

City of Santa Fe

PY 2024 Consolidated Annual Performance and Evaluation Report (CAPER)

July 1, 2024 to June 30, 2025

DRAFT

City of Santa Fe
Office of Affordable Housing
P.O. Box 909
500 Market St., Suite 200
Santa Fe, NM 87501

Table of Contents

CR-05 - Goals and Outcomes	3
CR-10 - Racial and Ethnic composition of families assisted	11
CR-15 - Resources and Investments 91.520(a)	13
CR-20 - Affordable Housing 91.520(b)	17
CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)	20
CR-30 - Public Housing 91.220(h); 91.320(j)	25
CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)	27
CR-40 - Monitoring 91.220 and 91.230	32
CR-45 - CDBG 91.520(c)	35
CD EQ. Coction 2	26

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

The City of Santa Fe is an entitlement city, receiving an annual allocation of Community Development Block Grant (CDBG) program funds through the U.S. Department of Housing and Urban Development (HUD). These funds help the City address the housing and community development objectives outlined by HUD, which include, but are not limited to providing affordable housing, public facility improvements, and vital public services for low- to moderate-income (LMI) persons.

Throughout Program Year (PY) 2024, the City focused on addressing socio-economic challenges, particularly concerning housing stability. This was achieved by enhancing the City's housing stock, increasing the availability of affordable housing units, and offering shelter and services to help individuals who have lost their homes find rehousing solutions. To accomplish these objectives, the City utilized the goals and objectives outlined in the 2023-2027 Consolidated Plan and the PY 2024 Annual Action Plan (AAP) to evaluate housing needs and make recommendations for addressing them. The City allocated Community Development Block Grant (CDBG) program funds to multiple service providers, fostering collaboration and strategically applying both federal and non-federal resources to meet community needs. The accomplishments for PY 2024 are summarized below by priority.

Affordable Housing:

- The City utilized program Income generated from past CDBG entitlement awards to provide mortgage principal reduction assistance to households earning 80% AMI or less. There were 2 LMI households assisted with these activities through the Homewise Mortgage Assistance Program (#401).
- Habitat for Humanity provided emergency home repair support for homeowners earning below 80%AMI. There were 17 LMI households assisted with these activities through the Habitat Home Repair Program (#400).

Public Facilities and Infrastructure:

- CDBG funding was used to make improvements at the Youth Shelters Transitional Living Program center (#398). There were repairs to exterior lighting, air duct systems, and minor electrical work in the facility. A total of 37 LMI persons were assisted with these activities.
- Funds were provided to make essential building improvements at Chainbreaker's new headquarters (#394) that benefitted 517 LMI

persons. This expansion will allow for their Bicycle Resource Center and Renter's Rights Center to safely and effectively re-open after COVID forced those closures.

Public Services:

- Homeless shelter operations assisted a total of 841 LMI persons at Interfaith Summer Safe Haven For All (#395) and homeless services were provided to 80 LMI at the Youth Shelters Street Outreach program (#397).
- The City funded the SFPS Adelante School Liaison Project (#396) which helped 3,453 LMI persons with case management, tutoring programs, and material aid such as school supplies and clothing.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

Goal	Category	Source	Indicator	Unit of Measure	Expected - Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected - Program Year	Actual – Program Year	Percent Complete
1A Increase Availability of Supportive Services	Homeless	CDBG	Public Facility or Infrastructure Activities other than Low/Mod Income Housing Benefit	Persons Assisted	4000	921	23.03%			
1A Increase Availability of Supportive Services	Homeless	CDBG	Public Facility or Infrastructure Activities for Low/Mod Income Housing Benefit	Households Assisted	0	0	0.00%	500	0	0.00%
1A Increase Availability of Supportive Services	Homeless	CDBG	Public service activities other than Low/Mod Income Housing Benefit	Persons Assisted	0	3453	100.00%	800	3453	431.63%
1A Increase Availability of Supportive Services	Homeless	CDBG	Homeless Person Overnight Shelter	Persons Assisted	2150	799	37.16%			
1B Expand Options for Overnight Shelter Beds	Homeless	CDBG	Homeless Person Overnight Shelter	Persons Assisted	2150	1640	76.30%	400	841	210.25%

		1	T							
1C Increase and			Public service activities							
Improve Street	Homeless	CDBG	other than Low/Mod	Persons	0	80	100.00%	50	80	160.00%
Outreach and			Income Housing Benefit	Assisted						
Support										
1C Increase and										
Improve Street	Homeless	CDBG	Homeless Person	Persons	550	54	9.82%			
Outreach and			Overnight Shelter	Assisted						
Support										
1D Increase			Public Facility or							
Available			Infrastructure Activities	Households						
Permanent	Homeless	CDBG	for Low/Mod Income	Assisted	50	0	0.00%			
Supportive			Housing Benefit	Assisted						
Housing			Housing benefit							
2A Expand			Public Facility or							
Choice for	Affordable	CDBG	Infrastructure Activities	Households	50	0	0.00%			
Affordable Rental	Housing	CDBG	for Low/Mod Income	Assisted	50					
Opportunities			Housing Benefit							
2B Expand Choice										
for Affordable	Affordable	CDBG	Direct Financial Assistance	Households	20	8	40.000/			
Home Buying	Housing	CDBG	to Homebuyers	Assisted	20	8	40.00%			
Opportunity										
2C Improve			Public Facility or							
Condition and	Affordable	CDDC	Infrastructure Activities	Households	50		0.000/			
Preserve	Housing	CDBG	for Low/Mod Income	Assisted	50	0	0.00%			
Affordable Renta			Housing Benefit							
3A Provide for										
Owner Occupied	Affordable	CD T C	Homeowner Housing	Household	60	24	E4 670/	20	47	05.000/
Housing	Housing	CDBG	Rehabilitated	Housing Unit	60	31	51.67%	20	17	85.00%
Rehabilitation										

3B Provide for Energy Efficiency Upgrades and Accessibility	Affordable Housing	CDBG	Homeowner Housing Rehabilitated	Household Housing Unit	60	14	23.33%	200	0	0.00%
3C Maintain Financial Stability for LMI Homeowners	Affordable Housing	CDBG	Homeowner Housing Rehabilitated	Household Housing Unit	60	14	23.33%			
3C Maintain Financial Stability for LMI Homeowners	Affordable Housing	CDBG	Direct Financial Assistance to Homebuyers	Households Assisted	20	6	30.00%			
4A Increase Economic Opportunities for LMI Population	Non-Housing Community Development	CDBG	Public Facility or Infrastructure Activities other than Low/Mod Income Housing Benefit	Persons Assisted	400	0	0.00%	80	0	0.00%
4A Increase Economic Opportunities for LMI Population	Non-Housing Community Development	CDBG	Public Facility or Infrastructure Activities for Low/Mod Income Housing Benefit	Households Assisted	0	0	0.00%	500	0	0.00%
4A Increase Economic Opportunities for LMI Population	Non-Housing Community Development	CDBG	Other	Other	0	0	0.00%	1	0	0.00%
4B Expand Public Facilities and Infrastructure for	Non-Housing Community Development	CDBG	Public Facility or Infrastructure Activities other than Low/Mod Income Housing Benefit	Persons Assisted	400	554	138.50%			

4B Expand Public Facilities and Infrastructure for	Non-Housing Community Development	CDBG	Public Facility or Infrastructure Activities for Low/Mod Income Housing Benefit	Households Assisted	0	0	0.00%	500	554	110.80%
4C Expand Access to Parks and Open Spaces	Non-Housing Community Development	CDBG	Public Facility or Infrastructure Activities other than Low/Mod Income Housing Benefit	Persons Assisted	300	0	0.00%			
4D Expand Access to Transportation	Non-Housing Community Development	CDBG	Public Facility or Infrastructure Activities other than Low/Mod Income Housing Benefit	Persons Assisted	300	0	0.00%			
4E Increase Programming to Prevent Displacement	Affordable Housing	CDBG	Public Facility or Infrastructure Activities other than Low/Mod Income Housing Benefit	Persons Assisted	4000	921	23.03%			
4E Increase Programming to Prevent Displacement	Affordable Housing	CDBG	Public Facility or Infrastructure Activities for Low/Mod Income Housing Benefit	Households Assisted	0	0	0.00%	500	0	0.00%
4E Increase Programming to Prevent Displacement	Affordable Housing	CDBG	Public service activities other than Low/Mod Income Housing Benefit	Persons Assisted	0	0	0.00%	800	0	0.00%
4E Increase Programming to Prevent Displacement	Affordable Housing	CDBG	Homeowner Housing Rehabilitated	Household Housing Unit	60	14	23.33%			

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

Santa Fe's CDBG program primarily focuses on meeting the housing and public service needs of its low- and moderate-income residents, including programs that range from assisting the homeless to improving homeowner properties. The city's priorities are reflected in its PY 2024 Annual Action Plan activities and related accomplishments. The majority of the City's CDBG activities met or exceeded their intended targets. CDBG funds were utilized towards these priorities:

Affordable Housing: \$162,270.82 (28.9%)

Public Facilities and Infrastructure: \$263,390.80 (46.9%) Public Services (including homeless): \$45,255.84 (8.1%)

Administration: \$91,020.63 (16.2%)

Total CDBG Expenditures in PY 2024: \$561,938.09

PY 2024 Goals to Accomplishments Reported in the PR03

1A Increase Availability of Supportive Services: The City had a goal to assist 500 households and 800 persons with this goal in PY 2024. There were 3,453 LMI persons assisted through the SFPS Adelante School Liaison Project (#396). The growth of this program demonstrates the commitment by City and SFPS to increase access to high-quality schools and opportunities for at-risk populations.

1B Expand Options for Overnight Shelter Beds: The City had a goal to assist 400 persons with homeless overnight shelter and 50 persons with homeless services with this goal in PY 2024. The City met these goals with 841 LMI persons assisted with shelter services at Interfaith Summer Safe Haven For All (#395) and 80 LMI at the Youth Shelters Street Outreach program (#397) with homeless services. These initiatives address the overall five-year goal of providing opportunities for at-risk populations and the crucial need for emergency shelter and supportive services to people experiencing homelessness.

2B Expand Choice for Affordable Home Buying Opportunities: The City did not establish a goal for homebuyer activities in PY 2024, however there were still 2 households assisted through the Homewise Mortgage Assistance Program (#401). Funds for this program are made possible with mortgage principal reduction loans, utilizing entitlement funds and program income generated from past CDBG awards.

3A Provide for Owner Occupied Housing Rehabilitation: The City had a goal to assist 20 households with housing rehab activities and assisted 17 LMI households at the Habitat Home Repair Program (#400). Habitat focused on the preservation and improvement of existing housing, as well as the promotion of accessible housing options. Activities include repaired roofs, replacement of AC units, furnace repairs, bathroom and shower areas, and other minor structural repair and maintenance.

3B Provide for Energy Efficiency Upgrades and Accessibility: There was a goal to assist 200 households with this activity in PY 2024, however activities for this goal have not started. This goal may be moved and combined in the future with other housing rehab goals.

4A Increase Economic Opportunities for LMI Populations: The City had a goal to assist 500 households and 80 persons with this goal in PY 2024. These activities have not been started yet. This goal may be moved and combined in the future with the public services goal.

4B Expand Public Facilities and Infrastructure: The City had a goal to assist 500 persons and met this goal with a total 554 LMI assisted. There were 37 LMI assisted at Youth Shelters TLP Repairs (#398) and 517 LMI assisted at the Chainbreaker HQ improvement activity (#394). Please note the 2024 AAP established this outcome for households, but the program actually reported by individuals. Youthworks converted their facility into a commercial kitchen and a job training center for at-risk youth. The Chainbreaker Collective facility improvement helped to move and reopen the Bicycle Resource Center and Renters Rights Center.

4E Increase Programming to Prevent Displacement: The City had a goal to assist 500 households and 800 persons with this goal in PY 2024. There were no activities that assisted LMI individuals and households with this goal in the program year.

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted). 91.520(a)

	CDBG
White	4,268
Black or African American	46
Asian	2
American Indian or American Native	228
Native Hawaiian or Other Pacific Islander	10
Total	4,554
Hispanic	3,959
Not Hispanic	988

Table 2 – Table of assistance to racial and ethnic populations by source of funds

Narrative

Data Note: Due to the limits of the IDIS reporting system, the table above does not include a category for people that identify as "other" or "multiple races" nor does it include services that were designed to benefit and measure accomplishments for low/mod areas. Therefore, the data in the above table does not necessarily match the number of people actually served by the City's CDBG funded community planning and development programs.

According to the most recent 2019-2023 ACS 5-Year Estimates, 61.0% of the population were White in Santa Fe, followed by 2.1% for Native American Indian, 1.9% for Asian and 1.3% for Black. "Some other" race were 11.2% and "Two or more" races were 22.4% of the population. Persons who identified ethnically as Hispanic were 49.9% of the population. Below is an assessment of how HUD CPD programs assisted minority groups in PY 2024.

The racial and ethnic composition reported for CDBG program sub-recipients represents cumulative annual data collected that represents the recipients of CDBG-funded projects, programs, and services. Of this number, the self-identified racial and ethnic statuses from the City's direct service activities are shown in the table above.

The table shows 4,554 persons served in the CDBG program, however the actual total number of persons served was 4,947. As noted earlier, the table above does not include a category for "other" or "multiple races" which had 393 persons. Of the total persons served in the CDBG program, 86.3% were White, 4.6% were Native American Indian, and all other races were less than 1% each. Those identifying as "Other or Multi-racial" were 7.9%.

Hispanic is an ethnicity and is separate from the rest of the table which categorizes by race. Hispanic is an ethnic category that refers to individuals with ties to Spanish-speaking countries, primarily from Latin

America and Spain. People of Hispanic ethnicity may identify with various races, including White, Black, Indigenous, or others. By ethnicity, the program reported 80.0% of persons assisted were Hispanic.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	897,535	561,938
Other-AHTF	public - local	3,877,554	N/A

Table 3 - Resources Made Available

Narrative

In PY 2024, a total of \$897,535 was allocated to the City's CDBG Program. This amount comprised of \$623,117 from the annual allocation and \$200,000 generated from program income. Further, \$74,418 of unspent funds from prior year entitlement allocations were reprogrammed into this program year. According to the PR-07 Drawdown Report, the City spent \$561,938 on various priorities, including public services, public facilities, housing programs and administration of the CDBG program. The following shows expenditures by priority:

Affordable Housing: \$162,270.82 (28.9%)

Public Facilities and Infrastructure: \$263,390.80 (46.9%) Public Services (including homeless): \$45,255.84 (8.1%)

Administration: \$91,020.63 (16.2%)

Total CDBG Expenditures in PY 2024: \$561,938.09

Please note that the City adheres to strict grant-based accounting guidelines. For each FY CDBG grant allocation, there is a maximum spending limit of 15% for public services and 20% for administrative costs. Grant guidelines also require that at least 70% of funds must be spent on LMI persons. Once all funds have been utilized for each FY grant, the City ensures that it will not exceed the maximum allowable spending for the fiscal year grant awards.

CARES Act Funds:

The City of Santa Fe received \$942,560 in CDBG-CV funding under the Coronavirus Aid, Relief, and Economic Stability Act (CARES Act), enacted in March 2020. These funds were designated to prevent, prepare for, and respond to COVID-19. In Program Year (PY) 2024, the City did not expend any CDBG-CV funds. Total expenditures from the CDBG-CV funds remains at \$942,530, which is almost 100% of the total allocation, and leaves a remaining balance of \$30. The City will work towards closing out the CDBG-CV program in the upcoming year.

Affordable Housing Trust Fund (AHTF)

To further complement CDBG funds, the City has also made available local funds from its AHTF in the amount of \$3,877,554 for the 2024-25 program year. Contracts with remaining balances were amended

to extend the term, so grantees could have additional time to spend down the remaining funds. The 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.

FY Grant Fund Close Out

At the end of each program year, the City reviews the spending status of grant allocations for CDBG, HOME, and HOPWA. None of the FY grant allocations were fully spent in the program year. When a FY grant allocation has been spent in full, the City will contact its HUD office to initiate the close-out process as outlined in CPD-22-14.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Citywide	100	100	Citywide

Table 4 – Identify the geographic distribution and location of investments

Narrative

The City of Santa Fe does not prioritize funding and support for programs based on geographic location due to its relatively low population density compared to its size. Instead, the City focuses on household income or specific characteristics of the participants and recipients of assistance. For example, mortgage reduction assistance is determined by the buyer's income rather than the location of the home. Similarly, public service programs for at-risk youth are available to the entire city rather than being restricted to those living in a specific census tract. This approach has been consistent in previous years and continues to be a priority. However, there are occasional exceptions where a project proposal may be accepted if funding in that area also contributes to other community development goals.

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

The City of Santa Fe delivers services primarily by passing through most federal funds to subgrantees who provide these services. This approach ensures that services are delivered in the most efficient and relevant way possible. These funds also help leverage additional local and state resources, allowing subgrantees to effectively run their programs. Furthermore, the City aims to utilize local funds to guarantee that essential local services continue to be available in our community, regardless of the status of federal funding.

For 2024, the City's nonprofit partners estimate that every dollar spent on mortgage principal reduction assistance leverages \$14 from other state, local, and private sources. Both the Housing Trust and Homewise are Community Development Financial Institutions (CDFIs) that actively leverage funds from various sources, including HOME, Fannie Mae secondary market loans, state-funded mortgage products allocated through the New Mexico Mortgage Finance Authority, Low-Income Housing Tax Credits (The Housing Trust), solar tax credits, the Federal Home Loan Bank of Dallas' Community Investment Programs, bank and foundation investments, and additional Department of Energy funds. They also have substantial organizational resources available for real estate development and to support programmatic goals. Similarly, the supportive housing providers in Santa Fe are also well-leveraged, effectively using Community Development Block Grant (CDBG) funds to enhance their missions.

Publicly owned property located within the jurisdiction that was 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 addresses the priority needs and funding objectives outlined in this plan, the City will proceed with such actions as permitted under the New Mexico Affordable Housing Act. In recent years, the City has donated land for two Low Income Housing Tax Credit (LIHTC) projects, which directly contributed to the construction of 152 affordable rental homes. In early 2024, the City conducted a Request for Qualifications to select an affordable housing development team to build homes on a City-owned tract of land located in an upscale neighborhood. The selected project will offer approximately 60 below-market homes, with 50% designated for income-qualified homebuyers. Additionally, Habitat for Humanity is prepared to break ground on five homes to be constructed on a lot that was donated by the City, situated 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.

CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be		
provided affordable housing units	0	0
Number of Non-Homeless households to be		
provided affordable housing units	22	19
Number of Special-Needs households to be		
provided affordable housing units	0	0
Total	22	19

Table 5 - Number of Households

	One-Year Goal	Actual
Number of households supported through		
Rental Assistance	0	0
Number of households supported through		
The Production of New Units	0	2
Number of households supported through		
Rehab of Existing Units	20	17
Number of households supported through		
Acquisition of Existing Units	2	0
Total	22	19

Table 6 - Number of Households Supported

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

For the first table, affordable housing goals accomplished by household type, the City had a goal to assist 22 non-homeless LMI households. There were 17 LMI households assisted with housing rehabilitation activities through the Habitat Home Repair Program (#400). There were also 2 LMI households assisted with these activities through the Homewise Mortgage Assistance Program (#401).

For the second table, housing goals by assistance type, the City had a goal to assist 20 LMI households with rehab of existing units, and 2 LMI households through acquisition of existing units. While the City did not meet its goal for the rehab of existing units, it did meet the goal of acquiring two units for LMI households. The City may have to revise its goal; however affordable housing programs remain successful and a priority need for residents

The Habitat Home Repair Program focused on the preservation and improvement of existing housing, as

well as the promotion of accessible housing options. Activities include repaired roofs, replacement of AC units, furnace repairs, bathroom and shower areas, and other minor structural repair and maintenance. Funds for the Mortgage Assistance Program are made possible with mortgage principal reduction loans, utilizing entitlement funds and program income generated from past CDBG awards.

Discuss how these outcomes will impact future annual action plans.

While the City did not meet its overall goals for affordable housing assistance for the Program Year (PY) 2024, the outcomes from this year will still impact future Community Development Block Grant (CDBG) funding allocations. There is a continued need to identify more low- to moderate-income (LMI) homeowners in the City. The demand for affordable housing options, supportive services, and prevention of foreclosure and homelessness remains the highest priority for Santa Fe.

Additionally, there is an ongoing need to provide shelter for homeless individuals and offer permanent supportive housing options to help them secure stable living situations. The rehabilitation of the City's aging housing stock will also continue to be necessary, particularly for seniors, disabled persons, and communities of color. As a result, the City will keep promoting its programs and actively seek eligible LMI households.

Mortgage reduction assistance is still crucial in Santa Fe. LMI borrowers require extra support to purchase homes due to rising property prices and higher interest rates. Often, borrowers seek additional sources of mortgage reduction assistance, alongside CDBG funds, to improve their chances of buying a home in Santa Fe. Like many other regions, Santa Fe is facing its worst housing affordability crisis to date. Therefore, there will be an increased focus on constructing new housing for homeownership, developing affordable rental units, and providing home repair assistance to preserve and maintain the existing affordable housing stock.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual
Extremely Low-income	4
Low-income	8
Moderate-income	7
Total	19

Table 7 - Number of Households Served

Narrative Information

A total of 19 LMI households were served, including 4 extremely low-income (0-30% AMI) 7 low-income (30-50% AMI) and 6 moderate-income households (50-80% AMI) in the housing rehab program. The mortgage assistance program assisted 1 low-income and 1 moderate-income household. This

achievement is reflective of the vital role served by CDBG funds in Santa Fe to meet the needs of individuals and families who have very few options for support.

Worst Case Housing Needs

All programs included outreach and services for households and individuals experiencing the worst housing needs. This includes households that pay more than half of their income on rent, those living in severely substandard housing, individuals without homes, and those who have been involuntarily displaced.

Moving forward, additional actions to foster and maintain affordable housing include utilizing city-owned land for affordable housing developments and continuing efforts to preserve affordable housing through rehabilitation programs. Households and individuals with the most critical housing needs will be prioritized when assistance is identified.

While the City has not specifically reported on individuals with disabilities in affordable housing programs, if a household with a disability is identified for assistance, the City is committed to making all reasonable accommodations to meet the needs of that household.

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

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

The increasing number of individuals experiencing homelessness in Santa Fe has intensified the city's commitment to ending functional homelessness. All of the city's nonprofit partners that assist homeless individuals engage in extensive outreach efforts, targeting veterans, families, and unaccompanied youth.

The City of Santa Fe collaborates closely with the New Mexico Coalition to End Homelessness (NMCEH) to coordinate services for homeless individuals and families. NMCEH implements a statewide coordinated entry system, which involves assessing every homeless individual and family using the nationally recognized Vulnerability Index/Service Prioritization Assessment Tool (VI/SPDAT). The assessment results are utilized to connect homeless individuals with suitable housing options, including permanent supportive housing.

Furthermore, the City recently joined the Built for Zero initiative, a national movement aimed at ending chronic homelessness in participating communities. The coordinated entry system is instrumental in creating a regularly updated, by-name list of individuals experiencing homelessness. The City is actively collaborating with its nonprofit partners to develop more permanent supportive housing to address the needs of those who are currently chronically homeless in Santa Fe.

Additionally, the City utilized Community Development Block Grant (CDBG) funds to support Youth Shelters and Family Services (YSFS) in providing Transitional Living and Street Outreach for young adults aged 16-22. Through the Transitional Living Program, 23 youth aged 17-21 were given a safe place to stay and case management to help them achieve their educational and employment goals. The Street Outreach Program served 80 clients during the reporting period, offering them referrals, services, and case management aimed at helping them exit homelessness. Many young people in both programs have secured more permanent housing through the YSFS Youth Homelessness Demonstration Project, which provides Rapid Rehousing for clients aged 18-24.

Another initiative to assist families experiencing homelessness is the Adelante program. This program offers referrals to services, school supplies, food, clothing, and other support to students enrolled in Santa Fe Public Schools and their families. CDBG funds were used to expand staff hours, enabling the program to serve 3,453 children and youth in need.

The Interfaith Community Shelter offers three programs to support individuals experiencing homelessness: 1. The Seasonal Overnight Shelter (SOS) program which provides emergency beds and meals during the colder months; 2. The Summer Safe Haven for All which is an initiative that offers emergency beds and meals for chronically homeless individuals throughout the summer months; and 3. The Day Services Program which provides essential services, including clothing, showers, lunches, case

management (which includes assistance with obtaining state IDs and referrals for other services), and various additional services through Partner Providers located in the building, such as medical care, job counseling, housing assistance, and meditation. In PY 2024, Interfaith experienced a significant increase in the number of bed nights, meals served, and day services provided. The program successfully served 841 individuals with overnight shelter services.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City collaborates with various non-profit organizations to provide essential services aimed at preventing issues faced by "at-risk" populations, including unaccompanied youth, battered families, individuals with disabilities, veterans, and seniors. One of the key goals is to assist existing homeless populations in obtaining safe, affordable, and sustainable housing, along with necessary services such as healthcare, transportation, and counseling. These efforts encompass a range of housing program options, which include emergency shelter services, transitional housing, and permanent supportive housing, as well as the construction of mixed-income and mixed-use affordable rental developments. Currently, the City, in partnership with its community organizations, supports emergency and transitional housing programs specifically for homeless individuals, families with children, veterans, and unaccompanied youth.

Additionally, the City of Santa Fe works closely with the New Mexico Coalition to End Homelessness (NMCEH) to coordinate services for homeless individuals and families. NMCEH operates a statewide coordinated assessment system that provides every homeless family and individual with an assessment based on the nationally recognized Vulnerability Index/Service Prioritization Decision Assistance Tool (VI/SPDAT). The results of this assessment are used to match homeless individuals with the type of housing that best meets their needs, while also creating a prioritized list that places chronically homeless individuals at the top for access to permanent supportive housing.

St. Elizabeth plays a vital role in providing services to the homeless community in Santa Fe. The organization works closely with the Interfaith Community Shelter, Consuelo's Place, and the New Mexico Coalition to End Homelessness. This collaboration enables St. Elizabeth to assist clients in finding work, applying for and receiving Social Security disability benefits, obtaining medical and mental health services, and ultimately securing stable housing. Additionally, St. Elizabeth manages the Santa Fe Suites, a former extended-stay motel with 123 units, which has been converted into supportive permanent housing for individuals and couples transitioning out of homelessness and those with low incomes.

The Interfaith Community Shelter (ICS) collaborates with over 40 faith and community organizations and nearly 2,000 active volunteers to provide shelter and services for men, women, and children experiencing homelessness in Santa Fe. ICS serves as a point of entry to essential services that help individuals transition from homelessness to stable housing. As a minimal barrier shelter, it offers several programs, including the Seasonal Night Shelter, the Day Services Program, and the Summer Safe Haven for All. Additionally, Resource Days are held three times a week throughout the year, featuring support from 12 partner provider agencies.

Youth Shelters and Family Services assists hundreds of homeless, runaway, and at-risk youth, along with their dependent children, each year. The organization offers thousands of bed nights to unaccompanied youth facing homelessness through its emergency shelter, cold weather shelter, transitional living programs, and rapid rehousing initiatives.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after 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); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

The City relies on a network of community partners to coordinate services for individuals and families who are vulnerable to homelessness. During Program Year 2024, the City continued its work with the Built for Zero (BFZ) initiative, a nationally recognized, evidence-based program that offers strategies and solutions to eliminate chronic homelessness. Communities involved in BFZ focus on achieving a state of "functional zero" for one specific population as a step toward addressing homelessness for all groups. This evidence-based model uses quality data to guide communities in reaching functional zero, a status in which homelessness becomes rare and brief.

Quality data is gathered through coordinated outreach efforts, which involve collecting real-time, byname data to create a comprehensive list of every individual experiencing homelessness in the community. Functional zero is determined by examining the inflow and outflow of individuals on this list. A community achieves functional zero when the number of people being housed exceeds the number of individuals added to the by-name list. Santa Fe has committed to reaching functional zero by 2026.

The application of Rapid Rehousing is limited and depends on the specific needs of the household. The City partners with organizations such as Life Link, the New Mexico Coalition to End Homelessness, Youthworks, and Adelante to provide rapid rehousing assistance and assess each household at intake. For those facing fewer barriers, rapid rehousing offers support until the household increases its income and/or benefits and can independently manage housing costs. Life Link and other rapid rehousing providers emphasize ongoing case management and referrals to additional services, such as employment, education, job training, budgeting, healthcare/insurance, food, and transportation. This approach ensures that when assistance from one program concludes, the household is prepared to transition into another program if they have not yet achieved independence.

Several agencies collaborate so that a person who is discharged from an institution, recovery program, detention center or hospital is transitioned to a safe place to stay. Anchorum St Vincent Foundation focuses particularly on people discharged from the hospital to ensure that they do not end up on the streets by paying for beds and staffing at local shelters, particularly for those who need longer term care for ordered bed rest, wound treatment, etc. The County of Santa Fe also pays for a navigator to help folks in jail get connected to services and shelter upon discharge. There are several gaps in this informal system though, and many services providers recognize the need to formalize a discharge policy. ESG funds are

not used directly by the City or its immediate partners but there is consensus across the Continuum of Care membership that there is need to investigate the potential of ESG use in Santa Fe.

The City works with, and provides CDBG funding to, Youth Shelters and Family Services to help address the needs of youth who are at risk of becoming homeless after leaving foster care, other youth facilities, as well as dysfunctional homes. Specifically, the Youth Shelters' Street Outreach Program proactively provides outreach services for youth living on the streets. Their Street Outreach Drop-In Center provides these youth with hot meals, showers, computer and phone access, and a safe space to connect with support systems.

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

For chronically homeless households, the service delivery system relies on a network of housing providers and services coordinated through the Continuum of Care, as well as various City funding cycles via the Children and Youth Commission, the Human Services Committee, and the Community Development Commission, along with other regional initiatives. Upon intake, each homeless or at-risk household is assessed to determine if they qualify for rapid rehousing or require more intensive support. If the household has minimal barriers, they may receive rental assistance until they can manage housing expenses independently, either through increased income or additional benefits. Additionally, individuals referred through the CONNECT navigation network are evaluated and directed to the appropriate agency for supportive housing services. A navigator from the service agency will assist the individual or household experiencing or at risk of homelessness to identify what is needed to secure stable housing. This navigation support continues until their housing needs are met. Extensive outreach activities specifically target veterans, their families, and unaccompanied youth.

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'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.

In addition to CDBG funds, other City departments actively support programming for youth exiting foster care and youth facilities. Youthworks receives City funding for its apprenticeship and job skills training programs as well as funding for social services provided to its youth participants and is in the process of creating a commercial kitchen and culinary training program for at-risk youth.

CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

The Santa Fe Civic Housing Authority (SFCHA) is the main public housing agency in Santa Fe. It oversees 28 units of public housing and manages 503 units of HUD Project-Based Rental Assistance (PBRA), of which 459 are also Low-Income Housing Tax Credit (LIHTC) units. Additionally, SFCHA administers 190 LIHTC units and 723 housing choice vouchers in Santa Fe.

Among the PBRA units, there are 359 designated for seniors and 132 for families. Currently, over 300 individuals are on the waiting list for housing authority apartment units, and approximately 300 people are on the Section 8 waiting list for Santa Fe. SFCHA receives about 35 housing applications per month, with the wait time for a unit ranging from 18 to 24 months. However, waiting lists are typically only open through a lottery system at specific times throughout the year.

In addition to its Santa Fe operations, SFCHA owns and operates affordable housing units in the City of Española and the Town of Bernalillo. According to SFCHA, 328 families with a voucher include a member with a disability, and 300 voucher participants are elderly. Santa Fe County also manages 200 units of public housing and administers 241 housing choice vouchers, 44 of which are VASH vouchers. Some of these vouchers can be used within city limits.

The maintenance of aging housing units is an ongoing effort, which is why the Santa Fe Civic Housing Authority (SFCHA) is converting its units under the Rental Assistance Demonstration (RAD) project. In addition, SFCHA successfully completed a 45-unit family project at the end of 2022 using Low-Income Housing Tax Credits (LIHTC). For 2024, SFCHA has received a preliminary award for Low-Income Housing Credits for the Ocate Apartments project, which will consist of 60 units, 13 of which will be allocated rental assistance youchers.

As an active developer of LIHTC projects, the Santa Fe Civic Housing Authority has become a key partner with the City of Santa Fe in providing affordable rental housing, extending beyond the typical functions of a housing authority. When the land is titled to the City, it has subordinated and amended its lease agreements with the housing authority; this has occurred for six projects, while all subsequent projects have had land titled under the Housing Authority. The City has supported the Calle Resolana project, which includes 45 townhomes that were awarded LIHTC funding in 2019, and it has also awarded a grant for the Ocate project in 2024.

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

Both Public Housing Authorities (PHAs) offer a Family Self-Sufficiency Program aimed at helping families achieve self-sufficiency and eventually become homeowners. Families enter into a five-year Contract of Participation with the Housing Authority, where they set specific goals to accomplish over the term of the Contract. As part of this agreement, the Housing Authority establishes an escrow account for each participating family. Whenever there is an increase in the family's earned income during the contract

term, funds are deposited into their escrow account. Upon successful completion of the program, families receive the balance in their escrow account, which can be used for homeownership and educational purposes.

Actions taken to provide assistance to troubled PHAs

N/A. The PHA is not designated as troubled.

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken 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. 91.220 (j); 91.320 (i)

Though public policies are meant to address the overall needs of citizens in Santa Fe, there are times where they may have a negative effect on certain aspects of the community, which in this case, are affordable housing and residential investment. Affordable housing and public and private residential investments are key components in furthering fair housing in any community. The following actions by the City and its various departments demonstrate the City's commitment to removing any barrier to affordable housing in Santa Fe.

The City continued its review of the Land Development Code (LDC) to address barriers to housing development - particularly affordable housing development. The City Planning and Land Use Office also continue to review local policies and make relevant revisions to codes where necessary.

The City is actively seeking opportunities to redevelop several underutilized corridors and properties that are equipped with infrastructure and could support rental housing. The aim for these potential redevelopment areas is to create housing that is affordable for a diverse range of income levels, offering various options for both rental and homeownership. Additionally, the City hopes to expand access to other essential opportunities, such as employment, education, and recreational activities. One advantage of these areas is the absence of existing residential neighbors who might oppose higher-density housing developments. Furthermore, these locations provide convenient access to transportation. The City has released a Request for Qualifications to promote affordable and workforce housing development on a 19-acre plot in Las Estrellas. Additionally, an Invitation to Bid (ITB) has been issued for a larger collection of city-owned tracts in the same area.

The Fee-in-Lieu options for developers continue to facilitate the reduction of barriers for multi-family rental development. The inclusionary zoning ordinance allows developers of multi-family rental housing to pay a fee-in-lieu by right, instead of having to incorporate subsidized units on-site. The fees are based on an "affordability gap," which estimates the difference between the rent that is affordable for those earning 30% to 65% of the Area Median Income (AMI) and the Fair Market Rent established by HUD. Additionally, amendments to the ordinance have increased the incentives available to developers to encourage the set-aside of rent-restricted units. In the upcoming program year, two projects are expected to finalize their land use entitlements and propose including affordable units on-site.

Revenues generated from the fee-in-lieu program are utilized to fund a citywide rental assistance program for tenants, which has minimal eligibility requirements. This assistance can be used for various needs, including rent, utilities, rental or utility arrears, and rental deposits. Another objective of the program is to eliminate financing barriers for multi-family housing. By encouraging the development of multi-family units, we aim to ease some of the demand for existing rentals. This, in turn, is expected to help reduce

rising rental rates and provide more options for voucher holders to utilize their subsidies. As with any revenue generated or designated for affordable housing, the use of these funds is governed by city code and must comply with the New Mexico Affordable Housing Act.

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

In PY 2024, the City continued to utilize CDBG funds and local Affordable Housing Trust Fund (AHTF) resources to enhance the availability of affordable housing for low- and moderate-income households. The City actively supports the development of Low-Income Housing Tax Credit (LIHTC) multi-family properties by providing local funding and donating City-owned land.

As previously mentioned, the Santa Fe Civic Housing Authority was awarded LIHTC funding, along with state HOME funds and Housing Trust Fund (HTF) resources from Housing New Mexico, for two housing developments aimed at increasing the number of affordable housing units in the city and offering more options for families with children.

Additionally, the City issued a Request for Qualifications in the previous program year to promote affordable and workforce housing development on a 19-acre plot in Las Estrellas. An invitation to bid (ITB) was also released for a larger number of City-owned parcels in the same area. Submissions for both proposals were received in January, but no awards have been made yet.

Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

According to the New Mexico Department of Health, Santa Fe has low risk factors for lead exposure in children, with few to no reports of elevated blood lead levels. The state Department of Health identified Santa Fe County as having "low levels" of lead exposure, as noted in the New Mexico Epidemiology Report from April 2017. Regardless of this, the Office of Affordable Housing conducts environmental reviews on all activities funded by the Community Development Block Grant (CDBG). For individual homes built before 1978 that may contain lead-based paint, the subrecipient must adhere to all applicable laws. This includes notifying homeowners about potential lead hazards, assessing the condition and presence of lead-based paint, and implementing remediation measures if necessary.

The City has also taken steps to address health hazards in various projects. For example, the City assisted with asbestos studies and remediation for the Youthworks Social Justice Kitchen. Additionally, CDBG funds were allocated for asbestos remediation and lead-based paint remediation during the conversion of the Bella Luz Apartments/Lamplighter Inn Motel.

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

Specific programs that CDBG funds supported in PY 2024 to reduce the number of poverty level of families include the following:

 Provide Emergency home repair/improvement funding to support 17 LMI homeowners with home renovations, emergency repairs and energy conservation measures including roof

- replacement, furnace/HVAC repairs, accessibility improvements, new appliances, and solar water heaters
- Provide wealth building opportunities and preservation of wealth through mortgage reduction loans (2 households received assistance)
- Fund various public services to help address and prevent homelessness.

As part of an anti-poverty strategy, the City is also 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, 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.

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 taken to develop institutional structure. 91.220(k); 91.320(j)

The City of Santa Fe is actively addressing the priority needs identified in the 2023-2027 Consolidated Plan by collaborating with nonprofit partners on affordable housing, public services, and both emergency and permanent housing solutions for the homeless. The primary challenge for the City during the Consolidated Plan period will be meeting the increasing demands for housing with limited financial resources.

The City's service delivery model involves passing through most federal funds to sub-grantees and establishing administrative contracts with service providers who deliver essential services. To ensure the effectiveness of this model, the City has focused on enhancing the capacity of community-based nonprofit service providers. City staff members serve as advocates, coordinators, and partners.

A key strength of this service delivery model is its ability to provide a wide range of services with minimal overlap, thanks to the coordinated efforts between City departments and nonprofit partners. This collaboration ensures that services effectively reach those in greatest need, including homeless families and individuals, veterans, senior citizens, victims of domestic violence, very low-income renters, at-risk youth, and people with special needs and disabilities.

Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

The City's Office of Affordable Housing is part of the Santa Fe Housing Action Coalition, which unites public and private housing agencies alongside social service providers. This Coalition facilitates coordination across the sector to align goals, identify barriers to housing, and develop actionable steps to tackle the housing affordability crisis in Santa Fe.

Representatives from the Office of Affordable Housing, the Community Health and Safety Department, and the Youth and Family Services Division participate in the S3 Santa Fe Housing Initiative. S3 is a collaborative effort involving local governments and philanthropic organizations, including Anchorum St. Vincent, the Santa Fe Community Foundation, the Thornburg Foundation, the City of Santa Fe, Santa Fe County, and the New Mexico Coalition to End Homelessness. S3 aims to leverage local expertise, build on existing efforts, and adopt the Built for Zero methodology in addressing homelessness.

Addressing homelessness is one of the most pressing needs for the City of Santa Fe and its residents. The Youth and Family Services Division funds numerous transitional homeless programs, including Youth Shelters (which provide outreach, transitional living, and emergency shelter), the Interfaith Community Shelter (offering services for women and families), and the St. Elizabeth Shelter (which serves men and families). Additionally, the Veterans Advisory Board funds a veteran navigator through the Santa Fe Veterans Alliance and provides flexible funding to help precariously housed veterans remain in their homes.

The City also supports Adelante, a school-based program, and Communities in Schools, which work to identify and assist homeless families in Santa Fe Public Schools. The City will continue to support these organizations and provide resources for case consulting meetings. These partners are part of CONNECT, a resource navigation program that utilizes a City-purchased database. Although this is a new data system, we have already observed positive results, including improved identification of precariously housed individuals and families, and increased referrals to housing assistance to prevent homelessness. Furthermore, Community Development Block Grant (CDBG) funds have been used to renovate the permanent supportive housing program (Casa Cerrillos) run by the St. Elizabeth Shelter, as well as to support an outreach coordinator for the Drop-In Center operated by Youth Shelters.

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

The City's 2017 Assessment of Fair Housing revealed that Hispanic populations have some of the lowest access to opportunities, particularly regarding poverty levels, school proficiency, and labor market conditions. In Santa Fe, the ongoing concerns are primarily poverty and school proficiency, both of which signify limited access to opportunity. Access to these opportunities is hindered by infrequent public transportation services to neighborhoods with higher opportunities and destinations outside core service areas, such as the county social services office. Additionally, some transportation routes have limited operating hours and days, and there is a lack of service on holidays.

The City's 2016 Analysis of Impediments also listed several barriers and actions needed to improve access to fair housing information, enhancing resident knowledge of fair housing rights and empowering residents to take action when they perceive a fair housing violation. Prior efforts have included:

- Preparation of outreach materials regarding housing laws including the Federal Fair Housing Act, the New Mexico Uniform Owner Resident Relations Act (UORRA) and the state Mobile Home Act. The outreach materials consist of Fair Housing Frequently Asked Questions brochures in English and Spanish and a tenant rights "Novella," both in Spanish and English called "Tino the Tenant"/"Tino el Inquilino", a story about a tenant who shares his own discrimination experiences with a group of acquaintances. Distribution is ongoing throughout the year predominantly in Spanish-speaking and lower income neighborhoods as well as through school liaisons with the Santa Fe Public Schools and community facilities throughout the City.
- Participation by the Office of Affordable in the Santa Fe Housing Action Coalition, in the promotion
 and distribution of an informational video on housing rights, and an outreach campaign to
 educate the public about affordable housing and fair housing issues.

CR-40 - Monitoring 91.220 and 91.230

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

The Office of Affordable Housing monitors program service providers funded by CDBG to ensure compliance with requirements through site inspections and documentation of organizational structures, with applicability to HUD national objectives and scope of work. Additionally, the Office of Affordable Housing attends technical assistance trainings in monitoring, subrecipient oversight and fair housing throughout the year. The City of Santa Fe utilizes HUD's following guides to ensure compliance:

- Guidebook for Grantee's on Sub-recipient Oversight
- CPD Monitoring Handbook
- Managing CDBG
- Ensuring CDBG Subrecipient Timeliness guidelines
- 24 CFR 570 governing CDBG and 24 CFR 58 governing Environmental Reviews
- Davis Bacon fair wage resources via the Department of Labor

All CDBG funded activities are monitored for performance measurement and financial, as well as record keeping oversight. Site visits were held in-person or virtually, depending on the comfort level of the subrecipient. Prior to the visit, the subrecipient completes a self-monitoring checklist, describing accomplishments and procedures for complying with CDBG regulation. Staff members meet with the leadership team of the particular non-profit sub-recipient and review selected files for accuracy based on the guiding regulations and documents. Staff note both deficiencies and accomplishments at the time of monitoring and issue follow up letters which outline corrective actions to be taken to achieve effective, efficient program delivery.

Reporting and Fiscal Management: Staff ensure that all subrecipients keep detailed records to evaluate the effectiveness of the project in meeting the needs of targeted populations and for accomplishments reporting in IDIS. Relevant data include the number of clients served, income and employment (locally and with the City depending on the program), assets breakdown (when appropriate) and Performance Measurement data by project type (Housing, Economic Development, Public Service or Facilities & Improvement), ethnicity and age breakdown.

This information is submitted quarterly by subrecipients. Input into IDIS with reporting data is finalized prior to program closeout and annual reporting in the CAPER. The reports track completion of the contracted scope of services and track program demand and utilization by demographic category for services provided by the program. The subrecipient's program manager also must submit audits and/or audited financial statements which include a breakdown of the expenditures and revenue (including Program Income if relevant) and a specific description of the charges as defined in the contract.

Comprehensive Planning Requirements

The comprehensive planning requirements include the community planning and development process of the 5-Year ConPlan, subsequent AAPs, and CAPERs as per 24 CFR 91 Subpart A, C & F. Citizen participation is a vital part of the consolidated plan process, and the City will make sure to follow its HUD approved Citizen Participation Plan (CPP) which helps guide staff to gather community input which is an essential component in identifying the priority housing and community development needs in the City. The ConPlan is developed every 5 years, with identified priority needs and goals to address these needs. Each year of the 5-Year plan, the City develops an AAP which identifies the projects and activities that will address and further the goals of the plan. This plan is required to be submitted to and approved by HUD each year to receive CPD funding annually. At the end of each AAP program year, the City will report on the accomplishments and performance of the program through the CAPER (performance report). Citizen participation is required in the development of each of these stages as per 24 CFR 91.105. PY 2024 is the second program year of the 2023-2027 Consolidated Plan.

Citizen Participation for the 2024 AAP

The community participation process focuses upon meaningful engagement of residents and stakeholders representing local organizations and coalitions. A public hearing was held at City Council on May 8, 2024, and 30-day public comment period was advertised and conducted from April 10, 2025 to May 10, 2024, which the Plan available for review City during was on the website https://www.santafenm.gov/affordablehousing. Three additional public meets were held during the development of the plan. All official notices of public hearings are published in the Legal Advertisements section of the Santa Fe New Mexican. During the City Council Public Hearing, one member of the public offered their thoughts about the homeless crisis, but not about the contents of the AAP. For more details on the community participation process, please see the 2024 AAP.

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

The City's Citizen Participation Plan (CPP) as per 24 CFR 91.105 requires that Santa Fe residents be given adequate time – a minimum of 15 days – to review the City's use of CDBG funds as well given a public hearing at a regular City Council meeting for public comment. The Office of Affordable Housing published a Legal Notice in Spanish and English on October 1, 2025 in the Santa Fe New Mexican, notifying the public of the public comment period and public hearing. The following details were given.

Public Comment Period: Citizens are invited to review and make comments on the draft 2024 CAPER. The draft CAPER will be available for (15) fifteen days beginning **Tuesday, October 7, 2025** through **Wednesday, October 22, 2025**, and comments concerning the draft CAPER must be received by **October 22, 2025**.

The draft CAPER is available online at the City's Affordable Housing webpage: https://santafenm.gov/affordable-housing or a paper copy of the CAPER is available by calling the Office of Affordable Housing at 505-955-6574. Written comments may be submitted by email to: contactoah@santafenm.gov or by mail to the Office of Affordable Housing, City of Santa Fe, 200 Lincoln Avenue, Santa Fe, NM 87501.

Public Hearing: A public hearing will be held on **Wednesday, October 22, 2025.** A presentation of the CAPER will be made and comments from citizens are welcome. The public hearing will be held at the Quality-of-Life Committee meeting, held at City Hall, 200 Lincoln Avenue, Santa Fe, New Mexico.

Disability & Translation Assistance: The City of Santa Fe will make efforts to provide reasonable accommodations to disabled members and provide translation assistance for anyone accessing City programs. For assistance with Spanish translation of written materials or Spanish interpretation of public meetings, please contact the Office of Affordable Housing via telephone: 505-955-6574 or email contactoah@santafenm.gov at least 5 working days prior to the date assistance is needed.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

PY 2024 is the second program year of the 2023-2027 Consolidated Plan. Data from the Housing Needs Assessment section of the updated plan showed that cost burden – paying 30% or more in income in housing costs – is the most prevalent housing problem among city of Santa Fe residents. This data supports the City's efforts on expanding both affordable rental and homeownership opportunities and providing critical housing and supportive services to homeless and underserved populations. Moving forward, the City will continue to seek to support activities that contribute to the affordable housing stock and move persons out of homelessness based on the proven Permanent Supportive Housing (PSH) model. At this time, the City does not anticipate any changes in the goals and objectives of the Consolidated Plan that would result in the change of its programs or objectives. No priorities or goals have been changed.

CDBG-CV

The City has successfully completed all activities under the CDBG-CV program. These activities included providing assistance for emergency services at the Midtown Shelter (#365) and Santa Fe Suites (#374) to support individuals and families at-risk of homelessness that were impacted by the pandemic. The final CDBG-CV expenditures are detailed in the PR-26 CDBG-CV financial summary report, which confirms the expenditures of the CDBG-CV program. Total expenditures remains at \$942,530, which is almost 100% of the total allocation, leaving a remaining balance of \$30. The City will work towards closing out the CDBG-CV program in the upcoming year.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

CR-58 - Section 3

Identify the number of individuals assisted and the types of assistance provided

Total Labor Hours	CDBG
Total Number of Activities	1
Total Labor Hours	0
Total Section 3 Worker Hours	0
Total Targeted Section 3 Worker Hours	0

Table 8 – Total Labor Hours

Qualitative Efforts - Number of Activities by Program	CDBG
Outreach efforts to generate job applicants who are Public Housing Targeted Workers	0
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.	0
Direct, on-the job training (including apprenticeships).	0
Indirect training such as arranging for, contracting for, or paying tuition for, off-site	0
training.	
Technical assistance to help Section 3 workers compete for jobs (e.g., resume	0
assistance, coaching).	
Outreach efforts to identify and secure bids from Section 3 business concerns.	0
Technical assistance to help Section 3 business concerns understand and bid on	0
contracts.	
Division of contracts into smaller jobs to facilitate participation by Section 3 business	0
concerns.	
Provided or connected residents with assistance in seeking employment including:	0
drafting resumes, preparing for interviews, finding job opportunities, connecting	
residents to job placement services.	
Held one or more job fairs.	0
Provided or connected residents with supportive services that can provide direct	0
services or referrals.	
Provided or connected residents with supportive services that provide one or more of	0
the following: work readiness health screenings, interview clothing, uniforms, test fees,	
transportation.	
Assisted residents with finding child care.	0
Assisted residents to apply for, or attend community college or a four year educational	0
institution.	
Assisted residents to apply for, or attend vocational/technical training.	0
Assisted residents to obtain financial literacy training and/or coaching.	0
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3	0
business concerns.	
Provided or connected residents with training on computer use or online technologies.	0

Promoting the use of a business registry designed to create opportunities for	0
disadvantaged and small businesses.	
Outreach, engagement, or referrals with the state one-stop system, as designed in	0
Section 121(e)(2) of the Workforce Innovation and Opportunity Act.	
Other.	0

Table 9 - Qualitative Efforts - Number of Activities by Program

Narrative

On November 30, 2020 HUD made effective the Final Rule, which set new benchmarks for Section 3 under 24 CFR 75. Section 3 helps to establish more economically sustainable communities by ensuring that employment and other economic opportunities generated by Federal assistance for development programs are directed towards very low- and low-income persons to the greatest extent possible, and in particular to those who are recipients of the Federal assistance. The Final Rule changes tracking the number of qualified new hires in Section 3 projects, to tracking the total labor hours worked.

As applicable to the City, the benchmark for Section 3 workers was set at 25 percent or more of the total number of labor hours worked by all workers on a Section 3 project. The benchmark for Targeted Section 3 workers was set at 5 percent or more of the total number of labor hours worked by all workers on a Section 3 project.

Section 3 Projects cover housing rehab/construction and public improvement construction activities assisted under HUD grant programs that provide housing and community development financial assistance that exceeds a threshold of \$200,000. A \$100,000 project threshold applies to grants under HUD's Lead Hazard Control and Healthy Homes programs. In PY 2024, the City had one activity that was subject to the Section 3 rule.

Activity #399, Youthworks Social Justice Kitchen '24-'25, was funded for \$200,031.60 and met the reporting threshold. CDBG funds were used for the conversion project of a nonprofit facility into a commercial training kitchen to support job training opportunities for at-risk youth and gain hands-on employability skills in the food and hospitality industry. This activity has not been completed yet, so there are no Section 3 or targeted Section 3 workers hirings reported yet. The City will also continue to work on meeting safe harbor through outreach to these workers. An update will be provided once the activity has been completed, which is expected to be in the Spring of the upcoming program year.