

**UNITED STATES DEPARTMENT
OF
HOUSING AND URBAN DEVELOPMENT**



**CONSOLIDATED ANNUAL PERFORMANCE
AND
EVALUATION REPORT
(CAPER)**

**FOR THE
FIFTH PROGRAM YEAR**

(Covering the period of July 1, 2017, through June 30, 2018)



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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's focus throughout FY 2017 was to improve and sustain affordable housing, rental, homeownership, and economic opportunities for low- to moderate-income households in Santa Fe, as well as address the needs of those experiencing homelessness or at risk of becoming homeless. The City accomplished this by administering program funds to service providers, supporting collaboration and strategically applying resources to community needs. The 2017 Action Plan identified the following goals as they related to HUD-mandated objectives and outcomes for its upcoming housing and community development activities. The following summarized action steps taken by the City to address each goal is also described:

- Reduced rate of cost burden and corresponding drop in poverty rate for homeless households and those at risk of becoming homeless: SFPS Adelante served three hundred and fifty-seven (357) homeless individuals providing referral to housing resources as well as assistance with counseling, education, food and clothing; Interfaith provided services to two hundred and thirty-five (235) homeless households through the Summer Safe Haven, a shelter for homeless women and their children; Youth Shelters and Family Services provided outreach services and resource referrals to five hundred and twenty-five (525) homeless or at risk for homelessness youth;
- Expanded inventory of rental units and vouchers to meet increased needs of renters with very low incomes: Addressing current and emerging needs, St. Elizabeth rehabilitated twenty-eight (28) rental units for tenants in Low-Moderate Income category.
- Increased homeownership opportunities and support for long-term affordability and accessibility for current homeowners: Habitat for Humanit rehabilitated twelve (12) homes; Homewise rehabilitated five (5) homes and provided mortgage reduction assistance for thirteen (13) households. The Housing Trust provided eight (8) households with mortgage reduction assistance.

To best understand the needs and to work toward meeting these housing goals, the City utilized the *Santa Fe Affordable Housing Plan*, finalized in December 2016, a five-year plan required by the New CAPER 2017- 2018

Mexico Mortgage Finance Authority, which assesses housing need in Santa Fe and provides recommendations for addressing the needs. The housing needs analysis portion examines housing needs across all income levels to identify mismatches in supply and demand for all households in Santa Fe. One of the essential items in this document is the gaps analysis, which compares the demand for and supply of housing by income level. The gaps analysis shows the following:

- The greatest need is for rental units priced between \$375 and \$500 per month, serving renters earning between \$15,000 and \$20,000 per year;
- 2,435 households earn less than \$25,000 and are considered cost burdened and unable to find affordable rental units;
- Over 400 homes reported as in substandard condition (incomplete kitchen/plumbing facilities) and are in probable need of rehabilitation.
- Increased homeownership opportunities and support for long-term affordability and accessibility for current homeowners: Habitat for Humanit rehabilitated twelve (12) homes; Homewise rehabilitated five (5) homes and provided mortgage reduction assistance for thirteen (13) households. The Housing Trust provided eight (8) households with mortgage reduction assistance.

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.

Table 1 - Accomplishments - Program Year

Goal	Category	Funding		Outcome				
		Source	Amount	Indicator	Expected	Actual	Unit of Measure	Percent complete
Address Current and Emerging Needs	Affordable Housing Non-Homeless Special Needs	CDBG	\$43,750.00	Rental units rehabilitated	28	28	Household Housing Unit	100.00 %
				Homeowner Housing Rehabilitated	16	17	Household Housing Unit	106.25 %
Increase Affordable Housing Opportunities	Affordable Housing	CDBG	\$325,000.00	Rental units rehabilitated	28	28	Household Housing Unit	100.00 %
				Homeowner Housing Rehabilitated	16	17	Household Housing Unit	106.25 %
				Direct Financial Assistance to Homebuyers	20	21	Households Assisted	105.00 %
Increase Opportunities for At Risk Populations	Public Housing Homeless	CDBG	\$75,000.00	Public service activities for Low/Moderate Income Housing Benefit	1325	1117	Households Assisted	84.30 %
		Shelter Plus Care	\$250,000.00					

Table 2 - Accomplishments - Strategic Plan to Date

Goal	Category	Funding	Outcome				
Address Current and Emerging Needs	Affordable Housing Non-Homeless Special Needs		Indicator	Expected	Actual	Unit of Measure	Percent complete
			Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	0	0	Persons Assisted	0%
			Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	28	22	Households Assisted	78.57%
			Public service activities other than Low/Moderate Income Housing Benefit	1325	1117	Persons Assisted	84.30%
			Rental units rehabilitated	28	28	Household Housing Unit	100.00%
			Homeowner Housing Rehabilitated	16	17	Household Housing Unit	106.25%
			Tenant-based rental assistance / Rapid Rehousing	0	0	Households Assisted	0%
			Homelessness Prevention	1325	1117	Persons Assisted	84.30%
Increase Affordable Housing Opportunities	Affordable Housing		Indicator	Expected	Actual	Unit of Measure	Percent complete
			Public service activities for Low/Moderate Income Housing Benefit	1325	1117	Households Assisted	84.30%
			Rental units rehabilitated	28	28	Household Housing Unit	100.00%
			Homeowner Housing Rehabilitated	16	17	Household Housing Unit	106.25%
			Direct Financial Assistance to Homebuyers	20	21	Households Assisted	105.00%
			Housing for Homeless added	0	0	Household Housing Unit	0%
			Housing for People with HIV/AIDS added	0	0	Household Housing Unit	0%
Increase Opportunities for At Risk Populations	Public Housing Homeless		Indicator	Expected	Actual	Unit of Measure	Percent complete
			Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	40	22	Persons Assisted	55.00%
			Public service activities other than Low/Moderate Income Housing Benefit	1325	1117	Persons Assisted	84.30%
			Public service activities for Low/Moderate Income Housing Benefit	0	0	Households Assisted	0%
			Facade treatment/business building rehabilitation	0	0	Business	0%
			Rental units rehabilitated	28	28	Household Housing Unit	100.00%
			Homeowner Housing Rehabilitated	16	17	Household Housing Unit	106.25%
			Tenant-based rental assistance / Rapid Rehousing	0	0	Households Assisted	0%
			Homeless Person Overnight Shelter	300	235	Persons Assisted	78.33%
			Overnight/Emergency Shelter/Transitional Housing Beds added	0	0	Beds	0%
			Housing for Homeless added	0	0	Household Housing Unit	0%
			Housing for People with HIV/AIDS added	0	0	Household Housing Unit	0%
			Other	0	0	Other	0%

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.

The highest priority in Santa Fe's plan is to serve the entire continuum of housing and related public services needs from the homeless to the homeowner. Expenditure of funds reflects that priority. Facility improvements on twenty-eight (28) rental units was proposed to serve 40 Low-to moderate income renters transitioning out of homelessness; however, twenty-two (22) individuals were served rather due to single person households rather than families, in addition to organizational planning adjustments that were required during rehab construction. Homeless women and their children were provided shelter during the summer months through services provided by the Interfaith Shelter. Three hundred (300) women were projected to be served by the facility, two hundred and thirty-five women (235) women were actually served. Five hundred and twenty-five (525) homeless or at risk for homelessness youth were provided support services by the Youth Shelters and Family Services Outreach Program. The difference in the projected six hundred and twenty five youth that were expected to be served was due to the additional assistance provided through other organizations within the community offering rapid rehousing programs. Support services for elementary school students whose families are experiencing homelessness which proposed to serve four hundred (400) actually served three hundred and fifty-seven (357). Mortgage reduction assistance (Homewise and the Housing Trust), activities that were expected to provide twenty (20) households with home purchase assistance, actually provided assistance to twenty-one (21) households. Twelve (12) very-low income homeowners at risk of homelessness received rehabilitation services from Habitat, the majority of the homeowners served were elderly and/or female head of household.

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	799
Black or African American	34
Asian	4
American Indian or American Native	118
Native Hawaiian or Other Pacific Islander	2
Total	957
Hispanic	618
Not Hispanic	339

Table 1 – Table of assistance to racial and ethnic populations by source of funds

Narrative

The racial and ethnic composition reported for CDBG program sub-recipients represent cumulative annual data collected that represents a total of one thousand, one hundred seventy-seven (1,177) recipients of CDBG program services. Of this number, nine hundred fifty-seven (957) self-identified their racial and ethnic statuses as shown in the table above, and two hundred twenty-one (220) homeless individuals receiving services through the Youth Shelters and Family Services Outreach program for homeless and at risk for homeless youth opted not to self-report. As a requirement of the Professional Services Agreements with the City, each CDBG sub-recipient reports the racial, ethnic, and demographic data to the City on a quarterly basis.

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	CDBG	1,044,652	893,764
HOME	HOME		
HOPWA	HOPWA		
ESG	ESG		
Shelter Plus Care	Shelter Plus Care	112,033	98,278
Other	Other	0	

Table 2 - Resources Made Available

Narrative

Resources made available for CDBG projects for FY 2017 totaled \$1,044,651.96. The City was awarded entitlement funds of \$530,468.00 for FY 2017. Program Income generated by Homewise mortgage reduction assistance programs and Home Improvement totaled: \$369,183.96, of which \$289,245.56 was expended. Program Income generated by the Housing Trust mortgage reduction assistance programs totaled: \$145,000, of which \$96,000 was expended. Total expenditures of CDBG funds and program income for housing, public services and public facilities provided were \$893,763.74.

Identify the geographic distribution and location of investments

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

Table 3 – Identify the geographic distribution and location of investments

Narrative

In any given program year, the City of Santa Fe does not prioritize allocating funds and supporting programs geographically, due to the City's lack of population density relative to its size. For the past three program years, no single Census Tract was earmarked for serving its LMI population. Instead, the City focuses programs on the household income or an identified characteristic of the participants and/or recipients of assistance. For example, mortgage reduction assistance is provided based upon the homebuyer's income rather than the location of the home. Likewise, public service programs for at risk youth serve the citywide population, rather than those youth living in a specific census tract. This description has been reported in previous years and that priority remains. However, on occasion, a project proposal will be accepted because allocating funds at that site will also serve 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's model of service delivery is to pass through most federal funds to subgrantees, who provide the services. This ensures that services are furnished in the most efficient and relevant manner possible. Additionally, the City strives to leverage local funds to ensure that effective and important local services continue to be provided in our community, regardless of the status of federal funds. The City's nonprofit partners estimate that every dollar of federally-funded mortgage reduction assistance leverages \$14 of funding from other state, local, and private sources. Both the Housing Trust and Homewise are CDFIs and actively leverage funds from HOME, Fannie Mae secondary market loans, state-funded mortgage products allocated through the New Mexico Mortgage Finance Authority, Low Income Housing Tax Credits (The Housing Trust), solar tax credits, Federal Home Loan Bank of Dallas' Community Investment Programs, bank and foundation investments, and other DOE funds as well as having substantial organizational resources to use for real estate development and to support programmatic goals.

The units owned and operated by the Santa Fe Civic Housing Authority are located on city-owned land which is controlled by 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.

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	64	66
Number of Special-Needs households to be provided affordable housing units	0	0
Total	64	66

Table 4 – 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	0
Number of households supported through Rehab of Existing Units	44	45
Number of households supported through Acquisition of Existing Units	0	0
Total	44	45

Table 5 – Number of Households Supported

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

Goals: The one year goal of providing affordable housing units to otherwise homeless individuals was not represented in FY 2017. However, other types of services such as shelter services were provided to a larger extent providing temporary and/or transitional shelter for an increased number of individuals in need of housing due to homelessness. Adelante provided three hundred fifty-seven (357) homeless individuals with resource linking and services. Youth Shelters and Family Services provided five hundred twenty-five (525) homeless or at-risk of homelessness youth with resource linking and services, and the Interfaith Shelter provided two hundred thirty-five (235) women and their children with shelter services throughout the summer months of 2017. The data reported in the next goal of non-homeless households to be provided affordable housing units represents all services that provided mortgage reduction assistance and home repair for low/mod income-households as well as affordable rental unit rehabilitations. The goal for FY 2017 was to provide sixty-four (64) units for affordable

housing to non-homeless individuals. The goal was exceeded with sixty-six (66) affordable housing units provided/rehabilitated.

Special needs projects, Rental Assistance, the Production of New Units and Acquisition of Existing Units were not funded by CDBG for FY 2017. Focus was directed toward the rehabilitation of existing units and assisting with homeownership. The rehabilitation of the units in existing inventory were comprised of twenty-eight (28) affordable rental units and seventeen (17) single family home rehabilitations serving LMI qualified individuals.

Outcomes: The total non-homeless households receiving CDBG assistance to buy or rehabilitate affordable, high quality housing situations exceeded the projected goals. The higher than expected achievement reflects a high demand for this service from low-income senior households, and mostly LMI female-headed households.

Discuss how these outcomes will impact future annual action plans.

The outcomes of FY 2017 will impact future CDBG funding allocations of mortgage reduction assistance, as the need within the community shifts towards that of affordable rental housing. Increased focus will target the construction of new, affordable rental units as well as home repair to preserve and maintain existing affordable housing stock. Priority will be given to emerging needs in the Opportunity Zones, centralized, geographic region of Midtown Campus, a city-owned property ripe for mixed-use, mixed-income housing development in FY 2018. Continued priority will also be given toward public services in the continuation of homelessness, and at-risk for homelessness service programs. The FY 2018-19 programs will also provide public facilities for the purpose of a medical and dental clinic in a low income identified neighborhood and an early childhood facility rehabilitation in the downtown area.

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	HOME Actual
Extremely Low-income	1,128	0
Low-income	17	0
Moderate-income	29	0
Total	1,174	0

Table 6 – Number of Households Served

Narrative Information

A total of one thousand, one hundred and seventy (1,177) individuals were served, of which one thousand, one hundred and twenty-eight were identified as extremely low income. 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. Three (3) individuals identified as non-low/Moderate homeless or at-risk for homelessness individuals were served.

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

All of the city's nonprofit partners who work with homeless persons have extensive outreach activities. The Resource Opportunity Center (ROC), once called Pete's Place, is part of the existing Interfaith Shelter and offers emergency beds in winter, meals and clothing. Most importantly, the organization 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. In response to direct community need, Interfaith proposed the Women's Summer Safe Haven when shelter staff and first responders noted that women were particularly vulnerable on the streets during summer months when the shelter is closed for the season.

The City used CDBG funds to support Youth Shelters and Family Services during the program year to expand the hours of its drop in center and to support an outreach worker. This service is critical both for youth living on the streets but also to provide referral services and support for youth trying to reconnect with family or obtain safe, permanent living situations. Over 600 youth are reached annually through this program. Another way that families experiencing homelessness are assisted is through the Adelante program which provides referrals to services, school supplies, food, clothing and other supports to students enrolled in Santa Fe Public Schools and their families. CDBG funds were used to expand staff hours which enabled the program to serve over 200 families.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City works in partnership with many non-profit organizations who provide a wide range of services to prevent "at-risk" populations such as unaccompanied youth, battered families, people with disabilities, veterans and seniors from becoming homeless. Another objective is to help existing homeless populations obtain safe, affordable and sustainable housing opportunities as well as needed services such as health care, transportation and counseling. These activities necessarily run along a continuum of housing program options that range from emergency shelter services to transitional housing and permanent supportive housing services to the new construction of mixed income and mixed use affordable rental development projects. Currently the City has in place emergency and transitional housing programs for homeless individuals, families with children, veterans, and unaccompanied youth.

The City of Santa Fe also works closely with the New Mexico Coalition to End Homelessness to coordinate services for homeless individuals and families. NMCEH operates a statewide system of coordinated assessment where every homeless family and individual is given an assessment based on the nationally

recognized VI/SPDAT (Vulnerability Index/Service Prioritization Assessment Tool). The results of the assessment are used to refer homeless people to the type of housing that best fits their needs and the assessment is used to create a prioritized list with chronically homeless people at the top of the list for permanent supportive housing.

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 its network of community partners to facilitate coordination of services and ensure that those vulnerable to homelessness don't "fall through the cracks". A Homeless Task Force was convened in 2017 to analyze and provide recommendations to the Governing Body "to ensure that homelessness is prevented whenever possible or is otherwise a rare, brief and non-recurring experience." In line with the draft recommendations of the report, rapid rehousing is proposed as an immediate response to stabilize the housing situations of those experiencing homelessness and discharged from public institutions and systems of care.

The use of Rapid Rehousing is limited by its applicability to the household in need. Life Link, the City's primary partner in administering rapid rehousing assistance, assesses each household at intake. For those with fewer barriers, rapid rehousing provides support until the household either increases income or benefits and can manage the housing expense independently. For some homeless households, rapid rehousing resources can be used to stabilize short term housing situations until a permanent supported housing unit becomes available without jeopardizing their eligibility status. Life Link and other rapid rehousing providers emphasize ongoing case management and referral to other services (employment, education, job training, budgeting, health care/insurance, food, transportation, etc.) so that when assistance ends with one program, the household is poised to enter another program if independence has not been achieved.

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, the City's funding cycles (through the Children and Youth Commission, the Human Services Commission and the Community Development Commission), and other regional efforts. Upon intake each homeless or at-risk household is assessed to determine whether they qualify for rapid rehousing or whether their needs are more intensive. If the household has few barriers then they can use rental assistance until they are able to manage the housing expense on their own- either through income or an increase in benefits. Homeless individuals or families can also use Rapid Rehousing to get out of the shelter system and into housing without losing their homelessness status (dependent on the funding source). It is the responsibility of the Case Manager to be knowledgeable about housing programs and other resources in the community and to work closely with the household to identify areas that need support which include but are not limited to: permanent supported housing, employment, education, job training, budgeting, health insurance, food, transportation, and support services. Another aspect once a household is stabilized is to continue working with case management so that that housing stability is maintained when assistance ends or circumstances change.

Additionally, the City of Santa Fe partnered with two agencies – The Housing Trust and St Elizabeth Shelter – to administer two site-based Shelter Plus Care/Continuum of Care rental assistance grants. 16 units were subsidized for homeless individuals and families with children and 4 units provided for seniors with chronic disability. The City has worked closely with the Santa Fe Community Housing Trust to develop three apartment communities - Village Sage (60 units), Stagecoach Apartments (60 units) and the soon-to-be constructed Las Soleras Station (87 units) where 25% of the units are set aside for people exiting homelessness. On-site support services and referral to other service providers is also provided. The City has contributed financially in various ways to each of these projects.

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 public housing agency in Santa Fe. As previously reported, it oversees 490 units of public housing, and manages 670 Section 8 vouchers in Santa Fe. There are a total of 369 units for seniors and 121 units for families. Currently, 399 people are on the public housing waiting list, and 171 people on the Section 8 Voucher waiting list for Santa Fe. SFCHA receives approximately 35 applications per month for public housing. The application window is closed when 400 are reached. With only 6 to 8 families and/or individuals coming out of the program each year, new openings are extremely limited. The Housing Authority is considering moving towards site-based or site-driven wait lists, which better supports applicants so that the Authority doesn't have to turn an individual or family down because of location, school district or other limiting factors, and to avoid having to send an individual or household back down to the bottom of the list again.

Newly refinanced properties are being systematically renovated to address long-term deferred maintenance issues. The City of Santa Fe assists this process by donating the lease value of the land on which the units are sited which is city-owned and providing fee waivers when possible. Over the program year, 237 units were remodeled located at two separate properties - PasaTiempo (121 units) and Villa Hermosa (116) -- both of which serve senior renters.

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

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

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

Actions taken to provide assistance to troubled PHAs

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)

Disproportionately, those who are most heavily cost-burdened, have the lowest incomes. The City of Santa Fe is reviewing its policies and practices to mitigate barriers to housing development--particularly affordable housing development. A review of city housing policies and land use and zoning regulations has identified concerns in 2016, namely stakeholders raising 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.

In 2014 and presented to the public through 2018, the City provided several 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. Often non-English speakers are further affected by not being aware of the rights and protections to which they are entitled under these laws. The outreach materials consist of Fair Housing Frequently Asked Questions brochures in English and Spanish and a tenant rights "Novella" with distribution continuing throughout the year. The City works with Spanish speaking fair housing advocates that actively meet with approximately 75 local small businesses and non-profit organizations that distribute fair housing literature published by the City and describe tenant rights.

The City of Santa Fe has been exploring efforts to potentially redevelop several of its underused corridors that have infrastructure and could support rental housing, and which wouldn't have existing residential neighbors concerned about higher density housing developments, while also providing easy access to transportation. These include the Siler Road corridor and the Midtown Local Innovation Corridor District, or Midtown LINC, at St. Michael's Drive.

Additionally, there has been a recently approved amendment to the City's Chapter 26 of the city's code which governs the Santa Fe Homes Program. The amendment allows multi-family developers of rental housing to pay a fee-in-lieu by right, rather than incorporating subsidized units on-site. Fees are

established on an "affordability gap" basis, estimating the difference between an affordable rent, averaged over three income tiers, and HUD's Fair Market Rent. The objective is to generate enough revenue to fund a rental assistance program for tenants that can be used citywide and does not have high requirements for eligibility. The assistance could be used for a variety of needs - rent, utilities, rental/utility arrears, rental deposits, etc. Another objective is to remove a financing barrier for multi-family housing with the expectation that the development of multi-family units will also loosen up some of the demand for existing units, stemming rising rental rates but also providing more options for voucher holders to use their subsidies. As with any revenue generated or earmarked for affordable housing, use of the funds is dictated by city code and must be compliant with the NM Affordable Housing Act.

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

As reported, the projects that were funded and executed through CDBG and local funds increase the availability of affordable housing to low and moderate income households. Furthermore, the City has actively supported the development of three LIHTC multi-family properties with CDBG funds and through the donation of City-owned land. Two are leased up (120 units total) and one will begin construction during the upcoming year (87 units). All of the properties address the needs of people transitioning out of homelessness, renters with special needs and very low incomes by offering 25% of their units at rents affordable to those earning 30%AMI and less.

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

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

As part of their home repair program, Homewise has tested 60 homes for lead since 2002. Of these, only four tested positive, which is 7% of the homes they tested. Extrapolated to the number of homes in Santa Fe built before 1950 (2,499 homes), a rough estimate is 175 homes could contain lead-based paint citywide.

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

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 CDBG funds supported to reduce the number of poverty level of families are:

- Down payment assistance funding to support 10 households earning less than 80% AMI achieve their dream of homeownership;
- Emergency home repair/improvement funding to support 15 low to moderate income homeowners (30 to 80 percent AMI) with home renovations, emergency repairs and energy conservation measures including the purchase of new appliances, retrofits, and solar water heaters;
- Support the efforts of local nonprofits and the Santa Fe Civic Housing Authority to build and conserve affordable rental units through the donation of land, provision of construction financing.

Additionally, the City provided local funds to support downpayment assistance and home repair programs. For the upcoming program year, local funds will be used to provide short-term rental assistance for individuals and families experiencing episodic homelessness and/or in danger of losing their current housing situations.

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

The City of Santa Fe continuously carries out the priorities in the *2013-2017 Consolidated Plan* by collaborating with non-profit partners. The City's philosophy is to help build the capacity of community-based service providers, rather than to increase the size of the City's bureaucracy. The City and its staff serve as advocates and coordinators for its partner nonprofits. Another strength of this service delivery model is that a wide array of services is provided with little overlap because of the coordination between City departments as well as between the City and nonprofit partners. This cooperation ensures that services reach those in most need, including homeless families and individuals and those in danger of becoming homeless – veterans, senior citizens, victims of domestic violence, very low-income renters, at risk youth – and people with special needs and disabilities.

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 coordinates closely with other City departments including the Youth and Family Services Division of the Community Services Department. The Youth and Family Services Division funds emergency housing and community development programs as well as social services and supports a juvenile justice program which provides program planning, service integration, data analysis, and program evaluation to ensure that youth are provided alternatives to detention and

YouthWorks has provided several programs to integrate disconnected youth with mainstream educational opportunities, job training and internships, reunification with families, and referral to other support services. Life Link, another of the City's nonprofit partners, provides intake, referral and on-site social services to people with mental illness who are homeless or at risk of becoming homeless. The agency works closely with other governmental, private and nonprofit providers of services. The City's CDBG allocation, its economic development fund and other local funds have supported several of these initiatives. Some beneficiaries of this funding also are recipients of public housing services. The City's CDBG sub-recipients strive to coordinate with the Santa Fe Civic Housing Authority so that outreach activities and some programming is located at housing authority sites.

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

In the 2017 Assessment of Fair Housing, the HUD provided Opportunity Indices show that Hispanic populations experience some of the lowest access to opportunity, particularly in the low poverty, school proficiency and labor market indexes. The indicators in Santa Fe that are of most concern are poverty and school proficiency, both of which show considerably low access to opportunity. According to stakeholders and residents, lack of access to opportunity is affected by infrequent public transportation services to higher opportunity neighborhoods and destinations outside of core service areas (e.g., county social

services office), limited hours and days of operation of some routes, lack of holiday service, etc. As per the 2016 Analysis of Impediments, the city's efforts to address barriers have focused on improving 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. These 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.
- In March 2016, the city hosted a fair housing consultant funded by the HUD Fair Housing Initiatives Program (FHIP) grant. This training was attended by 19 individuals representing several non-profit housing service providers in Santa Fe. The city also co-sponsored a training with the New Mexico Finance Authority for nonprofit partners; 30 people attended.

The Office of Affordable Housing has reached out to the Santa Fe Public Schools to establish a distribution plan for fair housing materials. City staff met with the Communities and Schools New Mexico School Outreach Coordinators of 11 schools at their annual retreat to present fair housing activities and distribute literature. The OAH conducted an outreach campaign to educate the public about affordable housing and fair housing issues continues to distribute the

- Fair Housing Frequently Asked Questions brochure in Spanish along with the "Tino el Inquilino" ("Tino the Tenant") Novella. Distribution is an ongoing effort to public schools, public libraries, city facilities, private non-profits and bilingual local businesses.
- The City of Santa Fe has committed funding or matched resources (meeting facilities), conditional on finalized budgets, to fair housing consultants to conduct fair housing training for lenders and apartment managers.

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 CDBG Administrator, in charge of the CDBG program, monitors program service providers, or sub-recipients 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. 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 Sub-recipient Timeliness Guidelines"
- CFR 570 Federal Regulation governing CDBG and including Part 58 governing Environmental Reviews
- Davis Bacon fair wage resources via the Department of Labor

Additionally, the Office of Affordable Housing attends technical assistance trainings in monitoring, sub-recipient oversight and fair housing throughout the year. Other ways in which the City ensures that programs are monitored appropriately and that the public has opportunity for comment include:

Site Visits: In the site visits, 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. Both deficiencies and accomplishments are noted at the time of monitoring and by follow up letters which outline corrective actions to be taken to achieve effective, efficient program delivery.

Reporting and Fiscal Management: Staff ensures that all sub recipients keep detailed records for the Performance Measurement System to evaluate the effectiveness of the project in meeting the needs of targeted populations. 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 and input into the Integrated Disbursement and Information System (IDIS) with data finalized prior to program closeout and reporting in the Program Year 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 sub-recipient'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.

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 CDBG Citizen Participation Plan, as approved by HUD, 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 as holding a Public Hearing at a regular City Council meeting for public comment. For the public comment opportunity, the Office of Affordable Housing published a Legal Notice in Spanish and English on Monday, August 27 in the Santa Fe New Mexican, soliciting written public comment. The document was made available from August 27 through September 12, 2018 - at the following locations:

- **Southside Library** (6599 Jaguar Drive)
- **The Main Library** (145 Washington Ave.)
- **City of Santa Fe Office of Affordable Housing** (500 Market St)
- **Santa Fe City Hall** (200 Lincoln Avenue-City Clerk)
- **Genoveva Chavez Community Center** (3221 Rodeo Rd)

To comply with the HUD Public Hearing and Public Comment requirements on the 2017 CAPER, the City Clerk published an official notice on August 27, 2018 for the CAPER Public Hearing in the Santa Fe New Mexican Legal Section to advertise the Public Hearing held on September 12, 2018.

The CAPER is made available to the public for review along with other internal committee reviews within the timeline below:

- City’s Community Development Commission: August 28, 2018
- City Finance Committee: September 4, 2018
- Public Hearing, City Council: September 12, 2018

Citizens have three options to participate. They may participate by attending public meetings, submitting written comments to the Office of Affordable Housing, and may testify at public hearings. All CDBG proposed projects go through the Community Development Commission public meeting advertised on the City’s website and printed in the City’s weekly meeting notice distributed to all City offices. All CDBG contracts represented in the CAPER were reviewed by the City Finance Committee prior to the start the funding year of July 1, 2017, and were advertised on the City’s website. Finally the projects were reviewed and represented within the 2017-2018 Annual Action Plan document, at the City Council Public Hearing, which was advertised in the Santa Fe New Mexican.

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.

There are no changes.

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

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.