

City of Santa Fe, New Mexico

memo

Date: April 22, 2014

To: Finance Committee – March 17, 2014 (Approved)
City Council (Request to Publish) – March 26, 2014
Community Development Commission – April 23, 2014 (NEW Meeting Date)
City Council (Public Hearing) – April 30, 2014

Via: Kate Noble, Interim Director
Housing and Community Development Department *KN*

From: Alexandra Ladd, Special Projects Manager *all*
Housing and Community Development Department

Re: DRAFT 2014 2015 Annual Action Plan

ACTION REQUESTED

Review and recommend approval of the DRAFT 2014 – 2015 Annual Action Plan.

BACKGROUND

CDBG is the Community Development Block Grant Program funded by the U.S. Department of Housing and Urban Development (HUD). The CDBG Program provides, on an annual basis, an allocation of funds to local governments for a wide-range of eligible housing and community development activities. The stated purpose of the program is:

“The development of viable urban communities, by providing decent housing and a suitable living environment and expanding economic opportunities, principally for persons of low and moderate income.”

CDBG funds are allocated each year to cities with populations in excess of 50,000 and urban counties. The City of Santa Fe, along with over 1,100 other cities in the country, is an “entitlement city” which means it automatically receives the federal money based on a formula that takes into consideration the community needs, including the extent of poverty, population, housing overcrowding, age of housing and population growth in relationship to other metropolitan areas.

The total amount of funds available to the City of Santa Fe varies each year. In 2011-2012, the total allocation was reduced by 16% from the prior year (\$625,125 to \$524,976). For the 2012-2013 CDBG allocation, the City received \$507,262 which is a reduction of \$17,714 from the prior FY. In 2013-2014, the City received \$510,621 and anticipates the FY 2014- 2015 amount to be \$500,000, although the exact amount is yet to be confirmed by HUD.

ITEM AND ISSUE

In order for the City to receive its annual allocation, it must submit an Annual Action Plan to the Department of Housing and Urban Development (HUD). The purpose of the Action Plan is to stipulate how funds will be allocated to housing and community development activities in Santa Fe based on the needs, priorities, goals and strategies identified in the 2013 – 2017 Consolidated Plan. HUD requires that the Action Plan is submitted for a 45 day review and approval period prior to the start of the fiscal year.

Approval Process. The following process is planned for the approval of the Action Plan and the funding recommendations:

1. Community Development Commission (CDC) reviews applications and makes a recommendation of projects to be funded and the allocation amounts. This was completed at the February 20, 2014 CDC meeting.
2. The Action Plan is then prepared by the CDBG staff planner which incorporates these recommendations as well as all other information required by HUD.
3. The plan is made available to the public for a 30 day review period which will run from April 4th – May 5th, 2014. Advertisements are placed in the *Santa Fe New Mexican* soliciting comments and the plan is made available as paper copies at public locations (the public libraries, the GCCC, and the senior centers), as well as being posted on the City's website.
4. Recommendation by the Finance Committee on March 17, 2014.
5. Recommendation by the CDC for City Council approval of the 2014-2015 Action Plan (April 16, 2014).
6. Adoption of the plan and approval of CDBG/AHTF-funded contracts by the City Council and public hearing at the April 30, 2014 City Council meeting.
7. Submit approved copies to the HUD field office in Albuquerque on May 12, 2014 for the 45 day review period which will end on June 25, 2014. Once approved, HUD will issue the grant agreement.

Funding Recommendation. The following projects and the allocations were approved by CDC on February 20, 2014. A detailed description of each project is in the Action Plan. For FY 14-15, funds were also allocated from the Affordable Housing Trust Fund (AHTF), which is funded through revenue generated through developers' fees, fees-in-lieu, land sales from Tierra Contenta, and the repayment of affordable housing liens.

Note that HUD allows a maximum of 15 % of the CDBG allocation to be awarded to Public Service projects and 20% for administration.

Housing:**Downpayment Assistance (DPA)**

Habitat: \$60,000 (CDBG)

Homewise: \$40,000 (CDBG); \$55,000 (AHTF)

Housing Trust: \$60,000 (CDBG); \$85,000 (AHTF)

Home Improvement Program

Habitat (emergency repairs): \$20,000 (AHTF)

Homewise (loan program): \$40,000 (CDBG); \$50,000 (AHTF)

Passive Home Project (Habitat): \$20,000 (AHTF)

Rental Assistance Program (Life Link): \$150,000 (AHTF)

Public Facilities (CDBG):

Kitchen Angels (food delivery for chronically ill homebound residents): \$20,000

St. Elizabeth Shelter (roof for Siringo Senior Program): \$73,000

Santa Fe Recovery Center (accessibility improvements): \$7,000

Youthworks (energy efficiency and safety improvements): \$45,000

Public Services (CDBG):

Emergency Assistance (Esperanza): \$20,000

Homeless student support

Adelante – SFPS (Expansion to middle schools): \$17,500

Adelante – SFPS (Deferred Action Program): \$17,500

Administration (CDBG):

\$100,000 (20% Allowed)

Total Allocation:

\$500,000 (CDBG)

\$380,000 (AHTF)



City of Santa Fe, New Mexico

200 Lincoln Avenue, P.O. Box 909, Santa Fe, N.M. 87504-0909

2014/2015 Action Plan

DRAFT

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City of Santa Fe 2014-2015 Action Plan

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Executive Summary

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

1. Introduction

The purpose of the Action Plan is to stipulate how funds will be allocated to housing and community development activities in Santa Fe based on the needs, priorities, goals and strategies identified in the 2013 – 2017 Consolidated Plan.

2. Summarize the objectives and outcomes identified in the Plan

The City of Santa Fe's focus over the next year is to improve and sustain affordable housing, rental, homeownership, and economic opportunities for low- to moderate-income households in Santa Fe, as well as addressing 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.

This Plan identifies the following goals as they relate to HUD-mandated objectives and outcomes for its upcoming housing and community development activities:

GOAL: Reduced rate of cost burden and corresponding drop in poverty rate for homeless households and those at risk of becoming homeless.

Objective: Creating Suitable Living Environments

Outcome: Availability/Accessibility

GOAL: Expanded inventory of rental units and vouchers to meet increased needs of renters with very low incomes.

Objective: Providing Decent Housing

Outcome: Availability/Accessibility

GOAL: Increased homeownership opportunities and support for long term affordability and accessibility for current homeowners.

Objective: Providing Decent Housing

Outcome: Affordability

3. Evaluation of past performance

The following bullets outline progress in meeting goals identified in the 2008-2013 Consolidated

Plan, the majority of which were met, or exceeded. Given the recent economic downturn, cutbacks in funding, and other emerging challenges, this achievement is a testament to the strong partnerships the City supports with its nonprofit partners and subrecipients.

- The City's goal for **rental housing** as outlined in the *2013-2014 Action Plan* was to serve renters earning less than 60% of Santa Fe's Area Median Income (AMI). 60 units of rental housing were made available at the Stagecoach Apartments, with ¼ of those units reserved for people transitioning out of homelessness. Community-wide, over 900 rents were paid for very low income renters with disabilities, using Shelter Plus Care rental vouchers and project-based assistance.
- The City's goal for **homeownership housing** as outlined in the *2013-2014 Action Plan* was to provide comprehensive assistance to low- to moderate-income homebuyers. This was accomplished by funding 0% interest no payment due loans for down payment assistance and homebuyer support services. The goal was to serve 40 households per year with both the CDBG funds as well as funds through the City's Affordable Housing Trust Fund (AHTF). For FY 12-13, providers were successful in meeting 93% of their goals on average, despite the downturn in the market and cutbacks in funding.
- The City's goal for **home improvement** as outlined in the *2013-2014 Action Plan* was to support energy efficiency upgrades, general renovations and emergency repairs. By the end of the fiscal year, 75 loans were made to support low- and moderate-income homeowners. Many were able to greatly reduce their long-term energy costs, while others were helped to bring their homes into compliance with basic housing quality standards.
- The City's goal for **emergency shelters and permanent supported rental housing** as outlined in the *2013-2014 Action Plan* was to provide 33 permanent beds and/or longer term units per year. As a direct result of this funding, the City's partner organizations were able to exceed their goal by two times.

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

Paper copies of the draft *2014-2015 Action Plan* were placed at the following locations for public review from April 8, 2014 to May 7, 2014 to comply with the 30-day review period required by the City's Citizen Participation Plan as adopted by HUD. The locations were selected based on their diversity of participants. Drafts will be available at all City of Santa Fe Public Library branches; Fort Marcy Recreation Center; Genoveva Chavez Community Center; Zona del Sol Youth and Family Center; Mary Esther Gonzales Senior Center, City Hall.

Advertisements were placed in the *Santa Fe New Mexican* on Friday April 4 and April 11 announcing the public review and comment period. The ad included notice that translation services into Spanish

were available upon request. The ads listed the locations of copies available for review as well as contact information for submitting comments. A press release was issued through the City's Public Information Office with information for the public on the availability of the plan and how to submit a comment. Two public meetings and one public hearing will be held on the Plan:

- The City of Santa Fe Finance Committee public meeting (March 17, 2014)
- The City of Santa Fe Community Development Commission public meeting (April 16, 2014)
- The Santa Fe City Council public hearing (April 30, 2014)

These meetings are open to the public and agendas are available on the City's website. The meetings are conveniently timed and located to encourage participation. The meeting 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 languages other than English. The public hearing allows members of the public to make comments as part of the public forum.

5. Summary of public comments

Once the public comment period is complete, staff will address the comments and report them in the final plan.

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

Once the public comment period is complete, staff will address the comments and report them in the final plan.

7. Summary

Over the next year, the Office of Affordable Housing Division will invest in strategies that prevent the most vulnerable City residents from falling into cycles of poverty and chronic homelessness, target low income "at-risk" neighborhoods 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. By focusing on these strategies in the 2014 Action Plan, the City of Santa Fe hopes to ensure that all City residents have access to affordable, accessible and high quality housing opportunities.

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

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

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

Agency Role	Name	Department/Agency
Lead Agency	SANTA FE	Housing and Community Development Department/Office of Affordable Housing Division

Table 1 – Responsible Agencies

Narrative

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

Action Plan Public Contact Information:

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AP-10 Consultation – 91.100, 91.200(b), 91.215(l)

1. Introduction

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(l))

The City activities that support coordination between public and assisted housing providers and health care and social service agencies involve different funding opportunities. These include Federal and City funding. The city advertises funding opportunities for housing, as well as supportive service providers during its CDBG, Affordable Housing Trust Fund (AHTF) and General Fund allocation timelines. The CDBG and AHTF follow the same time line but the General Fund allocation will advertise later in the year (March) for RFPs but all three fiscal years are from July 1 to June 30.

Secondly the city has two sections in the Youth and Family Services Division of the Community Services Department that funds emergency housing and community development programs as well as social services. The Children + Youth commission provides funding and support for local nonprofit organizations and public school programs for kids. Approximately one million dollars is awarded annually in the following five categories: early care and child Development; Healthy Living; Outdoor Education and Environmental Awareness and Supplemental Educational Programs for students in Santa Fe Public Schools. The other section, Human Services, which through a committee makes funding recommendations to City Council from the General Fund for health and human services for local residents, which include, basic food and shelter, medical services and other safety net services. A list of the 2013-2014 recipients is posted on the City’s website under Human Services Section main page. These sections have different timelines but advertisement and communication with many of the same stakeholders occurs to ensure the word gets out about the application process and the overview of the programs. Communication between city departments as well as stakeholders is an ongoing process.

The Office of Affordable housing has been in coordination with the local housing authority as to the availability of units and recently involved directly in design charettes for the rehabilitation of two of the Santa Fe Civic Housing Authority’s existing public housing projects.

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

Santa Fe is not served by a local Continuum of Care but rather is covered by New Mexico's Balance of State Continuum of Care, as administered by the New Mexico Coalition to End Homelessness.

Describe consultation with the Continuum(s) of Care that serves the State 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.

Staff from the City's Housing and Community Development Division participates on the Balance of State Continuum of Care Steering Committee, attending monthly meetings by phone and the annual meeting in person.

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.

The City of Santa Fe will carry out the priorities in the Consolidated 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.

The biggest challenge for the City of Santa Fe over the next five years will be to continue to address the increasing demands of the populations in need with limited financial resources.

Agency/Group/Organization	Agency/Group/Organization Type	What section of the Plan was addressed by Consultation?	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?
Santa Fe Civic Housing Authority (SFCHA) , Santa Fe County Housing Authority	PHA	Public Housing Needs	The sections were highlighted and the PIC generated charts were emailed for verification or update. Since their organization deals with these issues on a daily basis, accurate and precise data is anticipated. There was a meeting with the SFCHA Executive Director to receive input. Santa Fe County HA received a completed copy of the document.
Life Link, St. Elizabeth, Esperanza Shelter, Youth Shelters, Youth Works, SFPS Adelante Program	Continuum of Care Services-Victims of Domestic Violence Services- Homeless	Homeless Needs- Chronically Homeless Homelessness Needs-Unaccompanied Youth Homelessness Needs-families with children	The sections were highlighted and the PIC generated charts were emailed for verification or update. Since their organization deals with these issues on a daily basis, accurate and precise data is anticipated.
New Mexico Coalition to End Homelessness (NMCEH)	Continuum of Care	Homeless Needs- Chronically homeless Homelessness Strategy Anti-poverty Strategy	The sections were highlighted and the PIC generated charts were emailed for verification or update. They also submitted the narrative language for some of the document.
Homewise Habitat for Humanity The SFC Housing Trust	Housing Business Leaders	Housing Needs Assessment Market Analysis Lead Based Paint Strategy	A copy of the document was emailed for their review of the specific sections that are relevant and we are waiting for their comments.

Table 2 – Agencies, groups, organizations who participated

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

There were none.

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

Name of Plan	Lead Organization	How do the goals of your Annual Action Plan overlap with the goals of each plan?
2013 Housing Needs Assessment for Santa Fe	City of Santa Fe	This document served to highlight the priority needs that were addressed in the 2013 – 2017 Consolidated Plan
PHA 5-Year and Annual Plan	Santa Fe Civic Housing Authority	Many of the goals are incorporated into this plan
2012-2017 CIP Plan	City of Santa Fe	There are no goals set in this plan but project priorities were used in this plan
Five Year Plan to End Homelessness (2012)	NMECH	The goals of this plan were incorporated into this plan
Analysis of Impediments to Fair Housing Choices (2011)	City of Santa Fe	The actions required to reduce impediments are listed in plan
City of SF Economic Development Strategy for Implementation	City of Santa Fe	The goals were summarized in the Economic Development section of this plan
Santa Fe Trends Report (2013)	City of Santa Fe	There are no goals listed in this report but information and statistics from this report were incorporated into this plan

Table 3 – Other local / regional / federal planning efforts

AP-12 Participation – 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

Paper copies of the draft *2014-2015 Action Plan* will be placed at the following locations for public review from April 7, 2014 to May 6, 2014 complying with the HUD-mandated 30-day review period. Advertisements will be placed in the *Santa Fe New Mexican* on Friday April 5 and April 12 announcing the public review and comment period. The ads will state where the copies are available for review as well as contact information for submitting comments. A press release will be issued through the City's Public Information Office with additional information for the public on the availability of the plan and how to submit a comment. Two public meetings and one public hearing will be held on the Plan:

- The City of Santa Fe Finance Committee public meeting (March 17, 2014)
- The City of Santa Fe Community Development Commission public meeting (April 16, 2014)
- The Santa Fe City Council public hearing (April 30, 2014)

These meetings are open to the public and agendas are available on the City's website. The meetings are conveniently timed and located to encourage participation. The meeting 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 languages other than English. The public hearing allows members of the public to make comments as part of the public forum.

All of these meeting dates are set to correspond with the normal date that the Action Plan is submitted to meet the required 30 day review prior to the year-end date (June 30, 2014). This year HUD issued a revision to this requirement based on the release date of the actual Allocation by the federal government. The Action Plan that is submitted for HUD review must have the actual allocation amount, not an estimate. The City cannot submit to HUD until 60 days after the actual allocation is issued or August 16, 2014 whichever comes first. Depending on the timing, some of the above dates may need to be revised.

Table 4 – Citizen Participation

Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
Media Outreach	Non-targeted/general public	<ul style="list-style-type: none"> - Press Release by City of Santa Fe Public Information Office - Paid announcements in the Santa Fe New Mexican on April 4th and 12th (Fridays) - CDBG planner appears on the City Live show to discuss 2014-2015 CDBG program on December 18, 2013 			
Public Review	Non-targeted/broad community	<p>April 7 – May 6, 2014. Copies of the plan will be available at public facilities and on City’s website</p> <p>March 7 – March 31: Plan will be sent for review by collaborating agencies</p>			

Expected Resources

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

Introduction

The greatest challenge facing the City of Santa Fe's housing and public service programs is the reduction in funding whether from the federal government or from local sources. This requires creative use of funds as well as a reduction in the funding of some programs even though there is an increase in needs and requirements that must be addressed.

There has been a slight reduction of the City's CDBG funding from 2008 to 2014. The City is anticipating an 8.2% reduction, based on the federal sequester cuts, of the FY 2013-2014 Allocation and anticipates that its allocation will remain at this level for the next five years.

The City continues to apply for and receive Continuum of Care (C of C) funding through HUD. The C of C funding has increased since 2007 with the addition of two new grants, for approximately \$1.2 million in Shelter Plus Care funds being used to support renters with disabilities who would otherwise be homeless. The City administers funding to support Life Link's La Luz program (24 units), the Housing Trust's Village Sage and Stagecoach Apartments, St. Elizabeth's Shelter Siringo Senior Project (4 units) and pays over 900 rents annually with rental vouchers.

The City has an affordable housing fund, Affordable Housing Trust Fund (AHTF), funded by revenue generated through development fees (paid for fractions of units owed under the City's inclusionary zoning program) in lieu payments, (when alternate means of compliance with the inclusionary zoning requirements are granted), and the pay offs of City-held liens. Once the fund's balance reaches a threshold amount, an allocation process that coinciding with the CDBG timeline is done. Fifty percent (50%) of the allocation must support homeownership activities.

In early 2014, the City initiated an allocation process, through which \$380,000 were made available. On February 20, 2014, the Community Development Commission approved several proposals to fund downpayment assistance (Homewise, Habitat for Humanity and the Housing Trust), home repair (Homewise and Habitat), energy efficiency improvements for a Passive House Project (Habitat), and a rental voucher program (Life Link). The funds will be made available in FY 2014-2015.

In November of 2011, the City Council approved using CIP funding for down payment assistance for residents or local employees who make 120% or less of the AMI. \$800,000 was allocated. It is not anticipated there will be any additional CIP funds for this program through 2015.

The Office of Affordable Housing anticipates consistent funding amounts from the City's General Fund for FY 14-15. The funds support administrative contracts with nonprofit service providers (Homewise and the Housing Trust) and are generally allocated to support homebuyer programs. This includes homebuyer training and counseling, financial counseling and assistance, and other activities to support achievement of "buyer-ready" status of income-qualified homebuyers.

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Priority Table

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available 2014-2017 \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public-federal	Housing; Public Facilities; Public Improvements; Public Service; Administration; Planning; Acquisition	500,000	25,000	0	626,321	1,512,400	The assumption is that the yearly CDBG allocation will remain flat for the next four years after 2013.
Shelter Plus Care	Public-federal	Permanent Supportive Rental Assistance	1,200,000	0	0	1,200,000	5,698,000	In 2012, two additional grants were funded.
Affordable Housing Trust Fund (AHTF)	Public-local	Downpayment Assistance; Rental vouchers; Home repair	380,000	0	0	380,000	200,000	An allocation will occur in FY 2014-2015 at the same time as the CDBG process;
General Fund	Public-local	Homebuyer Programs; Technical Assistance	500,000	0	0	500,000	20,000,000	Funding is anticipated to remain flat at \$440,000 for FY 14-15

Table 3 - 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 City's nonprofit partners estimate that every dollar of federally-funded downpayment assistance leverages \$10 of funding from other state, local, and private sources. Both the Housing Trust and Homewise are CDFIs and actively leverage funds from HOME, state-funded mortgage products allocated through the New Mexico Mortgage Finance Authority, Low Income Housing Tax Credits (the Housing Trust), solar tax credits and other DOE funds (Homewise) as well as having substantial organizational resources to use for real estate development and to support programmatic goals.

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

All of the property on which public housing facilities are situated are 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. 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.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives - 91.420, 91.220(c) (3) & (e)

Goals Summary Information

Goal Name	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator 2014
A. Homeownership is an opportunity for “buyer ready” households and long-term affordability is sustained for current homeowners	Affordable Housing	Citywide	1. Down payment assistance 2. Home repair 3. Refinancing	<u>DPA:</u> • CDBG: \$160,000 • AHTF: \$140,000 <u>Home Repair:</u> • CDBG: \$40,000 • AHTF: \$90,000	Provide at least 25 Down Payment Assistance loans to reduce the amount of principal to help Low- to Moderate- Income homebuyers afford a home; provide home improvement loans/grants to serve at least 15 households with home improvements, including emergency repair and energy efficiency upgrades; finance installation of solar panels for Passive House duplex.
B. Reduced rate of households with cost burden and corresponding drop in poverty rates	Homeless	Citywide	1. Support Services for Homeless or at risk of Homelessness 2. Non-Housing Community facilities and Services	CDBG: \$200,000	Provide assistance to domestic violence victims to help stabilize housing situations for 35 households; provide meals to 57 chronically ill, homebound residents; roof replacement at homeless senior housing complex; provide support services to 170 SFPS students and their families; make accessible Wellness Center at SF Recovery Center; make essential repairs and energy upgrades to youth workforce training center.
C. Inventory of very low income rental units is expanded and vouchers are used to meet increased demand	Homeless, Affordable Housing	Citywide	4. LIHTC and other subsidized rental projects	AHTF: \$150,000	Assist 30 households who are homeless or at immediate risk of becoming homeless with rental vouchers and emergency assistance.

Table 4 – Goals Summary

Goal Descriptions

Goal A: Homeownership is an opportunity for “buyer ready” households and long-term affordability is sustained for current homeowners. This goal is achieved through Continuing down payment assistance, homebuyer counseling and training services, production of affordably-priced homes, supporting partnerships with nonprofits, for-profit builders and other housing providers, considering acquisition/rehab programs to absorb existing market supply, funding energy efficiency upgrades, continuing foreclosure prevention, legal assistance and refinancing services for existing homeowners, and offering accessibility improvements to help “age in place”.

Goal B. Reduced rate of households with cost burden and corresponding drop in poverty rates. This goal is achieved through preventing homelessness through rental vouchers, emergency assistance, support services, expanding rental choices for households earning less than 30% AMI, providing rehabilitation services, refinancing and support for existing low-income homeowners, preventing wage theft, and improving outreach efforts about housing rights especially to mono-lingual Spanish speakers.

Goal C. Inventory of rental units affordable to renters with very low incomes is expanded and vouchers are used to meet increased demand. This goal is achieved through supporting LIHTC projects and the provision or retention of other permanent, subsidized rental units, rehabilitating existing rentals to expand choice and housing quality, identifying additional funding sources and/or creating revenue streams to fund local rental vouchers.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b):

This City estimates that the funding documented in Table 6: Goals Summary will serve the following:

Extremely low-income: 290 households

Low-income: 20 households

Moderate-income: 20 households

AP-35 Projects – 91.220(d)

Introduction

Projects funded for FY 14-15 reflect a variety of programs, facilities and services in addition to the programs that are more commonly funded by the City – downpayment assistance and home improvement. The availability of Affordable Housing Trust Fund (AHTF) made it possible to dedicate CDBG resources for projects that serve Santa Fe’s residents with very low incomes, many of whom are experiencing homelessness or at risk of being homeless.

#	Project Name	CDBG	AHTF
1	Esperanza Emergency Assistance Program	✓	
2	Habitat for Humanity Emergency Home Repair		✓
3	Habitat for Humanity Down Payment Assistance	✓	
4	Habitat for Humanity Solar Installation		✓
5	Homewise Down Payment Assistance	✓	✓
6	Homewise Home Improvement	✓	✓
7	Housing Trust Down Payment Assistance	✓	✓
8	Kitchen Angels	✓	
9	Life Link Rental Assistance		✓
10	Santa Fe Recovery Center Accessibility Improvement	✓	
11	SFPS Adelante Deferred Action Project	✓	
12	SFPS Adelante Graduation Project	✓	
13	St Elizabeth Siringo Facility Improvement	✓	
14	Youth Works! Facility Improvement	✓	

Table 5 – Project Information

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

Allocation priorities were made by the City’s Community Development Commission on February 20, 2014. The Commission opted to prioritize facilities and services for those residents with very low incomes for CDBG funding and dedicated the AHTF to the needs of homebuyers and homeowners. The rationale was that many of services have been most heavily impacted by recent economic conditions and the cutbacks in subsidy and philanthropic funding sources.

Projects

AP-38 Projects Summary

Project Summary Information

A narrative description of each project follows.

- **Esperanza Emergency Assistance Program.** Provide assistance for domestic violence clients to help stabilize housing by providing up to 3 months (or \$1,000) for house payments/rent, security deposits, utilities, utility hook up fees, and other emergency needs.
- **Habitat for Humanity Emergency Home Repair.** Finance emergency repairs including energy upgrades, replacing furnaces and water heaters, fixing leaky roofs, installing accessibility features for owner-occupied homes with very low-income residents (less than 50% AMI), likely to be elderly and/or disabled. of AMI.
- **Habitat for Humanity Down Payment Assistance.** Provide DPA to three partner families earning no more than 60% of area median income (AMI), with most in the 30-50% range.
- **Habitat for Humanity Solar Installation.** Install photovoltaic panels for one of 2 Passive House duplexes, currently under construction, with the goal of eliminating energy costs for the future homeowners, who will earn less than 60% AMI.
- **Homewise Down Payment Assistance.** Provide DPA to qualified homebuyers who have completed homebuyer training and counseling; the AHTF funds will serve those earning 81-120% AMI and the CDBG funds for those at 80% or below.
- **Homewise Home Improvement.** Provide financing to current homeowners to make necessary repairs, upgrade appliances, windows, and other fixtures and improve energy and water conservation. AHTF funds will serve those earning 81-120% AMI and the CDBG funds for those at 80% or below.
- **Housing Trust Down Payment Assistance.** Provide DPA to qualified homebuyers who have completed homebuyer training and counseling; the AHTF funds will serve those earning 81-120% AMI and the CDBG funds for those at 80% or below.
- **Kitchen Angels.** Support home-delivery service of meals to people who are homebound because of chronic illness or disability to serve a total of 57 clients.
- **Life Link Rental Assistance.** Implement a rental voucher program that will provide support services in conjunction with financial assistance for emergency housing costs such as: rental and utility arrears, rental and utility deposits, rental and utility short term assistance (1 – 6 months). The project proposes to keep 26 – 34 households with incomes at 40% AMI or less out of homelessness.
- **Santa Fe Recovery Center Accessibility Improvement.** Increase accessibility to the Santa Fe Recovery Center by upgrading the handicap ramp to bring new addition into code compliance so that the Certificate of Occupancy can be attained.
- **SFPS Adelante Graduation Project.** Expand support for students whose families are currently experiencing homelessness to SFPS middle schools; includes providing food, clothing, school

supplies, transportation and linking students and their families to critical services.

- **SFPS Adelante Deferred Action Project.** Support the work of an immigration attorney to provide free services for students eligible for Deferred Action for Childhood Arrivals (DACA), including: helping students apply and request fee waivers to access legal status, affordable housing, health and social services and other opportunities.
- **St Elizabeth Siringo Facility Improvement.** Replace a 35+ year old roof (6,000 sq ft) at the permanent supported senior rental project that would have the added benefit of increasing energy efficiency.
- **Youth Works! Facility Improvement.** Support energy efficiency and health upgrades to the organization's Workforce Development and Alternative Education Center, as called for by an independent DOE-certified energy audit.

DRAFT

Project Name	Target Area	Goals Supported*	High Priority Needs Addressed*	Funding
Esperanza Emergency Assistance Program	Citywide	C	Support Services for Homeless or People at Risk of Homelessness	CDBG: \$20,000
Habitat Emergency Home Repair	Citywide	A	Homeowner Rehabilitation Programs, Energy-efficiency Upgrades, Accessibility Retrofits	AHTF: \$20,000
Habitat for Humanity DPA	Citywide	A	Downpayment Assistance 1	CDBG: \$60,000
Habitat Passive House Solar Installation	Citywide	A	Homeowner Rehabilitation Programs, Energy-efficiency Upgrades, Accessibility Retrofits	AHTF: \$20,000
Homewise DPA	Citywide	A	Downpayment Assistance	CDBG: \$40,000 AHTF: \$55,000
Homewise Home Improvement	Citywide	A	Homeowner Rehabilitation Programs, Energy-efficiency Upgrades, Accessibility Retrofits	CDBG: \$40,000 AHTF: \$50,000
Housing Trust DPA	Citywide	A	Downpayment Assistance	CDBG: \$60,000 AHTF: \$85,000
Kitchen Angels	City wide	B	Non-Housing Community Facilities and Services	CDBG: \$20,000
Life Link Rental Assistance	City wide	C	Rental Vouchers; Support Services for Homeless or People at Risk of Homelessness	CDBG: \$150,000
Santa Fe Recovery Center Accessibility Improvement	Citywide	B	Non-Housing Community Facilities and Services	CDBG: \$7,000
SFPS Adelante Deferred Action Project	Citywide	B	Non-Housing Community Facilities and Services	CDBG: \$17,500
SFPS Adelante Graduation Project	Citywide	B	Non-Housing Community Facilities and Services	CDBG: \$17,500
St Elizabeth Siringo Facility Improvement	Citywide	C	LIHTC and other subsidized rental projects	CDBG: \$73,000
Youth Works! Facility Improvement	Citywide	B	Non-Housing Community Facilities and Services	CDBG: \$45,000

Table 8 – Project Summary

CDBG = Community Development Block Grant

AHTF = Affordable Housing Trust Fund

*Priority needs and Goals are identified in the City of Santa Fe Consolidated Plan 2013 – 2017 and were used as a basis for funding allocations.

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

Allocations are based on need whether a program serves low to moderate-income (LMI) residents. Most of the City's programs serve LMI residents City Wide (limited clientele or housing) versus a specific LMI area (Area Benefit). If an application is submitted for a program that serves a specific LMI area as normally defined by census tract, it is given the same consideration as the applications for programs that serve LMI residents City Wide.

Geographic Distribution

Most of the City's programs serve LMI residents citywide.

Rationale for the priorities for allocating investments geographically

The City of Santa Fe does not have priorities for allocating geographically. The types of programs funded focus on the household (income) versus the location of the project. For example the City allocates funds programs for down payment assistance for home purchase which is dependent on the household versus the location of the home. The City funds public service programs that serve at risk youth throughout the City versus in a concentrated area.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

One Year Goals for the Number of Households to be Supported	
Homeless	150
Non-Homeless	60
Special-Needs	40
Total	290

Table 6 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	30
The Production of New Units	50
Rehab of Existing Units	15
Acquisition of Existing Units	0
Total	95

Table 7 - One Year Goals for Affordable Housing by Support Type

Discussion

Projects funded for FY 14-15 reflect a variety of programs, facilities and services in addition to the programs that are more commonly funded by the City – downpayment assistance and home improvement. The availability of Affordable Housing Trust Fund (AHTF) made it possible to dedicate CDBG resources for projects that serve Santa Fe’s residents with very low incomes, many of whom are experiencing homelessness or at risk of being homeless.

In addition to the numbers provided in Table 11, over 900 rents will be paid using Shelter Plus Care vouchers and project-based assistance for very-low income renters with disabilities who are transitioning out of homelessness or at risk of becoming homeless.

AP-60 Public Housing – 91.220(h)

Introduction

The Santa Fe Civic Housing Authority (SFCHA) is the public housing agency in Santa Fe. They oversee 490 units of public housing, and manage 670 Section 8 vouchers in Santa Fe. There are a total of 369 units for seniors, leaving 121 for families. All of the units are in livable condition but maintenance is a continuous effort. Currently, 399 people are on the public housing waiting list, and 171 people on the Section 8 waiting list for Santa Fe. SFCHA receives approximately 35 applications per month for public housing.

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

The City is also committed to supporting the SFCHA's RAD conversion project to renovate 121 public housing units and build 30 new units. The second round of funding will support the rehabilitation of 237 public housing units for very low-income seniors. Future allocations of the Affordable Housing Trust Fund may be provided as gap financing in the event that the SFCHA develops another LIHTC project.

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

The SFCHA currently runs a Family Self Sufficiency Program which supports residents and voucher holders to place funds in escrow to achieve homeownership 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.

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 that work to prevent “at-risk” populations such as youths, battered families and seniors from becoming homeless and to help existing homeless populations to obtain safe, affordable and sustainable housing opportunities as well as the needed services such as counseling and c.

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.

Services not available but needed: Long Range Transportation for access to VA services in Albuquerque and SOAR model benefits application assistance.

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. In 2010, several non-profits, working in conjunction with the City of Santa Fe established the SF Resource Opportunity Center (ROC). The Center offers emergency beds in winter, meals and clothing but more importantly, brings together outreach coordinators to provide information about available services. Medical care, job counseling, meals, clothing, transportation are a few of the services provided at the ROC, which is partially funded through local funds allocated through the City’s Human Services Division.

- **Addressing the emergency shelter and transitional housing needs of homeless persons**

The following programs provide comprehensive support and services for homeless individuals and families in Santa Fe:

St. Elizabeth. St. Elizabeth provides 28 year-round emergency shelter beds for men at its main facility, in addition to a library, TV room, laundry, showers and some case management. The organization also offers longer term and transitional shelter options. *Casa*

Familia offers five family rooms, with 16 additional dormitory beds reserved for women, in addition to supportive services and can house up to 30 people per night. *Casa Cerrillos* contains 28 efficiency apartments for longer term residency for people with physical, mental, and co-occurring substance abuse issues. *Sonrisa Family Shelter* offers eight apartments where families can stay for up to two years while they stabilize their finances and find permanent housing.

Interfaith Shelter. Several faith based organizations support a seasonal shelter from November to May. The shelter offers meals, showers and laundry, in addition to beds and also some case management services. Embedded within the shelter is the Resource Opportunity Center which is open two days per week, serves 120-140 people per day, and offers more intensive case management and legal services.

Life Link. Established in 1987 in a motel, Life Link has evolved into a highly effective mental health center. At *La Luz*, 24 transitional apartment units are provided to people with mental illness and other co-occurring disorders. The facility also offers extensive outpatient treatment, psycho-social rehabilitation, homeless prevention and rental assistance, peer support services and onsite healthcare screening. Additionally, an offsite facility called *Casa Milagro* offers permanent housing for 12 individuals.

Esperanza. Esperanza is a full-service organization offering counseling, case management and advocacy for survivors of domestic violence. The organization operates a shelter that can house up to 42 people, as well as 21 beds of transitional housing to allow clients establish independence while still receiving supportive services. The organization also offers comprehensive non-residential counseling services.

Youth Shelters. On any given night, the organization estimates that 100 youth may be homeless on the streets of Santa Fe. Services are provided to homeless, runaway and in-crisis youth and their families including street outreach, emergency shelter, transitional living and counseling. Special initiatives are the Pregnant and Parenting Project, including referrals, case management, parenting skills and donated items and the Workforce Development Initiative, which helps youth with job readiness skills. Youth can stay at the emergency shelter for up to 30 days and in the transitional, apartment style living program for 18 months.

- **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

In addition to ensuring the availability of a range of housing program options for these homeless populations, the City also ensures a range of social service program options for homeless individuals, families, veterans and unaccompanied youth that work to increase access for these populations to the health, education, employment, and housing sectors. These services include behavioral health counseling for adults and youth, dental healthcare for individuals and families, independent living skill training for homeless youth, and early childhood development and education for homeless families.

- **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.**

Given the effects of the economic recession, concerted efforts have been made to expand the safety net of services in Santa Fe. In 2010, the city allocated CDBG and Housing Trust funds to *Faith at Work* which provided 3 months of emergency rent/mortgage assistance to 62 families, preventing immediate eviction and default. Of these families, 53 percent were extremely low-income, earning less than 30 percent AMI. Forty-one families in 2011 were provided emergency rent/mortgage assistance through *Esperanza Shelter's* Emergency Assistance Program (EAP), all of whom were female-headed household with presumed household incomes in the 30 –50 percent AMI range.

In 2010, the city allocated CDBG funds to provide additional safety net services. *Kitchen Angels* delivered meals to homebound and terminally ill residents, serving 278 residents for the year. Over 500 children and their parents were assisted through the *Access Project* with qualifying for public services and benefits. As the 2013 application cycle for CDBG funds gets underway, city staff expects another round of applications to fund ongoing safety net services.

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

Introduction

Based on the results of the Housing Needs Assessment and the Housing Market Analysis, it seems clear that Santa Fe households experience being cost burdened significantly more often than any other housing problem type. Rising rents, lack of rental options for very low income renters and lowered vacancy rates is likely to worsen the cost burden situation over the next five years.

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

The City of Santa Fe recently reviewed its policies and practices to mitigate barriers to housing development—particularly affordable housing development—as part of the 2011 Analysis of Impediments to Fair Housing Choice. This review of city housing policies and land use and zoning regulations found few concerns. However, stakeholders raised concerns about inconsistent and unpredictable development approval decisions and NIMBYism affecting approvals. According to stakeholder interviews and private sector focus groups there is a stigma associated with affordable housing developments and neighborhood associations make strong efforts to impede affordable development.

The City is currently working on outreach materials regarding housing laws including the Federal Fair Housing Act, the New Mexico Uniform Owner Resident Relations Act (UORRA) and the NM Mobile Home Act. Disproportionately, those who are most heavily cost-burdened, have the lowest incomes and often non-English speakers are affected by not being aware of the rights and protections to which they are entitled under these laws. The outreach materials will be distributed during the fiscal year, particularly in predominantly minority and Spanish language neighborhoods.

AP-85 Other Actions – 91.220(k)

Introduction

Santa Fe is a desirable place to live with the beautiful weather, culture, arts, history and many outdoor recreation opportunities. This desirability has put upward pressure on real estate values by attracting real estate investors, second homeowners and wealthy retirees. High land costs have been prohibitive for developing more affordably-priced homes, driving the market rate homes out of reach for many of the community's workforce. In response, the Santa Fe City Council has supported an innovative combination of regulation, policy and financial support for the development, preservation and improvement of affordable housing.

Actions planned to address obstacles to meeting underserved needs

There is a continued need for more affordable housing in Santa Fe, given the high numbers of cost-burdened households. Likely program interventions include: providing rental assistance, supporting the development of rental units, continuing down payment, counseling and training for low-income homebuyers, and providing support services for low-income homeowners, including refinancing, foreclosure prevention and home repair.

Specifically, the City continues to work with the NM Mortgage Finance Authority to 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. Another action that will be undertaken in the upcoming fiscal year is to fund a local housing voucher program to provide assistance to the homeless and near homeless through the Affordable Housing Trust Fund. This assistance will be used in the form of one-time payments to cure rental, mortgage and/or utility arrears to supporting several consecutive months of rental payments.

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 allocate local funds from the General Fund to support the administrative functions of its nonprofit partners who provide housing services in the community, as well as prioritizing the use of CDBG and the Affordable Housing Trust Fund allocations to support downpayment assistance, home repair and rental assistance.

Actions planned to reduce lead-based paint hazards

The City of Santa Fe's housing partners; Habitat for Humanity, SFC Housing Trust and Homewise

must notify homeowners of any potential lead-based paint issues when federal funding is involved. If a homebuyer purchases an already 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.

Actions planned to reduce the number of poverty-level families

The following is a list of actions supported by the City of Santa Fe to help reduce the number of poverty-level families:

- Continue to enforce the City of Santa Fe Minimum Wage Law, which is the second highest in the country.
- Continue to create high wage jobs and to create/support job training centers and programs.
- Increase the supply of rental housing that is priced to be affordable to households earning 30% or less AMI;
- Provide housing in conjunction with supportive services for special populations including seniors, disabled, at risk youth, homeless and female-headed households.
- Continue to support foreclosure prevention programs.

Actions planned to develop institutional structure

Currently, the City amended its inclusionary zoning program to reduce the required percentage of affordable units in order to facilitate development and support the city’s economic recovery.

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 other special needs populations. Within the City’s internal structure, funding is provided to support service providers through its Human Services grant and Children and Youth Grant, in addition to housing resources.

Discussion

In addition to the programs described in the preceding sections, the City directly supports the creation, preservation and quality of affordable housing through several regulatory and programmatic actions. They include:

Santa Fe Homes Program. The City's inclusionary zoning program that requires all residential developments to provide a percentage of the total units as affordable, 20% for homeownership units and 15% for rental units. 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.

Waivers of Impact Fees for Residential Development for two years (2012-2014). Currently impact fees are levied at 50% of their usual rates, after two years of being suspended altogether.

City's Affordability Liens. 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).

Downpayment Assistance. Downpayment assistance is provided through a no-payment, no-interest due "soft" second mortgage that is used to buy down the principal of the homebuyers mortgage, thereby lowering their monthly payment and increasing their buying power. Homewise, Housing Trust and Habitat for Humanity income-qualify and make "buyer ready" the eligible homebuyers. The City uses CDBG and AHTF funds and recently allocated Capital Improvement Program (CIP) funds to provide downpayment assistance.

Program Specific Requirements

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

Introduction

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table.

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

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
Total Program Income	\$0

Other CDBG Requirements

1. The amount of urgent need activities	\$0
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