

**City of Santa Fe**  
**Community Development Block Grant**  
**(CDBG)**  
**2025-2026 Annual Action Plan**



**PREPARED BY:**

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# Executive Summary

## AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

### 1. Introduction

This document represents the Annual Action Plan for the City of Santa Fe for program year 2024-2025. The Annual Action Plan is required of any city, county or state that receives federal block grant dollars for housing and community development funding from the U.S. Department of Housing and Urban Development (HUD). The City is an entitlement city and receives an annual grant from the Community Development Block Grant (CDBG) program.

For the 2024-25 program year, HUD will entitle \$623,117 in CDBG funding to the City of Santa Fe, of which approximately 20% (\$120,000) is set aside for administrative costs.

Additionally, the City proposes to reprogram \$223,905.68 of unspent funds from prior year projects and anticipates receiving \$200,000 in program income for a total funding amount of \$1,067,380.68. To further complement CDBG funds, the City has also made available local funds from its Affordable Housing Trust Fund (AHTF) in the amount of approximately \$ 3,877,554 for the program year.

This Plan is one of the three components required by HUD to be submitted on an annual basis:

- **Consultation and Citizen Participation:** the process through which the grantee engages the community in developing and reviewing the plan as well as consulting with partner stakeholders in the implementation of programs. This process is required annually as part of the Annual Action Plan.
- **Annual Action Plan:** submitted to HUD at the beginning of each funding cycle, the AAP provides a concise summary of the actions, activities, and specific federal and non-federal resources that will be used each year to address the priority needs and specific goals identified in the Consolidated Plan.
- **Consolidated Annual Performance and Evaluation Report (CAPER):** the annual report submitted to HUD in which grantees report accomplishments and progress toward meeting Consolidated Plan goals in the prior year.

## 2. Summarize the objectives and outcomes identified in the Plan

Over the upcoming year, the City of Santa Fe will prioritize mitigating the effects of socio-economic challenges, particularly regarding housing stability. Efforts will be directed towards maintaining housing for residents and facilitating rehousing for those who have lost it. In addition, CDBG funds will be used to improve and sustain affordable housing, rental, homeownership, and economic opportunities for low- to moderate-income households in Santa Fe, as well as to address the needs of those experiencing homelessness or at risk of becoming homeless. The City will accomplish this by administering program funds to service providers, supporting collaboration and strategically applying resources to community needs.

HUD identifies three sets of planning objectives and three sets of activity outcomes to guide the Consolidated Plan planning process. All goals are expected to relate directly to these objectives and outcomes as illustrated in the following Goals Table.

Planning objectives include:

- **Creating Suitable Living Environments (SL)** – relates to activities that are designed to benefit communities, families, or individuals by addressing issues in their living environment. This objective relates to activities that are intended to address a wide range of issues faced by low- and moderate-income persons, from physical problems with their environment, such as poor quality infrastructure, to social issues such as crime prevention, literacy, or elderly health services.
- **Providing Decent Housing (DH)** – covers the wide range of housing activities that could be undertaken with CDBG funds. This objective focuses on housing activities whose purpose is to meet individual family or community housing needs. It does not include programs where housing is an element of a larger effort to make community-wide improvements, since such programs would be more appropriately reported under Suitable Living Environments.
- **Creating Economic Opportunities (EO)** – applies to activities related to economic development, commercial revitalization, or job creation.

HUD-mandated outcomes include:

- **Availability/Accessibility** – applies to activities that make services, infrastructure, public services, public facilities, housing, or shelter available or accessible to low- and moderate-income (LMI) people, including persons with disabilities. In this category, accessibility does not refer only to physical barriers, but also to making the basics of daily living available and accessible to LMI people where they live.
- **Affordability** – applies to activities that provide affordability in a variety of ways to LMI people. It can include the creation or maintenance of affordable housing, basic infrastructure hook-ups, or services such as transportation or day care. Affordability is an appropriate objective

whenever an activity is lowering the cost, improving the quality, or increasing the affordability of a product or service to benefit a low-income household. (For instance, a low interest loan program might make loans available to low- and moderate-income microenterprise businesses at 1% interest, which is far below the market rate. This program lowers the cost of the loan, enabling entrepreneurs to start businesses. As a result, the program makes financing more affordable. Another example might be a subsidized day care program that provides services to low- and moderate-income persons/families at lower cost than unsubsidized day care.)

- **Sustainability** – applies to activities that are aimed at improving communities or neighborhoods, helping to make them livable or viable by providing benefit to persons of low- and moderate-income or by removing or eliminating slums or blighted areas, through multiple activities or services that sustain communities or neighborhoods.

### 3. Evaluation of past performance

The following bullets outline progress in meeting goals identified in the 2023-2027 Consolidated Plan. Although the City is currently only in the third quarter of the first program year of the 2023-2027 Consolidated Plan, accomplishments have already been achieved through CDBG and local funding in all four of the identified priority needs. These achievements are a testament to the strong partnerships the City supports with its nonprofit providers and subrecipient contractors.

- **1) Ending Chronic Homelessness.** In the first half of PY 2023, Youth Shelters has already served 70 youth experiencing homelessness or at risk of homelessness through their Street Outreach and Transitional Living Programs. Interfaith Community Shelters at Pete’s Place utilized CDBG to provide overnight shelter stays to 418 individuals experiencing homelessness through their Summer Safe Haven For All Program. SFPS Adelante Program has served 640 students and their households who are either experiencing or at risk of homelessness. Local Affordable Housing Trust Fund (AHTF) funds were utilized to support the operations of Consuelo’s Place Shelter which has provided non-congregate overnight shelter stays for 85 individuals or households in the first half of the program year. These accomplishments contributed to the progress on the following goals: 1A) Increase Availability of Supportive Services; 1B) Expand Options for Overnight Shelter Beds; and 1C) Increase and Improve Street Outreach and Support.
- **2) Ensuring Housing Stability For All.** Homewise received a CDBG allocation for their mortgage principal reduction program and has provided 2 mortgage assistance loans to low-moderate income households in the first half of the PY. Both Homewise and the Housing Trust received AHTF allocations for their mortgage assistance programs and have collectively provided loans to 16 first time homebuyers. These crucial programs both contribute to the Consolidated Plan Goal 2B) Expand Choice for Affordable Home Buying Opportunities.
- **3) Ensuring Homeownership Is Sustainable For All.** The mortgage assistance programs administered by Homewise and the Housing Trust also address Consolidated Plan Goal 3C) Maintain Financial Stability for LMI Homeowners, as the loans help buy down the principal and make the monthly payments sustainable for the first time homebuying households. SF Habitat

for Humanity received a CDBG allocation for their Home Repair Program, which has so far provided emergency home repairs to 7 low-moderate income households. This important program contributes to the progress of Consolidated Plan Goal 3A) Provide for Owner Occupied Housing Rehabilitation, as well as Consolidated Plan Goal 3B) Provide for Energy Efficiency Upgrades and Accessibility.

- **4) Improving Social Determinants of Health.** Youthworks received a CDBG allocation to convert their nonprofit facility into a state-of-the-art commercial training kitchen. This facility will serve as the cornerstone of their culinary job training program tailored for young individuals. Although the conversion is still underway, once completed, the Youthworks Social Justice Kitchen will provide economic opportunities for young Santa Feans and directly contribute to Consolidated Plan Goal 4A) Increase Economic Opportunities for LMI Populations. Finally, the El Camino Real Academy Safe-Routes-To-School connector trail is currently being constructed. CDBG has paid for the planning and design costs, as well as construction. The trail should be completed by May and will directly contribute to the following Consolidated Plan Goals: 4B) Expand Public Facilities and Infrastructure for LMI Populations, 4C) Expand Access to Open Spaces and Parks, and 4D) Expand Access to Transportation.

#### **4. Summary of Citizen Participation Process and consultation process**

The City of Santa Fe's community participation process focuses upon meaningful engagement of residents and stakeholders representing local organizations and coalitions. Links to the City's broadcast channels are provided each week on the meeting agenda, accessible through the City's weekly meeting list. The public meeting schedule for the plan is as follows:

- Community Development Commission public meeting (June 18<sup>th</sup>)
- Annual Plan posted on City's website from (June 27<sup>th</sup> – July 11<sup>th</sup>, 2025)
- Quality of Life Committee public meeting (July 2<sup>nd</sup>, 2025)
- Finance Committee public meeting (July 7<sup>th</sup>, 2025)
- Governing Body public meeting (July 9<sup>th</sup>, 2025)

The meetings can be made accessible to people with disabilities, including sign language interpretation with prior notice to the City Clerk's office. The meetings are also publicized in Spanish. The public hearing at the May 8 City Council meeting will be streamed on the City's YouTube channel, broadcast on KSFR 101.1 and the public can make comments via Zoom during the meeting or prior to the meeting via email.

**Methods of engagement.** Engagement methods include opportunities for residents and stakeholders to participate in the development of planning strategies. Stakeholders are consulted and the public is invited to comment on the AAP and proposed use of funds as participants at virtual public meetings, by reviewing an electronic copy of the plan, and responding to a survey link on the City's website.

**Public outreach** is promoted through the City of Santa Fe and individual Council members' social media networks. Media relations includes a press release to local media and postings on the city's website. All meetings during which the Plan is discussed and acted on are public and must follow the Open Meetings Act requirements regarding notice and accessibility.

**Partner outreach.** Local stakeholders, including organizations, agencies and coalitions, promote the outreach efforts directly to their members, residents, consumers and clients. In addition to lending their subject-matter expertise, participating organizations promote resident engagement opportunities to recruit focus group participants and encourage residents to participate in the community meeting events.

## 5. Summary

Over the next program year, the Office of Affordable Housing will continue to work on strategies that prevent the most vulnerable City residents from falling into cycles of poverty and chronic homelessness. Available resources will be deployed as quickly as possible to keep vulnerable people housed and their basic needs met. The City will continue its focus on low income "at risk" populations with comprehensive programming interventions, and work with the larger community to identify ways that community needs can be more effectively and efficiently identified and met with limited community resources. Note that all projects establish income eligibility by using HUD's Area Median Income (AMI) statistic.

Projects recommended for CDBG funding for FY 2025 – 2026 include:

- Home Repair for Very Low Income Homeowners (Santa Fe Habitat for Humanity): Provides home repair services for people who can't afford necessary repairs to uphold the structural and functional safety of their homes (roofs, heating systems, windows, etc.). The majority of homeowners who benefit from this program are elderly and considered very low income (VLI). **Proposed CDBG funding amount: \$135,000.**
- Homewise (Energy Efficiency Improvements): Subsidize the cost of an energy efficient improvement and increase the scope of the project to include health and safety improvements not covered by energy efficiency funding. **Proposed CDBG Funding \$85,000.**
- Santa Fe Community Housing Trust (Mortgage Reduction Assistance) Supports individuals and families in purchasing a home. **Proposed CDBG Funding Amount: \$100,000 + Unused Funds: \$116,952.84 = \$216,952.84**
- School-based Services for Homeless Students and Families (SFPS Adelante School Liaison): Provides referral and support services for students and their families experiencing homelessness. The mission of the program is to support academic achievement by helping with tutoring, case management, school supplies, clothing and advocacy to attain other social services. **Proposed CDBG funding amount: \$40,000.**

- Summer Safe Haven For All Shelter (Interfaith Shelter): Supports staffing costs to keep the shelter open during the summer months when it would normally be closed. Provides meals, short term support services and connection to longer term case management. **Proposed CDBG funding amount: \$45,000**
- Youthworks Social Justice Kitchen Facility Renovation Project (Youthworks): Youthworks will utilize funds to convert its nonprofit owned facility into a commercial kitchen and café for job training for Opportunity Youth to gain hands-on employability skills and feed public. Funds will be used for framing, plumbing, electrical, and other interior and exterior renovations. **Proposed CDBG funding amount: \$75,000 + Unused funds: \$116,952.84 = \$117,027.84**

## PR-05 Lead & Responsible Agencies – 91.200(b)

### 1. Agency/entity responsible for preparing/administering the Consolidated Plan

Agency Role	Name	Department/Agency
Lead Agency	SANTA FE	
CDBG Administrator	SANTA FE	Office of Affordable Housing/City of Santa Fe

Table 1 – Responsible Agencies

### Narrative (optional)

The City of Santa Fe's Office of Affordable Housing Division administers the Community Development Block Grant (CDBG), the Affordable Housing Trust Fund (AHTF), and other local funds to support housing and community development activities in Santa Fe.

### Consolidated Plan Public Contact Information

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## **AP-10 Consultation – 91.100, 91.200(b), 91.215(I)**

### **1. Introduction**

Because of the City’s long-standing partnerships with community-based organizations, much of the consultation about the Annual Action Plan happens within the context of strategic planning, participation in regional collaborations, and through interdepartmental collaboration. The Office of Affordable Housing funds programs through CDBG and local funds to support the housing component that is aligned with the human services programming. The City's Community Services Department funds several programs through its Youth and Family Services Division that provide emergency housing, health, and safety-net services. Both City divisions rely on Strategic Plans to guide funding decisions and ensure that needs are identified and met in a comprehensive manner. All of the City’s housing and human services providers work closely with other governmental agencies and health providers to ensure that the provision of housing services is provided hand in hand with wrap-around health and social services. The City also relies on its Office of Emergency Management to provide guidance related to preventing, protecting against, mitigating, preparing for, responding to, and recovering from emergencies or disasters in order to ensure that housing funds are expended with resilience in mind. The City is also designing a project for improving broadband service and accessibility by stimulating competition in services provision to open up economic opportunities for underserved communities and businesses.

### **Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))**

To enhance coordination and communication between agencies, the City of Santa Fe and Santa Fe County collaborated and formalized the CONNECT network. CONNECT is a network of over 60 local community programs and more than 200 navigators that work together to get residents connected to local resources. Residents are screened for social and health needs using the Social Determinants of Health (SDOH) and Evaluation screening tools, which ask questions about access to safe and stable housing and are then connected to local non-profit resources within the network. The CONNECT network has enhanced the coordination between providers and the clients served, using data from the network, the City has been able to analyze gaps in services, especially in housing and mental health services and drive policy and funding shifts to address critical needs. CONNECT has a leadership team, planning committee and operations team set up with providers and other stakeholders that work together to drive, coordinate and enhance how CONNECT serves the community.

The City's Youth and Family Services Division funds emergency housing and community development programs, social services and supports a juvenile justice program, which provides program planning, service integration, data analysis, and program evaluation to ensure that youth are provided alternatives to detention and referral to support services, including housing, as appropriate. The City’s partner organizations, YouthWorks and Adelante have provided several programs to integrate disconnected

youth with mainstream educational opportunities, job training and internships, reunification with families, and referral to other support services. Interfaith, another City nonprofit partner, provides intake, referral and on-site social services to people with mental illness who are homeless. The agency works closely with other governmental, private and nonprofit providers of services, as well as hospitals and correctional institutions to ensure that services are continuous. The City's CDBG allocation, its economic development fund and other local funds have supported several of these initiatives. Some beneficiaries of this funding also are recipients of public housing services. The City's CDBG subrecipients strive to coordinate with the Santa Fe Civic Housing Authority so that outreach activities and some programming are located at housing authority sites.

**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.**

Through the NMCEH's efforts to coordinate housing grants and HMIS, and the collaboration of partner agencies that receive funding from the City of Santa Fe's Human Services and Children and Youth funding programs, the most vulnerable people experiencing homelessness are prioritized for housing. Monthly case conferencing sponsored by NMCEH for veterans and people experiencing chronic homelessness helps to coordinate the placement of the most vulnerable into housing. Youth are prioritized separately, with NMCEH facilitating a monthly case conferencing focused on clients 24 years-old and under, and housing is provided by utilizing the Youth Coordinated Entry System established under the Youth Homelessness Demonstration Program.

NMCEH operates a statewide system of coordinated assessment where every family and individual experiencing homelessness has access to an assessment based on the nationally recognized VI/SPDAT (Vulnerability Index/Service Prioritization Assessment Tool). The results of the assessment are used to refer people experiencing homelessness to the type of housing that best fits their needs. The assessment is used to create a prioritized list with individuals classified as chronically homeless at the top of the list for permanent supportive housing. NMCEH also coordinates the annual Continuum of Care grant application to HUD for homeless housing and support services statewide.

In addition to HUD funds, the City's local funds are used to support Life Link, St. Elizabeth Shelter, and the Interfaith Shelter to provide shelter to homeless people and help them make the transition to permanent housing. CDBG funds will be used in the upcoming program year to support the Interfaith Shelter's Summer Safe Haven for All, which provides shelter services during the hot summer months. CDBG Funds will also be utilized to support the Santa Fe Public Schools-Adelante program that supports families in mitigating financial barriers to lower academic withdrawals and maintain student retention.

**Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate**

**outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS**

The Interfaith Community Shelter (ICS) is the largest minimal barrier homeless shelter in Northern New Mexico and, as such, accepts everyone, regardless of condition or circumstance, including their pets. ICS shelters men and women year-round and provides Resource Days every Tuesday, Wednesday and Friday. By creating a "one-stop shop" ICS has incorporated within its design a service delivery system that will afford those who are chronically homeless the best opportunities to make the transition from homelessness to stable housing. Resource Day Partner Providers include Alcoholics Anonymous, Art for Life, Feed the Hungry, Goodwill Industries, Healthcare for the Homeless, New Mexico Legal Aid, The Life Link, Santa Fe Recovery Center, Southwest Care, Street Homeless Animal Project and Upaya/Mountain Cloud Zen Centers.

**2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities**

**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	SANTA FE CIVIC HOUSING AUTHORITY
	<b>Agency/Group/Organization Type</b>	Housing PHA
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The sections of the Draft AAP are highlighted and the information is emailed for verification or update. Since their organization deals with these issues on a daily basis, accurate and precise data is anticipated.
2	<b>Agency/Group/Organization</b>	Interfaith Community Shelter
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The sections of the Draft AAP are highlighted and the information is emailed for verification or update. Since their organization deals with these issues on a daily basis, accurate and precise data is anticipated.
3	<b>Agency/Group/Organization</b>	Youth Shelters & Family Services
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The sections of the Draft AAP are highlighted and the information is emailed for verification or update. Since their organization deals with these issues on a daily basis, accurate and precise data is anticipated.

4	<b>Agency/Group/Organization</b>	Santa Fe Public Schools-Adelante
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The sections of the Draft AAP are highlighted and the information is emailed for verification or update. Since their organization deals with these issues on a daily basis, accurate and precise data is anticipated.
5	<b>Agency/Group/Organization</b>	ESPERANZA SHELTER
	<b>Agency/Group/Organization Type</b>	Services – Victims of Domestic Violence Services – Victims
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs – Families with children Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The sections of the Draft AAP are highlighted and the information is emailed for verification or update. Since their organization deals with these issues on a daily basis, accurate and precise data is anticipated.

## **Identify any Agency Types not consulted and provide rationale for not consulting**

While the City works diligently to foster geographic equity, there are no identified blighted areas within the City limits, or extreme levels of poverty concentrated in census tracts requiring consultation with other entities or organizations at this time. Areas of 30% poverty have been addressed through the Opportunity Zones (OpZone) recently identified for the City which include small pockets of higher poverty rates. The engagement of individuals in these areas is being addressed during the City wide engagement plan process for the Midtown Campus project. Although establishment of services and businesses to contribute to these zones is in the beginning stages, the OpZone neighborhoods continue to be served through the CDBG funds and other service providers.

Additionally, Fair Housing education is made available through the dissemination of fair housing data facts and information (primarily through distribution the City's website, Office of Affordable Housing page). Currently, there is not capacity to actively develop fair housing materials and distribute them and/or consult regularly with fair housing advocacy providers. All of the City's fair housing partners are subject to fair housing law and provide notices, as applicable. In the event that a resident of Santa Fe reports a fair housing violation, City staff takes appropriate action to ensure that they are referred to an appropriate agency or HUD's fair housing complaint system.

Furthermore the City did not consult directly with the State of NM Department of Health (NMDOH) regarding lead exposure because Santa Fe has low risk factors. Nearly ten percent (9.6%) of the City's housing stock was built before 1950. A study by the NMDOH identified Santa Fe County as having "low levels" of lead exposure, as cited in the NM Epidemiology Report, April 2017. The Office of Affordable Housing also conducts environmental reviews on all CDBG-funded activities. In cases where individual homes are older than 1978 and may have lead-based paint, the subrecipient is required to follow all applicable law to assess the presence of lead and remediate it, if necessary.

**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	NM Coalition to End Homelessness	Promotes a comprehensive CoC funding strategy to align services providers with housing opportunities.
5 Year Strategic Housing Plan	City of Santa Fe	Provides a needs assessment and housing affordability analysis of unit inventory and demand and provides policy to shape funding decisions, including CDBG. The City of Santa Fe is currently working on the Strategic Plan and will complete the plan by Fall 2024.
Transportation Improvement Program	Santa Fe Metropolitan Planning Organization	Identifies funded transportation projects of regional significance and/or projects receiving federal funds.
Capital Improvement Plan	City of Santa Fe	Provides project list of capital improvements prioritized for funding.
Sustainable Land Use Code	City of Santa Fe	Regulates the development and construction of affordable housing units.
Fair Housing Assessment 2017	City of Santa Fe	Evaluates housing need through the lens of equity and recommends strategies for increasing access to housing and economic opportunity.

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

**Narrative (optional)**

The City of Santa Fe works closely with the State of New Mexico Mortgage Finance Authority (MFA). MFA provides oversight for the city’s five-year affordable housing plan and production goals. The City also supports applications for Low Income Housing Tax Credit (LIHTC) developments, which are reviewed and allocated by MFA. The City of Santa Fe’s Office of Affordable Housing and Community Health and Safety Department are both active in the S3 Santa Fe Housing Initiative, a collaborative effort between local government and philanthropic organizations including Anchorum St. Vincent, Santa Fe Community Foundation, McCune Charitable Foundation, Santa Fe County, and the New Mexico Coalition to End Homelessness. The S3 group has worked closely together on converting the Lamplighter Inn into 58 units of affordable housing with 25% of the units set aside for formerly unhoused tenants.





## Expected Resources

### AP-15 Expected Resources – 91.220(c)(1,2)

#### Introduction

The City of Santa Fe will receive a 2024 entitlement allocation of \$623,117, of which \$120,000 will be reserved for administrative costs. Additionally, the city proposes to re-program \$74,418 of unspent funds from prior year entitlement allocations and anticipated receiving about \$200,000 in program income for a total funding amount of \$897,535. To further complement CDBG funds, the City has also made available local funds from its Affordable Housing Trust Fund (AHTF) in the amount of \$3,877,554 for the 2024-25 program year.

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	633,475.00	\$200,000.00	\$223,905.68	\$823,905.68	\$1,067,380.68	\$633,475.00 of entitlement funds, of unused CDBG funds, \$223,905.68, approximately \$120,000 for admin) and \$200,000 of program income provide the basis for the projects presented in this plan.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other	public - local	Acquisition Housing	3,877,554	0	0	3,877,554	3,877,554	Affordable Housing Trust Fund (AHTF) is a local fund that provides financing for affordable housing construction, rehabilitation, and mortgage principal reduction programs. The use of funds is regulated by SFCC 26-3 and must be compliant with the NM Affordable Housing Act.

**Table 4 - Expected Resources – Priority Table**

**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 greatest challenge facing the City of Santa Fe's housing and public service programs in 2025 is the threat of reduction in funding from all sources: federal, state, or local. For every dollar of Affordable Housing Trust Funds (AHTF), the City requires that applicants have \$3 dollars from other resources committed. The City's nonprofit partners estimate that every dollar of mortgage principal reduction assistance leverages \$14 of funding from other state, local, and private sources. Both the Housing Trust and Homewise are CDFIs and actively leverage funds from HOME, Fannie Mae secondary market loans, state-funded mortgage products allocated through the New Mexico Mortgage Finance Authority, Low Income Housing Tax Credits, solar tax credits, Federal Home Loan Bank of Dallas' Community Investment Programs, bank and foundation investments, and other DOE funds as well as having substantial organizational resources to use for real estate development and to support programmatic goals.

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

At any time during the year if the City determines that donating and/or using City-owned property will benefit a proposed project that will serve the priority needs and funding objectives outlined in this plan, the City will do so, as allowed under the NM Affordable Housing Act. In recent years, the City donated land for two Low Income Housing Tax Credit (LIHTC) projects which directly supported the construction of 152 affordable rental homes. In early 2024, the City conducted a Request for Qualifications to find an affordable housing development team to build housing on a City-owned tract of land, located in a high-end neighborhood. The chosen project will offer approx. 60 below market homes, of which 50% will be offered to income-qualified homebuyers. Habitat for Humanity is ready to break ground on five homes to be constructed on a lot donated by the City that's located in a downtown historic district.

The City also owns the Midtown Campus, formerly home to both the College of Santa Fe and the Santa Fe University of Art and Design. Recently, City staff managing the Midtown redevelopment project had the Midtown Master Plan, as well as the Midtown Community Development Plan, approved by City Council. Although the plan is fluid and allows for the development of the campus to change according to need over the coming years, the plan calls for a baseline of 1,100 homes of which 30% will be affordable and income-restricted. Currently the community is discussing using some of these residential parcels to implement innovative housing models, such as a community land trust. Constituents have expressed desire to make this property a mixed-use walkable urban environment that includes affordable housing for seniors.

Much of the property on which public housing facilities are situated is owned by the City and used by the Santa Fe Civic Housing Authority under long-term leases. The units are rented to income-qualified

renters, many of them very low-income seniors.

### **Discussion**

All of the donations described above are intended to support the uses of CDBG resources, both by increasing access to community facilities and programs but also to support the City's subrecipients in their efforts to leverage additional housing and community development resources into the community.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding 2026	Five Year Goal Outcome Indicator
1A Increase Availability of Supportive Services	2023	2028	Homeless	Citywide	Ending Chronic Homelessness	CDBG: <b>\$40,000</b>	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: <b>500 Households Assisted</b> Public service activities other than Low/Moderate Income Housing Benefit: <b>800 Persons Assisted</b>
1B Expand Options for Overnight Shelter Beds	2023	2028	Homeless	Citywide	Ending Chronic Homelessness	CDBG: <b>\$45,000</b>	Homeless Person Overnight Shelter: <b>400 Persons Assisted</b>
2B Expand Choice for Affordable Home Buying Opportunities	2023	2028	Affordable Housing	Citywide	Direct Financial Assistance to Homebuyers	CDBG: <b>\$216,952.84</b>	Proving DPA to new homebuyers for Low-Moderate income persons
3A Provide for Owner Occupied Housing Rehabilitation	2023	2028	Affordable Housing	Citywide	Ensuring Homeownership is Sustainable for All	CDBG: <b>\$135,000</b>	Homeowner Housing Rehabilitated: <b>20 Household Housing Unit</b>
3B Provide for Energy Efficiency Upgrades and Accessibility	2023	2028	Affordable Housing	Citywide	Ensuring Homeownership is Sustainable for All	CDBG: <b>\$85,000</b>	Homeowner Housing Rehabilitated: <b>200 Household Housing Unit</b>

Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding 2026	Five Year Goal Outcome Indicator
4A Increase Economic Opportunities for LMI Populations	2023	2028	Non-Housing Community Development	Citywide	Improving Social Determinants of Health and Address	CDBG: <b>\$117,027.84</b>	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: <b>80 Persons Assisted</b> Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: <b>500 Households Assisted</b>

**Table 5 – Goals Summary**

## Goal Descriptions

**\*\*The following table only includes 2023-2027 Consolidated Plan Goals that are addressed in the 2025 Annual Action Plan.**

1	<b>Goal Name</b>	1A Increase Availability of Supportive Services
	<b>Goal Description</b>	Improve and expand availability of supportive services for persons experiencing or at risk of homelessness. Activities include case management, counseling, drug and alcohol rehabilitation, and other wrap around services necessary to transition an individual out of homelessness.
2	<b>Goal Name</b>	1B Expand Options for Overnight Shelter Beds
	<b>Goal Description</b>	Improve and increase the availability of overnight shelter beds through homeless persons overnight shelter operations.
3	<b>Goal Name</b>	2B Expand Choice for Affordable Home Buying Opportunities
	<b>Goal Description</b>	Provide Direct Financial Assistance to Homebuyers
4	<b>Goal Name</b>	3A Provide for Owner Occupied Housing Rehabilitation
	<b>Goal Description</b>	Provide for owner occupied housing rehabilitation for low- to moderate income households.
5	<b>Goal Name</b>	3B Provide for Energy Efficiency Upgrades and Accessibility Retrofits
	<b>Goal Description</b>	Provide for rehab activities in both owner occupied and rental units that makes them more energy efficient or ADA accessible.
6	<b>Goal Name</b>	4A Increase Economic Opportunities for LMI Populations
	<b>Goal Description</b>	Increase economic opportunities for low- to moderate-income populations. Activities include, but are not limited to, public facility renovations to be used for job training programs.

# Projects

## AP-35 Projects – 91.220(d)

### Introduction

Projects funded for FY 2024-25 reflect a variety of programs, facility improvements and public services in addition to programs focused upon increasing affordable housing to include homeowner rehabilitation and mortgage principal reduction for homebuyers for low-to moderate income households. Additionally, the City operates a local Affordable Housing Trust Fund (AHTF) that is funded through developer fees, pay off of City-held affordability liens, and land sales revenues from City-held mortgages. The trust funds are monitored by the NM Mortgage Finance Authority for compliance with the NM Affordable Housing Act which allows funds to be used for beneficiaries earning up to 120% AMI (area median income). This enables subrecipients to serve a full range of incomes as CDBG funds are used for those at 80% AMI and below and the AHTF can be used for those at 81-120% AMI. Additionally, program income provides additional revenue for eligible programs. In the past, PI has been used for mortgage principal reduction loans and home repair loans. For the upcoming program year, the City estimates that roughly \$200,000 will be generated and used for mortgage principal reduction loans.

### Projects

#	Project Name
1	Program Administration
2	Public Services
3	Housing
4	Public Facilities and Improvements

Table 6 - Project Information

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

The City continues to prioritize supporting the work of its nonprofit partners who provide the majority of housing-related programming, services and shelter. The applicants must demonstrate the need for their allocation through data evidence. All applicants for CDBG funds are required to match the funds at a 1:1 basis, ensuring that funded projects are viable.

## AP-38 Project Summary

<b>Project Summary Information1</b>	<b>Project Name</b>	Program Administration
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	1A Increase Availability of Supportive Services 1B Expand Options for Overnight Shelter Beds 2B Expand Choice for Affordable Home Buying Opportunities 3A Provide for Owner Occupied Housing Rehabilitation 3B Provide for Energy Efficiency Upgrades and Accessibility Retrofits 4A Increase Economic Opportunities for LMI Populations
	<b>Needs Addressed</b>	Ending Chronic Homelessness Ensuring Housing Stability for All Ensuring Homeownership is Sustainable for All Improving Social Determinants of Health and Addressing Emerging Needs
	<b>Funding</b>	CDBG: \$120,000
	<b>Description</b>	General management, oversight, and coordination of administering the CDBG program
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	All 2024 CDBG-funded activities will be indirectly supported through the CDBG program administration
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Program Administration (\$120,000)
	<b>2</b>	<b>Project Name</b>
<b>Target Area</b>		Citywide
<b>Goals Supported</b>		1B Expand Options for Overnight Shelter Beds
<b>Needs Addressed</b>		Ending Chronic Homelessness Improving Social Determinants of Health and Addressing Emerging Needs
<b>Funding</b>		CDBG: \$45,000
<b>Description</b>		Provision of public services (including labor, supplies, and materials) including but not limited to those concerned with homelessness response, employment, crime prevention, child care, health, drug abuse, education, fair housing counseling, energy conservation, welfare (but excluding the provision of income payments), or recreational needs
<b>Target Date</b>		6/30/2026

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The Adelante Program estimates to serve 800 youth enrolled in Santa Fe Public Schools and their families whom are experiencing or at risk of experiencing homelessness. Interfaith Shelter estimates to provide overnight shelter stays and services to 400 chronically homeless individuals through their Summer Safe Haven for All Program.
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	SFPS Adelante Expanded School Liaison Program (\$40,000); Interfaith Shelter's Summer Safe Haven for All (\$45,000)
<b>3</b>	<b>Project Name</b>	Housing
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	2B Expand Choice for Affordable Home Buying Opportunities 3A Provide for Owner Occupied Housing Rehabilitation 3B Provide for Energy Efficiency Upgrades and Accessibility Retrofits
	<b>Needs Addressed</b>	Ensuring Homeownership is Sustainable for All
	<b>Funding</b>	CDBG Entitlement: \$320,000, Estimated PI: \$200,000
	<b>Description</b>	A means of providing or producing affordable housing, such as production, rehabilitation, or acquisition.
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	SF Habitat for Humanity will provide emergency home repairs to an estimated 20 low- to moderate-income households through their Home Repair Program. Although Homewise and the Santa Fe Community Housing Trust do not have a PY24 CDBG allocation, the City of Santa Fe estimates the organizations will generate approximately \$200,000 of program income over the program year and will provide mortgage assistance loans to roughly 2-4 households.
	<b>Location Description</b>	Citywide.
	<b>Planned Activities</b>	SF Habitat for Humanity (\$135,000); Homewise- Energy Efficiency (\$85,000) in addition to Mortgage Reduction Program Income; and SF Community Housing Trust- Mortgage Assistance (\$100,000) in addition to Program Income. Cumulative estimated PI: \$200,000
<b>4</b>	<b>Project Name</b>	Public Facilities and Improvements
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	4A Increase Economic Opportunities for LMI Populations Populations
	<b>Needs Addressed</b>	Improving Social Determinants of Health and Addressing Emerging Needs
	<b>Funding</b>	CDBG: \$117,027.84

	<b>Description</b>	According to the CDBG program, public facilities and public improvements are interpreted to include all facilities and improvements that are publicly owned, or that are owned by a nonprofit and open to the general public. Eligible activities include acquisition, construction, rehabilitation, or installation of public facilities and improvements.
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Youthworks will utilize CDBG to convert their nonprofit facility into a commercial kitchen for a job training program for at-risk youth. They estimate to provide job training to about 80 youth a year.
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Youthworks Social Justice Kitchen (\$117,027.84) to convert facility into a commercial kitchen with seating for public.

## **AP-50 Geographic Distribution – 91.220(f)**

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

The Community Development Commission placed the highest funding priority on affordable housing and the provision of related services citywide, rather than focusing on a specific area or neighborhood. Another high priority of the CDC is funding public facilities that most closely serve very low-income households, as well as funding public services that help very low-income individuals and households to transition out of homelessness. Again, because of Santa Fe's relatively compact geography, funds are not prioritized for a particular area as all facilities serve city-wide residents.

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
Citywide	100

**Table 7 - Geographic Distribution**

### **Rationale for the priorities for allocating investments geographically.**

All programs for the 2024 CDBG program year will serve extremely low to moderate-income residents throughout the city as the City of Santa Fe does not have priorities for allocating resources geographically.

### **Discussion**

The City's policy of city-wide distribution of resources is due in part because the population of low income/minority residents is not substantial enough relative to specific areas of concentration in Santa Fe. In contrast, a larger urban area with a larger population is more likely to have higher numbers of low income/minority residents living in concentrated areas which makes geographic priorities more feasible and effective. In Santa Fe, eligibility is defined based on household (income) versus the location of the project or program. For example, the City allocates funding programs for mortgage principal reduction assistance which is dependent on the household income versus the location of the home, which is also the same standard for home improvement funds. Likewise, public service programs that serve at-risk youth, for example, focus on serving citywide residents versus those coming from a specific geographic area.

## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

The City of Santa Fe's expenditure of funds - federal and local - supports projects and programming that serve the spectrum of housing needs from the homeless to the homeowner. The City identifies needs and evaluates existing housing gaps to ensure that programs and projects increase and improve access to the community's housing opportunities. Delivery of these services is provided through the City's network of nonprofit partners, which ensures they are effective, responsive and timely. For the upcoming program year, the City will immediately deploy Affordable Housing Trust Funds (AHTF) in the amount of \$3,877,554 in conjunction with CDBG funds, serving over 600 additional households and individuals. The tables below detail affordable housing goals for CDBG in the upcoming program year, specifically Habitat for Humanity's Home Repair Program and program-income funded mortgage assistance loans administered by Homewise and the Housing Trust.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	0
Non-Homeless	22
Special-Needs	0
Total	22

**Table 8 - One Year Goals for Affordable Housing by Support Requirement**

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	20
Acquisition of Existing Units	2
Total	22

**Table 9 - One Year Goals for Affordable Housing by Support Type**

#### Discussion

CDBG will support Habitat's Home Repair Program. The City estimates that \$200,000 of program income will be generated over the program year and utilized for mortgage assistance loans administered by Homewise and the SF Community Housing Trust.

In addition to the above-mentioned CDBG funded projects, Affordable Housing Trust Funds (AHTF) will be used to support supplies, new construction and affordable housing provision. The City also emphasizes the future utilization of City-owned land to build affordable housing. The Community

Development Commission is passionate about exploring ways to present City-owned land to the City Council to be used for this effort. There is a shortage of affordable rental housing in Santa Fe, which puts the existing housing vouchers in the City at risk of being remitted back to HUD if not put to use. Utilizing City-owned land to build affordable housing will be a priority of the CDC and the City moving forward by illustrating a priority of the Affordable Housing Trust Fund (AHTF) RFP towards affordable housing construction, in order to provide more voucher opportunities for the Housing Authority.

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

The Santa Fe Civic Housing Authority (SFCHA) is the primary public housing agency in Santa Fe. It oversees 28 units of public housing, 503 units of HUD Project based rental assistance (PBRA) – 459 of which are also LIHTC units, and 190 Low Income Housing Tax Credit (LIHTC). SFCHA also manages 723 housing choice vouchers in Santa Fe. Of the PBRA there are a total of 359 units for seniors and 132 units for families. Currently, over 300 people are on the waiting lists for a housing authority apartment unit, and approximately 300 people on the Section 8 waiting list for Santa Fe. SFCHA receives approximately 35 applications per month for housing. The wait for a unit is between 18 and 24 months; however, the waiting lists are usually only open on a lottery basis at designated times during the year. In addition SFCHA owns and operates affordable units in the City of Espanola and the Town of Bernalillo.

Santa Fe County also manages 200 units of public housing and administers 241 housing choice vouchers (44 VASH). Some vouchers are used within city limits.

According to the Santa Fe Civic Housing Authority, 328 families with a voucher have a member with a disability, and 300 voucher participants are elderly.

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

Maintenance of aging units is a continuous effort so the housing authority is systematically converting its units under the Rental Assistance Demonstration (RAD) project. Additionally, SFCHA successfully applied for and completed a 45 unit family project at the end of 2022 using Low Income Housing Tax Credits. In 2024 SFCHA has been awarded a preliminary award for 2024 Low Income Housing Credits (Ocate apartments) for 60 units of which 13 will have rental assistance vouchers.

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

Both Public Housing Authority's (PHA) provide a Family Self-Sufficiency Program which supports self-sufficiency with the eventual goal of becoming viable homeowners. The family enters into a five-year Contract of Participation with the Housing Authority and sets specific goals to be achieved over the term of the Contract. As part of the Contract, the Housing Authority opens an escrow account for each participating family and any time there is an increase to the family's earned income during the term of the Contract, money is deposited into the family's escrow account. Upon successful completion of the Program, the family receives the balance in their escrow account to use for home ownership and educational goals.

### **If the PHA is designated as troubled, describe the manner in which financial assistance will be**

## **provided or other assistance**

The PHA is not designated as troubled.

## **Discussion**

As an active developer of LIHTC projects, the Santa Fe Civic Housing Authority is considered a partner of the City of Santa Fe's in the provision of affordable rental housing beyond the typical housing authority functions. If the land is titled to the City it subordinated and amended its lease agreements with the housing authority, this occurred on 6 projects, all subsequent projects had land titled under the Housing Authority. The City provided support for the Calle Resolana project, 45- townhomes that were awarded LIHTC funding in 2019 and has awarded a 2024 grant for the Ocate project.

As mentioned in the Affordable Housing section, the Community Development Commission is adamant about utilizing City-owned land to build affordable housing and wants to establish this as part of the City's values. The City desperately needs more affordable rental units to be available to the Housing Authorities to use their vouchers. The Community Development Commission wants to address this pressing problem and make this a priority moving forward.

## **AP-65 Homeless and Other Special Needs Activities – 91.220(i)**

### **Introduction**

The City works in partnership with many non-profit organizations who provide a wide range of services to prevent “at-risk” populations such as unaccompanied youth, families with children, veterans, battered families, people with disabilities and seniors from becoming homeless. Another objective is to help existing homeless populations obtain safe, affordable and sustainable housing opportunities as well as needed services such as health care, transportation and counseling.

These activities necessarily run along a continuum of housing program options that range from emergency shelter services to transitional housing and permanent supportive housing services to the new construction of mixed income and mixed use affordable rental development projects. Currently the City has in place emergency and transitional housing programs for homeless individuals, families with children, veterans, and unaccompanied youth.

The City became a Built for Zero (BFZ) community in 2019, joining a national movement committed to end homelessness measurably and equitably. Communities in BFZ focus on achieving “functional zero” for one population, as a step on the way toward solving homelessness for all populations. This evidence-based model uses quality data to guide communities to reach functional zero, when reached, makes homelessness rare and brief. Quality data is maintained by collecting real-time, by-name data through coordinated outreach efforts to create a list of every individual experiencing homelessness in the community. A “by-name list” helps providers understand the unique needs of an individual experiencing homelessness and recognizes that unhoused individuals all have their own story. Functional zero is indicated by inflow and outflow. A community has reached functional zero when the number of people being housed surpasses the number of individuals being added to the by-name list. A critical aspect of BFZ relies on affordable housing stock. Community Solutions, the driving organization for BFZ, is motivated to identify innovative funding structures that will allow Santa Fe to expand its stock of affordable and supportive housing to ensure a continuous housing supply for individuals exiting homelessness.

### **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.** All of the city’s nonprofit partners who work with homeless persons have extensive outreach activities that the City seeks to improve over the next program year. The City’s one year goal is to identify, by-name, all the currently chronically homeless individuals and those precariously housed –this will be completed through an online database that can access and screen for basic social determinants of health. The City is working with local non-profit service providers, the HMIS continuum site as well as

housing partners.

In the winter, the Interfaith Shelter, St. Elizabeth's and Youth Shelters provide emergency beds, meals and clothing. Most importantly, the organization brings together outreach coordinators to case consult and provide information about available services. Medical care, job counseling, meals, clothing, transportation are a few of the services provided at the Interfaith Shelter, St. Elizabeth's, and Youth Shelters and Family Services, which is partially funded through local funds allocated through the City's Youth and Family Services Division.

The City of Santa Fe works closely with the New Mexico Coalition to End Homelessness to coordinate services for homeless individuals and families. NMCEH operates a statewide system of coordinated entry where every homeless family and individual is given an assessment based on the nationally recognized VI/SPDAT (Vulnerability Index/Service Prioritization Assessment Tool). The results of the assessment are used to refer homeless people to the type of housing that best fits their needs and the permanent supportive housing. As previously stated, the City recently signed up to be part of Built for Zero, a national movement to end chronic homelessness in participating communities. The coordinated entry system is used to create a regularly updated by-name list of those who are homeless, and the City is working with its nonprofit partners to develop more permanent supportive housing to meet the needs of the individuals who are currently chronically homeless in Santa Fe.

In December 2020 the City helped a national nonprofit, Community Solutions, in conjunction with St Elizabeth Shelter, its local partner, to purchase the Santa Fe Suites, a 123 unit residence hotel and is using it to provide permanent supportive housing to 40 chronically homeless households and as affordable housing for other low income renters. The City provided funding to purchase another property, the Lamplighter Inn, which is currently being converted into residential use for permanent supportive housing. The Lamplighter's conversion into affordable housing is still in process and the City is hopeful it will be occupied within the next calendar year. The City has provided rescue plan funds (CARES and ARPA) for the acquisition of these properties and has deployed both CDBG and AHTF for capital improvements and renovations necessary to convert the properties from motels to apartment buildings used for affordable housing.

**Addressing the emergency shelter and transitional housing needs of homeless persons.** The City relies on a network of service providers to address the emergency shelter and transitional needs of homeless persons. These programs are supported through fee-for services agreements and pass through funds from federal and local sources. The City's partners include:

- **St. Elizabeth Shelter.** Operates the Men's Emergency Shelter (28 beds) and Casa Familia (30 beds for women and children) and three transitional/supportive housing properties: Casa Cerrillos (28 apartments), Sonrisa Family Shelter (8 apartments) and the Santa Fe Suites (120 apartments). St. Elizabeths recently took on management of the Suites, which is a mixed-income program for those coming out of homelessness and/or those who are working with low to moderate incomes. The shelters provide respite care for those who are in need of a place to

recover from illnesses and behavioral health issues. Both have a program manager, case managers and supervisory staff. The supportive housing programs have on-site program/case managers that work closely with each guest and monitor their progress.

- **Consuelo's Place Shelter.** Consuelo's Place Shelter (CPS) provides emergency shelter and services for those experiencing homelessness and for those at imminent risk of becoming homeless. CPS also provides quarantine services and housing for those who have recently tested positive with COVID-19, have had recent exposure to COVID-19 and/or are awaiting results. The latter service is offered to individuals and families who lack a safe space to quarantine during the period of infection. CPS provides safe and stable emergency housing, intensive and high-quality case management, connects those facing a variety of housing related crises to appropriate resources and information and assists clients in securing and maintaining permanent housing after residency at CPS.
- **Interfaith Community Shelter (ICS).** Through partnership with 40+ faith and community groups and nearly 2,000 active volunteers, ICS provides shelter and services to men, women and children who are experiencing homelessness in Santa Fe, and provides a point of entry to the other services necessary to make the transition from homelessness to stable housing. As a minimal barrier shelter, it offers the Seasonal Night Shelter; the Day Services Program; and the Summer Safe Haven for All. Resource Days operate 3 days/week, year round, with 12 partner provider agencies.
- **Life Link.** Operates 24 apartment units at La Luz, administers Continuum of Care vouchers to support 70 scattered-site units for people with mental illness and other co-occurring disorders. They also administer 78 linkage vouchers in Santa Fe. The Life Link provides extensive outpatient treatment, psychiatric and medication assisted treatment, psychosocial rehabilitation, homeless outreach, prevention, and rental assistance, peer support services, onsite healthcare screening, and comprehensive human trafficking outreach and aftercare services.
- **Esperanza Shelter.** Offers no cost services to victims of domestic violence. The organization provides community navigation, advocacy, safety planning, therapy, substance abuse therapy, case management, child/family therapy, parenting classes, infant mental health, psycho educational groups for both survivors and offenders and legal advocacy. It operates a 24/7 crisis hotline 1-800-473-5220, and emergency shelter services for those needing to escape domestic violence.
- **Youth Shelters and Family Services.** Youth Shelters and Family Services provides shelter and resources for hundreds of homeless, runaway, and at-risk youth and their dependent children each year. The organization provides tens of thousands of bed nights annually for youth experiencing homelessness through its emergency shelter, transitional living program, and rapid rehousing program.

**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.** The City relies on its network of community partners to facilitate coordination of services and ensure that those vulnerable to homelessness don't "fall through the cracks". NMCEH continues to implement systems for ensuring that homeless who seek services are tracked through HMIS through a statewide system of coordinated assessment. Every homeless family and individual is given an assessment based on the nationally recognized VI/SPDAT (Vulnerability Index/Service Prioritization Assessment Tool). The results of the assessment are used to refer homeless people to the type of housing that best fits their needs and the assessment is used to create a prioritized list. Chronically homeless people are placed at the top of the list for permanent supportive housing.

The City, along with other local housing funding partners, has contributed funds to the Lamplighter Inn project, which will convert a local motel into 58 units of affordable housing with 25% of the units reserved for people exiting homelessness. The City has supported this project using AHTF, CDBG, as well as \$2 million in ARPA funds towards the acquisition of the property.

**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's CDBG entitlement funds and local funds will be used to support those with special needs through Adelante, Life Link, and the Interfaith Shelter programs which will provide services to homeless, veterans, and people with special needs in order to help them in the area of their specific need(s) and/or to make the transition to permanent housing. The City's Youth and Family Services Division funds numerous transitional homeless programs including: Youth Shelters (outreach, transitional living, rapid rehousing, and emergency shelter for youth and their dependent children with special needs and/or at risk of homelessness) and Interfaith (Community Shelter with special needs and/or at risk for homelessness). In addition, these programs work with the Veterans Advisory Board which funds a veteran support worker through the Veterans Integration Center (VIC) and rental space at Interfaith for a Homeless Veterans Coordinator through the Veterans Administration.

The City also funds SFPS Adelante Program which works directly with students in Santa Fe Public Schools. The Adelante staff members work with students and their families' to qualify them for services through the McKinney-Vento Homeless Assistance Act and provide support focusing on housing instability, food instability, and academic success. CDBG funds are being used to provide enhanced security for homeless youth, such as Youth Shelters and Family Services' Transitional Living and Street Outreach Programs. Apart from HUD funding, the City also supports the Santa Fe Recovery Center to provide housing for individuals who have graduated from their addiction recovery program.

The City has set aside funding for supplementation of rental assistance programs provided by a collaboration of organizations serving those who are, or are at risk of becoming, homeless (Life Link, SFPS Adelante Program, YouthWorks, the Santa Fe Recovery Center, and NM Coalition to End

Homelessness). These organizations have joined forces to address the gap in housing availability and homelessness for young adults to seniors, those young people who are unstably housed but working or attending higher education or trades training, and those starting a new chapter toward addiction recovery within the community. The collaboration was formed from a working group of concerned organizations that work daily to serve the populations with the highest-needs in Santa Fe. In addition to the rental assistance, the organizations will work together in a complimentary manner to provide a coordinated system of entry, wraparound services, staff and administrative support and interagency referrals for optimal placement of residents.

The City works closely with its network of housing partners to ensure that the needs of those discharged from institutions are also being met. Many women have entered Casa Familia after giving birth once discharged from the hospital. Likewise, Youthworks receives many referrals from juvenile corrections systems and assists youth and their families with support to overcome obstacles such as housing instability, and other wrap-around services. Additionally, Consuelo's Place Shelter takes in individuals who have been discharged from the county jail, the hospital, and recovery programs.

## **Discussion**

As a result of the COVID-19 pandemic, the City re-commissioned several dormitory rooms and campus apartments at the Midtown Campus to house homeless people or people without access to a safe place to stay if they needed to self-quarantine. Four years later, the Midtown Emergency Shelter has evolved into Santa Fe's first and only non-congregate shelter, Consuelo's Place Shelter. What was initially intended to provide unhoused individuals with a place to quarantine or isolate from the coronavirus has become a proven and necessary community resource to stabilize a vulnerable population and eventually connect them to permanent housing. The City has deployed various funding streams to support the operations of Consuelo's, including CDBG, Affordable Housing Trust Fund, as well as CARES and ARPA federal rescue act funds. The City recognizes the importance and need of non-congregate shelter in the community and intends to build the capacity of Consuelo's to continue its operations. City staff is currently looking at other properties to permanently house a non-congregate shelter, as the dormitories at the former college campus are slated for demolition in the coming years.

Several of the City's housing projects and activities support non-homeless special needs persons, such as the elderly, frail elderly, persons with disabilities, persons with HIV/AIDS and their families, and public housing residents. A regularly CDBG-funded activity, Habitat for Humanity's Home Repair Program, provides emergency home repairs, such as walk-in bathtubs, wheel chair ramps, as well as the replacement of carpet with linoleum for wheelchair-bound residents. Many of the beneficiaries of this program are elderly or experiencing disabilities. The City has also provided funding to the Santa Fe Civic Housing Authority for various public housing projects. According to the Santa Fe Civic Housing Authority, 328 families with a voucher have a member with a disability, and 300 voucher participants are elderly.

## **AP-75 Barriers to affordable housing – 91.220(j)**

### **Introduction:**

Typically, those who are most heavily cost-burdened, have the lowest incomes. The City of Santa Fe reviewed its policies and practices to mitigate barriers to housing development-- particularly affordable housing development—as part of the 2011 Analysis of Impediments (AI) to Fair Housing Choice. The City also submitted the 2016 AI update which was made available for public review with its successor, the City's 2017 Assessment of Fair Housing (AFH). HUD required both documents to be submitted in consecutive years, though the 2016 AI contains much of the framework as required by the AFH, per the federal rule to Affirmatively Further Fair Housing. This update provides an in-depth review of city housing policies and land use and zoning regulations and also incorporates elements of the successor study as required by HUD. This study examines in further depth any groups or individual citizens not captured in the 2016 AI participation, especially such persons who reside in areas identified as Racially or Ethnically-Concentrated Areas of Poverty (R/ECAP's), Limited English Proficient (LEP) persons, and persons with disabilities.

**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.**

According to the City's most recent AI, there are four substantial barriers to fair housing:

1. Lack of affordable housing: The City continues to undertake several activities to address its lack of affordable housing. In 2019, an ordinance amendment to the Santa Fe land use code eased restrictions on building accessory dwelling units. The objective was to provide incentives for incremental infill development and open up potential options for naturally occurring affordable rental units. The City also amended its inclusionary zoning program (SFCC 26-1, 26-2) to provide incentives and flexible options for the purpose of encouraging development that meets the community's current needs. The funds generated through allowable fees-in-lieu are expected to generate enough revenue to continue funding tenant-based rental assistance to meet a variety of needs - rent, utilities, rental/utility arrears, rental deposits, etc. As with any revenue generated or earmarked for affordable housing, use of the funds is dictated by city code and must be compliant with the NM Affordable Housing Act.
2. Some residents lack equal access to opportunity due to lower performing schools in high-poverty neighborhoods, and the lack of public transportation. Applicants for CDBG funds are required to demonstrate how their project will promote livability, sustainability, walkability to services, transportation and quality schools.
3. There is a lack of fair housing information and supportive services to assist people facing housing discrimination. The City's Fair Housing Assessment is accessible to the public on the City

website and is updated every few years. The City also provides referrals to HUD's Fair Housing resources.

4. Stakeholders continue to view neighborhood resistance or NIMBYism (Not-In-My-Backyard mentality) as a barrier to fair housing choice. One quarter of these survey respondents identified this as a "very serious" contributing factor. By expanding outreach tools and through partnerships with advocacy organizations, the City seeks a more demographically diverse representation in voices and opinions to be shared throughout the City.

### **Discussion:**

Recent data shows a current occupancy of almost 98% for all rental housing in Santa Fe. Almost half of the city's renter population is cost-burdened and three quarters of them do not earn enough to afford the median priced home for purchase. For that reason, the City continues to proactively enforce its inclusionary zoning requirement and to support the construction of housing, both affordable and market rate units. The City's objective is to support a healthy housing market that offers all types and price ranges. To that end, the City's been exploring efforts to potentially redevelop several of its underused corridors that have infrastructure and could support rental housing, and which wouldn't have existing residential neighbors concerned about higher density housing developments, while also providing easy access to transportation. These areas include the Siler Road corridor, the Midtown Local Innovation Corridor District (Midtown LINC), at St. Michael's Drive, the Airport Road corridor and the Midtown campus property.

Future production of new units will need to reflect the needs of emerging populations, specifically older, smaller households; the elderly; the self-employed; and special needs groups such as veterans. Market demand for single-family suburban style housing is decreasing as more households seek housing that is close to transportation, economic centers, services and amenities and can be adapted to changing needs to allow "aging in place" and entrepreneurial activities.

A focus in 2024 will be on the development of new, sustainable (in location, as well as efficiency) affordable units and sustainable rehabilitation of existing units in order to maintain affordable rent and housing stock as well as increase the availability of affordable housing. The City of Santa Fe's 25-Year Sustainability Plan was adopted in December 2018 and is focused upon taking the necessary steps to become carbon neutral by 2040, while increasing ecological resilience, economic vitality, quality of life and social equity for Santa Feans. Increasingly, interdisciplinary efforts are being made throughout the City to address the triple bottom line needs outlined in the 25-Year Plan for resiliency and sustainability through scaling and scoring each project's impact in environmental, economic and social health giving preference to the projects that will provide the most positive impact(s).

## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

Having a roof over one’s head is one of our essential needs as human beings, as important as eating, sleeping, and receiving medical care. Yet, too often, the poor, the disabled, the elderly and even many in the workforce are not able to afford a house that meets their needs. A lack of high-quality housing directly affects one’s ability to build wealth, participate in civic activities, enjoy leisure time, and most of all, to have a decent and safe place to live. The overall health and vitality of a community suffers directly when its residents aren’t housed adequately.

In Santa Fe, this situation is compounded by the fact that as a tourist destination and a place where wealthy people have second homes or choose for retirement, the city has attracted people from all over the world to live here, driving up the value of real estate beyond the ability of many who rely on the local economy to afford housing. Furthermore, due to the rise of remote work from the COVID-19 pandemic, Santa Fe has seen an influx of remote workers move to the city who earn far more than the average Santa Fean and drive up market rate rents.

A common obstacle to the underserved need of homeownership for Santa Fe residents is lack of credit worthiness and the inability to save a down payment for a home. Several of the City’s partner organizations offer assistance in the rebuilding of credit history, as well as homebuyer education programs. However, those earning low incomes, mostly renters, are even more hard-pressed to attain affordable housing.

### **Actions planned to address obstacles to meeting underserved needs**

The primary obstacle to meeting underserved needs is the lack of capacity to address systems gaps with available resources. The local economic environment is generally positive. Unemployment is low and the community has seen some commercial growth. Because of the predominance of tourism and service-oriented jobs, as well as the high numbers of self-employed and gig economy workers, the effects of the pandemic were initially devastating, but the economy is in a recovery period.

The City remains committed to using its limited financial resources in the most effective and efficient manner possible and to collaborate with other agencies and programs to address the community’s needs, particularly those arising from the pandemic. More importantly, the City will dedicate its resources to keeping safely housed those who are recently unemployed, precariously housed or homeless.

### **Actions planned to foster and maintain affordable housing**

The City of Santa Fe is committed to providing funding that supports innovative and sustainable housing solutions that result in permanently affordable and sustainable housing for residents who live and/or

work in Santa Fe. It will continue to prioritize the use of CDBG and the Affordable Housing Trust Fund allocations to support mortgage principal reduction assistance, home repair and rental assistance. The City also provides administrative funding to nonprofit partners to provide housing and/or housing-related services.

The City's inclusionary zoning program requires all residential developments to provide a percentage of the total units as affordable, 20% for homeownership units and three options for compliance for rental units: 1) paying a "fee-in-lieu of" (calculated using an "affordability gap" basis: the subsidized rent amount subtracted from the area's fair market rent); 2) constructing "Low Priced Dwelling Units" (affordable to renters earning up to 120% AMI); or 3) setting aside 15% for renters earning less than 80%AMI. Fees paid support the Affordable Housing Trust Fund, which, in turn, can fund rental assistance throughout the City as well as down payment assistance. The incentives for this program are a 15% density bonus, fee reductions for water and wastewater connections and fee waivers for development review and permit fees.

The affordability of homes created through the SFHP is controlled by the placement of a lien on the property that constitutes the difference between the appraised value of the home and the subsidized/effective sales price paid by the income-qualified buyer. If the unit is sold, the lien is either transferred to the new affordable buyer who is income qualified or repaid into the City's Affordable Housing Trust Fund (AHTF).

### **Actions planned to reduce lead-based paint hazards**

According to the State of NM Department of Health (NMDOH), Santa Fe has low risk factors for lead exposure in children. 9.6% of its housing stock was built before 1950 and in 2011, 0 children in Santa Fe County tested positively for elevated blood levels. More recent studies by the NMDOH identified Santa Fe County as having "low levels" of lead exposure, as cited in the NM Epidemiology Report, April 2017. The Office of Affordable Housing also conducts environmental reviews on all CDBG-funded activities. In cases where individual homes are older than 1978 and may have lead based paint, the subrecipient is required to follow all applicable law to assess the presence of lead and remediate it, if necessary.

Additionally, the City of Santa Fe's housing partners - Habitat for Humanity, The Housing Trust and Homewise - must notify homeowners of any potential lead-based paint issues as part of every home-buying transaction. If a homebuyer purchases an existing home with financial assistance from the Housing Trust or Homewise, they are given a lead-based paint disclosure form that must be signed. If a home is purchased that was built before 1978, the EPA lead-based paint pamphlet entitled "Protect Your Family from Lead in Your Home" is also given to the homeowner. All federally funded home-repair activities are also subject to stringent guidelines for lead-based paint assessment and remediation. Both Habitat and Homewise are experienced in addressing the presence of lead-based paint in their home

rehabilitation programs. Any presence of lead-based paint is remediated by a certified professional.

### **Actions planned to reduce the number of poverty-level families**

As part of an anti-poverty strategy, the City is implementing the following:

- Establish priorities for allocating federal tax credits to mixed income rental developments where at least 30% of the rental units will be affordable to households earning less than 50% of the AMI; (The Soleras Station project funded through CDBG initiated this strategy. The Siler Yard and Calle Resolana projects both followed suit and implemented this approach.)
- Continue funding a local housing voucher program to provide assistance to low-income homeowners or near to homeless and homeless families to prevent displacement; (Local funds will support , Adelante, NM Coalition to End Homelessness, YouthWorks, and Santa Fe Habitat for Humanity.)
- Work with for-profit and nonprofit organizations to develop new multi-family, mixed income rental property;
- Identify all existing affordable rentals and develop a preservation plan as needed. (Underway as part of the revitalization of the Midtown Campus project.)

Given the city's high rate of cost burden, even for homeowners, it is apparent that continued focus on rehabilitation, home repair, and other support services is essential to alleviating poverty in Santa Fe. Specific programs that reduce the number of poverty level families are:

- Dedicating capital impact programming and resources to Santa Fe's existing lower-income residential neighborhoods.
- Supporting youth recreation programs, meal delivery and afterschool resources to serve the needs of poverty level individuals and families.
- Continuing to support rehabilitation programs targeted toward low to moderate income homeowners (50%-80% AMI), which includes home renovations, emergency repairs and energy conservation measures including the purchase of new appliances, retrofits, and solar water heaters.
- Supporting the SFCHA's acquisition/rehabilitation of rental properties nearing the end of their initial affordability compliance periods as well as building new units when feasible.

### **Actions planned to develop institutional structure**

The biggest challenge for the City of Santa Fe over the next five years will be to continue to address the increasing demands of housing needs with limited financial resources. The City of Santa Fe's model of service delivery is to pass through most federal funds to sub-grantees and enter into administrative contracts with service providers who provide the services. This ensures that services are provided in the most efficient and relevant manner possible. The sub-grantees are then able to leverage additional

programming and project funds, including LIHTC, HOME, ESG, CDFI, as well as funds allocated through the state's Mortgage Finance Authority.

The City of Santa Fe will carry out the priorities in the Consolidated Plan and subsequently, the 2024 Annual Action Plan, by continuing to collaboratively work with our non-profit partners. The City's philosophy is to help build the capacity of our service providers, rather than increase the size of the City's bureaucracy. The City and its staff serve as advocates and coordinators for our partner non-profits. Another strength is the diversity of services provided with little overlap because of the coordination between City departments as well as between the City and the non-profit organizations. This communication and cooperation are key to ensuring that the services reach a wide range of the population who are in need, including homeless, senior citizens, low/mod income, at-risk youth and people with special needs and disabilities.

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

The City of Santa Fe has a long and successful history of working with the nonprofit, private, and governmental sectors to create collaborative partnerships. The City encourages partnerships with the state and federal governments to expand funding for affordable housing, especially housing for people with disabilities, seniors, minorities, female-headed populations and various special needs populations. The City acts as a convener through its use of funds to support a variety of housing services and programs related to housing security. Through its various citizen committees (Community Development Commission, Veterans Affairs Committee, the Mayor's Panel on Disability, Built for Zero Initiative with Community Services, the Children and Youth Committee, and more efforts to network with Economic Development Division for the increase of affordable workforce housing stock, etc.) the City ensures that funds are deployed to maximum benefit in the community.

The Youth and Family Services Division funds numerous transitional homeless programs including: Youth Shelters (outreach, transitional living, and emergency shelter), Interfaith (Women's and Community Shelter), St Elizabeth Shelter (Men and Family shelter). In addition, the Veterans Advisory Board funds a veteran navigator through the Santa Fe Veterans Alliance and flexible funding to keep precariously housed veterans in their homes. The City also funds Adelante, a school-based program, and Communities in Schools to identify and work with homeless families in Santa Fe Public Schools. The City will continue to support these organizations along with providing support for case consulting meetings. These partners, among others, are part of CONNECT, a resource navigation program that uses a City-purchased database. While this is a new data system, we have already seen positive results, including better identification of those precariously housed, getting those families/individuals into programs or referrals to housing assistance to avoid falling into homelessness. CDBG funds have been used to provide renovation of a permanent supportive housing program (Casa Cerrillos) run by St Elizabeth Shelter, as well as the funding necessary to support an outreach coordinator for the Drop In Center run

by Youth Shelters.

Specific projects that bridge economic development needs with that of housing providers and social services agencies include: redevelopment of the Midtown Campus; support of the Siler Yard live/work affordable housing project; support of the housing needs for youth participating in the Youthworks Culinary job training program; support of the upgrades at Chainbreaker Collective's headquarters, where they offer both a Bicycle Resource Center and Renter's Rights Center; and support for low-mod homebuyers and homeowners which directly supports the local economy and the triple bottom line address of social, economic and environmental sustainability practices adoption throughout the City.

**Discussion:**

The City's philosophy is to help build the capacity of community-based service providers, rather than to increase the size of its bureaucracy. This has been achieved by providing local funding to support administrative contracts in all areas of nonprofit services – affordable housing, youth programs, human services and economic development. As a result, the nonprofit network in Santa Fe is among the strongest in the state of New Mexico. Many pilot programs initiated in Santa Fe have been replicated not only statewide, but across the nation.

Another strength of the City's service delivery model is that a wide diversity of services is provided with little overlap because of the coordination between City departments as well as between the City and the non-profit organizations. This communication and cooperation are key to ensuring that services reach those in the most need, including homeless families and individuals and those in danger of becoming homeless, veterans, senior citizens, victims of domestic violence, very-low income renters, at-risk youth and people with special needs and disabilities.

Due to many factors, such as some lingering economic effects of the Covid-19 pandemic, inflation, high interest rates, economic disparity in Santa Fe continues to worsen. The number of households at risk of becoming homeless or experiencing episodic homelessness has increased dramatically. Without an increase in resources to support services and facilities, the service providers will grapple with limited capacity to meet emerging needs. The Santa Fe City Council will continue to support an innovative combination of regulation, policy and financial support for the development, preservation and improvement of affordable housing.

## Program Specific Requirements

### AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

#### Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(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.

1. 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
2. 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
3. The amount of surplus funds from urban renewal settlements	0
4. 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
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b>0</b>

#### 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. Specify the years covered that include this Annual Action Plan.	100.00%