center also provides intervention services for the chronically homeless. Rimrock provides addiction treatment and mental health counseling.

Families with Children: Family Promise of Yellowstone Valley provides transitional housing for chronically homeless families. The YWCA provides shelter and transitional housing opportunities for homeless families with children. The Women and Family Shelter provides shelter for women and families with children.

Veterans and Unaccompanied Youth: Volunteers of America - Independence Hall provides transitional housing for veterans who have experienced homelessness. The organization also provides homeless prevention, rapid rehousing, and supportive services. Current resources for veterans can be located using [Montana 211](#). Unaccompanied youth are provided with shelter and supportive services through Tumbleweed.

Introduction

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs.

There are many organizations serving the needs of the elderly, those with disabilities, addicted persons and individuals who have been diagnosed with HIV/AIDS. A number of supportive services serving the elderly and disabled are available through the Adult Resource Alliance organization, including nutrition programs, minor home repair, and volunteer engagement. The Alliance also operates an aging and disability resource center to provide long-term care information and referral services, options for counseling, and access to private and public benefits.

Big Sky Senior Services serves the elderly through nursing, respite care, homemaking services, prevention of elder abuse and personal care. There are also two senior centers in Billings; the Southside Senior Center and the Billings Community & Senior Center. Food services are provided at both the Southside Senior Center and the Billings Community & Senior Center. The Billings Community & Senior Center also provides access to computers, a health and fitness center, a variety of classes and activities, free or low-cost screenings, trips, and tours.

A comprehensive service array is available to assist those with disabilities in Billings. Organizations providing housing and services include: AWARE, Inc.; Living Independently for Today and Tomorrow; the Montana Center on Disabilities, Support and Technologies for Empowering People, COR Enterprises, Easter Seals Goodwill, and Job Connection. Organizations serving those with addictions or who have been diagnosed with HIV/AIDS have been mentioned previously in this Consolidated Plan and include: Rimrock; Mental Health Center; and HRDC District 7.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

As previously mentioned, the greatest housing problem in Billings for both owners and renters of all income levels and populations is housing cost burden, followed by access to housing in tight rental and ownership markets. Housing quality is also a concern, as renters and owners with incomes less than 80% AMI are dealing with one or more housing problems. The need for case management and supportive services has been a consistent concern with special needs populations.

Elderly: Demand for special living facilities for the elderly appears to remain high, according to facility and Census Bureau data. Housing affordability continues to be a challenge for the elderly and disabled like other populations. The Housing Authority owns a 102-unit Section 8 project-based complex which exclusively serves the elderly. The [CPD Maps](#) website identified 28 total federally assisted affordable rental housing projects in Billings containing 1,726 units. [Thirteen housing projects](#) provide housing units for the elderly.

Persons with Disabilities, HIV/AIDS and Domestic Violence Victims: Service providers indicate a high need for rental housing assistance and owner-occupied housing rehabilitation. Supportive services include transportation, medical / dental care, childcare, reliable and sustainable food sources, and case management.

Addicted Persons: The development of sober living apartments would assist those exiting inpatient treatment in Billings. A short-term sobering center with accelerated access to inpatient, detoxification treatment and long-term addiction treatment options would also meet the needs of addicted persons in Billings.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

The **South Central Montana Regional Mental Health Center** provides mental health and chemical dependency care in the Billings area and surrounding region. The organization owns and manages several supportive housing programs including an eight-bed adult group home, cooperative living settings, and independent living apartments. These supportive housing placements require involvement in case management and treatment planning.

Rainbow House, the Mental Health Center's day treatment program, has provided an important service to the community since de-institutionalization of Montana State Hospital in 1975. Although Rainbow House is not a live-in facility, the program is designed to assist clients in successful independent living while incorporating support from other Mental Health Center programs and community care providers.

The **Community Crisis Center** serves a vital role in the community as a crisis management facility. Previous to the Community Crisis Center, emergency departments of the two local hospitals served as the de facto option for people in mental health / substance abuse crisis. The Crisis Center operates 24 hours per day and provides assessment and referral services.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

The City of Billings has historically managed several programs to address the housing needs for households with members having special needs:

- **HOME-ARP:** This program provides funding to subrecipients for supportive services to qualified populations including financial assistance for housing, rental assistance, substance abuse treatment, credit repair, employment assistance and job training, mental health services, transportation services and case management.
- **Affordable Housing Development:** This program provides affordable financing to housing developers to build or renovate housing units for low-income households and may include housing options for those with special needs. The City requires a percentage of the units be accessible for the mobility, visual and hearing impaired.
- **Billings Metro VISTA Project:** This AmeriCorps VISTA program places full-time and summer associate volunteers with nonprofit host sites to build capacity for serving those in need, including those experiencing poverty.
- **First Time Home Buyer:** This program provides down payment and closing cost assistance to low-income households to purchase their first home. Priority is given to large households and households including a disabled individual requiring special home modifications or other considerations.
- **Foreclosure Acquisition / Rehabilitation:** The City purchases vacant, foreclosed homes for the purpose of rehabilitation and sale to income qualified, first-time home buyers.

Please refer to the City's one-year goals in the Action Plan.

Negative Effects of Public Policies on Affordable Housing and Residential Investment

According to the City's most recent Analysis of Impediments to Fair Housing Choice, most of the typical exclusionary provisions that would hinder affordable housing development do not exist in current zoning codes. However, the following issues may act as barriers to affordable housing investment:

- Density bonuses have not been established to offset the cost of development if a project contains a certain percentage of affordable housing.
- There is currently not a way to fast-track the approval processes for affordable housing development projects. However, fast-tracking may not be as important in Billings as it is in other parts of the country. Subdivision review times are set by the Montana State Legislature. Building permit reviews for single-family homes (one to four units) are three to five days and commercial permits, including multi-family with five or more units in a structure, take four to six weeks to review. Other areas of the country, and some cities in Montana, take 30 days or longer for single-family reviews and four to six months for commercial reviews.
- The City does not currently permit a waiver or reduction of impact fees, including water and wastewater system development fees, to promote affordable housing development.
 - This particular barrier, relative to water hook-up fees, was mentioned during staff's attendance at a Neighborhood Task Force meeting.
- The use of accessory dwelling units is not a widely practiced housing development strategy.

Other public policy concerns relate to a dated zoning code and inadequate funding to further affordable housing development. The City completed a process to revise the zoning code and one of the main goals of the project is to expand affordable housing choice across the City. Additional information can be found online at [Project Re:Code](#).

Introduction

Billings is one of the nation’s largest trade areas covering over 125,000 square miles and serving nearly 400,000 people with medical, retail, educational and business services. According to the [Bureau of Labor Statistics](#), the civilian labor force has been relatively stable over the past several years; approximately 94,000. The average annual unemployment rate has also been level, ranging between two and three percent.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	3,972	277	4.2	0.4	-3.8
Arts, Entertainment, Accommodations	9,647	10,131	10.2	13.7	3.5
Construction	8,039	3,782	8.5	5.1	-3.4
Education and Health Care Services	22,793	18,894	24.1	25.6	1.5
Finance, Insurance, and Real Estate	5,769	5,058	6.1	6.8	0
Information	1,324	939	1.4	1.3	0
Manufacturing	4,729	2,174	5.0	2.9	-2.1
Other Services	5,107	7,029	5.4	9.5	4.1
Professional, Scientific, Management Services	9,268	5,028	9.8	6.8	-3.0
Public Administration	3,972	3,580	4.2	4.8	0
Retail Trade	11,538	9,732	12.2	13.2	1
Transportation and Warehousing	5,864	3,041	6.2	4.1	-2.1
Wholesale Trade	2,554	4,282	2.7	5.8	3.1
Total	47,284	57,687	--	--	--

HUD Table 40 - Business Activity Data: 2019-2023 ACS (Workers), 2022 Longitudinal Employer-Household Dynamics (Jobs)

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

The largest business industries noted in the Business Activity table are education and health care services, followed by retail trade and arts, entertainment and accommodations. The table also illustrates that there are more workers than jobs in agriculture, mining, oil / gas extraction, construction, manufacturing, transportation, warehousing and professional, scientific and management service businesses.

According to the [Current Employment Survey](#), there were 89,800 jobs in Billings as of November 2023, which represents a growth of approximately 1,000 jobs a year. Billings offers the second highest median household income in the state with a median household income of **\$59,656 as of 2021**. However, the median household income in Billings is just over five percent less than the national median.

Labor Force [Participation]

Total Population in the Civilian Labor Force	94,951
Civilian Employed Population 16 years and over	62,617
Unemployment Rate	3.5%
Unemployment Rate for Ages 16-24	16.2%
Unemployment Rate for Ages 25-65 [64]	17.3%

HUD Table 41 - Labor Force, Data Source: 2019-2023 ACS, Table S2301

Occupations by Sector

Occupations by Sector	Number of People
Management, business, science, and arts occupations	36,885
Service occupations	16,740
Sales and office occupations	19,861
Natural resources, construction, and maintenance occupations	10,782
Production, transportation, and material moving occupations	10,403

HUD Table 42- Occupations Sector, Data: 2019-2023 ACS

Employment by Industries in 2022

60,050 workers



City of Billings, Figure Q - Data Source: DataUSA

Commute Method

Travel Time	Number	Percentage
< 30 Minutes	48,077	91%
30-59 Minutes	3,374	6%
60 or More Minutes	1,614	3%
Total	53,065	100%

HUD Table 43 - Travel Time Data Source: 2019-2023 ACS

According to the American Community Survey, the mean travel time to work is just under 18 minutes. Most drive alone, around nine percent carpool, just under three percent walk from home, around four percent work from home, and less than one percent of workers use public transportation.

Educational Attainment (Population 16 and Older)

	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	997	0	1213
High school graduate, GED, or alternative	14,168	336	3,709
Some college or Associates degree	16,034	309	2,851
Bachelor's degree or higher	18,302	278	2,433
	997	0	1213

HUD Table 44 - Educational Attainment

Data Source: 2019-2023 ACS

Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	22,243
High school graduate (includes equivalency)	108,861
Some college or Associate's degree	155,095
Bachelor's degree	232,292
Graduate or professional degree	264,505

HUD Table 45 - Median Earnings in the Past 12 Months

Data Source: 2016-2020 ACS

Describe the workforce and infrastructure needs of the business community.

Big Sky Economic Development recently published a [State of the Workforce](#) report that includes data and projections for the Billings workforce. The report noted employers do not have an adequate supply of talent to meet industry needs and for most, the lack of available workers inhibits industry growth.

According to this report, the occupations projected to have the highest growth over the next ten years are food service occupations, healthcare practitioners and technical professions, and construction and extraction occupations. The occupations projected to have the highest total employment by 2029 are office and administrative support, sales and food service occupations. Additional training in general employability skills is also needed, including emphasis on drug-free status, decision making, problem solving, and critical thinking.

Travel time is an average of less than 20 minutes for over 90% of the citizens in Billings and very few people travel more than 60 minutes. Infrastructure needs cited by the region's [Comprehensive Economic Development Strategy](#) include, but are not limited to:

- Housing availability, variety, and condition
- Workforce housing expansion
- Shortage of long-term planning efforts
- Infrastructure improvements
- Access to funding and funding incentives

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

In a [recently posted video](#) BillingsWorks notes that there will be 7,660 new jobs in Billings over the next 10 years and an additional 42,683 jobs due to baby-boomer retirements and job exits. This results in over 50,000 new positions by 2030. BillingsWorks is focusing on attracting millennials and others to Billings to meet business employment demands.

Downtown Billings has been designated an Opportunity Zone to encourage long-term investments in low-income areas. This program provides federal tax incentives to taxpayers who reinvest capital gains in development activities such as revitalization, workforce development, affordable housing, infrastructure, business startup, and business expansion.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

As outlined in the Educational Attainment table, nearly 23% of the population over the age of 25 attended college, but did not graduate with a degree. The percent of the population who graduated with a Bachelor's degree is also nearly 23%. Almost five percent of the population do not have a high school diploma. Median earnings are highest for those with graduate or professional degrees and lowest for those without a high school diploma.

As noted in the [State of the Workforce Report](#), employers have been challenged in finding workers with the required education, experience and employability skill set to fill vacant positions. The report noted employers do not have an adequate supply of talent to meet industry needs and for most, the lack of available workers inhibits industry growth. The most difficult positions to fill are in the following areas: manufacturing, engineering, energy, technical / skilled trade positions; information technology and professional services; health care positions; and retail / hospitality.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

The Big Sky Economic Development Authority created [BillingsWorks](#) to increase collaboration, accountability and reporting related to workforce needs. BillingsWorks supports the Consolidated Plan by working to address workforce development and attraction needs, providing linkage to and coordination with higher education systems in the community, and developing talent attraction campaigns.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

Yellowstone County is covered by the Beartooth Resource Conservation and Development District's [Comprehensive Economic Development Strategy](#). The latest plan was developed in 2023 and includes projections through December 31, 2023. The Big Sky Economic Development Authority is also working on economic development activities for Yellowstone County including a campaign, Better off in Billings. The Better off in Billings campaign aims to attract and retain workforce talent to improve and strengthen the community.

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

The Community Development Division does not have adequate funding allocations and capacity to undertake initiatives specifically dedicated to economic growth. Big Sky Economic Development was created and financed by the Yellowstone County Commissioners. They also receive funding from various grants and loan programs, including those from the state of Montana and the federal government.

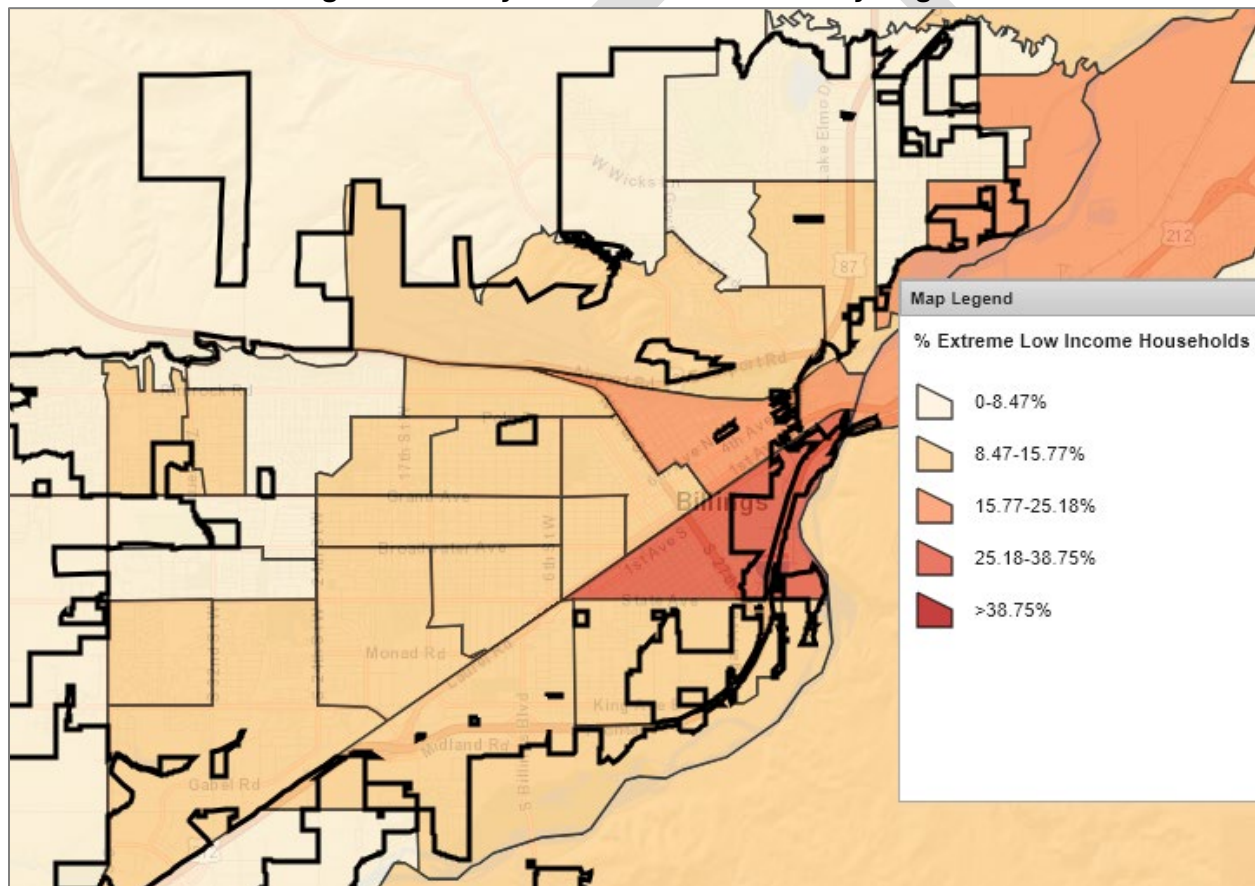
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Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

Concentrated housing problems reference the clustering of multiple housing-related challenges within a specific geographic area or community. These problems may include overcrowding, cost burden, substandard housing conditions, lack of affordable housing, etc. Concentrated housing problems often lead to broader social and economic challenges for residents. These areas may require targeted policy interventions, community investment, and housing assistance programs to address the issues effectively.

In Billings, certain neighborhoods experience higher concentrations of households facing multiple housing challenges. Notably, the Northside and Southside areas are often associated with higher rates of poverty, housing instability, and crime. These neighborhoods have been identified as having significant low-income populations, which can contribute to various housing issues.

Percentage of Extremely Low-Income Households by Neighborhood

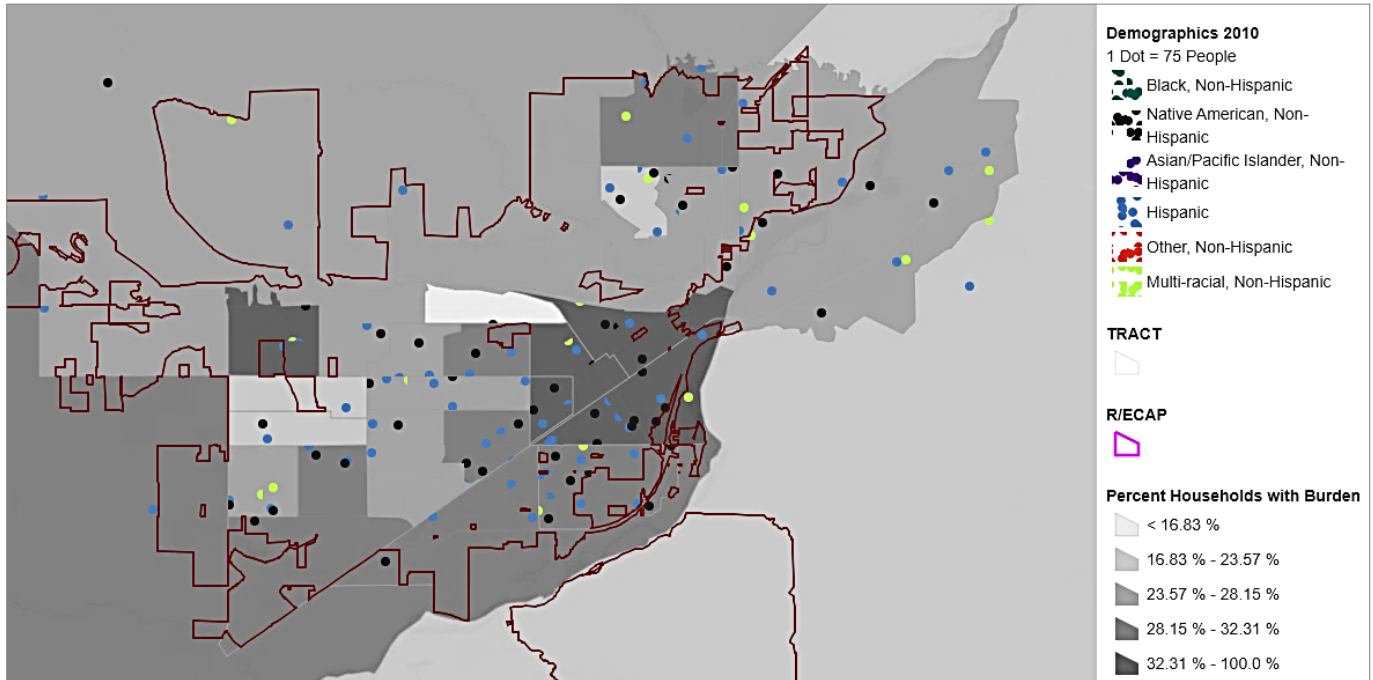


City of Billings, Figure R - [HUD Mapping System](#), Retrieved February 2025

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated?

In HUD's mapping system, It appears as though minorities are residing across all areas of the City. The highest percentage of cost-burdened households is located in the North Park and Southside neighborhoods. Smaller neighborhoods in the West End and Billings Heights are also identified, followed by the southwest corridor neighborhood.

Percentage of Households with Housing Cost Burden and Race / Ethnicity



City of Billings, Figure S - HUD Mapping System, Retrieved February 28, 2025

What are the characteristics of the market in these areas/neighborhoods?

The South Side of Billings is characterized by its affordability, noticeable price appreciation, a mix of historic housing options, a balanced rental market, convenient commute times, and a culturally diverse community. The area is largely composed of small to medium-sized single-family homes along with a few small apartment buildings. Many residences are historic, with a significant number built before 1939 and others from the 1940 to 1969 period. Homes are relatively affordable compared to other parts of Billings. There is a healthy mix of homeowners and renters in the neighborhood.

The North Park neighborhood is defined by its relatively affordable housing options, a moderate pace of sales, and a mix of housing types. It is an affordable and steadily growing area in Billings with a mix of historic homes, rental properties, and single-family residences. While prices remain low compared to city averages, the area is seeing moderate demand.

Are there any community assets in these areas/neighborhoods?

The [South Side neighborhood](#) of Billings, Montana, is rich in community assets that contribute to its unique character and support its residents. Notable assets include:

- South Park, established over a century ago, is one of Billings' oldest and most significant community spaces, serving as a central hub for recreation, cultural events, and social gatherings. Since its inception, South Park has been integral to the community, particularly for immigrant populations drawn to Billings by industries like the sugar beet factory. The park's design, featuring a centrally located gazebo, was intended to create a communal space for gatherings, concerts, and public speeches.
- The South Side Neighborhood Task Force was originally created in the 1970s to provide input on the allocation of CDBG funding. The task force has evolved into a diverse body addressing various community concerns. They hold monthly meetings to discuss and plan neighborhood initiatives, fostering civic engagement among residents.

In the North Park neighborhood, residents benefit from a range of community assets that support recreation, civic engagement, and neighborhood improvement. The following notable assets include:

- Many recent improvements have been made to North Park. The neighborhood [recently hosted a grand reopening](#) aimed at revitalizing the park's facilities and improving safety features. The event showcased updated amenities, interactive activities, and a renewed commitment to making the space more welcoming for families and residents.
- The North Park Task Force was also originated in the 1970s to provide input on CDBG funding allocations. The Task Force has been actively involved in gathering resident feedback to inform these improvements. Their efforts ensure that the upgrades not only address safety concerns but also align with the community's needs and aspirations.

Are there other strategic opportunities in any of these areas?

North Park Neighborhood: Given North Park's central community asset, a well-used 15-acre park, and its family-friendly atmosphere, there's an opportunity to develop modern multi-family housing. These developments could include apartments or townhomes designed to serve young professionals and families looking for quality rentals close to recreational amenities.

With some of the existing housing stock dating back several decades, infill development or the adaptive reuse of older properties can modernize the neighborhood while retaining its community identity. Upgrades and value-add projects might be particularly attractive as public improvements and community engagement continue to drive interest in the area.

Incorporating residential units with ground-floor commercial spaces, such as cafes or small retail outlets—can enhance walkability and serve the needs of residents, further strengthening North Park as a vibrant, community-centered neighborhood.

South Side Neighborhood: The South Side is known for its affordability and historic character. Redevelopment initiatives could focus on rehabilitating older, historic homes and integrating modern energy-efficient features, preserving the neighborhood's charm while offering updated housing for both buyers and renters.

New developments that include affordable single-family homes or small-scale multi-family units can cater to first-time homebuyers and families. These projects might be designed to complement the existing architectural fabric and community resources, such as local schools and recreational areas.

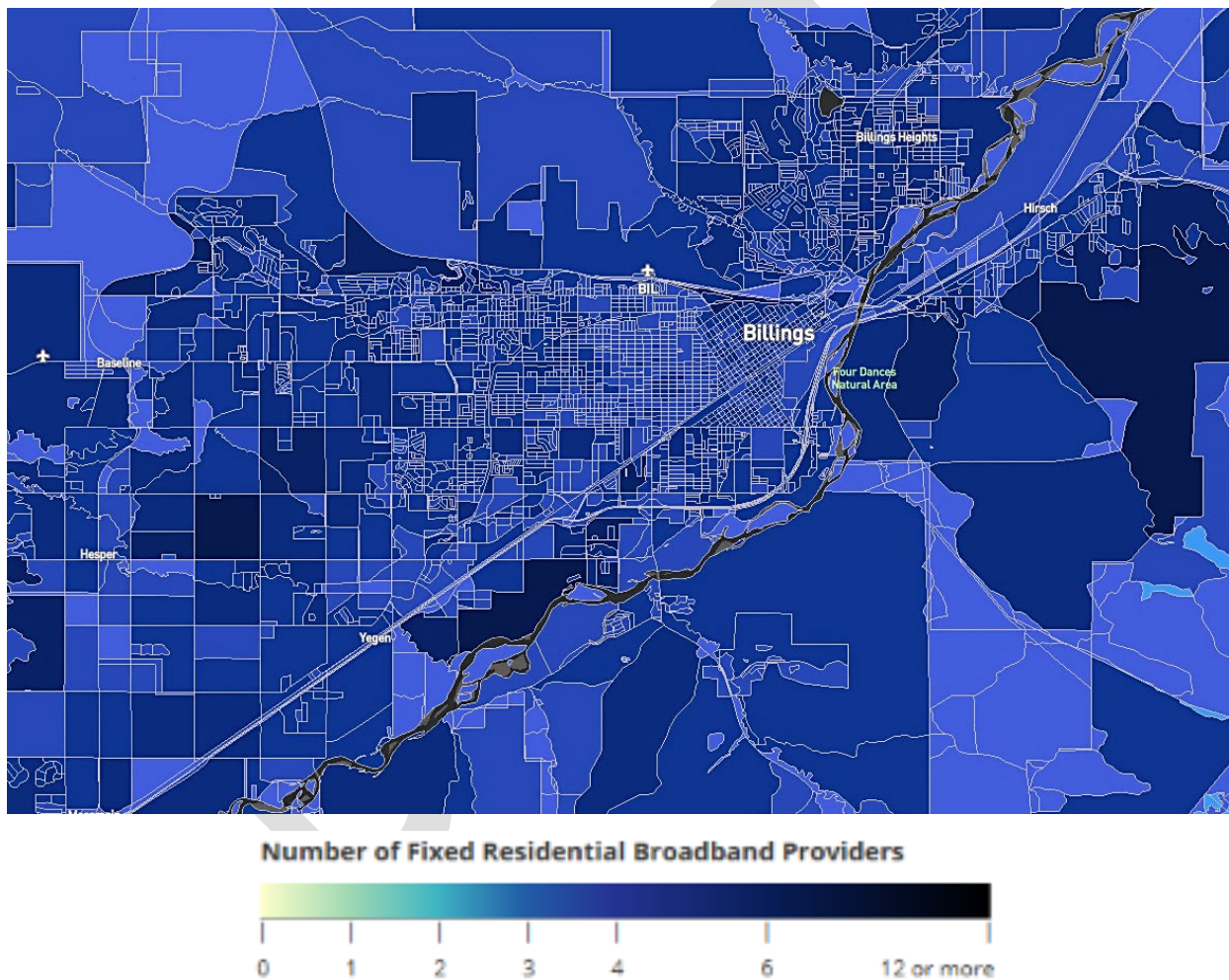
Given the presence of local community organizations that support affordable housing and social services, there's potential for public-private partnerships to develop mixed-income housing. Such projects can integrate supportive services and community spaces, aligning with ongoing revitalization efforts in the South Side.

Market Demand: In North Park, the focus might be on creating attractive rental units or mixed-use projects that leverage community assets, whereas in the South Side, affordability and historic preservation might drive demand for renovated single-family homes and smaller multi-family projects. By aligning new housing developments with the distinct characteristics and community priorities of North Park and South Side, developers can help further enhance the quality of life for residents while contributing to sustainable neighborhood growth in Billings, Montana.

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Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

The City must determine the broadband internet access needs of housing occupied by low / moderate income households based on analysis of data for low income neighborhoods. The National Broadband Map indicates the vast majority of Billings residents, including those residing in lower-income neighborhoods, have adequate access to internet / broadband service providers. According to the [Census](#), nearly 93% of Billings households have internet subscriptions and nearly 93% have access to broadband (2023 American Community Survey, one-year estimates).



City of Billings, Figure T - *National Broadband Map*, Federal Communications Commission

Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

According to [Broadband Now](#), there are eight internet service providers serving residents in the City with speeds from 12Mbps to 940 Mbps. [BusinessInternet](#) reports Billings has ten to 15 internet service providers with download speeds up to 2,010 Mbps. There appears to be little need for additional jurisdictional investments in broadband infrastructure within the Billings city limits.

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Describe the jurisdiction’s increased natural hazard risks associated with climate change.

The [Montana Climate Solutions Plan](#) indicates state temperatures are three degrees warmer on average than a few decades ago. Early spring runoff impacts water availability and causes flooding. Fire seasons are more severe and nearly 80 days longer than they were 30 years ago. The plan includes verbiage related to building on the Montana Ready Communities Initiative to promote resiliency for the state’s lower income communities. This initiative was sponsored by the City of Billings’ AmeriCorps VISTA program and three VISTA members participated in the development of the state’s strategic framework.

The Yellowstone County [Multi-Hazard Mitigation Plan](#) was updated in 2019. The plan mentions its obligation to identify and address any disproportionately high adverse human health or environmental effects of its projects on minority or low-income populations (page 226), although impact is not identified. The [Disaster and Emergency Services Strategic Plan for FY2023-2028](#) is posted online.

According to the [HUD Natural Hazard Map](#), Yellowstone County’s community resilience is rated as very high, with moderate ratings relative to cold waves / winter weather, hail, heat waves, ice storms, and wildfire. The most significant risk in the area is related to lightning.

Natural Hazard Risks in Yellowstone County: Risk Index is Relatively Low

<i>Composite Risks</i>	<i>Yellowstone County Risk Index Rating</i>
National Risk Index – Composite	Relatively Low
Expected Annual Loss – Composite	Relatively Low
Social Vulnerability	Relatively Low
Community Resilience	Very High
<i>Hazard Type</i>	<i>Risk Index Rating</i>
Avalanche - Hazard Type	Not Applicable
Coastal Flooding - Hazard Type	Not Applicable
Cold Wave	Relatively Moderate
Drought	Relatively Low
Earthquake	Very Low
Hail	Relatively Moderate
Heat Wave	Relatively Moderate
Hurricane	Not Applicable
Ice Storm	Relatively Moderate
Landslide	Relatively Low
Lightning	Relatively High
Riverine Flooding	Relatively Low
Strong Wind	Relatively Low
Tornado	Relatively Low
Tsunami	Not Applicable
Volcanic Activity	Not Applicable
Wildfire	Relatively Moderate
Winter Weather	Relatively Moderate

The hazard risk ratings in this map reflect the March 2023 version of the dataset displayed in FEMA’s NRI, Version 1.19.0. For more information about how the NRI was developed, including how the hazard categories were selected, the data sources for the hazard risk ratings, and the limitations or assumptions of the results, explore [FEMA’s website](#).

City of Billings, Figure U

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

Lightning strikes are the only relatively high-risk natural hazard identified for the City of Billings. They are generally associated with thunderstorms, which can occur throughout the area. While specific data pinpointing areas within Billings that experience higher frequencies of lightning strikes is limited, regional patterns indicate that elevated terrains and open spaces may be more susceptible due to their exposure.

Cold Waves, Winter Weather, and Heat Waves: Many low-income homes, especially older structures, have inadequate insulation and single-pane windows, making them inefficient at retaining heat / cooled air. Households with limited financial resources may struggle to afford heating costs. Energy insecurity can result in shutoffs during the coldest and warmest months. Heavy snowfall and ice accumulation can strain roofs and cause leaks, collapse risks, and mold growth in poorly maintained homes. Frozen pipes are a common issue in older or poorly insulated homes. These circumstances can lead to higher energy bills, greater exposure to extreme cold and heat indoors, heat-rationing, using unsafe heating methods (space heaters, ovens, etc.), water damage, loss of potable water, increased risk of hypothermia, heat stroke, and other cold- and heat-related health issues.

Hail: Many low-income homes have older, deteriorated, or low-cost roofing materials that are more susceptible to hail damage and are less likely to have emergency funds to make needed repairs. These households may also have higher insurance deductibles and exclusions for hail damage. Roof damage can lead to leaks, water infiltration, and structural deterioration if not promptly repaired.

Wildfire: Housing occupied by low-income households is particularly vulnerable to wildfires due to several key factors, including location, building materials, limited financial resources, and challenges in emergency preparedness and recovery. These vulnerabilities increase the risk of property loss, displacement, and long-term economic hardship. Yellowstone County's [Community Wildfire Protection Plan](#) was last updated in 2006.

The Yellowstone River is south of Billings and historic flooding events may impact the Southwest Corridor and Southside neighborhoods. Fire is a seasonal concern for the entire city, although all of the neighborhoods in Billings are serviced by the Billings Fire Department. City resources can be rerouted to meet the needs of lower income neighborhoods if impacted by natural hazards.

Section V: Strategic Plan

SP-05 Overview

Strategic Plan Overview

The Community Development Division’s strategies for addressing community needs are included herein. The City’s primary needs are affordable housing, services for vulnerable populations, and poverty impact. As per findings and recommendations from the City’s Analysis of Impediments to Fair Housing Choice, the investment of federal funds is not predominantly geographically distributed; funds are invested based on the needs of low-income households and citizens.

SP-10 Geographic Priorities

91.215 (a)(1)

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction.

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

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

The City will focus distribution of investments on a citywide basis to support diversity and mixed-income development across the community. Neighborhood Revitalization Strategy Areas **have not been established** in Billings and there is no specific amount of funding allocated for a target area in the City’s geographic distribution of resources.

Therefore, the City plans to dedicate zero percent of funding to target areas in favor of supporting a citywide approach to further fair housing, equal opportunity, and anti-segregation efforts.

Geographic Distribution

Target Area	Percentage of Funds
Citywide	100%

Table 46 - Geographic Priority Areas

#	Priority Need	Priority Level / Population	Family Types	Homeless Categories		Non-Homeless Special Needs	
1	Affordable Housing	High	Large Families Families w/Children Elderly Public Housing Residents	Chronic Homeless	Veterans	Elderly	Persons w/HIV/AIDS Domestic Violence Survivors
		Extremely Low-Income		Individuals	Persons w/HIV/AIDS	Frail Elderly	
		Low-Income		Families w/Children	Domestic Violence	Disabled – All	
				Mentally Ill	Survivors	Addicted Persons	
		<p>Description (Goal): Create, preserve, and expand decent, affordable housing options for low-income residents citywide. Community Development aims to enhance and broaden housing access, availability, physical quality, economic value, and longevity across the city for Billings’ low-income residents including seniors, individuals with disabilities, minority groups, and other special populations. The City’s strategy is to increase affordable housing opportunities by implementing financing initiatives, including housing development loans to drive construction and rehabilitation, first-time homebuyer loans to support sustainable ownership, and home repair financing to preserve and upgrade existing low-income homes.</p> <p>Basis for Relative Priority: Thousands of households in Billings are experiencing housing cost burden. Nearly all minority cohorts are more likely to have one or more housing problem, which is a considerable barrier to fair housing choice. Over 8,000 households are on the public housing / Section 8 waiting lists. Housing prices have increased 47% over the past five years. The homeownership rate in Billings is significantly lower than state and national rates. Billings citizens rate the variety and availability affordable, quality housing is much lower than national benchmarks. Approximately 200 lead water service lines replaced and many are located in low-income neighborhoods and are older homes.</p>					
2	Services for Vulnerable Populations	High	Large Families Families w/Children Elderly Public Housing Residents	Chronic Homeless	Veterans	Elderly	HIV/AIDS Domestic Violence Survivors
		Extremely Low-Income		Individuals	Persons w/HIV/AIDS	Frail Elderly	
		Low-Income		Families w/Children	Domestic Violence	Disabled - All	
				Mentally Ill	Survivors	Addicted Persons	
		<p>Description (Goal): Ensure that vulnerable populations have reliable access to comprehensive supportive services that enhance stability, self-sufficiency, and overall well-being. The City’s strategy is to provide resources to nonprofit organizations to address poverty and provide supportive services to low-income individuals and families to provide stable housing, promote self-sufficiency, and promote overall well-being:</p> <p>Basis for Relative Priority: The 2024 Montana Homeless Population point-in-time count identified 273 individuals, nearly 50% were White, 41% were Native American, and nearly nine percent were listed as “other”. The Native American cohort is disproportionately represented in the unhoused population. The suicide and domestic violence rates are higher than national rates.</p>					

#	Priority Need	Priority Level / Population	Family Types	Homeless Categories		Non-Homeless Special Needs	
3	Neighborhood Revitalization	Moderate	Large Families		Veterans	Elderly	
		Extremely Low-Income	Families w/Children	Individuals	HIV/AIDS	Frail Elderly	HIV/AIDS
		Low-Income	Elderly	Families w/Children	Domestic Violence Survivors	Disabled - All	Domestic Violence Survivors
			Public Housing Residents			Addicted Persons	
		<p>Description (Goal): Foster suitable living environment and quality of life through the improvement of physical conditions in lower-income neighborhoods. The City's strategy is to integrate environmental design, infrastructure improvements, and public safety measures to revitalize neighborhoods, prevent crime, and enhance quality of life for residents.</p> <p>Basis for Relative Priority: The violent and property crime rates in Billings is notably higher than the national rate. Billings citizens indicate a strong need for public safety, including street lighting. There are 200 residences with lead water service lines and many are located in low-income neighborhoods and are older homes and housing cost burden limits the ability to update these lines.</p>					

HUD Table 47

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Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	There is great need in the Billings community for tenant housing assistance as evidenced by the Needs Assessment and Market Analysis. Those most in need may not have positive credit or rental histories to secure housing.
TBRA for Non-Homeless Special Needs	See above. The needs for special needs populations remains consistent, particularly for the disabled and elderly.
New Unit Production	The majority of rental and owner households are cost burdened. Affordable housing development, particularly smaller rental units for extremely low and low income households, is paramount to the City’s success in meeting current housing needs in Billings.
Rehabilitation	Rental and owner rehabilitation greatly influences the quality of affordable housing stock in Billings. For owners, rehabilitation has been shown as an effective neighborhood stabilization tool that effectively lowers the costs of maintaining housing. For renters, investment in the affordable housing stock where housing currently exists benefits both the neighborhood overall and maintains the quality of the rental market. Rehabilitation is also utilized as a tool to make accessibility improvements to sustain the affordable housing stock to meet the needs of those who are disabled and the elderly.
Acquisition, including preservation	Acquisition for affordable housing development, foreclosure rehabilitation, and first-time homebuyer remains a high priority due to the high percentage of households experiencing housing cost burdens. Investment in the acquisition and rehabilitation of the affordable housing stock in Billings meets the needs of extremely low and low income households.

HUD Table 48 - Influence of Market Conditions



Introduction

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

Expected revenues from the CDBG program include repayments of funding loaned through the Housing Rehabilitation program, First Time Home Buyer program, and other revitalization efforts. The City expects to receive approximately \$50,000 to \$300,000+ in repayments for the upcoming fiscal year and this funding will be reprogrammed for programs identified herein. The City will not receive proceeds for Section 108 loan guarantees, surplus funds from urban renewal settlements, or float-funded activities.

Revenue expected for the HOME program includes recaptured and program income funding generated by the First Time Homebuyer Loan program. The City expects to receive approximately \$50,000 to \$300,000+ in HOME funding through these venues, and the funding will be utilized to further programs identified in this Plan. City of Billings programs utilize 100% of CDBG and HOME funding to benefit low- to moderate-income households and/or areas. The City may also receive program income attributable to the Neighborhood Stabilization Program and other previously funded federal and state programs.

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

Anticipated Resources

Program	Source of Funds	Expected Amount Available				Expected Amount Available Reminder of Con Plan	Narrative Description
		Annual Allocation	Program Income	Prior Years EN Resources	Total		
CDBG	Public / Federal	~\$650,000 per year	#### Prior PI #### Current Year PI	\$0	####	\$0	Entitlement Allocation
	Uses of Funds: Administration, activities described herein						
HOME	Public / Federal	~\$345,000 per year	#### Prior PI #### Current Year PI	\$0	####	\$0	Entitlement Allocation
	Uses of Funds: Administration, Homebuyer Acquisition, New Housing Development						

HUD Table 49 - Anticipated Resources

HUD HAS NOT RELEASED CDBG AND HOME ALLOCATIONS TO DATE

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

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

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

The requirements set forth in CFR 24 91.220 and 91.520 are as follows:

- Where the jurisdiction deems it appropriate, the jurisdiction *may* indicate publicly owned land or property located within the jurisdiction that *may be used* to address the needs identified in the plan.
- The performance report must include a *description of the resources made available*, the investment of available resources, the geographic distribution and location of investments, the families and persons assisted (including the racial and ethnic status of persons assisted), actions taken to affirmatively further fair housing, and other actions indicated in the strategic plan and the action plan.

The City of Billings has [published a map of publicly owned land](#) and is currently accepting offers for development, including affordable housing development.

The Billings City Council also supported the Community Development Division's housing programs by dedicating \$250,000 in non-federal funds in 2013. In 2015, the City Council dedicated an additional \$195,321 in non-federal funding to further the City's housing programs.

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

The City of Billings is the lead government entity responsible for Consolidated Plan activities funded through CDBG and HOME.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City of Billings	Government	Planning Affordable Housing Ownership Affordable Housing Rental Public Services	City of Billings Jurisdiction
HomeFront	PHA	Public Housing Affordable Housing Ownership Affordable Housing Rental	Billings Area

HUD Table 50 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System.

The City of Billings - Community Development Division is a small branch of the City’s government with a total of four full-time equivalent staff positions. Strengths of the Division include:

- **Longevity:** Staff have extensive experience working with federal grant programs in the Division. Staff have combined longevity of over 42 years working for the City of Billings.
- **Advanced Training and Certifications:** Several of the staff members have HOME certifications, including: Regulations; Administration; and Rental Compliance. Staff members have also been trained in Lead-Based Paint Risk Assessment and Environmental Review.
- **Focused Goals and Programs:** When funding levels were higher, the Division was able to fund and manage many diverse programs to meet community needs. As funding levels diminished, staff has condensed program development, management and implementation on a few core programs, including: First Time Home Buyer; Foreclosure Acquisition / Rehabilitation; Affordable Housing Development; and the Billings Metro VISTA Project as the City’s primary anti-poverty initiative. Streamlining programs has resulted in the development of comprehensive procedures and forms to maintain program compliance, including: Section 3, Lead-Based Paint, Subsidy Layering, Labor Standards, Environmental Review, etc.
- **Affordable Housing Partnerships:** City staff have forged strong relationships with HomeFront (the local housing authority), local developers, realtors, contractors, lenders, and agencies interested in affordable housing development and preservation. City staff also maintain relationships with the staff working in HOME and CDBG programs across the state, including the Montana Department of Commerce, the Missoula Department of Grants and Community Programs, and the Great Falls Planning and Community Development Department.
- **Poverty and Homeless Services Partnerships:** Through the development and implementation of the City’s anti-poverty initiative, the Billings Metro VISTA Project. City staff has created partnerships with over 50 social service agencies, benefit providers, faith communities, philanthropic organizations and private industry leaders to expand coordination, collaboration and efficacy. Information on local Continuum of Care efforts can be found in the PR-10 Consultation section of this Consolidated Plan.

The Montana Continuum of Care completed a “secret shopper” study of homeless service providers in Billings from October 2024 to January 2025. During the review period, “secret shoppers” were sent to service providers to inquire about available resources and reported their experiences. Six visits were completed at five service provider sites in Billings. Respondents reported a difficulty identifying what support services are provided by each provider and a lack of staff time to understand the individual’s needs.

Gaps in the local institutional delivery system exist primarily due to funding limitations, particularly for administrative functions. Billings offers a great number of services to its citizens, but needs for funding, staffing, innovative programs and coordination exist. The ability to effectively relay information regarding the service array in Billings to those in need has been one of the community’s greatest challenges. A comprehensive strategy for overcoming service gaps in the institutional delivery system is a priority for many organizations involved in overall community development initiatives.

Availability of services targeted to homeless persons and persons with HIV and mainstream services.

Service Continuum	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X		X
Mortgage Assistance	X		X
Rental Assistance	X	X	X
Utilities Assistance	X	X	X
Street Outreach Services			
Law Enforcement	X	X	
Mobile Clinics	X	X	
Other Street Outreach Services	X	X	X
Supportive Services			
Alcohol & Drug Abuse	X	X	X
Child Care	X	X	X
Education	X		X
Employment / Training	X		X
Healthcare	X	X	X
HIV/AIDS	X		X
Life Skills	X		X
Mental Health Counseling	X	X	X
Transportation	X	X	X
Other			
Housing First	X	X	

Table 51 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth).

A complete listing of services to meet the needs of the homeless is located in MA-30 Homeless Facilities and Services. The services listed herein meet the needs of some who are experiencing homelessness in

the Billings community. The main issue with service delivery is the lack of resources relative to the number of people seeking assistance. The greatest barrier in the coordination of the institutional delivery structure to serve the homeless is community capacity and funding sources to manage long-term efforts. Several nonprofits have greatly limited services due to overwhelming need and a greatly diminished donor pool. Through the efforts of the Community Development Division, with the support of the capacity building efforts of the Billings Metro VISTA Project, the community has benefitted from several initiatives aimed at improving public awareness of service delivery structure.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above.

The service delivery system for special needs populations and the homeless in Billings is bolstered by the vast service array available for those seeking assistance. The Community Development Division has spearheaded many initiatives based on national best practices, including the development and implementation of the State's first ten-year plan to impact homelessness. City staff have also created the Billings Metro VISTA Project to enhance capacity building efforts to support local nonprofit organizations serving special needs and the homeless.

While Billings provides a vast array of services to persons experiencing homelessness, most services are only available to individuals enrolled to receive services. For others, the basic services are adequate to meet basic human needs such as food, clothing, toiletries, and referrals.

Montana 211 provides detailed information about each service provider to address this gap in the homeless service delivery system. Montana 211 is a **free, confidential, 24/7 service** that connects people to essential health and human services. It is a vital link between people with social service needs and organizations providing assistance.

Resources are not adequate to meet the needs of the general homeless population, including housing, temporary shelter beds, dental care, vision care, and day centers. The most urgent need in the community is housing, both long-term affordable housing and safe sleeping / low-barrier facility for those not meeting eligibility requirements for other programs.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs.

The primary gaps identified in this section are:

- The need for improved coordination and partnerships between public and private service providers
- Financial resource and organizational capacity limitations
- Lack of resources for the unhoused population in Billings

The City maintains positive relations with HomeFront, developers, lenders, realtors and others to ensure collaboration and engagement in the implementation of Community Development programs. The City has a certified Community Housing Development Organization and is actively seeking additional organizations for the purposes of affordable housing development. Additionally, City staff maintain positive and close relationships with the staff at Montana Fair Housing, who is the primary organization in fair housing education and enforcement for the state. Maintaining strong partnerships and coordination between agencies allows the City to better understand the needs of Billings residents and develop thoughtful, sustainable solutions to support and serve the community.

City staff meet monthly with the Community Development Board, which is primarily comprised of representatives from low-income neighborhoods. Board members are liaisons with HomeFront. City staff attend the statewide Montana Housing Conference to form a strong network of partners and to gain

education and resources during breakout sessions. Neighborhood task forces, focus groups, HOME-ARP subrecipients and Billings Metro VISTA Project host sites provide valuable feedback and coordination across Billings. These strong partnerships allow City staff to garner feedback about potential projects, priority issues and community needs to better serve Billings residents

Long-term funding and resources will remain a challenge for organizations across Billings. CDBG and HOME resources are not adequate to meet the needs of the homeless and those experiencing poverty in Billings. The City will overcome these challenges by continually improving coordination between local agencies and focusing on the execution of anti-poverty initiatives.

The City's main anti-poverty initiative is the implementation of the Billings Metro VISTA Project. The City has provided full-year and summer associate support to over 50 nonprofit organizations to date and the continuance of this initiative is imperative to strengthen service delivery to those in need. The Billings Metro VISTA Project enables the City to support nonprofit organizations in a sustainable fashion since the provision of public service grants is no longer an option due to dwindling CDBG allocations.

The City provides additional funding to nonprofit organizations for supportive services to qualified populations through administration and monitoring of the HOME-ARP program. Supportive services aim to prevent homelessness and poverty through financial housing assistance, case management, mental health services, substance abuse treatment and employment assistance services. Montana 211 provides detailed information about each service provider to address this gap in the homeless service delivery system. Montana 211 is a **free, confidential, 24/7 service** that connects people to essential health and human services. It is a vital link between people with social service needs and organizations providing assistance.

SP-45 Goals Summary

91.215(a)(4)

Funding allocated in this section represents an estimate of resources to be utilized over a five-year period utilizing average allocations for the last five years. Projects are funded on a close- and shovel-ready basis for core programs as described in this Plan. An asterisk indicates *Housing development organizations housing development activities must be implemented by housing development organizations.

#	Goal Name	Category & Needs Addressed	Outcome	Objective	\$	City Program / Activities	Goal Outcome Indicator	Five Year Goal
1	Create, preserve, and expand affordable housing options	Affordable Housing	Affordability	Decent Affordable Housing	CDBG HOME NSP	Affordable Housing Development	7 - Rental Units Constructed	32 Rentals: Mitchell Court 101 Rentals: LB Lofts 12 HOME Housing Units
							2 - Public Facility / Infrastructure for low-income housing benefit	Housing Units or LMA
							8 - Rental units rehabilitated	Housing Units
							9 - Homeowner housing added (construction new units)	Housing Units
						First Time Home Buyer	11 - Direct Financial Assistance to Homebuyers	50 Housing Units
						Foreclosure Acquisition / Rehabilitation	10 - Homeowner housing rehabilitated	5 Households Assisted
						<p>Goal: Create, preserve, and expand decent, affordable housing options for low-income residents citywide. Community Development aims to enhance and broaden housing access, availability, physical quality, economic value, and longevity across the city for Billings' low-income residents including seniors, individuals with disabilities, minority groups, and other special populations.</p> <p>Strategy: Increase affordable housing opportunities by implementing financing initiatives, including housing development loans to drive construction and rehabilitation, first-time homebuyer loans to support sustainable ownership, and home repair financing to preserve and upgrade existing low-income neighborhood homes.</p> <ul style="list-style-type: none"> • Affordable Housing Development: Promote citywide development of affordable single-family, multi-family, and special needs housing by offering loan financing to private developers and nonprofit organizations for new construction, rehabilitation, and infrastructure improvements. • First Time Home Buyer: Offer accessible loan financing to foster first-time homeownership opportunities that support long-term financial stability, build generational wealth, and stabilize neighborhoods. • Home Repair: Offer loan financing to agencies that assist low-income homeowners in completing essential repairs - such as major systems upgrades, weatherization, energy/water efficiency, and lead water service line replacements - to enhance and preserve the quality of Billings' affordable housing stock. • Foreclosure: Mitigate the adverse effects of vacant, foreclosed properties by acquiring, rehabilitating, and selling these homes to low-income households - thereby combating urban decay, reducing crime, stabilizing property values, and stimulating the local economy. 		

#	Goal Name	Category & Needs Addressed	Outcome	Objective	\$	City Program / Activities	Goal Outcome Indicator	Five Year Goal
2	Services for vulnerable populations	Services for vulnerable populations	Availability / Accessibility	Create Suitable Living Environment	CDBG HOME CNCS	Billings Metro VISTA Project	1 - Public service activity other than low-income benefit	250 People
						Public Facilities	1 - Public facility / infrastructure for other than low-income housing benefit	1 Facility
<p>Goal: Ensure that vulnerable populations have reliable access to comprehensive supportive services that enhance stability, self-sufficiency, and overall well-being.</p> <p>Strategy: Provide resources to nonprofit organizations to address poverty and provide supportive services to low-income individuals and families to provide stable housing, promote self-sufficiency, and promote overall well-being:</p> <ul style="list-style-type: none"> • Public Facilities: Provide financing to develop public facilities to serve as accessible, community-based hubs where individuals and families facing economic, social, or health-related challenges can find help. • Billings Metro VISTA Project: Allocate AmeriCorps resources to nonprofit organizations to undertake poverty impact activities and to support the low income individuals and families they serve. Federal AmeriCorps Volunteers in Service to America (VISTA) focus areas include: education, healthcare, food security, economic opportunity, housing, financial literacy, and others. • HOME-ARP: Provide grant funding to nonprofit organizations delivering supportive services to: prevent homelessness; unhoused individuals and families; those at-risk of becoming unhoused; and people fleeing domestic violence / trafficking. Federal service categories include case management, housing counseling, rent/utilities/deposit assistance, mental health, healthcare, substance misuse treatment, job training, employment, financial literacy, assistance with benefits enrollment, childcare, and transportation. 								
3	Neighborhood Revitalization	Neighborhood Revitalization	Availability / Accessibility	Create Suitable Living Environment	CDBG	CPTED Public Facilities	1 - Public facility / infrastructure for other than low-income housing benefit	5 Facilities
						Lead-Water Pipe Replacement	10 - Homeowner housing rehabilitated	100 Households
<p>Goal: Foster suitable living environment and quality of life through the improvement of physical conditions in lower-income neighborhoods.</p> <p>Strategy: Integrate environmental design, infrastructure improvements, and public safety measures to revitalize neighborhoods, prevent crime, and enhance quality of life for residents.</p> <ul style="list-style-type: none"> • Crime Prevention Through Environmental Design: Reduce crime by making infrastructure improvements in low-income neighborhoods (parks, adding street lights, etc.) while: creating more attractive and secure environments; stimulating local investment; encouraging residents to use public spaces more freely; and improve quality of life for low-income residents. • Lead-Pipe Water Line Replacement: Provide affordable loan financing to low-income homeowners to remove lead pipes from the property line to residences to prevent lead poisoning, improve water quality, and promote neighborhood health and public safety. 								
HOME Investment Partnerships Program (HOME)			Community Development Block Grant (CDBG)			Corporation for National and Community Service (CNCS)		

HUD Table 52 - Goals Summary

Estimate the number of extremely low income, low income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2).

Over the next five years, the City expects to:

- Assist in completing new rental unit construction that will serve 132 households and 12 of the units will be HOME-assisted.
- Assist 50 low income households through the First Time Home Buyer program.
- Acquire and rehabilitate five foreclosed, vacant homes to sell to low income households citywide.
- Serve 250 extremely-low and low-income individuals through poverty impact initiatives through the Billings Metro VISTA Project.
- Provide financing for one public facility to assist vulnerable populations.
- Complete Crime Prevention through Environmental Design improvements to five low-income neighborhood parks.
- Provide financing to 100 low-income households to replace lead pipe water service lines.

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

HomeFront, the City's public housing authority, performed a baseline Section 504 Needs Assessment that was updated in detail for physical changes in 1992 and the assessment is reviewed annually. HomeFront keeps track of demand for accessible units and wait list needs to determine when more accessible units may be needed. HomeFront also keeps a list of accessible units in the community for the Section 8 and Shelter Plus Care participants to assist them in their search. This is completed via outreach survey to all landlords participating in the program. Outreach is facilitated throughout the year to those who may need housing in accessible units.

HomeFront performs outreach to many agencies several times annually and to other program lists to make sure staff are able to fill accessible units with a family or individual who may need such a unit. If staff is not able to serve households for accessible units when their application comes to the top of the waiting list, they are offered a voucher to look for housing within the community. If an accessible unit at another program managed by the Housing Authority has not been filled, applicants are allowed to transfer to that program.

HomeFront will continue to review 504 Assessment results to determine when additional units and bedroom sizes may be needed in the inventory and research how to best implement those needs as they arise. As part of all Housing Authority programs, the disabled and handicapped are encouraged and allowed to request reasonable accommodations using approved Fair Housing Office forms to assist with whatever physical or assistance needs they may have.

Activities to Increase Resident Involvements

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

Is the public housing agency designated as troubled under 24 CFR part 902?

Not applicable.

Plan to remove the 'troubled' designation

Not applicable.

Barriers to Affordable Housing.

According to the City’s most recent Analysis of Impediments to Fair Housing Choice, most of the typical exclusionary provisions that would hinder affordable housing development do not exist in current zoning codes. However, the following issues may act as barriers to affordable housing investment:

- Density bonuses have not been established to offset the cost of development if a project contains a certain percentage of affordable housing.
- There is currently not a way to fast-track the approval processes for affordable housing development projects. However, fast-tracking may not be as important in Billings as it is in other parts of the country. Subdivision review times are set by the Montana State Legislature. Building permit reviews for single-family homes (one to four units) are three to five days and commercial permits, including multi-family with five or more units in a structure, take four to six weeks to review. Other areas of the country, and some cities in Montana, take 30 days or longer for single-family reviews and four to six months for commercial reviews.
- The City does not currently permit a waiver or reduction of impact fees, including water and wastewater system development fees, to promote affordable housing development.
- The use of accessory dwelling units is not a widely practiced housing development strategy.

Other public policy concerns relate to a dated zoning code and inadequate funding to further affordable housing development. The City completed a process to revise the zoning code and one of the main goals of the project is to expand affordable housing choice across the City. Additional information can be found online at [Project Re:Code](#).

Strategy to Remove or Ameliorate the Barriers to Affordable Housing.

Over the summer of 2024, a team from the Counselors of Real Estate visited Billings to [assess local housing affordability](#). The report identified 29,000 area residents do not have enough money to live in a median-priced home. Local REALTORS estimate a housing deficit of up to 1,300 units annually and an overall 10,000 unit shortage. The report recommends, in part:

- Utilize \$17 million in funding provided by HB 819 for workforce housing development in Yellowstone County
- Promote infill development
- Establish a starter home program with well-advertised outreach
- Provide design-build toolkits
- Promote housing rehabilitation programs
- Engage stakeholders in strategic planning

“The most stunning demographic statistic in the Billings area is that four of the top five occupations do not compensate employees with enough income to qualify to purchase a home at the July 2024 median sales price.”

[Accelerating Production of Attainable Housing](#)

The City plans on assisting with: housing affordability for renters / owners; cost of development; difficulty in paying for needed repairs; manufactured housing developments; and tax structure by implementing the following programs:

- Affordable Housing Development
- First Time Home Buyer
- Foreclosure Acquisition / Rehabilitation

While City staff does not have the capacity to manage a home repair program, local nonprofit agencies are welcome to apply for CDBG funding to manage a housing rehabilitation loan program through the City's routine allocation process.

Relative to the barriers identified in the City's Analysis of Impediments to Fair Housing Choice, the City plans on the following activities:

- Produce and disseminate consumer education on Fair Housing issues through ongoing publicity campaigns to make people aware they can move anywhere in the area they can afford.
- Work to expand housing choices of existing and potential new residents beyond neighborhoods identified by their own race or ethnicity.
- Continue to partner with enforcement agencies providing testing of the real estate industry practitioners to identify discriminatory practices in rental and for-sale housing.
- Support the efforts of local housing counseling agencies, especially to Latinos, before they apply for a mortgage.
- Continue to provide brochures containing information apprising potential home buyers of the availability of housing counseling and how to spot / report discriminatory lending practices.
- Continue to work toward the provision of affordable housing through Community Development programs.
- Support the HomeFront's efforts to expand the geographic range where holders of Housing Choice Vouchers look for housing.

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs.

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

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

To the greatest extent possible, City staff will continue to provide local nonprofit organizations access to AmeriCorps VISTA members through the Billings Metro VISTA Project resources. VISTA members may be placed at the City to undertake objective citywide initiatives. VISTA members may also be placed at nonprofit Host Site organizations to work on specific anti-poverty initiatives.

Addressing the emergency and transitional housing needs of homeless persons.

The following agencies assist in the provision of emergency and transitional housing in Billings:

- **Community Crisis Center** provides intervention services to individuals who are in crisis due to mental health, substance abuse or social service needs. Individuals who engage in mental health assessment and qualify for extended care may utilize stabilization service for up to 24 hours per visit.
- **Family Promise of Yellowstone Valley** provides emergency shelter to several families at a time in a network of church congregations. The organization also operates a transitional housing program that provides apartments for those who have graduated from the shelter program.
- **HRDC District 7** receives Emergency Shelter Grant funds and manages a rapid rehousing program to provide deposit and rent payment assistance to help families quickly regain stability into permanent housing.
- **Montana Rescue Mission** provides emergency shelter in 86 year-round beds. MRM is in the process of finishing a **Unified Campus Project**, which will add an additional 50 beds for women and families, 76 beds for men and 29 affordable housing apartments. The **Women and Family Shelter** provides year-round beds and some of the beds are reserved for individuals without children.
- **Off the Streets** provides 24 year-round beds to chronically homeless individuals.
- **Tumbleweed** provides emergency services for unaccompanied youth and families including emergency shelter placement.
- **YWCA Billings** provides shelter and 24-hour help lines for survivors of domestic violence. Additional services provided include case management, legal advocacy, and assisting with benefits access. The organization also provides transitional housing and permanent supportive housing.

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

City staff administer and monitor funding for subrecipients of the HOME-ARP program. Staff may solicit new applications for supportive services to meet community needs and meet expenditure deadlines in the future. Three subrecipients have already received funding in Billings and details of each subrecipient are listed below:

- **Alternatives, Inc.:** Alternatives, Inc. provides financial assistance for housing including rental application fees, security deposits, utility deposits, utility payments and moving costs. The organization assists with rental arrears up to 24 months and substance abuse treatment. This array of services plays an integral role in empowering individuals to prevent homelessness.
- **District 7 Human Resources Development Council (HRDC):** HRDC District 7 provides financial assistance for housing including rental application fees, security deposits, utility deposits, utility payments, moving costs and rental arrears up to 24 months. Case management through the organization allows for personalized education and support to prevent recurring homelessness. In addition to HOME-ARP funding, HRDC District 7 receives Emergency Shelter Grant funds and manages a rapid rehousing program to help families quickly regain stability into permanent housing.
- **Native American Development Corporation (NADC):** NADC provides supportive services including credit repair services, employment assistance, job training and transportation services. The organization also administers substance abuse treatment and mental health services. Direct case management provides ongoing support for low-income households and those at risk of homelessness.

In addition to organizations supported by the HOME-ARP program, various other organizations provide housing and assistance solutions.

- **Tumbleweed** provides emergency services for unaccompanied youth and families including emergency shelter placement.
- **Family Promise of Yellowstone Valley** provides emergency shelter to several families at a time in a network of church congregations. The organization also operates a transitional housing program that provides apartments for those who have graduated from the shelter program
- **YWCA Billings** provides shelter and 24-hour help lines for survivors of domestic violence. Additional services provided include case management, legal advocacy, and assisting with benefits access. The organization also provides transitional housing and permanent supportive housing.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

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

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

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Actions to address LBP hazards and increase access to housing without LBP hazards

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

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

How are the actions listed above related to the extent of lead poisoning and hazards?

Unlike many larger jurisdictions, the City of Billings does not have a high prevalence of lead poisoning. The City's actions related to housing rehabilitation and development activities are preventive in nature.

How are the actions listed above integrated into housing policies and procedures?

The City's procedures contain provisions for lead-based paint compliance in all programs. A complete set of forms is currently utilized by staff for the purposes of lead-paint inspection, assessment, notification, reporting and compliance.

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

The Needs Assessment contains comprehensive information on the lower income status of local households. All of the Consolidated Plan strategies target the improvement of economic conditions of lower income households in the community, including housing development, financing home repair, continuing partnerships and funding public service activities. The City proposes to support the following specific activities in this Consolidated Plan to address economic conditions of low-income households in Billings:

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

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

Anti-Poverty Strategy

<i>Focus Area</i>	<i>Objective</i>	<i>Programming Area: Specific to People Experiencing Poverty</i>
Economic Opportunity	Financial Literacy	Financial services and related programs to enhance financial literacy.
	Housing	Services to improve housing situations and access to affordable housing, including transitioning individuals into or helping them remain in safe, healthy, affordable housing.
	Employment	Efforts to train and employ low-income individuals. This includes literacy, vocational training aimed at building and gaining work-related skills.
Education	School Readiness	Services for children to make gains in school readiness in the following areas: Social / Emotional Development; Literacy Skills; and Numeracy / Math Skills.
	K-12 Success	Services to improve academic performance and engagement for students, particularly for students in low-achieving schools.
	Post-Secondary Success	Services to increase enrollment and completion of post-secondary education.
Healthy Futures	Food Security	Services to gain access to food resources and access to nutritious food.
	Access to Health Care	Services to gain access to preventative and primary health care services.
Veterans & Military Families	Veterans Served	Any of the above programming areas targeting services for low-income veterans, family members, members of active-duty military and military service members.

City of Billings, Figure V

The structure of the Billings Metro VISTA Project serves to assist nonprofit organizations working on poverty issues. VISTA members may serve at the City to work on initiatives with citywide benefit such as: Faith Engagement in Homelessness; Illuminate Poverty; Resource Map and Notepad; Veterans and Military Families; and Food Security. More information on citywide initiatives can be found on the [City's Poverty Impact Initiatives](#) website. Information on VISTA can be found online at www.BillingsMT.gov/vista.

VISTA members may also be placed at nonprofit Host Site organizations to work on specific anti-poverty projects to benefit the organization's clients. Examples of organizations served include:

- Philanthropic organizations:
 - United Way of Yellowstone County

- Housing organizations:
 - HomeFront, local public housing authority
 - Rebuilding Together for Yellowstone County
 - NeighborWorks Montana

- Social service organizations:
 - Family Support Network
 - Center for Children and Families
 - Mental Health Center
 - Montana Rescue Mission
 - District 7 HRDC
 - Self-Help Law Center
 - National Alliance on Mental Health Billings
 - Tumbleweed Program, Inc.
 - Boys & Girls Club
 - Independence Hall, serving unhoused veterans
 - Billings Family Service
 - Billings Head Start – Explorer's Academy
 - Friendship House
 - Family Promise of Yellowstone Valley
 - Crow Veteran's Affairs
 - YWCA Billings

- Adjacent public entities have also been served by the VISTA program, including:
 - Billings Public Library
 - Billings Public Schools
 - Downtown Billings Association
 - Billings Police Department
 - Planning & Parks Divisions

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan?

Poverty reduction is addressed through the Billings Metro VISTA Project and the City's affordable housing programs. Priority needs, program goals, policies and procedures are all aligned with poverty impact and affordable housing activities.

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements.

The goals to be achieved through the Consolidated Plan will be monitored on a yearly basis as required as part of the CAPER submitted to HUD for the Consolidated Plan. Monitoring consists of:

- Examination of the community's use of available HUD, state, and local resources to meet the affordable housing and community development needs as outlined in the Consolidated Plan.
- Examination of the effectiveness of the programs in place.
- Review of public comments received on the community's performance in meeting the affordable housing and community development needs described in the City's Consolidated Plan.

The City may fund a variety of organizations to carry out City-funded activities each year and would enter into a written agreement specifically describing scope of work and funding use. Organizations receiving City funds will generally be monitored on-site by Community Development staff to ensure compliance with the terms of the agreement and applicable regulations. Site visits will include monitoring in the following areas:

- Compliance with agreement timeframe
- Rate of expenditures
- Continued eligibility of the activities under the agreement
- Adequate documentation concerning client eligibility and service delivery

Compliance with federal regulations will also be monitored, including (but not limited to) a review of the following:

- American Disabilities Act
- Fair Housing Act
- Equal Employment Opportunity
- Section 3 of the Housing and Urban Development Act of 1968
- Uniform Administrative Requirements
- Davis-Bacon Labor Standards

Community Housing Development Organizations

The City requires Community Housing Development Organizations (CHDOs) apply for recertification on an annual basis to ensure continued requirements are being met for CHDO designation, including (but not limited to) maintenance of Board composition, including at least one-third membership by residents of low-income neighborhoods and no more than one-third may be public officials or local / state employees. Staff also conducts a CHDO capacity review every time a new project is funded to ensure the organization has the ability to carry out functions of the proposed project.

Affordable Housing Projects

Housing projects are monitored via desk review and / or site-visits, including inspections, on a schedule based on the number of units in the project. On-site visits include property standards compliance inspections, tenant file review, household income verification, etc. City staff will also conduct annual desk

reviews to ensure leases are in compliance with HOME regulations; rents are compliant with HOME limits; tenant incomes are reviewed annually and they are within eligibility limits; the property owner/manager is inspecting the property at least annually; that adequate project reserves have been established and annual reports are received; and the year-end profit and loss statements show the project is profitable and/or sustainable for the period of affordability.

Affordable housing projects are also scrutinized via routine Risk Assessment in order for City staff to evaluate the relative level of risk of noncompliance for each project in the assisted portfolio. Projects with higher risk assessment scores are prioritized for intensive case management efforts to bring the project into compliance and may receive multiple site visits and technical assistance from City staff.

First Time Home Buyers

Homebuyers receiving assistance are monitored for residency requirements by U.S. Postal Service and noncompliant projects are prioritized for intervention through the City's legal office.

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Section VI: Annual Action Plan

AP-15 Expected Resources

91.220(c)(1,2)

Introduction

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

Expected revenues from the CDBG program include repayments for funding loaned through the Housing Rehabilitation program, First Time Home Buyer program, and other revitalization efforts. The City expects to receive approximately \$50,000 to \$300,000+ in repayments for the upcoming fiscal year and this funding will be reprogrammed for programs identified herein and in the Consolidated Plan. The City will not receive proceeds for Section 108 loan guarantees, surplus funds from urban renewal settlements, or float-funded activities.

Revenue expected for the HOME program includes recaptured and program income funding generated by the First Time Homebuyer Loan program. The City expects to receive approximately \$50,000 to \$300,000+ in HOME funding through these venues, and the funding will be utilized to further programs identified in this Plan. City of Billings programs utilize 100% of CDBG and HOME funding to benefit low- to moderate-income households and/or areas. The City may also receive program income attributable to the Neighborhood Stabilization Program and other previously funded federal and state programs.

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

Anticipated Resources

Program	Source of Funds	Expected Amount Available				Expected Amount Available Reminder of Con Plan	Narrative Description
		Annual Allocation	Program Income	Prior Years EN Resources	Total		
CDBG	Public / Federal	\$650,000	#### Prior PI ~\$100,000 25-26 PI	\$0	####	\$0	Entitlement Allocation
	Uses of Funds: Administration, activities described herein						
HOME	Public / Federal	\$345,000	#### Prior PI ~100,000 PI 24-25 PI	\$0	####	\$0	Entitlement Allocation
	Uses of Funds: Administration, Homebuyer Acquisition, New Housing Development						

Table 53 - Expected Resources – Priority Table

HUD HAS NOT RELEASED CDBG AND HOME ALLOCATIONS TO DATE

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

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

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

The requirements set forth in CFR 24 91.220 and 91.520 are as follows:

- Where the jurisdiction deems it appropriate, the jurisdiction *may* indicate publicly owned land or property located within the jurisdiction that *may be used* to address the needs identified in the plan.
- The performance report must include a *description of the resources made available*, the investment of available resources, the geographic distribution and location of investments, the families and persons assisted (including the racial and ethnic status of persons assisted), actions taken to affirmatively further fair housing, and other actions indicated in the strategic plan and the action plan.

The City of Billings has [published a map of publicly owned land](#) and is currently accepting offers for development, including affordable housing development.

The Billings City Council also supported the Community Development Division's housing programs by dedicating \$250,000 in non-federal funds in 2013. In 2015, the City Council dedicated an additional \$195,321 in non-federal funding to further the City's housing programs.

#	Goal Name	Category & Needs Addressed	Outcome	Objective	\$	City Program / Activities	Goal Outcome Indicator	One-Year Goal
1	Create, preserve, and expand affordable housing options	Affordable Housing	Affordability	Decent Affordable Housing	CDBG HOME NSP	Affordable Housing Development	7 - Rental Units Constructed	32 Rentals: Mitchell Court 6 HOME Housing Units
						First Time Home Buyer	11 - Direct Financial Assistance to Homebuyers	10 Housing Units
						Foreclosure Acquisition / Rehabilitation	10 - Homeowner housing rehabilitated	1 Households Assisted
						<p>Goal: Create, preserve, and expand decent, affordable housing options for low-income residents citywide. Community Development aims to enhance and broaden housing access, availability, physical quality, economic value, and longevity across the city for Billings' low-income residents including seniors, individuals with disabilities, minority groups, and other special populations.</p> <p>Strategy: Increase affordable housing opportunities by implementing financing initiatives, including housing development loans to drive construction and rehabilitation, first-time homebuyer loans to support sustainable ownership, and home repair financing to preserve and upgrade existing low-income neighborhood homes.</p> <ul style="list-style-type: none"> • Affordable Housing Development: Promote citywide development of affordable single-family, multi-family, and special needs housing by offering loan financing to private developers and nonprofit organizations for new construction, rehabilitation, and infrastructure improvements. • First Time Home Buyer: Offer accessible loan financing to foster first-time homeownership opportunities that support long-term financial stability, build generational wealth, and stabilize neighborhoods. • Home Repair: Offer loan financing to agencies that assist low-income homeowners in completing essential repairs - such as major systems upgrades, weatherization, energy/water efficiency, and lead water service line replacements - to enhance and preserve the quality of Billings' affordable housing stock. • Foreclosure: Mitigate the adverse effects of vacant, foreclosed properties by acquiring, rehabilitating, and selling these homes to low-income households - thereby combating urban decay, reducing crime, stabilizing property values, and stimulating the local economy. 		

#	Goal Name	Category & Needs Addressed	Outcome	Objective	\$	City Program / Activities	Goal Outcome Indicator	One-Year Goal
2	Services for vulnerable populations	Services for vulnerable populations	Availability / Accessibility	Create Suitable Living Environment	CDBG HOME CNCS	Billings Metro VISTA Project	1 - Public service activity other than low-income benefit	50 People
						Public Facilities	1 - Public facility / infrastructure for other than low-income housing benefit	1 Facility
<p>Goal: Ensure that vulnerable populations have reliable access to comprehensive supportive services that enhance stability, self-sufficiency, and overall well-being.</p> <p>Strategy: Provide resources to nonprofit organizations to address poverty and provide supportive services to low-income individuals and families to provide stable housing, promote self-sufficiency, and promote overall well-being:</p> <ul style="list-style-type: none"> • Public Facilities: Provide financing to develop public facilities to serve as accessible, community-based hubs where individuals and families facing economic, social, or health-related challenges can find help. • Billings Metro VISTA Project: Allocate AmeriCorps resources to nonprofit organizations to undertake poverty impact activities and to support the low income individuals and families they serve. Federal AmeriCorps Volunteers in Service to America (VISTA) focus areas include: education, healthcare, food security, economic opportunity, housing, financial literacy, and others. • HOME-ARP: Provide grant funding to nonprofit organizations delivering supportive services to: prevent homelessness; unhoused individuals and families; those at-risk of becoming unhoused; and people fleeing domestic violence / trafficking. Federal service categories include case management, housing counseling, rent/utilities/deposit assistance, mental health, healthcare, substance misuse treatment, job training, employment, financial literacy, assistance with benefits enrollment, childcare, and transportation. 								
3	Neighborhood Revitalization	Neighborhood Revitalization	Availability / Accessibility	Create Suitable Living Environment	CDBG	CPTED Public Facilities	1 - Public facility / infrastructure for other than low-income housing benefit	1 Facility
						Lead-Water Pipe Replacement	10 - Homeowner housing rehabilitated	20 Households
<p>Goal: Foster suitable living environment and quality of life through the improvement of physical conditions in lower-income neighborhoods.</p> <p>Strategy: Integrate environmental design, infrastructure improvements, and public safety measures to revitalize neighborhoods, prevent crime, and enhance quality of life for residents.</p> <ul style="list-style-type: none"> • Crime Prevention Through Environmental Design: Reduce crime by making infrastructure improvements in low-income neighborhoods (parks, adding street lights, etc.) while: creating more attractive and secure environments; stimulating local investment; encouraging residents to use public spaces more freely; and improve quality of life for low-income residents. • Lead-Pipe Water Line Replacement: Provide affordable loan financing to low-income homeowners to remove lead pipes from the property line to residences to prevent lead poisoning, improve water quality, and promote neighborhood health and public safety. 								
HOME Investment Partnerships Program (HOME)			Community Development Block Grant (CDBG)			Corporation for National and Community Service (CNCS)		

Introduction

The City of Billings is recommending the following projects for CDBG and HOME funding for FY2024-2025. Revenues received from CDBG, HOME, and other sources will be allocated to current programs under a close- or shovel-ready basis to ensure commitment and expenditure timeliness. The City will be receiving an estimated \$645,000 in new CDBG funds and \$350,000 in new HOME funds. CDBG and HOME administration will be funded at the maximum allowable caps (20 and 10 percent, respectively).

CDBG programs will be funded with entitlement and program income funding as follows: Pending...

Fifteen percent of new HOME entitlement funding will be dedicated to Community Housing Development Organizations for affordable housing development (\$52,500). All remaining entitlement and program income HOME funding would be allocated to the Affordable Housing Development program (\$262,500).

CDBG and HOME funding allocations are subject to the City’s standard close- and shovel-ready allocation process, including the addition of repayment revenues to any project/activity identified in the City’s Consolidated / Annual Action Plan, as per the City’s Citizen Participation Plan. The amounts below represent budget authorizations from past years as well as the Annual Action Plan’s program year.

HUD HAS NOT RELEASED CDBG AND HOME ALLOCATIONS TO DATE - PENDING COMMUNITY DEVELOPMENT BOARD RECOMMENDATIONS

FY2025-2026 Allocations

#	Project Name	CDBG				HOME				TOTALS
		EN	Prior EN	Prior PI	Est PI	EN	Prior EN	Prior PI	Est PI	
1 & 2	Administration	129,000	-	-	-	35,000	-	-	-	164,000
3	Community Housing Dev Orgs Restricted Set-Aside	-	-	-	-	52,500	-	-	-	52,500
	Community Housing Dev Orgs - Released	-	-	-	-	-	106,095	-	-	1,545,000
4	Affordable Housing Development: LB Lofts	100,000	45,000	-	-	262,500	821,030	210,375	-	~25,000
	Billings Metro VISTA Project	0	-	-	~25,000	-	-	-	-	~225,000
5	Lead Water Service Line Replacement	200,000	-	-	~25,000	-	-	-	-	50,000
	Foreclosure Acquisition / Rehabilitation	50,000	-	-	-	-	-	-	-	~246,229
6	First Time Home Buyer	116,000	-	-	~25,000	-	-	5,229	100,000	~75,000
7	Crime Prevention through Environmental Design	50,000	-	-	~25,000	-	-	-	-	2,382,729
TOTALS		645,000	45,000	0	~100,000	350,000	927,125	215,604	~100,000	

Table 56 – Project Info, Allocations including estimated future program income. Program income is not budgeted in the City’s system until received

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

The allocation priorities were established by identifying community needs through the Needs Assessment and Market Analysis. The main obstacle in meeting community needs is the amount of funding allocated and available to address identified needs.

Housing Cost-Burden

- Over 3,000 renting households are paying more than 30% of their income for housing costs, and nearly 3,000 households are paying over 50% of their income for housing costs. Cost burden is particularly challenging for the elderly, followed by small related households.
- Minorities comprise just under 11% of the overall 80% AMI population and nearly all minority cohorts are more likely to have one or more housing problems. Over 1,600 racial / ethnic minority households under 50% AMI are experiencing housing cost burden. Housing cost burden is an impediment to fair housing choice for these cohorts.
- The highest percentage of cost-burdened households is located in the North Park and Southside neighborhoods. Smaller neighborhoods in the West End and Billings Heights are also identified, followed by the southwest corridor neighborhood.
- Cost-burdened households are not able to afford routine home maintenance and improvements. Approximately 200 households have lead water service lines and many are older homes, located in low-income neighborhoods. The cost to replace lines from the city main to residences can be \$3,000 to \$10,000 per home.

Lack of Housing Availability, Variety, and Quality

- There are 5,175 households on the Public Housing waiting list and 3,075 households on the Section 8 tenant-based waiting list. This indicates a high need for application, deposit, rent, and mortgage assistance. Over 3,800 households are seeking one-bedroom units.
- Housing prices have increased 47% over the past five years. [Renters make up 35%](#) of Billings' population, resulting in a homeownership rate of 65%, which is lower than Montana's statewide rate of 71% and the national average of 69%. The First Time Home Buyer program is a high priority for Consolidated Plan survey respondents.
- [The 2022 National Community Survey](#) indicated the variety and availability affordable, quality housing is much lower than national benchmarks. Nearly 40% of respondents noted the variety of housing options is "Poor" and 64% indicated the availability of affordable, quality housing is "Poor".
- Approximately 200 lead water service lines replaced and many are located in low-income neighborhoods and are older homes. It is the homeowner's responsibility to make needed repairs; \$3,000 to \$10,000 per residence. Cost burden is a particularly concerning finding in this Consolidated Plan, therefore, assistance for low-income homeowners to replace these lines is a significant recommendation.

Need for Supportive Services

- The [2024 Montana Homeless Population](#) point-in-time count identified 273 individuals, nearly 50% were White, 41% were Native American, and nearly nine percent were listed as “other”. The Native American cohort is disproportionately represented in the unhoused population.
- The [Office of Epidemiology and Scientific Support](#) states 270 Montana citizens die by suicide each year and in 2017, the suicide rate was two times higher than the national rate (29 deaths per 100,000 people versus 14 deaths per 100,000 people in the United States). Males account for 80% of suicide deaths in Montana. One in ten high school students reported having attempted suicide in the past twelve months. Access to healthcare and mental health care is the number one priority for Consolidated Plan respondents.
- Over 23% of [Community Health Needs Assessment](#) survey respondents indicate they have been a victim of domestic violence at least one time in their life. This figure is higher than the nation’s 13% data point. Nearly [60% of reported crimes](#) in Billings are related to domestic violence. The Billings Police Department responds to [over 600 non-aggravated Partner or Family Member Assaults](#) annually, the highest number of offenses in the state.

Need for Neighborhood Improvements

- The [violent crime rate](#) in Billings is approximately nine incidents per 1,000 residents, which is notably higher than the national median of four per 1,000. This means residents have about a one in 112 chance of becoming a victim of violent crime.
- Property crimes are also prevalent, with a rate of around 36 incidents per 1,000 residents, compared to the national median of 19 per 1,000. This translates to a one in 28 chance of experiencing property crime in Billings.
- The City’s [Citizen Survey’s](#) open-ended questions indicated a strong need for public safety including response to crime and safety services.
- The Billings City Council and Planning and Community Services Department is undertaking updates to neighborhood plans which will identify needed improvements in the City’s lower-income neighborhoods. The need for street lighting has been identified as a significant priority in the Consolidated Plan survey.
- There are 200 residences with lead water service lines and many are located in low-income neighborhoods and are older homes. It is the homeowner’s responsibility to replace the lines from the property line to the residence and the cost per home is estimated at \$3,000 to \$10,000 per residence.

AP-38 Project Summary

#	Project Name	Target Area	Goals / Needs	Funding Subject to Close- and Shovel-Ready Allocations	Target Date	Estimate # / Type Families Benefitting
1 & 2	Administration	City of Billings	Affordable Housing	CDBG \$### HOME \$###	June 30, 2026	Not Applicable
		Description (Goal): Efficiently manage the implementation of objectives, strategies, and initiatives for HUD-funded programs and projects and ensuring federal regulatory compliance.				
3	Affordable Housing - Rental Construction	City of Billings	Affordable Housing	CDBG FY25-26 EN \$### CDBG Estimated FY25-26 PI ~\$##	June 30, 2026	32 Total Rental Housing Units Mitchell Court 6 HOME Housing Units Low-Income Households
		<p>Description (Goal): Create, preserve, and expand decent, affordable housing options for low-income residents citywide. Community Development aims to enhance and broaden housing access, availability, physical quality, economic value, and longevity across the city for Billings' low-income residents including seniors, individuals with disabilities, minority groups, and other special populations.</p> <p>Strategy: Increase affordable housing opportunities by implementing financing initiatives, including housing development loans to drive construction and rehabilitation, first-time homebuyer loans to support sustainable ownership, and home repair financing to preserve and upgrade existing low-income neighborhood homes.</p> <p>Planned Activity: Promote citywide development of affordable single-family, multi-family, and special needs housing by offering loan financing to private developers and nonprofit organizations for new construction, rehabilitation, and infrastructure improvements.</p>				
4	First Time Home Buyer	City of Billings	Affordable Housing	CDBG Estimated FY25-26 PI ~\$### HOME CHDO, EN, & PI: \$###	June 30, 2026	10 Household Housing Units Low-Income Households Direct Homeownership Assistance
		<p>Description (Goal): Create, preserve, and expand decent, affordable housing options for low-income residents citywide. Community Development aims to enhance and broaden housing access, availability, physical quality, economic value, and longevity across the city for Billings' low-income residents including seniors, individuals with disabilities, minority groups, and other special populations.</p> <p>Strategy: Increase affordable housing opportunities by implementing financing initiatives, including housing development loans to drive construction and rehabilitation, first-time homebuyer loans to support sustainable ownership, and home repair financing to preserve and upgrade existing low-income neighborhood homes.</p> <p>Planned Activity: Offer accessible loan financing to foster first-time homeownership opportunities that support long-term financial stability, build generational wealth, and stabilize neighborhoods.</p>				
5	Foreclosure - Acquisition / Rehabilitation	City of Billings	Affordable Housing	HOME Prior Year EN \$### CDBG & HOME Estimated FY25-26 PI ###	June 30, 2026	1 Low-Income Households Direct Homeownership Acquisition / Rehabilitation
		<p>Description (Goal): Create, preserve, and expand decent, affordable housing options for low-income residents citywide. Community Development aims to enhance and broaden housing access, availability, physical quality, economic value, and longevity across the city for Billings' low-income residents including seniors, individuals with disabilities, minority groups, and other special populations.</p> <p>Strategy: Increase affordable housing opportunities by implementing financing initiatives, including housing development loans to drive construction and rehabilitation, first-time homebuyer loans to support sustainable ownership, and home repair financing to preserve and upgrade existing low-income neighborhood homes.</p> <p>Planned Activity: Mitigate the adverse effects of vacant, foreclosed properties by acquiring, rehabilitating, and selling these homes to low-income households - thereby combating urban decay, reducing crime, stabilizing property values, and stimulating the local economy.</p>				

#	Project Name	Target Area	Goals / Needs	Funding Subject to Close- and Shovel-Ready Allocations	Target Date	Estimate # / Type Families Benefitting
6	Billings Metro VISTA Project	City of Billings	Poverty Impact	CDBG \$###	June 30, 2026	50 Low-Income Persons Assisted
		<p>Description (Goal): Ensure that vulnerable populations have reliable access to comprehensive supportive services that enhance stability, self-sufficiency, and overall well-being.</p> <p>Strategy: Provide resources to nonprofit organizations to address poverty and provide supportive services to low-income individuals and families to provide stable housing, promote self-sufficiency, and promote overall well-being.</p> <p>Planned Activity: Allocate AmeriCorps resources to nonprofit organizations to undertake poverty impact activities and to support the low income individuals and families they serve. Federal AmeriCorps Volunteers in Service to America (VISTA) focus areas include: education, healthcare, food security, economic opportunity, housing, financial literacy, and others.</p>				
7	Crime Prevention through Environmental Design	City of Billings	Crime Prevention	CDBG FY25-26 \$### CDBG Prior Year EN & PI \$### CDBG PI ~\$###	June 30, 2026	1 Public Facility Low-Income Area
		<p>Description (Goal): Foster suitable living environment and quality of life through the improvement of physical conditions in lower-income neighborhoods.</p> <p>Strategy: Integrate environmental design, infrastructure improvements, and public safety measures to revitalize neighborhoods, prevent crime, and enhance quality of life for residents.</p> <p>Planned Activities: Reduce crime by making infrastructure improvements in low-income neighborhoods (parks, adding street lights, etc.) while: creating more attractive and secure environments; stimulating local investment; encouraging residents to use public spaces more freely; and improve quality of life for low-income residents.</p>				
8	Lead Water Pipe Replacement	City of Billings	Crime Prevention	CDBG FY25-26 \$### CDBG Prior Year EN & PI \$### CDBG PI ~\$###	June 30, 2026	20 Low-Income Households Housing Rehabilitation
		<p>Description (Goal): Foster suitable living environment and quality of life through the improvement of physical conditions in lower-income neighborhoods.</p> <p>Strategy: Integrate environmental design, infrastructure improvements, and public safety measures to revitalize neighborhoods, prevent crime, and enhance quality of life for residents.</p> <p>Planned Activities: Provide affordable loan financing to low-income homeowners to remove lead pipes from the property line to residences to prevent lead poisoning, improve water quality, and promote neighborhood health and public safety.</p>				

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

HUD Table 57 - Project Summary

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

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

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

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

Geographic Distribution

Target Area	Percentage of Funds
Citywide	100%

HUD Table 58 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

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

Introduction

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

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	37
Special-Needs	0
Total	37

HUD Table 59 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	6
Rehab of Existing Units	21
Acquisition of Existing Units	10
Total	37

HUD Table 60 - One Year Goals for Affordable Housing by Support Type

Introduction

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

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

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

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

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

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

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

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

Not applicable. HomeFront is a [standard performer](#) as per the Public Housing Assessment System (HAS) and, therefore, a review of troubled status needs is not required.

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Introduction

As previously stated in the SP-60 Homelessness Strategy of the [Consolidated Plan](#), the Community Development Division's ongoing activities, to the greatest extent possible:

- Continuing to provide supportive services funding to nonprofit organizations through the HOME-ARP program, specific to qualified populations. Funding allows subrecipients to provide supportive services and financial assistance to low-income households and individuals at risk of homelessness. These services help households regain stability and permanent housing.
- Staff will continue to provide local nonprofit organizations access to AmeriCorps VISTA members through the **Billings Metro VISTA Project** resources. VISTA members may be placed at the City to undertake objective citywide initiatives. VISTA members may also be placed at nonprofit Host Site organizations to work on specific anti-poverty initiatives.

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

A network of over 50 local service providers in the community strive to meet the diverse needs of those experiencing homelessness, those who are at-risk of homelessness, and people experiencing poverty. A complete listing of services, including outreach, is included in the MA-30 Homeless Facilities and Services section of this Consolidated Plan.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including: Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs; and Addressing the emergency shelter and transitional housing needs of homeless persons

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

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

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

City staff administer and monitor funding for subrecipients of the HOME-ARP program. Three subrecipients have received funding in Billings and details of each subrecipient are listed below:

- **Alternatives, Inc.:** Alternatives, Inc. provides financial assistance for housing including rental application fees, security deposits, utility deposits, utility payments and moving costs. The organization assists with rental arrears up to 24 months and substance abuse treatment. This array of services plays an integral role in empowering individuals to prevent homelessness.
- **District 7 Human Resources Development Council (HRDC):** HRDC District 7 provides financial assistance for housing including rental application fees, security deposits, utility deposits, utility payments, moving costs and rental arrears up to 24 months. Case management through the organization allows for personalized education and support to prevent recurring homelessness. In addition to HOME-ARP funding, HRDC District 7 receives Emergency Shelter Grant funds and manages a rapid rehousing program to help families quickly regain stability into permanent housing.
- **Native American Development Corporation (NADC):** NADC provides supportive services including credit repair services, employment assistance, job training and transportation services. The organization also administers substance abuse treatment and mental health services. Direct case management provides ongoing support for low-income households and those at risk of homelessness.

In addition to organizations supported by the HOME-ARP program, various other organizations provide housing and assistance solutions:

- **Montana Rescue Mission:** The organization operates men's shelter and a shelter to serve women and their children. Montana Rescue Mission does not seek nor utilize federal funds for its operation.
- **YWCA's Northern Lights:** Provides housing for survivors of domestic violence. Additional services provided include case management, mental health treatment, budgeting assistance, and the facilitation of access to benefits. The organization also provides transitional housing and permanent supportive housing.
- **Community Crisis Center:** Provides crisis intervention and 23 hour stays as a technique to impact chronic homelessness.
- **Family Promise of Yellowstone County:** Provides emergency shelter to several families at a time in a network of church congregations. The organization also operates a transitional housing program that provides apartments for those who have graduated from the shelter program.

Several local service providers assist homeless families by providing funding for rent, mortgage, utility, and deposit assistance. Additional services for the homeless are included in the MA-30 Homeless Facilities and Services section of this Consolidated Plan.

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

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

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

Introduction

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

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

- Concentrations of minorities that would not exist in a free market not distorted by discrimination suggest that Billings has a dual housing market; one for non-Hispanics, Whites and Asians and another for all other minorities.
- Discriminatory real estate industry practices such as racial and ethnic steering distort the free market in housing.
- Discrimination against Latinos in issuing government-backed mortgage and refinancing loans continues unabated in Billings as it does throughout the nation.
- The relatively high cost of housing continues to pose a barrier to fair housing choice in Billings.
- A review of Unified Zoning Regulations and review requirements was needed to foster compliance with fair housing law and to promote inclusionary zoning. [Project Re:Code](#) was completed in 2021.
- There is a serious shortage of housing affordable to holders of Housing Choice Vouchers in the areas where the proportion of public-school students from low-income neighborhoods is relatively low.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment.

The City plans on assisting with: housing affordability for renters / owners; cost of development; difficulty in paying for needed repairs; manufactured housing developments; and tax structure by implementing the following programs:

- Affordable Housing Development
- First Time Home Buyer
- Foreclosure Acquisition / Rehabilitation

While City staff does not have the capacity to manage a home repair program, local nonprofit agencies are welcome to apply for CDBG funding to manage a housing rehabilitation loan program through the City's routine allocation process.

Relative to the barriers identified in the City's Analysis of Impediments to Fair Housing Choice, the City plans on the following activities:

- Produce and disseminate consumer education on Fair Housing issues through ongoing publicity campaigns to make people aware they can move anywhere in the area they can afford.
- Work to expand housing choices of existing and potential new residents beyond neighborhoods identified by their own race or ethnicity.

- Continue to partner with enforcement agencies providing testing of the real estate industry practitioners to identify discriminatory practices in rental and for-sale housing.
- Support the efforts of local housing counseling agencies, especially to Latinos, before they apply for a mortgage.
- Continue to provide brochures containing information apprising potential home buyers of the availability of housing counseling and how to spot / report discriminatory lending practices.
- Continue to work toward the provision of affordable housing through Community Development programs.
- Support the Housing Authority's efforts to expand the geographic range where holders of Housing Choice Vouchers look for housing.

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Introduction

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

Actions planned to address obstacles to meeting underserved needs.

Pending City Council discussion on March 17, 2025.

Actions planned to foster and maintain affordable housing.

Pending City Council discussion on March 17, 2025.

Actions planned to reduce lead-based paint hazards.

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

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

Actions planned to reduce the number of poverty-level families.

All Consolidated Plan strategies target the improvement of economic conditions of lower-income households in the community, including housing development, financing home repair, continuing partnerships, and funding public service activities. The City proposes to support the following specific activities in the Consolidated Plan to address economic conditions of low-income households in Billings:

- Continuing to provide supportive services funding to nonprofit organizations through the HOME-ARP program, specific to qualified, eligible populations.
- Continue to work with nonprofit organizations to help address the human service needs of lower-income residents of the community in general and of our lower-income neighborhoods. This would be achieved primarily through supporting capacity building efforts of social service agencies through implementation of the *Billings Metro VISTA Project*.
- If available, continue to apply for the AmeriCorps VISTA project status to bring full-time and summer associate volunteers to work on poverty-impact programs.

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

Actions planned to develop institutional structure.

The City of Billings maintains strong partnerships with housing and social service agencies. The only gaps in the institutional structure relate to funding limitations and the City's inability to dedicate time and resources to additional projects outside of the current funding structure.

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

The City will continue coordinating with public, private, and social service agencies to further activities and projects identified herein, including collaborating via the following:

- Nonprofit Organizations
- Neighborhood Task Forces
- Billings Metro VISTA Project
- HOME-ARP Supportive Services

DRAFT

Introduction

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

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

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

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

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

Other CDBG Requirements

1. The amount of urgent need activities.	\$0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low- and moderate-income. Overall Benefit - A consecutive period of one, two, or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specific the years covered that include this Annual Action Plan.	100%
FY Year Covered 2025	

**HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(l)(2)**

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

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

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

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

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

Homebuyer Requirements: For homeownership housing to qualify as affordable housing eligible for HOME funding, it must be single-family; considered modest housing; be acquired by a low-income household for their principal residence; and meet affordability requirements for a single period as determined by the amount of assistance provided. The City utilizes [single family mortgage limits set by HUD](#).

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

Net Proceeds: The sales price, less the superior loan repayment and any closing costs. The City will only recapture the net proceeds from a sale. Any loans or improvements made to the property after the time of the HOME assistance will be paid after the City is repaid the amount owed under its

recapture provisions. If the net proceeds are not sufficient to recapture the full HOME investment, the City will accept the available net proceeds as full payment.

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

Subordination: The City does not subordinate loans in the First Time Homebuyer program and other homeowner-assisted projects without City Administrator approval. Therefore, if an assisted homeowner refinances the property, the City will need to be repaid the full amount of HOME assistance provided.

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

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

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

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

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

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

Section VII: Appendices

A. Data, News Articles, Agencies, and City of Billings Sources Used in the Plan, by Type

Data Sources:

- 2016-2020, [American Community Survey](#), Billings, Montana
- 2019-2023, [United States Census Bureau](#), Billings, Montana
- 2024, [Statistical Atlas](#), Billings, Montana
- 2022, [Point2Homes](#), *Billings, Montana Demographics*
- 2025, [Federal Reserve Bank of St. Louis](#), Billings, Montana
- 2022, [The National Community Survey](#), Billings, Montana
- 2023, [Community Health Needs Assessment](#), Yellowstone County, Montana
- 2025, [Realtor.com](#), Billings, Montana
- 2024, [MT Continuum of Care Coalition](#), Homeless Population Point-in-Time Count
- 2020, [Homelessness and Housing Supports in Yellowstone County](#)
- 2024, [U.S. Department of Veterans Affairs](#), *Montana VA Exceeds Goal To Support Veterans Experiencing Homelessness*
- 2025, [Montana Department of Health and Human Services](#), Epidemiology and Scientific Support Bureau
- 2025, [Montana Department of Health and Human Services](#), *7 FACTS ABOUT HIV, the virus that causes AIDS*
- 2025, [U.S. Department of Agriculture](#), Food Access Research Atlas
- 2025, [Healthy by Design](#), Riverstone Health
- 2023, [National Human Trafficking Hotline](#), Montana
- 2020, [Montana Department of Justice](#), *The Landscape in Montana: Missing Indigenous Persons*
- 2025, [Montana Department of Commerce](#), *Housing Tax Credits*
- 2024, [Counselors of Real Estate](#), *Accelerating Production of Attainable Housing*
- 2022, [Big Sky Business Journal](#), *Billings Needs to Build 2000 Homes a Year*
- 2025, [Best Places](#), Billings, Montana
- 2025, [Zillow Home Values Index](#), Billings, Montana
- 2025, [Montana Department of Commerce](#), *Fair Market Rent Reevaluation*
- 2024, [Point2Homes](#), *Billings, Montana Rental Market Trends*
- 2025, [Montana Rescue Mission](#), *Unified Campus Project*
- 2025, Montana Department of Labor & Industry, [Montana Works](#)
- 2025, [Senior Housing Net](#), Billings, Montana
- 2025, [U.S. Bureau of Labor Statistics](#), Montana
- 2023, [Department of Numbers](#), *Billings, Montana Job Growth*
- 2019, [Stacker](#), *Highest-earning cities in Montana*
- 2023, [Data USA](#), Billings, Montana
- 2020, [State of the Workforce](#)
- 2023, [Annual Comprehensive Economic Development Strategy and Progress Report](#)
- 2025, [Big Sky Economic Development](#), BillingsWorks
- 2023, [Montana Historical Society](#), *The Southside of Billings, 1882-1940*
- 2025, [BroadbandNow](#), *Internet Providers in Billings, Montana*
- 2025, [ISP Reports](#), *Business Internet in Billings, Montana*

- 2020, [Montana Climate Solutions Council](#), *Montana Climate Solutions Plan*
- 2019, [Multi-Hazard Mitigation Plan](#), *Yellowstone County, Montana*
- 2023, [Disaster & Emergency Services Strategic Plan](#), *Yellowstone County, Montana*
- 2025, [FEMA National Risk Index](#)
- 2006, [Community Wildfire Protection Plan](#), *Yellowstone County, Montana*

News Articles:

- 2024, [Q2 News Billings](#), *Affordable housing waitlist hits 30-year high at Homefront in Billings*
- 2024, [Q2 News Billings](#), *The 'Clothesline Project' raises awareness of domestic violence in Billings*
- 2023, [Q2 News Billings](#), *Domestic violence support in Billings*
- 2021, [The Wall Street Journal](#), *Montana Boomtown Jumps to No. 1 on WSJ/Realtor.com Housing Market Index*
- 2023, [Daily Inter Lake](#), *The truth about your home's property tax increase*
- 2024, [Q2 News Billings](#), *Billings schools establishing Family Resource Center to better serve growing homeless population*
- 2024, [NonStop Local](#), *New data shows instance of homeless veterans dropping in Montana*
- 2024, [Billings Gazette](#), *Still fighting HIV/AIDS in Montana*
- 2023, [Q2 News Billings](#), *FBI and Billings area law enforcement battle human trafficking*
- 2024, [NonStop Local](#), *North Park grand reopening will bring enhanced safety for residents*
- 2024, [Billings Gazette](#), *Billings attainable housing report promotes small homes, density*
- 2024, [Billings Gazette](#), *Montana Rescue Mission shows off its new shelter in downtown Billings*

Agency Links:

- 2025, [YWCA Billings](#)
- 2025, [Domestic Shelters](#)
- 2025, [Yellowstone Human Trafficking Task Force](#)
- 2025, [HER Campaign](#)
- 2025, [Urban Indian Health Institute](#)
- 2025, [National Ashanti Alert Network](#)
- 2025, [Community Crisis Center](#)
- 2025, [HRDC District 7](#)
- 2025, [Montana Rescue Mission](#)
- 2025, [Off the Streets](#)
- 2025, [Tumbleweed](#)
- 2025, [Volunteers of America – Northern Rockies](#)
- 2025, [South Central Montana Regional Mental Health Center](#)
- 2025, [Rimrock](#)
- 2025, [Dress for Success Billings](#)
- 2025, [Billings Family Service](#)
- 2025, [Montana 211](#)
- 2025, [Project Re:Code](#)

City of Billings Links:

- 2025, [Capital Improvement Plan \(CIP\)](#), *City of Billings*
- 2023, [Billings Police Department Annual Report](#), *City of Billings*
- 2025, [Housing Authority of Billings – Community Gardens Project](#), *City of Billings*
- 2025, [Magic City Community Gardens Facebook](#)

- 2025, [Amend Park Community Garden](#), City of Billings – Parks and Recreation
- 2025, [Parkland Gleaning Project](#), City of Billings – Parks and Recreation
- 2025, [Community & Neighborhood Plans](#), City of Billings
- 2023, [HOME-ARP Allocation Plan](#), City of Billings
- 2025, [City Owned Properties](#), City of Billings
- 2025, [Poverty Impact Initiatives](#), City of Billings
- 2025, [Billings Metro VISTA Project](#), City of Billings

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B. Data Sources in Order of Appearance

- 2016-2020, [American Community Survey](#), Billings, Montana
- 2019-2023, [United States Census Bureau](#), Billings, Montana
- 2024, [Statistical Atlas](#), Billings, Montana
- 2024, [Q2 News Billings](#), *Affordable housing waitlist hits 30-year high at Homefront in Billings*
- 2022, [Point2Homes](#), *Billings, Montana Demographics*
- 2024, [Q2 News Billings](#), *The 'Clothesline Project' raises awareness of domestic violence in Billings*
- 2023, [Q2 News Billings](#), *Domestic violence support in Billings*
- 2025, [YWCA Billings](#)
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- 2020, [Homelessness and Housing Supports in Yellowstone County](#)
- 2024, [Q2 News Billings](#), *Billings schools establishing Family Resource Center to better serve growing homeless population*
- 2024, [NonStop Local](#), *New data shows instance of homeless veterans dropping in Montana*
- 2024, [U.S. Department of Veterans Affairs](#), *Montana VA Exceeds Goal To Support Veterans Experiencing Homelessness*
- 2025, [Montana Department of Health and Human Services](#), *Epidemiology and Scientific Support Bureau*
- 2025, [Montana Department of Health and Human Services](#), *7 FACTS ABOUT HIV, the virus that causes AIDS*
- 2024, [Billings Gazette](#), *Still fighting HIV/AIDS in Montana*
- 2025, [U.S. Department of Agriculture](#), *Food Access Research Atlas*
- 2025, [Capital Improvement Plan \(CIP\)](#), City of Billings
- 2023, [Billings Police Department Annual Report](#), City of Billings
- 2025, [Housing Authority of Billings – Community Gardens Project](#), City of Billings
- 2025, [Magic City Community Gardens Facebook](#)
- 2025, [Amend Park Community Garden](#), City of Billings – Parks and Recreation
- 2025, [Parkland Gleaning Project](#), City of Billings – Parks and Recreation
- 2025, [Healthy by Design](#), Riverstone Health
- 2023, [National Human Trafficking Hotline](#), Montana
- 2023, [Q2 News Billings](#), *FBI and Billings area law enforcement battle human trafficking*
- 2025, [Yellowstone Human Trafficking Task Force](#)
- 2025, [HER Campaign](#)
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- 2025, [Community & Neighborhood Plans](#), City of Billings

- 2025, [Montana Department of Commerce](#), *Housing Tax Credits*
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- 2022, [Big Sky Business Journal](#), *Billings Needs to Build 2000 Homes a Year*
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- 2025, [Zillow Home Values Index](#), *Billings, Montana*
- 2025, [Montana Department of Commerce](#), *Fair Market Rent Reevaluation*
- 2024, [Point2Homes](#), *Billings, Montana Rental Market Trends*
- 2023, [HOME-ARP Allocation Plan](#), *City of Billings*
- 2025, [Community Crisis Center](#)
- 2025, [HRDC](#)
- 2025, [Montana Rescue Mission](#)
- 2025, [Montana Rescue Mission](#), *Unified Campus Project*
- 2025, [Off the Streets](#)
- 2025, [Tumbleweed](#)
- 2025, [Volunteers of America – Northern Rockies](#)
- 2025, [South Central Montana Regional Mental Health Center](#)
- 2025, [Rimrock](#)
- 2025, [Dress for Success Billings](#)
- 2025, [Billings Family Service](#)
- 2025, [Montana Department of Labor & Industry](#), [Montana Works](#)
- 2025, [Montana 211](#)
- 2025, [Senior Housing Net](#), *Billings, Montana*
- 2025, [Project Re:Code](#)
- 2025, [U.S. Bureau of Labor Statistics](#), *Montana*
- 2023, [Department of Numbers](#), *Billings, Montana Job Growth*
- 2019, [Stacker](#), *Highest-earning cities in Montana*
- 2023, [Data USA](#), *Billings, Montana*
- 2020, [State of the Workforce](#)
- 2023, [Annual Comprehensive Economic Development Strategy and Progress Report](#)
- 2025, [Big Sky Economic Development](#), *BillingsWorks*
- 2023, [Montana Historical Society](#), *The Southside of Billings, 1882-1940*
- 2024, [NonStop Local](#), *North Park grand reopening will bring enhanced safety for residents*
- 2025, [BroadbandNow](#), *Internet Providers in Billings, Montana*
- 2025, [ISP Reports](#), *Business Internet in Billings, Montana*
- 2020, [Montana Climate Solutions Council](#), *Montana Climate Solutions Plan*
- 2019, [Multi-Hazard Mitigation Plan](#), *Yellowstone County, Montana*
- 2023, [Disaster & Emergency Services Strategic Plan](#), *Yellowstone County, Montana*
- 2025, [FEMA National Risk Index](#)
- 2006, [Community Wildfire Protection Plan](#), *Yellowstone County, Montana*
- 2025, [City Owned Properties](#), *City of Billings*
- 2024, [Billings Gazette](#), *Billings attainable housing report promotes small homes, density*
- 2025, [Poverty Impact Initiatives](#), *City of Billings*
- 2025, [Billings Metro VISTA Project](#), *City of Billings*
- 2024, [Billings Gazette](#), *Montana Rescue Mission shows off its new shelter in downtown Billings*

A. CDBG Application for Federal Assistance (SF-424)

B. HOME Application for Federal Assistance (SF-424)

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E. HUD Table 2, Continuation: Participating Agencies, Groups, and Organizations

#	Agency/Group/Organization*	Type(s)	Consolidated Plan Section(s)	How Consulted / Outcomes
	Adjacent Neighborhood Task Force	Civic Leaders; low-income Area Representatives; Neighborhood Organization	All	Email / phone / web retrieval; data exchange for the development of relevant sections
	Adult Resource Alliance	Services - Elderly Persons	Housing Need Assessment; Non-Homeless Special Needs; Anti-Poverty Strategy	
	Big Sky Economic Development	County Government	Economic Development; Anti-Poverty Strategy	
	Big Sky Senior Services	Services - Elderly Persons	Housing Need Assessment; Non-Homeless Special Needs; Anti-Poverty Strategy	
	Billings City Council	Local Government; Civic / Business Leaders	All	
	Billings Job Service	Services - Employment	Economic Development; Anti-Poverty Strategy	
	Billings Police Department	Local Government; Services - Domestic Violence, Homeless	Housing Need Assessment; Anti-Poverty Strategy	
	Billings Public Schools	Services - Homeless, Education	Homeless Needs - Families with Children; Anti-Poverty Strategy	
	Billings Public Works Department	Local Government	Non-Housing Community Development Needs	
	City of Billings - Community Development Board	Civic / Business Leaders, Low-income Area Representatives; Neighborhood Leaders	All	

	City of Billings - Domestic Violence Unit	Local Government; Services - Domestic Violence	Housing Need Assessment; Anti-Poverty Strategy	
	City of Billings - Planning Division	Local Government; Planning Organization	Housing Needs Assessment; Market Analysis; Economic Development; Anti-Poverty Strategy; Broadband Access; Resiliency	
	Downtown Billings Alliance	Business and Civic Leaders	Homeless Needs - Chronically Homeless; Economic Development; Anti-Poverty Strategy	
	Living Independently for Today and Tomorrow	Housing; Services - Persons with Disabilities	Housing Needs Assessment; Market Analysis; Non-Homeless Special Needs	
	Montana Department of Commerce	State; Housing	Housing Need Assessment; Market Analysis; Anti-Poverty Strategy	
	Montana Epidemiology, Addictive / Mental Disorders	Health Agency; Services - Health, Persons with HIV/AIDS, Disabilities, Homeless; State Government	Housing Need Assessment; Non-Homeless Special Needs	
	Montana Fair Housing	Services - Fair Housing	Housing Needs Assessment; Non-Homeless Special Needs; Anti-Poverty Strategy	
	Rimrock	Housing; Services - Persons with Disabilities	Housing Need Assessment; Homeless Needs - Chronically Homeless; Anti-Poverty Strategy	
	Yellowstone County Emergency Services	County Government	Resiliency	

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Email Listserv

The following organizations are included in an email listserv and all were contacted to: apply for CDBG, HOME, and AmeriCorps VISTA resources; participate in the Consolidated Plan survey to garner public input on community needs and how federal funding should be spent in Billings, and to publicly comment on the drafted Consolidated Plan during the 30-day draft review period.

- Adult Resource Alliance
- Ag Workers Health and Services
- Alliance Yellowstone County
- Alternatives, Inc.
- Angela's Piazza
- Big Sky Economic Development
- Big Sky Senior Services
- Billings Food Bank
- Billings Job Service
- Billings Public Schools
- Billings Urban Indian Health and Wellness Clinic
- Billings Veteran's Administration Health Care Center
- Bureau of Indian Affairs - Rocky Mountain Region
- Carbon County Commissioners
- City of Billings - Public Works
- Community Crisis Center
- Community Development Board
- Community Leadership Development, Inc.
- Dental Lifeline Network Montana
- Director of Adult Education, Billings Schools
- Downtown Billings
- Downtown Billings Alliance, Resource Outreach Coordinator
- Dress for Success
- Easter Seals Goodwill
- Education Foundation
- Emergency Services, YWCA
- Family Promise of Yellowstone Valley
- Family Service, Inc.
- Federal Express
- First Church
- Food Stamps (SNAP), Office of Public Assistance
- Habitat for Humanity
- Healthy by Design
- HomeFront, local public housing authority
- Homeward
- HopeLink Transition-in-Placement

- Human Resource Development Council - District 7
- Jefferson Bus Lines
- Job Connection, Inc
- Job Corps
- Job Service Billings
- Living Independently for Today and Tomorrow
- MDOC
- Mental Health Center
- MET Transit
- Montana Community Services, Inc
- Montana Fair Housing
- Montana Healthcare Association
- Montana Legal Services Association
- Montana Rescue Mission
- Montana State University Billings
- Montana United Indian Association
- Montana Veterans Affairs Division-Billings
- Montana Warm Line
- Montana Youth Challenge Academy
- MONTANA Legal Services
- MONTANA Migrant Council
- MONTANA Native American Center
- MT.gov, Blind and Low Vision Services, Job Service
- National Alliance for the Mentally Ill - Billings
- Native American Development Corporation
- NeighborWorks Montana
- Northern News Network
- Office of Public Assistance - Yellowstone County
- Peoples Community Outreach
- People's Outreach
- Residential Support Services, INC.
- Rimrock Foundation
- RiverStone Health
- Rocky Mountain Tribal Leaders Council
- Rod Ostermiller
- Rural Employment Opportunities - Billings Office
- Saint Vincent de Paul
- Salvation Army
- Social Security Administration
- St. Vincent Healthcare
- State of Montana - Adult Protective Services

- State of Montana - Dept of Health Human Services
- State of Montana - Mental Health First Aid
- State of Montana - MONTANA Federation of Public Employees, Job Service
- State of Montana - Operations Bureau
- State of Montana - Public Assistance Manager
- State of Montana - Vocational Rehab
- STEP Inc.
- Sweet Grass County Commissioners
- Temporary Assistance for Needy Families (TANF), Human Community Services Division
- Tumbleweed
- United Way of Yellowstone County
- University of Montana, Missoula
- University of Wyoming
- US Department of Veteran Affairs
- USDA-FNS via DPHHS
- Veteran's Meat Locker
- Veteran's Nav
- Veterans Upward Bound
- Volunteers of America
- Walla Walla University - Billings Campus
- Walla Walla University - Billings Mental Health Clinic
- Yellowstone Boys & Girls Ranch
- Yellowstone County Alliance
- Yellowstone County Continuum of Care
- YWCA Billings
- Yellowstone Youth Services Center

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Affidavit of Publication

STATE OF MONTANA

County of Yellowstone

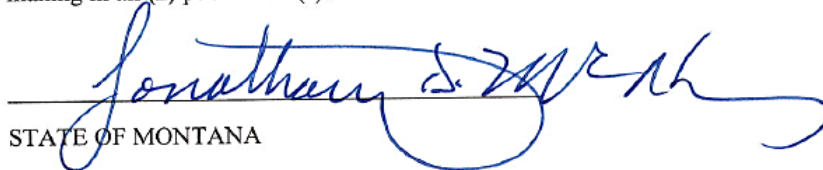
Jonathan McNiven

Being duly sworn, deposes and says:

That he is the Legal Advertising Clerk of Yellowstone County News, a newspaper of general circulation published weekly in the town of Huntley, in the County of Yellowstone, State of Montana, and that the (6) Folio Legal, **Public Notice**, a true copy of which is hereto **Included**, was published in said newspaper on the following dates:

September 20, 2024; September 27, 2024;

making in all (2) publication(s).



STATE OF MONTANA

County of Yellowstone

On this 27th day of September 2024, before me, the undersigned, a Notary Public for the State of Montana, personally appeared Jonathan McNiven, known to me to be the person whose name is subscribed to the within instrument and acknowledged to me that he executed same.

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

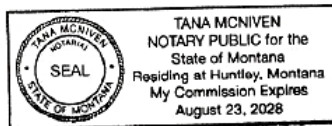


Tana McNiven

NOTARY PUBLIC for the State of Montana, residing

at Huntley, MT.

My commission expires: August 23, 2028



PUBLIC NOTICE CITY OF BILLINGS FY2023-2024 COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM (CDBG) AND HOME INVESTMENT PART- NERSHIP PROGRAM (HOME) COMPREHENSIVE ANNUAL PERFORMANCE EVALUATION REPORT (CAPER)

The City of Billings will hold a public hearing on Monday, September 23, 2024, at 5:30 pm to obtain public comment on:

- CDBG and HOME Comprehensive Annual Performance Evaluation Report (CAPER) for the prior program year; and
- Current community needs to assist the Community Development Board in:
 - o Designing the application process for the upcoming program year, before the publication of the drafted Annual Action Plan; and

Federal regulations require the City to facilitate two public hearings, at different stages of the program year, to obtain residents' views and respond to questions. Together, the hearings must address housing and community development needs, development of proposed activities, proposed strategies and actions for affirmatively furthering fair housing, and a review of program performance. Copies of the City's drafted FY2023-2024 CDBG and HOME CAPER are available beginning September 6, 2024, online at www.BillingsMT.gov/CDreports. The City must facilitate a minimum 15-day public comment period for the CAPER. The City of Billings exceeds this requirement by facilitating a public comment period beginning September 7 through September 27, 2024.

PUBLIC PARTICIPATION

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

- **Agenda Packet:** Available for viewing on the City's website www.BillingsMT.gov/councilagendas.
- **Viewing the Meeting:** The Public may view the meeting on the Community 7 TV - Channel 7 or Channel 507 - Spectrum Gable. The Public may also view online at www.com7tv.com and click the Watch Live icon. Community 7 also has links to their Facebook page and YouTube channel in which to view the meeting. Meeting recordings are also available after the meeting for viewing online via the Community 7 TV website, Facebook page, or YouTube channel.
- **Comments:** Verbal comments are taken only during the Public Comment periods as indicated on the agenda and during the Public Hearings under the regular agenda. Written communication can be submitted any time prior to or during the public comment period.

o **In-Person:** The public may attend the meeting in person in the Council's Chambers, City Hall, 210 North 27th Street, Billings, Montana.

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

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

Published on September 20 and 27, 2024.

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

9/20, 9/27 2024
MNAXLP

G. Public Comments

The City of Billings held a public hearing on Monday, September 23, 2024, at 5:30 pm to obtain public comment on:

- CDBG and HOME Comprehensive Annual Performance Evaluation Report (CAPER) for the prior program year.
- Designing the application process for the upcoming program year before the publication of the drafted Annual Action Plan.

Federal regulations require the City to facilitate two public hearings, at different stages of the program year, to obtain residents' views and respond to questions. Together, the hearings must address housing and community development needs, development of proposed activities, proposed strategies and actions for affirmatively furthering fair housing, and a review of program performance. Public comments / inquiries are summarized below.

- **CM Kennedy:** Asked if money allocated to parks can be used for lighting, noting that many of the City's parks need lighting (referencing Crime Prevention Through Environmental Design). He asked about the eligibility of Rose Park and staff noted they would need to check on eligibility. CM Kennedy recognizes that Optimist Park is being done and inquired about South Park. Rose Park included – Optimist is being done. He inquired about South Park, and staff noted that the park is located within the non-safe acceptable distance from potential environmental hazards.
- **CM Rupsis:** Thanked staff for updating the CAPER to include the City's openness for dedicating public land to affordable housing development. Asked about a link to the Billings Pattern Guide referenced in the CAPER, indicating that it would be very useful. Staff will investigate the status of the website. Staff notes that it is a great tool.

Under "other actions to be done to improve affordable housing development" (CR-35 Other Actions, findings from the Analysis of Impediments to Fair Housing Choice), CM Rupsis noted staff indicated:

- Density bonuses have not been established to offset the cost of development if a project contains a certain percentage of affordable housing.
- The City does not currently permit a waiver or reduction of impact fees, including water and wastewater system development fees, to promote affordable housing development.

He asked the City Administrator to bring these initiatives forward and the City Administrator agreed. Mayor Cole noted that if developers do not pay impact fees, someone else does and noted legal impacts would need to be investigated.

- **Rebecca Noell, Community Development Board Chair:** She would like to talk about her experience with the Community Development Department, having served on the Board since 2017. She notes housing used to be an issue but is now a crisis in the nation. As the biggest city in Montana, the department she has had the privilege of working with has really been a leader in trying to come up with solutions and trying to see the best path forward for all of our neighbors in Billings.

During her time on the Board, she has continually seen a demonstration of deep institutional knowledge, of integrity, and staff competence. They honestly have the interests of our neighbors and the people who live in Billings in their hearts every day as they do their work. She thanked Brenda Beckett, Carly Collins, Tam Rodier, and Planning & Community Services Director Wyeth Friday. She noted it has been a privilege to work with the department and she feels that the team

has accomplished a lot. She hopes the Board can work with the department in the future and keep moving Billings forward, keep accomplishing things, and keep helping all our neighbors because we all deserve to have a great life in Billings.

- **Denver Slater:** He commended the Council and their tireless efforts. He has addressed the Council before about the Montana Rescue Mission. He has an issue with the organization's leadership. He used to live and work in an industrial-sized kitchen in the basement years ago. They used to serve over 200 meals a day to anyone in need. Breakfast was for the male residents of the shelter, and lunch and dinner was for the community.

He noted they used to provide exceptional health care services there and leadership stopped the program without explanation. He has talked with Healthcare for the Homeless about the change.

Mr. Slater noted that there was a [grand opening](#) a couple of weeks ago. He expressed concerns about residents related to financial issues and what benefits the organization takes and that they are working without pay. He also had concerns about not being able to get a bible from the shelter's thrift store.

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H. Consolidated Plan Survey



The City of Billings receives federal funding to assist low-income households and to revitalize neighborhoods. We want to hear what **YOU** think the City should fund when other funding resources are not available. **Would you please complete this short survey?**

Surveys should be mailed to: Community Development Division, PO Box 1178, Billings, MT 59103

Alternatively, you may scan the QR code at right and complete the survey online:



1	What is your zip code?						
2	Do you have access to the Internet at home?		<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown				
3	Is your home currently at risk from natural hazards? (flood, fire, etc.)		<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown				
4	Please select the importance of funding the following activities in Billings.		Low --> High Importance				
			1	2	3	4	5
	a.	First Time Home Buyer <i>Loans for downpayment and closing costs for low-income households</i>					
	b.	Foreclosed and/or Vacant Properties <i>Purchase and renovate run-down homes to sell to low-income households</i>					
	c.	Build new housing for homeowners					
	d.	Build new housing for renters					
	e.	Home Repair <i>Loan financing for low-income homeowners to make needed repairs</i>	Furnace, roof, electrical, plumbing, etc.				
			Windows, Insulation, etc.				
			Solar Roofing Panels				
	f.	Park improvements to improve safety in low-income neighborhoods <i>Lighting, fencing, landscaping, signage, public art, etc.</i>					
	g.	Improvements in your neighborhood	Water and sewer				
			Streets, curbs, gutters, sidewalks				
			Street lights				
	h.	Family justice and domestic violence programs					
	i.	Food security programs					
j.	Improved access to healthcare and mental health care						
k.	K-12 Education & School Readiness						
l.	Financial Literacy, Housing, & Employment						
m.	Services for Veterans and Military Families						
5.	What suggestions do you have for improving affordable housing options in Billings?						
6.	Please share any additional thoughts you have about effectively using U.S. Department of Housing & Urban Development (HUD) federal funding here in Billings						

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