

Summary of Citizen Comments

State of Montana

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Summary of Public Comments:

Topic: Partner and Stakeholder Engagement

Comment 1: Jeannene Maas, Valley Flood Committee -- In addition to engaging Department of Transportation, also need to engage the SilverJackets organization that coordinates responses and best practices across disciplines.

Response 1: The Silver Jackets were included on the original disaster resiliency e-mail list and have been notified and invited to participate in this application process.

Comment 2: Jeannene Maas, Valley Flood Committee -- Believe narrative should address magnitude that roadways, private, county, state and federal, by design, create flooding. The statewide approach should address this.

Response 2: The Montana Department of Transportation was included on the original disaster resiliency email list and have been notified and invited to participate in this application process. Commerce will continue to seek their involvement in Phase 2 of the application process, as specific project activities and best practices are developed.

Comment 3: Larry Miers, Glasgow Levee Committee – Under narrative response to Factor 4 – will additional partners be added? Is MDT a partner? MDT has engaged in road projects that have not taken flooding into consideration and in one case have developed projects that damaged an existing levee. They are a contributing factor in why this flooding was so severe.

Response 3: If the state is selected for Phase 2, it will continue to solicit partners to build upon the existing partnerships established. Because the entire State is the primary applicant, state

agencies will not be submitting separate partner letters. Please reference Response 2 (above) with regard to MDT's continued involvement in Phase 2, if selected.

Comment 4: Archie Harper, Valley Flood Committee -- MDT gave a number of presentations to county & local governments about the corresponding effects of flooding - making it less efficient. In a flood study, there were over 100 hydraulic restrictions substantial cost for flood conveyance. MDOT needs to be engaged to solve problems.

Response 4: Commerce will continue to seek MDT's involvement in Phase 2 of the application process, as specific project activities and best practices are developed.

Comment 5: Larry Miers, Glasgow Levee Committee - MDT needs to be engaged and work with economic development.

Response 5: Commerce will continue to seek MDT's involvement in Phase 2 of the application process, as specific project activities and best practices are developed.

Comment 6: Pete Brown, State Historic Preservation Office -- On behalf of the Montana State Historic Preservation Office (SHPO), I ask the Montana Department of Commerce to include our office in your web-based platform as a resource of information on cultural properties and best practices in treating them. SHPO is eager to consult with property owners as they plan work on historic properties that would involve CDBG-NDR grants. Our involvement during early planning would help fulfill HUD's obligation to consult with SHPO under Section 106 of the National Historic Preservation Act. It would also enable SHPO to fulfill its mission to provide outreach to historic property owners. Considering the potentially large number of

projects and HUD's ability to delegate Section 106, it might be in everyone's interest to establish a programmatic agreement (PA) specific to the CDBG-NDR program. A PA could alleviate the need for HUD designees to consult on specific work items that are unlikely to adversely affect historic properties. Both USDA-Rural Development and the Department of Energy's Weatherization programs operate under PAs. HUD might have examples of such a PA relevant to this program. Thank you for the opportunity to comment. Please feel free to contact me with any questions you have.

Response 6: Should the State be invited to participate in Phase 2, Commerce would seek input and collaboration from SHPO in the development of the interactive web-based platform.

Topic: Approach and Project Activities

Comment 7: Trudy Scurry, FirstNet - In a housing situation will there be an opportunity for fiber optics?

Response 7: If the State is selected for Phase 2, it will begin to develop a list of potential projects to increase statewide resiliency. At that time, the State will explore this opportunity.

Comment 8: Trudy Scurry, FirstNet - In reference to Reverse 911 in the draft narrative, does that language refer to pending technology changes in the 911 system?

Response 8: If the State is selected for Phase 2, it will begin to develop a list of potential projects to increase statewide resiliency. At that time, the State will ensure that projects being proposed are not going to become obsolete in the short term.

Topic: General Process, Administration & Eligibility

Comment 9: Craig Erickson, Great West Engineering – Inquired whether applicants in identified sub-county areas would have to submit an application to be eligible for monies, if the State is awarded.

Response 9: It is the State’s intent these funds would be available automatically to eligible MID-URN areas/communities to complete resilient projects. The State will follow HUD’s requirements in the administration of the funds, if awarded.

Comment 10: Roger LaVoie, Valley Flood Committee – What is the timeline? When is the grant request to be submitted to feds for Phase 2?

Response 10: Following the March 27th deadline, HUD anticipates taking 60 days for the review period to invite applicants to Phase 2. If the State is selected for Phase 2, the State will have 120 days to complete its Phase 2 application.

Comment 11: Archie Harper, Valley Flood Committee -- Curious how it (the grant) will coordinate at local level. How will the State administer and leverage funds. How are funds disbursed? One concern for the future: MDOT – some projects target just them and there has been a delay in bringing them onboard.

Response 11: With regard to coordination, if the state is selected for Phase 2, it will more specifically outline the administration and distribution of funds and will enter into binding partnership agreements with local governments outlining these terms and conditions. With regard to MDT, Commerce will continue to seek MDT’s involvement in Phase 2 of the application process, as specific project activities and best practices are developed.

Comment 12: Barb Stiffarm, Opportunity Link -- I'm looking at the language stated in the narrative and it says while CDBG-NDR funds will only be expended in the identified sub county areas the State's resiliency frame will be accessible in the entire state. So does that mean if you are not identified, and I'm trying to understand what you are saying here, because if you are not included in Phase 1 as an identified sub county area then if you are added in Phase 2 there won't be funds allocated to it there will just be participation in the learning and sharing of best practices?

Response 12: Only areas/communities meeting the MID-URN threshold requirements identified and accepted by HUD will be eligible to utilize CDBG-NDR funds (if awarded), to implement resilient solutions. If the State is invited to participate in Phase 2 of the application process and MID-URN areas are added that meet the threshold requirements and are accepted by HUD in Phase 2, those areas would be eligible for expenditure of CDBG-NDR funds in addition to the MID-URN areas identified in Phase 1 of the application process.

Topic: Draft Narrative Content

Comment 13: Larry Miers, Glasgow Levee Committee – On page 48 of the draft narrative the cost to taxpayers is referenced. This seems generic...is it local taxpayers or taxpayers in general?

Response 13: Costs borne by taxpayers to replace or repair necessary infrastructure could be both local and statewide, depending on the extent of the cost and source of the financial assistance.

Comment 14: Craig Erickson, Great West Engineering –Great West Engineers should be Great West Engineering within Factor 4.

Response 14: This correction has been made.

Comment 15: Kristen Gilbraith, Big Horn County – Inquired as to whether Big Horn County should submit a partner letter and be listed as a partner within Factor 4.

Response 15: Big Horn County has submitted a partner letter.

Comment 16: Jeannene Maas, Valley Flood Committee – Wants to confirm that Lewis and Clark County formally adopted the Valley Flood Study referenced on Page 19 of the application instead of just accepting it.

Response 16: This correction has been made.

Comment 17: Day Soriano, Opportunity Link -- The draft includes no mention of the HUD-funded Sustainable Communities Regional Planning Grant to North Central Montana (Vibrant Futures Project) that resulted in a 20-year plan for the region, yet it seems like this would be a valuable asset to the state in the application. The inclusive nature of the planning process itself, the disaster-prone region that it covered, the demonstrated interdependency of infrastructure/housing/economy/environment defined by the plan, and the conclusion that rural regions must use multi-jurisdictional approaches to attain effective scope in development projects--all these reflect high priorities stated in the RFP.

Response 17: Reference to the HUD-Funded Sustainable Communities Regional Planning Grant, and Opportunity link's involvement in that process, has been made in Factor 1

beginning on page 12 of the narrative.

Comment 18: Day Soriano, Opportunity Link -- The state's language on page 15 says that funds can only be expended in the identified sub- county areas. Does this mean that other disaster sub-county areas including Rocky Boy and Blackfeet cannot be added later on? Is it possible to add them still in this Phase? The 2010 and 2014 disaster declarations were not included in this proposal. Several North Central Montana communities [a list of these communities was provided] have been excluded from the draft Phase 1 application. How can we help get these communities included in the application?

Response 18: As indicated on Page 8 of the NOFA, this grant application can only reference presidentially declared disasters from 2011, 2012, or 2013. The state was only able to acquire sufficient documentation to meet the Most Impacted, Most Distressed, and Unmet Recovery Need (MID-URN) thresholds for those areas identified within this Phase 1 application. If sufficient documentation can be obtained to determine that more sub-county areas meet the MID-URN thresholds, it is possible that these areas could be included in the Phase 2 application.

Comment 19: Day Soriano, Opportunity Link -- We understand that Phase 2 is when the state will consider infrastructural needs and implementation plans for the targeted areas. Can we ask that the Vibrant Futures Regional Planning be recognized in this application as having already identified clear action steps prioritized by residents for Blaine County, and that this advance work will be prove more efficient when Phase 2 is implemented. Again, it seems that mention of the HUD-funded Sustainable Communities Regional Planning Grant to North Central

Montana would be an asset to the state's proposal and that it should be included and highlighted.

Response 19: Reference to the HUD-Funded Sustainable Communities Regional Planning Grant, and Opportunity link's involvement in that process, has been made in Factor 1 beginning on page 12 of the narrative. Should the State be invited to participate in Phase 2, the State will seek input from Opportunity link and communities within the region on resilient solutions and best practices that may be incorporated within the comprehensive resiliency project list and implemented in MID-URN communities identified.

Comment 20: Day Soriano, Opportunity Link -- It seems like Page 39 has a typo in Paragraph 2, Line 1 where the word "present" should be "prevent". This does change the meaning of the sentence pretty significantly.

Response 20: This correction has been made.